Project Specific Analysis and Addendum to the CalVTP Program EIR

Summerville-Tuolumne Vegetation Management

Tuolumne County, CA

CalVTP ID # 2025-24

Prepared for:

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Section 1: Project Overview and Document Purpose

In 2019, the California Board of Forestry and Fire Protection certified the Program Environmental Impact Report (PEIR) for the California Vegetation Treatment Program (CalVTP). This PEIR evaluates the potential environmental effects of implementing vegetation treatments throughout the state of California's State Responsibility Area (SRA) and selected portions of the Local Responsibility Area (LRA). The following document is a supplement to the PEIR through a Project-Specific Analysis (PSA) and Addendum for a localized vegetation treatment project in Tuolumne County. The PSA process was designed through the PEIR for use by many state, special district, and local agencies to help increase the pace and scale of vegetation treatment in California by employing California Environmental Quality Act (CEQA) streamlining tools. An Addendum to the PEIR is another CEQA streamlining tool designed to address the project components that are not within the scope of the PEIR. For this project, the Addendum covers several proposed revisions to standard project requirements (SPRs) and mitigation measures (MMs). The PSA and Addendum are combined into the following document.

The purpose of the PSA/Addendum is to evaluate the conditions of a specific project site and proposed treatments to ensure that they are within the scope of the PEIR analysis and to ensure that all applicable SPRs and MMs are incorporated into treatments. This insurance keeps the project within the already analyzed and accepted PEIR.

Project Overview

The proposed project, Summerville-Tuolumne Vegetation Management (Summerville), comprises vegetation management treatments on up to 1,067 acres of land near the community of Tuolumne City and the Summerville High School property in Tuolumne County. The intent of the project is to reduce the risk to communities, infrastructure, and natural resources in this area by managing the amount and continuity of hazardous vegetative fuels that promote wildland fire.

The proposed treatment type (WUI Fuels Reduction) and the treatment activities (mechanical, manual, prescribed burning, prescribed herbivory and herbicide application) are consistent with those evaluated in the PEIR for both initial and maintenance treatments.

The proposed project is anticipated to be completed in two phases. Phase I is about 136 acres and initial treatments in this area may commence as soon as late fall 2025 with herbicide application. Initial treatments in Phase II of the project area are anticipated to occur no earlier than 2026 as the acceptance of landowners and availability of contractors and funding allows. Initial treatments in Phase II would be a combination of mechanical and manual treatments and the prescribed burning of piles. Maintenance treatments in both Phase I and Phase II would be anticipated to follow at least 1 year after initial treatment is completed and up to 10 years after initial treatments depending on the regeneration of vegetation and the availability of funding and contractors.

Agency Roles

For the purposes of the PEIR and this PSA/Addendum, a project proponent is any 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. This document is prepared for the Tuolumne County Resource Conservation District (TCRCD), in its role as CEQA lead agency, and the Tuolumne Fire Safe Council (TFSC) to comply with CEQA for the implementation of vegetation treatments that require a discretionary action of TCRCD. TCRCD in conjunction with TFSC would provide funding for and oversee implementation of the treatments conducted for the Summerville project. The PSA/Addendum provides environmental information to TCRCD and TFSC in the implementation of treatments.

As the CEQA lead agency, TCRCD would be responsible for ensuring that implementation of SPRs and MMs related to its discretionary approval occurs in accordance with the Mitigation Monitoring and Reporting Program (MMRP) pursuant to Section 15097(a) of the State CEQA Guidelines. Please refer to the MMRP for additional explanation of agency roles regarding monitoring and reporting (Attachment A).

Purpose of this PSA/Addendum

As briefly noted above, this document serves as a PSA to evaluate whether the proposed treatment types and activities would be within the scope of the CalVTP PEIR. Among the other criteria for determining whether a project is within the scope of the PEIR is whether it is within the CalVTP Treatable Landscape. The Treatable Landscape is the geographic extent of analysis that was covered in the PEIR. If a proposed project is covered by the evaluation of environmental effects in the PEIR, it may be approved using a finding that the project is within the scope of the PEIR for its CEQA compliance, consistent with CEQA Guidelines Section 15168(c)(2).

The PSA checklist includes the criteria to support an Addendum to the PEIR. The checklist evaluates each resource in terms of whether the treatment(s), including the changed condition, would result in significant impacts that would be substantially more severe than those covered in the PEIR or would result in any new impacts not covered in the PEIR. If a new impact arose, the analysis in the checklist would provide substantial evidence about whether it would be more severe. If it would not, it could be addressed in the addendum to the PEIR.

An Addendum to an EIR is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts, consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In this case, there are no changed circumstances to the landscape or areas within the project that lie outside of the Treatable Landscape; however, there are proposed revisions to some of the SPRs and MMs.

This document serves as both a PSA and an Addendum to the CalVTP PEIR for TCRCD review and analysis under CEQA regarding the proposed Summerville-Tuolumne Vegetation Management project. It provides environmental information supported by substantial evidence to TCRCD in its implementation of the work by TCRCD or its contractor(s). The project-specific MMRP, which identifies the CalVTP SPRs and MMs applicable to the proposed project, is presented in the following pages and 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.

Proposed Project Revisions

Proposed Revisions to CalVTP SPRs and MMs

While the proposed treatment types and treatment activities are consistent with the CalVTP, the TCRCD has determined that certain requirements of the SPRs are infeasible as written, are not warranted for this project to maintain the impact significance conclusions in the PEIR, and, if implemented as presented in the PEIR, would prevent achievement of treatment objectives. Because the SPRs are part of the CalVTP Program Description and are incorporated into later activities as a standard part of the treatment design and implementation, revisions (beyond clarifying edits) would constitute a change to the CalVTP. CEQA Guidelines Section 15168(c)(3) requires incorporation of feasible mitigation when approving later activities. If the mitigation measure is simply incorporated without revision, it would contribute to a within the scope finding. If revisions to a mitigation measure are proposed, it could be evaluated within an Addendum pursuant to CEQA Guidelines Section 15164. This can occur either because the change is simply a clarification or other revision that does not meet the requirements for supplemental or subsequent review in CEQA Guidelines Section 15162; or it is a case, as explained in CEQA Guidelines Section 15162(a)(3)(D), where a mitigation measure is "considerably different" from those in the PEIR, would substantially reduce significant effect(s), and the proponent will adopt it as part of the project. The proposed revisions to the SPRs and MMs are described below. These proposed changes would not result in any new or substantially more severe significant impacts on any of the resources evaluated in the PEIR and described in this PSA/Addendum. Evidence to explain this conclusion is presented under each applicable resource, as summarized below and presented throughout Section 4.

SPR GEO-1

SPR GEO-1, as presented in the PEIR, requires that mechanical, prescribed herbivory, and herbicide treatments be suspended if the National Weather Service forecast is a "chance" (30% 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.

TCRCD proposes to suspend mechanical treatments and prescribed herbivory if: 1) soils are saturated, and/or 2) soils are wet enough to be compacted by mechanical activities. TCRCD proposes no changes to the SPR GEO-1 language in regards to herbicide application. Herbicides will be applied according to the specifications laid out in SPR HYD-5. Activities that cause mechanical soil disturbance may resume when soils are no longer saturated. In the region where the project is located, forecasts often include a chance of rain, but that precipitation sometimes does not materialize. Additionally, in the area where the project is located, occasional limited precipitation occurs across the operating season but would not warrant a full stop of activities when the soil and environmental conditions can absorb precipitation without mechanical activities impacting the soil. Therefore, suspension of treatment activities when there is a chance of rain or limited precipitation that does not impact erosion or compaction potential could result in unnecessary loss of work time and high mobilization costs for removing equipment and/or livestock. The project proponent would be prepared to suspend all mechanical activities in the event that sufficient active precipitation creates saturated soils or soils wet enough to be compacted by mechanical activities. 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 revision is consistent with the purpose of SPR GEO-1 to suspend disturbance during heavy precipitation to minimize the risk of soil compaction and disturbance.

Potential impacts resulting from revisions to SPR GEO-1 are discussed below in Section 4 items: Geology, Soils, Paleontology, and Mineral Resources, Biological Resources and Hydrology and Water Quality Resources. 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 PEIR. Impacts on other resources would not occur as a result of these revisions, because SPR GEO-1 is not required to reduce environmental effects to any other resources from the implementation of the project. The proposed revisions to SPR GEO-1 are shown in underline and strikethrough in the MMRP (Attachment A).

SPR GEO-3

SPR GEO-3 requires stabilization of soil disturbed during treatments that result in exposure of bare soil over 50% or more of the project area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable. It also requires that treatment activities that could result in substantial sediment discharge from disturbed soil, organic material or mulch will be incorporated onto at least 75% of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50% of the disturbed soil surface where soil erosion hazard is low to help prevent erosion as described in the CalVTP PEIR.

TCRCD proposes to revise the language to stabilize bare soils disturbed by treatments within watercourse and lake protection zones (WLPZs), equipment exclusion zones, and anywhere else deemed necessary by a qualified RPF in order to maintain the natural ability of ground cover in the WLPZs to filter sediment, minimize soil erosion, and stabilize banks where the potential erosion risk is higher. Additionally the TCRCD proposes to clarify that slash mulch will only be ground into the soil in feasible areas determined by the RPF, but will not be ground into the soil in WLPZs or equipment exclusion zones. This revision is consistent with the purpose of SPR GEO-3 to minimize the potential for erosion and substantial sediment discharge while still meeting the purpose of HYD-4. The SPR as written could require soil stabilization in many areas where runoff and sediment discharge would not result in environmental impacts making the treatments unnecessarily costly and more time consuming.

Potential impacts resulting from revisions to SPR GEO-3 are discussed below under Section 4. Biological Resources, Geology, Soils, Paleontology, and Mineral Resources, Hydrology and Water Quality Resources, and Wildfire Resources. As explained in these sections, the proposed revisions to SPR GEO-3 would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. Impacts on other resources would not occur as a result of this revision, because SPR GEO-3 is not required to reduce environmental effects to any other resources from the implementation of the project. The proposed revisions to SPR GEO-3 are shown in underline and strikethrough in the MMRP (Attachment A).

SPR HAZ-1

The PEIR SPR HAZ-1 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. Any equipment found to be leaking shall be promptly removed from the treatment area.

The TCRCD proposes to revise the language to allow for equipment that is identified to be leaking to be promptly fixed on-site or removed from the treatment area. This gives the TCRCD's contractors the flexibility to fix equipment on-site if feasible and continue treatment rather than requiring all leaking equipment to be completely removed. Additionally, some mechanical issues, such as hydraulic hose failure, may at times require on-site repair of equipment if equipment is no longer in functioning condition, precluding it from being moved off-site. This would help to prevent unnecessarily slowing down project implementation while still maintaining the overall intent of SPR HAZ-1 to minimize hazardous material releases in the treatment area from equipment use.

Potential impacts result from revisions to SPR HAZ-1 are discussed below under Section 4. Hazardous Materials, Public Health, and Safety Resources, Air Quality Resources, and Hydrology and Water Quality Resources. As explained in these sections, the proposed revisions to SPR HAZ-1 would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. 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 the implementation of the project. The proposed revisions to SPR HAZ-1 are shown in underline and strikethrough in the MMRP (Attachment A).

SPR HYD-3

The PEIR SPR HYD-3 requires that the project proponent implement various water quality protection measures for all prescribed herbivory treatments. The TCRCD proposes no revisions to the language, but would add the use of virtual fencing as an option to be included with temporary fencing and active herding. This gives the TCRCD's contractors the ability to utilize emerging technologies and maximize implementing efficiencies by reducing the need for capacity to install, move, and dismantle temporary fencing or to actively herd livestock. According to a variety of studies, virtual fencing technologies are becoming more common and are seemingly effective at keeping livestock contained to a desired area (Staahltoft et al 2023, Boyd et al 2022, and Silber et al. 2024). The TCRCD will ensure that the technology meets certain accuracy requirements prior to implementation. This addition to SPR HYD-3 would provide contractors with additional flexibility while still maintaining the overall intent of SPR HYD-3 to maintain water quality protections during prescribed herbivory treatments.

Potential impacts result from revisions to SPR HYD-3 are discussed below under Section 4. Hydrology and Water Quality Resources, Biological Resources, and Geology, Soils, Paleontology, and Mineral Resources. As explained in these sections, the proposed revisions to SPR HYD-3 would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. Impacts on other resources would not occur as a result of these revisions because SPR HYD-3 is not required to reduce environmental effects to any other resources from the implementation of the project. The proposed revisions to SPR HYD-3 are shown in underline and strikethrough in the MMRP (Attachment A).

SPR BIO-11

The PEIR SPR BIO-11 requires that the project proponent review the plan for and ensure the installation of wildlife-friendly fencing prior to prescribed herbivory treatments. The TCRCD proposes no revisions to the language, but would add the use of virtual fencing as a temporary fencing option. This gives the TCRCD's contractors the ability to utilize emerging technologies, maximize implementing efficiencies by reducing the need for capacity to install, move, and dismantle temporary fencing, and further ensure the protection of wildlife species. According to a variety of studies, virtual fencing technologies are becoming more common and are seemingly effective at keeping livestock contained to a desired area (Staahltoft et al 2023, Boyd et al 2022, and Silber et al. 2024). The TCRCD will ensure that the technology meets certain accuracy requirements prior to implementation. Additionally, there is no risk of entanglement and no need for maintenance or increased visibility. This addition to SPR BIO-11 would provide contractors with additional flexibility while still maintaining the overall intent of SPR BIO-11 to ensure the protection of wildlife species in the project area that may encounter prescribed herbivory treatments.

Potential impacts resulting from revisions to SPR BIO-11 are discussed below under Section 4. Biological Resources. As explained in these sections, the proposed revisions to SPR BIO-11 would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. Impacts on other resources would not occur as a result of these revisions because SPR BIO-11 is not required to reduce environmental effects to any other resources from the implementation of the project. The proposed revisions to SPR BIO-11 are shown in underline and strikethrough in the MMRP (Attachment A).

MM BIO-3a

The PEIR MM BIO-3a requires that the project proponent implement certain measures within sensitive communities and oak woodlands in order to ensure their conservation during treatment activities. The TCRCD proposes no revisions to the MM language, but would add the exclusion of herbivory in areas deemed to be especially sensitive within these habitat types. There is an abundance of research and studies to suggest that grazing may be one of the larger threats to oak - specifically blue oak - regeneration in oak woodlands (McCreary 2010, McCreary and George 2005, Lopez-Sanchez et al. 2014). In order to mitigate that risk, a qualified RPF, botanist, or Certified Range Manager (CRM) with knowledge of the affected sensitive natural community will review the treatment design and applicable impact mitigation measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant to the community or woodland because implementation of the treatment will not maintain habitat functions of the sensitive natural community or oak woodland. If the qualified RPF, botanist, or CRM determines the impact on sensitive natural communities or oak woodlands would be less than significant, no further mitigation will be required. If the qualified RPF, botanist, or CRM determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant after implementing feasible treatment design alternatives and impact mitigation measures, then MM BIO-3b will be implemented. This addition to MM BIO-3a would continue to ensure further protections to sensitive natural communities and oak woodlands while still maintaining the overall intent of MM BIO-3a.

Potential impacts resulting from revisions to MM BIO-3a are discussed below under Section 4. Biological Resources. As explained in this section, the proposed revisions to MM BIO-3a would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. Impacts on other resources would not occur as a result of these revisions because MM BIO-3a is not required to reduce environmental effects to any other resources from the implementation of the project. The proposed revisions to MM BIO-3a are shown in underline in the MMRP (Attachment A)

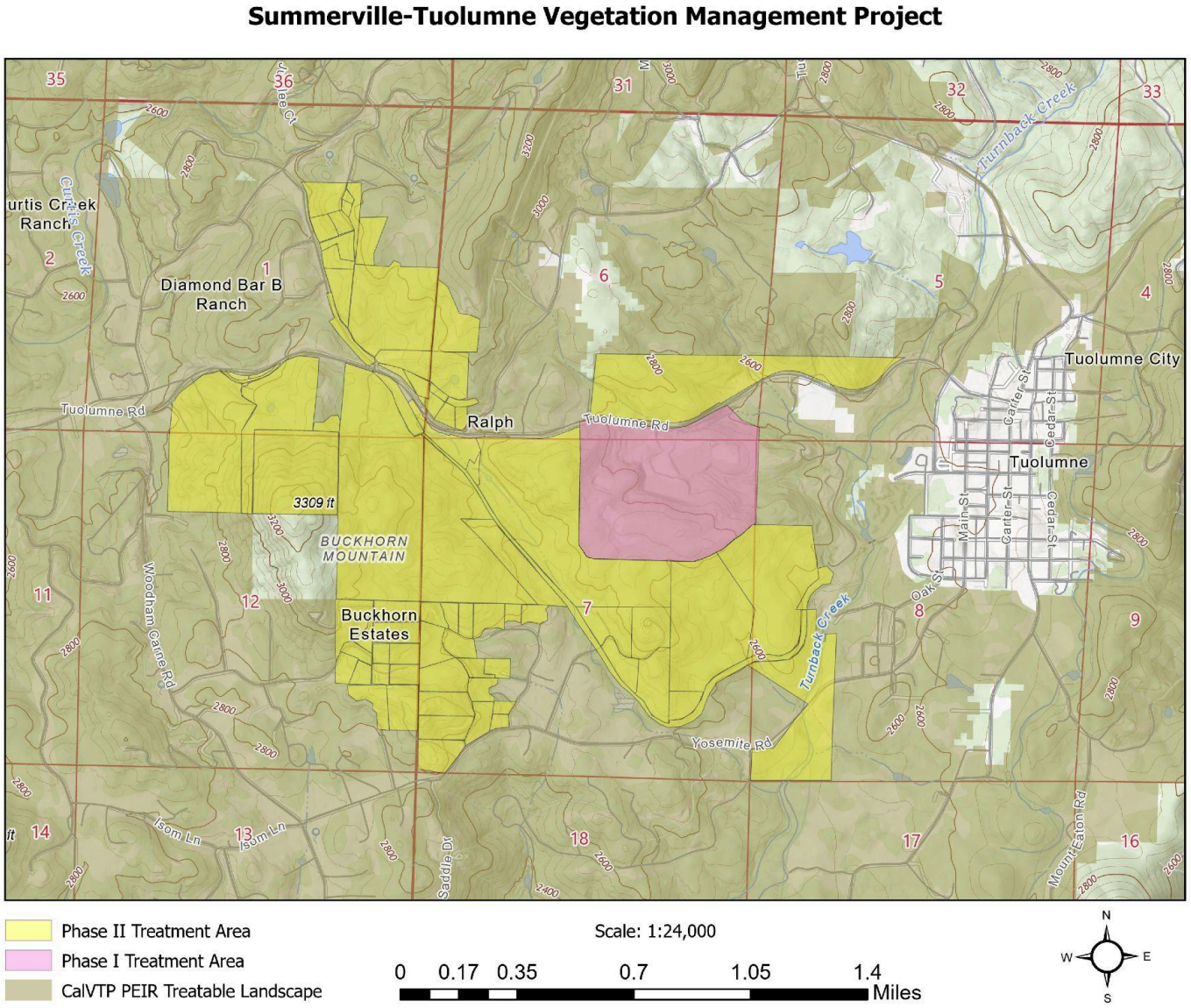

Figure 1. Summerville-Tuolumne Project Area and CalVTP Treatable Landscape

Section 2. Project Description

The CalVTP treatment type that would be implemented is WUI Fuels Reduction for both initial and maintenance treatment cycles. The proposed CalVTP treatment activity for initial treatments in Phase I is herbicide application, and for Phase II the initial treatment activities are mechanical and manual treatments and the prescribed burning of piles. Maintenance treatment activities in both Phase I and Phase II may include mechanical and manual treatments, prescribed burning, prescribed herbivory, and herbicide application. The location within which the proposed treatments may be implemented are shown in Figures 1 and 2.

Proposed Treatments

The Tuolumne County Resource Conservation District (TCRCD) and the Tuolumne Fire Safe Council (TFSC) are proposing the Summerville-Tuolumne Vegetation Management project (Summerville) in the Turnback Creek, Curtis Creek, and Rough and Ready Creek-Tuolumne River watersheds near the community of Tuolumne City in Tuolumne County. Treatment types and activities will occur on approximately 1,067 acres. The project is anticipated to occur in two phases. Phase I is about 136 acres and is primarily located on the property of Summerville High School. These 136 acres were mechanically treated approximately one to two years ago under a CAL FIRE grant and CEQA NOE, but have been identified as important for maintaining low vegetation loads in order to aid in community protection efforts. Thus, the project proponent has identified this as a strategic location to implement initial herbicide treatment and maintain subsequent future maintenance.

Phase II is approximately 931 acres on properties surrounding the Summerville High School that have not seen recent treatments and have been identified as benefitting from initial and maintenance treatment cycles, including mechanical and manual treatments, as well as prescribed herbivory, prescribed burning, and targeted herbicide applications. The total acreage of Phase I and Phase II may include some areas that would not end up being treated for site specific conditions such as steep slopes, economic feasibility, or site specific concerns (e.g. cultural sites or sensitive species). The project area is located in Township 1 North, Range 15 East in portions of Sections 1 and 12, and in Township 1 North, Range 16 East in portions of Sections 5, 6, 7, and 8; Mount Diablo Base Meridian. The project is in the Standard and Tuolumne Quadrangles and is primarily south of Tuolumne Road with a small portion of Phase II on the north side of the roadway. It is located directly west of Tuolumne City. The goal of the Summerville Project is to reduce the risk of wildland fire to land adjacent to Tuolumne City and sensitive infrastructure by decreasing the amount and continuity of hazardous fuel loading in the wildland urban interface (WUI). These vegetation treatment types and activities are intended to create conditions that will minimize fire behavior and to create a mosaic condition that is more resistant to stand replacing type fires. Of the 1,067 acres in the project area, all are located within the CalVTP Treatable Landscape. The breakdown of treatment activities is displayed in Figure 2.

Summerville ranges in elevation from 2,500 to 3,300 feet and contains varying aspects and topography with slopes ranging from less than 10% to over 50%. The vegetation types in this project would best be described as **tree and shrub** with overstory species consisting primarily of interior live oak, California gray pine, California black oak, buckeye, valley oak, blue oak, ponderosa pine and incense cedar and understory species consisting of manzanita, toyon, poison oak, live oak seedlings, yerba santa and ceanothus.

Initial Treatment

The treatment type that will be implemented is **wildland urban interface (WUI) fuel reduction.** The WUI fuel reduction areas were determined to be the locations where the proximity of private property and high fuel loads were close together and posed a high likelihood that a fire that started in one location could impact the other. This treatment type and these similar conditions were analyzed in the CalVTP PEIR and are consistent with that analysis (PEIR section 2.5.1 page 2-8). Generally, brush vegetation would be removed and smaller trees thinned to reduce canopy connectivity. Larger trees would be retained to try and shade out shrub regeneration. The shrubs that have regenerated after the recent treatment a couple of years ago in Phase I, will be targeted with herbicides to maintain low fuel loads.

The initial proposed **treatment activities** consist of **herbicide application in Phase I and mechanical treatment, manual treatment, and the prescribed burning of piles in Phase II**. Phase II does not have current implementation funding and it is unlikely that implementation on this Phase will occur within the next calendar year.

Phase I of the project area (136 acres) located primarily on the Summerville High School property has already been mechanically treated through a CEQA NOE within the past couple of years. Since that treatment, vegetation has begun to regenerate on the property resulting in an increased amount of fuel loading located near a sensitive community. The intent of the initial treatment of this Phase of the Summerville Project is to manage that regeneration through the **targeted ground based application of herbicides.** Herbicide application may include any of the 13 designated herbicides analyzed in the PEIR depending on the primary species that regrows within the project area, and all herbicide treatments shall occur in accordance with local and state regulations, and PEIR analysis. It is noted in Appendix A - SPR HAZ-6 that specific herbicide brands shall not be used on the Summerville High School property pursuant to Assembly Bill 405 and herbicide products containing glyphosate will not be used on the Summerville High School property per the Tuolumne Joint Powers Authority. All required permits shall be obtained prior to application and applied under an individual with a Qualified Applicator's License (PEIR section 2.7.8 page 2-49). For initial treatment, herbicide application may occur on up to 136 acres within the designated Phase I area of the project. No application of herbicides will occur during the initial treatment activities of Phase II. This treatment activity has been evaluated in the CalVTP PEIR and is consistent with that analysis (PEIR section 2.5.2 page 2-27 to 28).

Phase II of the project area has not been recently treated and thus requires site prep work in order to increase the likelihood of being able to reintroduce fire to the landscape to control fuel loading. **Mechanical treatment** will be utilized in order to modify the existing vegetation in the WUI Fuels Reduction area. The Summerville area is covered in dense stands of vegetation and will benefit from the controlled break up of that vegetation that mechanical treatments may provide over other methods when in proximity of private property (like in the WUI), along roadways, and near sensitive areas. Mechanical treatment will occur over the primary area of Phase II of the project (up to 868 acres) and consist of uprooting vegetation or masticating and chipping material to a specified maximum length and depth and dozer piling. Mechanical treatment will not occur on slopes steeper than 50% (PEIR section 2.7.6 page 2-48). Masticators, skid steers, dozers, excavators, brush rakes, chippers, and equipment operators will be used during implementation with crew sizes anticipated to be between one and 60 crew members. Up to five crews could be conducting treatments simultaneously across the project area. Mastication is expected to occur during the time of year when fire risk is low (late fall to early spring) and outside of sensitive species windows where possible (see Section 4. Biological Resources). Dozer piling may occur year round weather permitting, unless precluded by a sensitive species or in areas that prevent the effective use of mechanical equipment. Slash disposal will be distributed across the landscape or piled for burning. Some biomass removal off site may occur. This treatment activity has been evaluated in the CalVTP PEIR and this project is consistent with that analysis (PEIR section 2.5.2 page 2-22 to 24).

Summerville Phase II has several areas that are too steep or deemed to be more sensitive (such as archaeological sites) that preclude the effective use of mechanical treatment. As such, **manual treatment** may be utilized in order to cut, clear, and prune vegetation. Manual treatment will consist of hand crews thinning or pruning vegetation with chain saws, and either lop and scattering, chipping, or piling the material. Manual treatment is expected to occur year round (up to 931 acres) weather permitting, unless precluded by a sensitive species (see Section 4. Biological Resources). This treatment activity has been evaluated in the CalVTP PEIR and is consistent with that analysis (PEIR section 2.5.2 page 2-24 to 25).

For initial treatments, prescribed burning will consist of **pile burning** on up to an estimated 868 acres. This method of vegetation management is intended to manage fuel loading by reducing the amount of cut material left on the landscape after mechanical and manual treatments and allows for fuel removal in areas that are harder to access by other methods (like rock outcrops). Pile burning will generally occur after manual and mechanical treatments have been completed to allow for some time to dry the piled material and for appropriate weather conditions, likely late fall to early spring. This treatment activity has been evaluated in the CalVTP PEIR and is consistent with that analysis (PEIR section 2.5.2 page 2-19 to 21).

Maintenance Treatments

Maintenance treatment types will include **WUI Fuel Reduction**. The treatment activities are expected to occur at least 1 year after initial treatment in both Phase I and Phase II areas of the project (up to 1,067 acres) due to the reasonable expectation that after initial treatments, vegetation (specifically shrubs) will have grown back in most of the project area. The vegetation condition that would trigger the need for maintenance would include significant regeneration that increases the wildland fire risk to the community of Tuolumne City and surrounding homes and infrastructure. The fuel types for maintenance are the same as those for the initial treatments – tree and shrub. **The mechanical and manual treatment activities used during the initial treatments of Phase II will be the same for the maintenance treatments of Phase I and Phase II, as well as the prescribed burning of piles all described above**.

In both Phase I and Phase II, **prescribed herbivory** may be expected to start at least 1 year after initial treatments have been conducted and could occur up to another 10 years for continued maintenance, depending on availability of funding and contractors. Prescribed herbivory may be used to slow the regeneration of shrubs on treated portions of the project area. This treatment activity could consist of using goats, cattle, or sheep to reduce the regeneration of the primary understory species' – manzanita, chamise, poison oak, toyon, yerba santa, and ceanothus – and to maintain low fuel loads. It would occur on up to 1,021 acres in the project area during the appropriate application window for the species being targeted, unless precluded by a sensitive species (see Section 4. Biological Resources). Prescribed herbivory will not occur in sensitive areas or areas with slopes steeper than 50% (PEIR section 2.7.6 page 2-48). This treatment activity has been evaluated in the CalVTP PEIR and is consistent with that analysis (PEIR section 2.5.2 page 2-25 to 27).

In addition to the initial treatment of herbicide application in Phase I, **herbicide application** may also be used as a maintenance treatment in both Phase I and Phase II for up to 10 years on up to 1,067 acres, depending on availability of funding and contractors. The herbicide application parameters for maintenance are the same as described above in the initial treatments of Phase I.

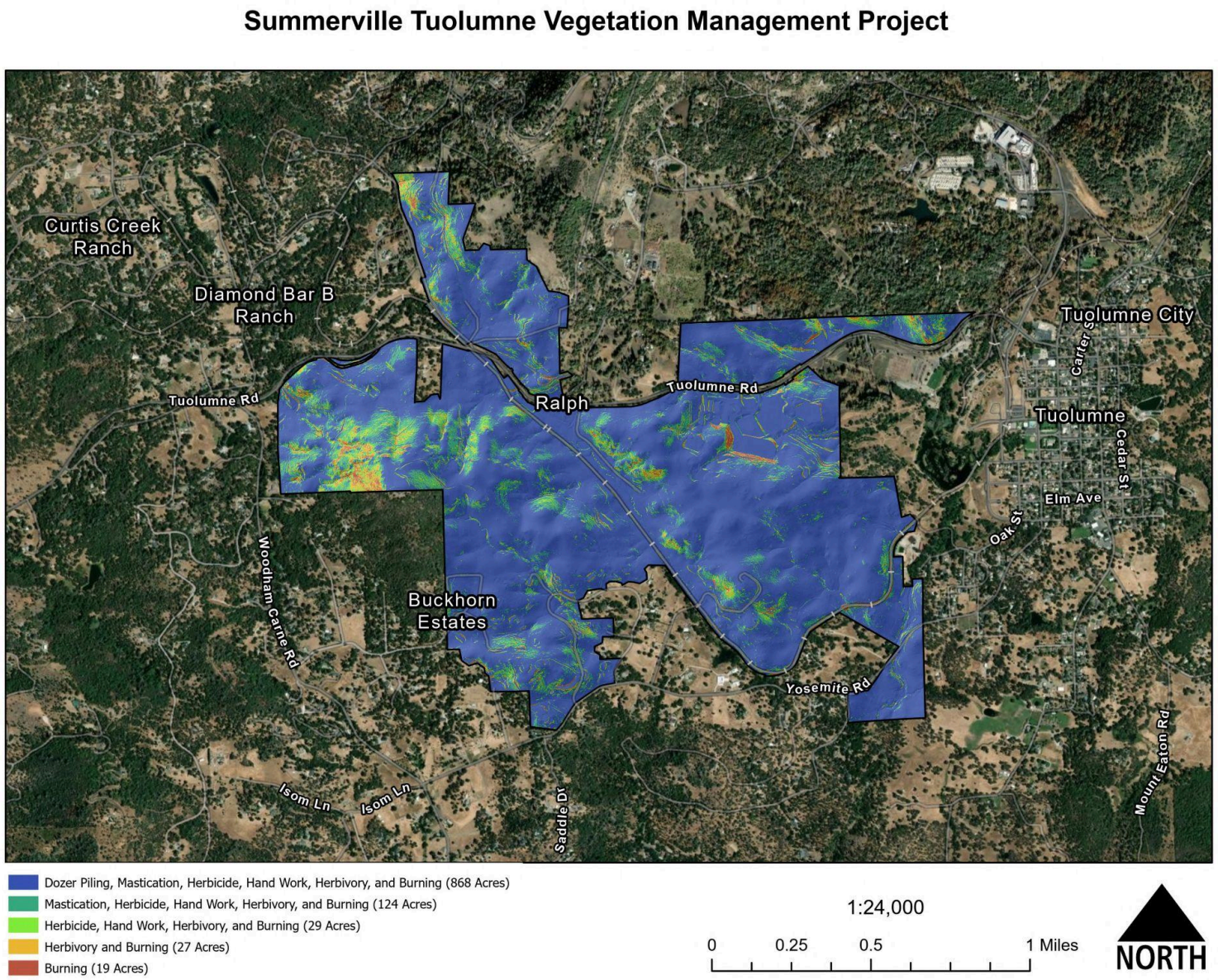

Figure 2. Summerville Project Area and Treatment Types and Activities

Section 3. Environmental Checklist

VEGETATION TREATMENT PROJECT INFORMATION

1. **Project Title:** Summerville-Tuolumne Vegetation Management
2. **CalVTP I.D. Number:** 2025-24
3. **Project Proponent Name and Address:** Tuolumne County Resource Conservation District

   81 N Washington St Suite B, Sonora, CA 95370
4. **Contact Person and Phone Number:** Frank Lewicki
   TCRCD Registered Professional Forester
   530-557-9632
5. **Project Location:** Tuolumne County
   37.9608867, -120.2552789
   Township 1 North, Range 15 East in portions of Sections 1 and 12, and in Township 1 North, Range 16 East in portions of Sections 5, 6, 7, and 8
   Project is located in the proximity of Tuolumne Road and the Summerville High School property; it is directly west of Tuolumne City
6. **Total Area to be Treated (acres):** Up to 1,067 acres
7. **Description of Project:** See Section 2. Project Description

   a. Initial Treatment
   The Initial Treatment type would be WUI Fuels Reduction. Treatment activities would be herbicide application (Phase I) and mechanical treatments, manual treatments, and the prescribed burning of piles (Phase II). See Section 2. Project Description for additional details.

   Treatment Types

   - ☑ Wildland-Urban Interface Fuel Reduction
   - ☐ Fuel Break
   - ☐ Ecological Restoration

   Treatment Activities

   - ☐ Prescribed Burning (Broadcast), _____ acres
   - ☑ Prescribed Burning (Pile Burning), up to an estimated 868 acres
   - ☑ Mechanical Treatment, up to an estimated 868 acres
   - ☑ Manual Treatment, up to an estimated 931 acres
   - ☐ Prescribed Herbivory, _____ acres
   - ☑ Herbicide Application, up to an estimated 136 acres

Fuel Type

- ☐ Grass Fuel Type
- ☑ Shrub Fuel Type
- ☑ Tree Fuel Type

b. Treatment Maintenance
Maintenance treatment types would include WUI Fuels Reduction. Maintenance treatment activities may include mechanical and manual treatments, prescribed burning, prescribed herbivory, and herbicide application. See Section 2. Project Description for additional details.

Treatment Types

- ☑ Wildland-Urban Interface Fuel Reduction
- ☐ Fuel Break
- ☐ Ecological Restoration

Treatment Activities

- ☑ Prescribed Burning (Broadcast), up to an estimated 1,067 acres
- ☑ Prescribed Burning (Pile Burning), up to an estimated 868 acres
- ☑ Mechanical Treatment, up to an estimated 868 acres acres
- ☑ Manual Treatment, up to an estimated 931 acres
- ☑ Prescribed Herbivory, up to an estimated 1,021 acres
- ☑ Herbicide Application, up to an estimated 1,067 acres

Fuel Type

- ☐ Grass Fuel Type
- ☑ Shrub Fuel Type
- ☑ Tree Fuel Type

Use of the PSA for Treatment Maintenance

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

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

8. **Regional Setting and Surrounding Land Uses:**
The project area is primarily zoned agricultural, public, and rural and estate residential. The agricultural zoning is identified as grazing land according to the California Department of

Conservation's Farmland Mapping and Monitoring Program (CDC 2022). The land uses surrounding the project area include more agricultural and rural/low density residential property as well as parks and recreation and open space to the east of the project area.

9. **Other Public Agencies Whose Approval is Required**:

   Herbicide Application Permit - Tuolumne County Agricultural Commissioner

   Smoke Management Plan/Burn Permit - Tuolumne County Air Pollution District

   Burn Permit - California Department of Forestry and Fire Protection

   The California Department of Fish and Wildlife (CDFW) will be consulted prior to implementation of treatments and when required by applicable SPRs to ensure operations are in conformance with appropriate agency standards. Biological scoping letters were emailed on August 18, 2025. On September 18, 2025, an agency representative responded by email that they were unable to review the project at this time due to staffing issues.

   The United States Fish and Wildlife Service (USFWS) will be consulted prior to implementation of treatments and when required by applicable SPRs to ensure operations are in conformance with appropriate agency standards. Biological scoping letters were emailed on August 18, 2025. An agency representative responded by email on August 26, 2025 that they were able to review the project documents and have no comments to provide.

   Coastal Act Compliance

   - ☑ The proposed project is NOT within the Coastal Zone
   - ☐ The proposed project is within the Coastal Zone (*check one of the following boxes*)
     - ☐ A coastal development permit been applied for or obtained from the local Coastal Commission district office or local government with a certified Local Coastal Plan, as applicable
     - ☐ The local Coastal Commission district office or local government with a certified Local Coastal Plan (in consultation with the local Coastal Commission district office) has determined that a coastal development permit is not required

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

    Initial and maintenance treatment activities occurring in the Summerville project are all analyzed and meet the criteria in the CalVTP PEIR, therefore AB52 consultation has already been completed during the PEIR process.

    <u>*Phase I*</u>
    Pursuant to SPR CUL-2, an updated Native American contact list and sacred lands file search was obtained from the Native American Heritage Commission in July 2025 for Phase I of the project area only. The Sacred Lands File check conducted through the Native American Heritage Commission

came back negative. Given the contact list provided, further consultation with interested Native American tribes was conducted in July and August 2025 through emails and one mailed letter. This notification included all parameters required in SPR CUL-2, as well as notification of the two prehistoric sites that were found during cultural surveys within the Phase I project area, including how they will be protected during treatment activities. Those contacted included Jessalyn Pastran and Jesse Galvan of the Buena Vista Rancheria of Me-Wuk Indians; Debra Grimes, Gloria Grimes, and Adam Lewis of the Calavaras Band of Mi-Wuk Indians; Anthony Wilson, Antoinette Del Rio, and Lawrence Wilson Jr. of the California Valley Miwok Tribe; Monica Fox, Stephanie Suess, Cynthia Reyes, and Joanna Portillo-Hsu of the Chicken Ranch Rancheria of Me-Wuk Indians; Rolland Fillmore and Adam Dalton of the Jackson Rancheria Band of Miwuk Indians; Leland Valdez and Cosme Valdez of the Nashville Enterprise Miwok-Maidu-Nishinam Tribe; Alejandra Ramirez and Scott Dinsmore of the Pakan'yani Maidu of Strawberry Valley Rancheria; Sandra Chapman and Jazzmyn Gegere of the Southern Sierra Miwuk Nation; Neil Peyron of the Tule River Indian Tribe; Kenneth Woodrow of the Wuksachi Indian Tribe/Eshom Valley Band; Andrea Reich of the Tuolumne Band of Me-Wuk Indians.

The responses received included deferment to local tribes from Gloria Grimes, Adam Lewis, and Lawrence Wilson. No other tribes responded.

For additional information regarding Native American consultation and Cultural SPRs in Phase I, see Section 4. Archeological, Historical, and Tribal Cultural Resources below.

Phase II

Due to the fact that Phase II of the Summerville project does not currently have implementation funding, contact with the NAHC and a sacred lands file search will occur once treatment areas in Phase II are further determined and funding is secured. All contact and tribal notification from the NAHC list will be made in enough time prior to implementation to ensure feedback can be received in a timely manner.

For additional information regarding Native American consultation and Cultural SPRs in Phase II, see Section 4. Archeological, Historical, and Tribal Cultural Resources below.

DETERMINATION (To be completed by the project proponent)

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

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

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

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

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

Signature Date

Printed Name Title

Agency

Section 4. Project Specific Analysis/Addendum

Aesthetics and Visual Resources

Impact in the PEIR	Project-Specific Checklist

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities	LTS	Impact AES-1, pp. 3.2-16 – 3.2-19	Yes	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 WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	LTS	Impact AES-2, pp. 3.2-20 – 3.2-25	Yes	AD-3 AD-4 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 Non-Shaded Fuel Break Treatment Type	PSU	Impact AES-3, pp. 3.2-25 – 3.2-27	No	–	–	–	–	–

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

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

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

Discussion

Impact AES-1

Initial and maintenance treatment activities may include mechanical treatment, manual treatment, prescribed burning, targeted ground application of herbicides and prescribed herbivory. The potential for these treatment activities to result in short-term degradation of the visual character of the treatment area was examined in the CalVTP PEIR. There are no eligible or designated state scenic highways visible from the project area (California Department of Transportation (Caltrans) 2025). The project area will be visible from the public traveling along Tuolumne Road, Yosemite Road and other public roadways in the area; the students, staff, parents and other affiliated persons with Summerville High School; as well as the various landowners adjacent to the Summerville High School property.

There are no public viewpoints within the project area, and no prominently identified public viewpoints adjacent to the project area. However, there could be possible viewpoints near the project area from which treatments could be visible including Westside Pavilion event center and Tuolumne Memorial Park. While portions of the project area are visible from several public access points, Phase I of the project area has been mechanically treated in the past and would undergo maintenance of that original treatment. Thus, treatments under this VTP would not create any conditions that are not already existing on the landscape. Phase II would comprise a newly treated area, but the topography and the surrounding vegetation would help reduce the visibility of treatments. Mechanical and manual treatments would remove shrubs and trees less than 12" diameter at breast height (DBH), leaving overstory vegetation in much of the project area. The only exception to this DBH limit would be for snags that pose a safety concern along roadways and near infrastructure. While short term visual impacts from vegetation removal and burning may be noticeable, retention of some mature vegetation of different sizes and age classes would still be present to maintain some partial screening of treatments and annual grasses will regenerate quickly the following spring. The areas along public roadways would be designed to feather treatment with existing vegetation in order to create a shaded park like condition. Post-project, it is expected that this area will have improved visual character. Equipment, crews, livestock, and smoke from prescribed burning may at times be visible from public viewpoints and roadways, but this would occur for only a short period of time during treatment activities. Per SPRs AD-4, AQ-2 and AQ-3, public notification prior to prescribed burning would occur along with the preparation of a smoke management plan and a burn plan (when required for broadcast burns) to alert the public to and help reduce smoke under certain conditions respectively. Additionally, vehicles and equipment will not be staged for an extended period of time within the viewshed of roadways when feasible. Some staging along roads may occur due to the location of the project, but the duration is expected to be temporary.

The potential for the Summerville project treatment activities to result in short-term degradation of the visual character or quality of public views within and near the project area are within the scope of the PEIR because the proposed treatment activities are consistent with those analyzed in the PEIR. SPRs applicable to this impact are AD-4, AES-2, AQ-2, AQ-3, and REC-1. This determination is consistent with the PEIR and any short term impacts would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AES-2

Initial and maintenance treatment activities would include WUI Fuel Reduction. The potential for WUI Fuel Reduction to result in long-term degradation of the visual character of the treatment area was examined in the PEIR. While there are no public viewpoints within the project area, the public may see the project area when traveling on public roadways such as Tuolumne Road and Yosemite Road, attending or visiting Summerville High School or Westside Pavilion event center, or recreating in Tuolumne Memorial Park. During a different project a few years ago, the Summerville High School property was mechanically treated. Herbicide application in this area (Phase I) is intended to enhance the

quality of those treatments and continue to manage fuel loading. Given that the treatment has already happened, herbicide application will not change the aesthetic condition of that treatment. Other manual and mechanical treatments as well as the prescribed burning of piles (Phase II) would remove shrubs and trees smaller than 12" DBH, leaving overstory vegetation in much of the project area that provides partial screening of treatments. This is anticipated to increase the visual character of the treatment area in the long term due to the thinning of the currently dense understory vegetation.

The potential for the Summerville project WUI Fuel Reduction to result in the long-term degradation of the visual character or quality of public views within and near the project area are within the scope of the PEIR because the proposed treatment types and activities are consistent with those analyzed in the PEIR. The SPRs applicable to this impact are AD-3, AD-4, AES-1, and AES-3. This determination is consistent with the PEIR and any long-term degradation would not be substantial and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AES-3

This impact does not apply to this project given that non-shaded fuel breaks are not proposed.

New Aesthetic and Visual Resource Impacts

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the final CalVTP PEIR (refer to PEIR Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II). No changed circumstances are present. Therefore, no new impact related to aesthetics and visual resources would occur.

Agriculture and Forestry Resources

Impact in the PEIR	Project-Specific Checklist

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

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

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

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

Discussion

Impact AG-1

Initial and maintenance treatment activities may include mechanical treatment, manual treatment, prescribed burning, targeted ground application of herbicides and prescribed herbivory to conduct WUI Fuels Reduction. The project area includes forest land consisting of hardwoods, conifers, and snags.

In Phase I of the project area, herbicide application would target the regeneration of shrubs for treatment. The treatments in Phase II would target small trees and shrubs less than 12" DBH to be thinned and removed to establish spacing between vegetation both vertically and horizontally. Larger, more mature vegetation would be retained leaving canopy overstory. Additionally, snags that pose a threat to safety and are within one and a half tree lengths from the roadway or infrastructure would be removed. Maintenance treatments that occur in the future in both Phase I and Phase II would follow the same mosaic treatment strategy, retaining mature trees that will result in maintaining some canopy overstory. The project is designed to promote a healthier, more resilient stand and reduce risk to adjacent communities following treatment. Overall, the project would retain some untreated areas of vegetation leaving a landscape that will continue to support 10% of native tree cover.

The potential for these treatment types and activities to result in the loss of forest land or conversion of forest land to non-forest use is within the scope of the PEIR because the proposed treatment activities

are consistent with those analyzed in the PEIR and would occur in forested lands. The vegetation remaining after treatments would meet the definition of forest land as defined in the PRC Section 12220(g), which defines "forest land" as land that can support 10% native tree cover of any species under natural conditions. No SPRs are applicable to this impact. This determination is consistent with the PEIR and any potential for this project to result in the loss or conversion of forest land is consistent with the PEIR and would not constitute a substantially more severe significant impact.

New Agriculture and Forestry Resource Impacts

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the final CalVTP PEIR (refer to PEIR Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II). No changed circumstances are present. Therefore, no new impact related to agriculture and forestry resources would occur.

Air Quality

Impact in the PEIR	Project-Specific Checklist

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	PSU	Table 3.4-1; Impact AQ-1, pp. 3.4-26 – 3.4-32; Appendix AQ-1	Yes	AD-1 AD-4 AQ-1 AQ-2 AQ-3 AQ-4 AQ-6	AQ-1	PSU	No	Yes
Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk	LTS	Table 3.4-6; Impact AQ-2 pp. 3.4-33 – 3.4-34; Appendix AQ-1	Yes	HAZ-1 NOI-4 NOI-5	AQ-1	LTS	No	Yes
Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	LTS	Section 3.4.2; Impact AQ-3, pp. 3.4-34 – 3.4-35	No	-	-	-	-	-
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	PSU	Section 3.4.2; Impact AQ-4, pp. 3.4-35 – 3.4-37	Yes	AD-4 AQ-1 AQ-2 AQ-6	NA	PSU	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	Section 2.5.2; Impact AQ-6; pp. 3.4-38	Yes	AD-4 AQ-1 AQ-2 AQ-6	NA	PSU	No	Yes

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

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

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

Discussion
Tuolumne County is in the jurisdiction of the Tuolumne County Air Pollution Control District (TCAPCD). Pursuant to SPR AQ-1, the implementing entity would comply with the applicable air quality requirements of the TCAPCD and pursuant to AQ-2 a smoke management plan will be prepared and submitted to TCAPCD prior to implementing any prescribed burning. Additionally, an Incident Action Plan (SPR AQ-6) would identify burn dates and hours, weather limitations, burn prescriptions, communication, traffic, and medical plans, and other special instructions required by TCAPCD for all proposed burning, and pursuant to AQ-3 a burn plan would be prepared for maintenance broadcast burning, which would include fire behavior modeling. All of the above includes obtaining all applicable burn permits.

Impact AQ-1
The use of vehicles and mechanical equipment and prescribed 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 PEIR. Emissions of criteria air pollutants related to the proposed treatment activities are within the scope of the PEIR because the associated equipment and duration of use are consistent with those analyzed. The SPRs applicable to this treatment project are AD-1, AD-4, AQ-1, AQ-2, AQ-3, AQ-4, and AQ-6. The implementing entity will also implement the emissions reduction techniques included in Mitigation Measure AQ-1 to the extent feasible. However, because the treatments would be implemented by a public agency with limited funding, procuring companies – especially in a rural area – that have the latest clean technology may be cost prohibitive. Carpooling will be encouraged, but because crews may not all be employed with the same company or working in the same area of the project, it may not be feasible for most workers. For these reasons and other local and regional project emissions, this impact may remain potentially significant and unavoidable. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Impact AQ-2
Initial and maintenance treatment activities will include the use of mechanical equipment which could expose people and the environment to diesel particulate matter emissions. The potential to expose people and the environment to diesel particulate matter emissions was examined in the PEIR. Diesel particulate matter emissions from the proposed treatment activities are within the scope of the PEIR because the exposure potential as well as the types, amount of, and duration of use of equipment that would be used are consistent with those analyzed.

The TCRCD proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on-site. All other elements of SPR HAZ-1 would remain the same as presented in the PEIR. 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 impact related to emissions of diesel particulate matter than what was covered in the PEIR.

Treatment activities are not expected to occur near the same people for an extended period of time such that prolonged exposure would occur. Additionally, idling time of vehicles will be kept to a minimum and staging areas will be placed as far as feasible from human receptors. As noted above in Impact AQ-1, MM AQ-1 will also be implemented to the extent feasible. The SPRs applicable to this impact are HAZ-1, NOI-4, and NOI-5. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Impact AQ-3
This impact does not apply to the proposed project area because there is no Naturally Occurring Asbestos (United States Geological Survey 2011) nor are there ultramafic and serpentine soils.

Impact AQ-4
Prescribed burning may occur during initial and maintenance treatments which could expose people to toxic air contaminants (TAC). The potential for people to be exposed to TACs during prescribed burn treatment activities was examined in the PEIR. The impact of this analysis was found to be potentially significant and unavoidable even after the application of all feasible mitigation measures (SPR AQ-1, AQ-2, and AQ-6) because unpredictable changes in weather can occur during prescribed burns that may result in short-term exposure of people to concentrations of TACs and associated levels of acute health risks. The duration and parameters of the proposed prescribed burning are within the scope of the activities addressed in the PEIR and air quality conditions will remain consistent with those analyzed in the PEIR for Tuolumne County. Therefore, the potential for exposure to TACs is also within the scope of the PEIR. The SPRs applicable to this impact are AD-4, AQ-1, AQ-2, and AQ-6. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Impact AQ-5
Initial and maintenance treatment activities may require the use of diesel powered equipment that could expose people to objectionable odors from diesel exhaust. The potential to expose people to objectionable odors from diesel exhaust was examined in the PEIR. Consistent with the PEIR, diesel exhaust emissions would be temporary, not generated in one location for an extended period of time, and would dissipate quickly at the distances where vehicles would primarily be running. Additionally, in areas nearest to sensitive receptors (like the Summerville High School) the limited operating periods discussed in REC-1 would result in minimized exposure to this sensitive receptor. This impact is within the scope of the PEIR because the equipment would be used and the duration of its use are consistent with the PEIR analysis.

The TCRCD proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on-site. All other elements of SPR HAZ-1 would remain the same as presented in the PEIR. 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. The SPRs applicable to this impact are AQ-1, HAZ-1, NOI-4, and NOI-5. This determination is consistent with the PEIR and would constitute a substantially more severe significant impact.

Impact AQ-6
Prescribed burning that may occur during initial and maintenance treatment activities may expose people to objectionable odors of smoke. The potential to expose people to objectionable odors of smoke was examined in the PEIR. This impact was found to be potentially significant and unavoidable despite applications of all feasible mitigation measures because short-term exposure to odorous smoke emissions from unpredictable weather changes could still occur. The duration and parameters of the proposed prescribed burn activities are within the scope of the activities addressed in the PEIR. Therefore the resultant potential for exposure to objectionable odors from smoke emissions is also within the scope of the PEIR. The SPRs applicable to this impact are AD-4, AQ-1, AQ-2, and AQ-6. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

New Air Quality Impacts
The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable

environmental and regulatory conditions presented in the final CalVTP PEIR (refer to PEIR Section 3.2.1, “Environmental Setting,” and Section 3.2.2, “Regulatory Setting,” in Volume II). No changed circumstances are present, therefore, no new impact related to air quality would occur.

Archaeological, Historical, and Tribal Cultural Resources

Impact in the PEIR	Project-Specific Checklist

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources	LTS	Impact CUL-1, pp. 3.5-14 – 3.5-15	Yes	CUL-1 CUL-4 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	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	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	NA	NA	LTS	No	Yes

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

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

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

Discussion

As part of a past CEQA NOE approved in 2023, a cultural records search and survey were conducted and an Archeological Survey Report (ASR) written in 2022 by qualified RPF, Adam Frese, under the jurisdiction of CAL FIRE as the CEQA lead agency *for Phase I of the Summerville project only*. Mr. Frese is an Archaeologically Trained Resource Professional who holds a current Archaeological Training Certificate issued by CAL FIRE and the Board of Forestry and Fire Protection. This ASR was used to inform – but did not take the place of – inquiries, surveys, and reports required by the SPRs for this PSA/Addendum. All archaeological work conducted for this PSA was conducted under the direction of Dr. Brian Ludwig, a Qualified Archaeologist who meets the Secretary of Interior's Qualifications Standards (36 CFR Part 61).

Phase I - Records Check
Consistent with SPR CUL-1, a cultural records search of the current data held at the Central California Information Center (CCIC) was completed in July 2025 for Phase I of the project area (136 acres), including a 330 foot buffer. This search included only areas within the CalVTP Treatable Landscape. A total of 3 previously recorded archeological sites and historic features came back within the area of interest; of which, 2 were located in the project area and visited during cultural surveys. Additionally, as part of the ASR written by Adam Frese in 2022, 10 additional historic sites were found within the project area. These sites were revisited during cultural surveys for this PSA/Addendum. Of all of the sites in the project area (a total of 12 sites), Dr. Ludwig recommends that only1 full site and 1 component of a site are eligible for protection measures. He has determined that a 100 foot buffer around the site and site component with no treatment activities within those buffers would be sufficient for protection measures.

Phase II - Records Check
Due to the fact that there is not yet implementation funding for Phase II of the Summerville project and that a records check needs to be completed within 5 years of implementation, a cultural records search will occur after funding is obtained for - but prior to - any implementation. Additionally, surveys will occur after the records search has been completed, but prior to, any implementation of treatment activities.

Phase I - Consultation with Tribes
Consistent with SPR CUL-2, a list of geographically affiliated Native American representatives was obtained from the Native American Heritage Commission (NAHC) in July 2025, and a search of the Sacred Lands database returned negative. The TCRCD sent emails and one letter in July and August 2025 to the tribes listed on the NAHC list requesting information regarding potential impacts to cultural resources from the proposed treatments. This notification also included information about the two prehistoric sites found in Phase I of the project area and the proposed resource protection measures for those sites. The proposed resource protection measures included consultation for a 50 foot buffer around the sites, but Dr. Ludwig recommends that that be extended to a 100 foot buffer around the sites where no treatment activities will occur.

A list of the representatives identified by the NAHC, the method of contact, and any response received - including project specific requests that reflect tribal concerns and values to be incorporated into the SPRs, is provided in the table below.

Table 1: Geographically Affiliated Native American Tribes and Representatives Contacted

Name and Title	Affiliation	Date and Medium of Initial Contact	Response Summary
Jessalynn Pastran Chairperson	Buena Vista Rancheria of Me-Wuk Indians	07/21/2025 - email	None.
Jesse Galvan THPO	Buena Vista Rancheria of Mw-Wuk Indians	07/21/2025 - email	None.
Debra Grimes Tribal Cultural Resources Specialist	Calaveras Band of Mi-Wuk Indians	07/21/2025 - email	None.
Gloria Grimes Chairperson	Calaveras Band of Mi-Wuk Indians	07/21/2025 - email	Deferred to local tribe.
Adam Lewis Tribal Cultural Resources Assistant	Calaveras Band of Mi-Wuk Indians	07/21/2025 - email	Deferred to local tribe.

Anthony Wilson Treasurer	California Valley Miwok Tribe	07/21/2025 - email	None.
Antoinette Del Rio Interim Chairperson	California Valley Miwok Tribe	07/21/2025 - email	None.
Lawrence Wilson Jr. Cultural Specialist	California Valley Miwok Tribe	07/21/2025 - email	Deferred to local tribe.
Monica Fox Tribal Administrator	Chicken Ranch Rancheria of Me-Wuk Indians	07/21/2025 - email	None.
Stephanie Suess Community and Resources Development Director	Chicken Ranch Rancheria of Me-Wuk Indians	07/21/2025 - email	None.
Cynthia Reyes Cultural Manager	Chicken Ranch Rancheria of Me-Wuk Indians	07/21/2025 - email	None.
Joanna Portillo-Hsu Environmental and Planning Manager	Chicken Ranch Rancheria of Me-Wuk Indians	07/21/2025 - email	None.
Rolland Fillmore Cultural Preservation Representative	Jackson Rancheria Band of Miwuk Indians	07/21/2025 - email	None.
Adam Dalton Chairperson	Jackson Rancheria Band of Miwuk Indians	07/21/2025 - email	None.
Leland Valdez Cultural Resources	Nashville Enterprise Miwok-Maidu-Nishinam Tribe	07/22/2025 - USPS letter	None.
Cosme Valdez Chairperson	Nashville Enterprise Miwok-Maidu-Nishinam Tribe	07/21/2025 - email	None.
Sandra Chapman Chairperson	Southern Sierra Miwuk Nation	07/21/2025 - email	None.
Jazzmyn Gegere Director of Cultural Resource Preservation	Southern Sierra Miwuk Nation	07/21/2025 - email	None.
Neil Peyron Chairperson	Tule River Indian Tribe	07/21/2025 - email	None.
Kenneth Woodrow Chairperson	Wuksachi Indian Tribe/Eshom Valley Band	07/21/2025 - email	None.
Alejandra Ramirez Co-Chair	Pakan'yani Maidu of Strawberry Valley Rancheria	07/21/2025 - email	None.
Scott Dinsmore Co-Chair	Pakan'yani Maidu of Strawberry Valley Rancheria	07/21/2025 - email	None.
Andrea Reich Chairperson	Tuolumne Band of Me-Wuk Indians	08/05/2025 - email. This tribal contact was not provided by the NAHC, but due to local knowledge and relationships it was important to consult with them about this project.	None.

Phase II - Consultation with Tribes

Due to the fact that there is not yet implementation funding for Phase II of the Summerville project and a records search still needs to be completed, SPR CUL-2 for Phase II will occur once implementation funding is obtained, but prior to any implementation of treatment activities. A summary of those

findings and contacts will be maintained and added to the project documentation. Depending on the results of that consultation, SPRs may be modified to accommodate any tribal requests.

Phase I - Cultural Surveys
Consistent with SPR CUL-4, archeological surveys and corresponding survey reports were conducted and written in September 2025 by the following Archaeologically Trained Resource Professionals who are qualified RPFs with current certifications for CAL FIRE Archeological Review Training under direction by a Qualified Archeologist:

Dr. Brain Ludwig, Registered Professional Archeologist #11220;

Adam Frese, RPF #2659, CAL FIRE Archeological Training Refresher 2024;

Byron Krempl, RPF #3222 CAL FIRE Archeological Training 2024.

Phase II - Cultural Surveys
Due to the fact that there is not yet implementation funding for Phase II of the Summerville project and a records search still needs to be completed, SPR CUL-4 for Phase II will occur once implementation funding is obtained, but prior to any implementation of treatment activities. Any findings or SPR modifications that result from these surveys will be documented in the PSA/Addendum project documentation.

Impact CUL-1
Initial and maintenance treatment activities including manual, mechanical, prescribed burning, prescribed herbivory, and herbicide application have the potential to disturb, damage, or bring destruction to built historical resources. The potential for harm to these resources was examined in the PEIR. This impact is within the scope of the PEIR because treatment activities and the intensity of ground disturbance of the treatment project are consistent with those analyzed in the PEIR. The SPRs applicable to this impact are CUL-1, CUL-4, CUL-7, and CUL-8. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Impact CUL-2
Initial and maintenance treatment activities that include mechanical treatments with heavy equipment may result in ground disturbance as vegetation is removed, and prescribed burning could damage above ground archaeological features. As a result, these treatment activities have the potential to damage unique or subsurface archeological resources if they are present within the treatment area.

The potential for these treatment activities to result in inadvertent discovery and subsequent damage of unique archaeological resources or subsurface historical resources was examined in the PEIR. This impact was identified as significant and unavoidable because of the large geographic extent of the Treatable Landscape and the possibility that there could be rare instances of resources that any inadvertent damage may be extensive. For the proposed treatment area, SPRs CUL 1, CUL-2, CUL-3, CUL-4, CUL-5, CUL-8 and MM 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 archeological resource. However, because inadvertent damage could be caused during the course of this project, it could contribute to the environmental significance conclusion in the PEIR; therefore this PSA notes the impact as potentially significant and unavoidable.

This impact is within the scope of the PEIR because treatment activities and intensity of ground disturbance of the Summerville project are consistent with those analyzed in the PEIR. The SPRs applicable to this impact are CUL-1, CUL-2, CUL-3, CUL-4, CUL-5, and CUL-8. MM CUL-2 would also apply. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact CUL-3

Communication with the Tuolumne County tribes listed on the NAHC provided contacts occurred in July and August of 2025, and included those listed in Table 1 above along with the subsequent responses for Phase I of the project area only. There were no requests for additional protection measures. Communication with tribes for Phase II will occur after funding for implementation is secured, but prior to the implementation of treatment activities. Documentation of communication for Phase II will be collected and incorporated into the project files.

The potential for the proposed initial and maintenance treatment activities to cause a substantial adverse change in the significance of a tribal cultural resource during vegetation management was examined in the PEIR. This impact is within the scope of the PEIR because the intensity of ground disturbance of the treatment project is consistent with that analyzed in the PEIR. While resources may be found within the treatment area, implementation of the SPRs would avoid any substantial adverse change to any tribal cultural resource. The SPRs applicable to this impact are CUL-1, CUL-2, CUL-3, CUL-4, CUL-5, CUL-6 and CUL-8. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact CUL-4

Mechanical treatment activities using heavy equipment could uncover human remains. The CCIC records search for Phase I did not reveal any burials or sites containing human remains. Once the records search for Phase II has been completed, it will be noted in the project documentation if any human remains were returned in the search. The potential for treatment activities to uncover human remains was examined in the PEIR. This impact is within the scope of the PEIR because the treatment activities and intensity of ground disturbance are consistent with those analyzed in the PEIR and the project would comply with California Health and Safety Code Section 7050.5 and PRC Section 5097 in the event of a discovery. There are no SPRs applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Archaeological, Historical, and Tribal Cultural Resource Impacts

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the final CalVTP PEIR (refer to PEIR Section 3.2.1, “Environmental Setting,” and Section 3.2.2, “Regulatory Setting,” in Volume II). No changed circumstances are present. Therefore, no new impact related to archeological, historical, or tribal cultural resources would occur.

Biological Resources

Impact in the PEIR	Project-Specific Checklist

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTSM	Impact BIO-1, pp 3.6-131–3.6.138	Yes	AD-1 BIO-1 BIO-2 BIO-5 BIO-7 BIO-9 AQ-3 AQ-4 GEO-1 GEO-2 GEO-3 GEO-4 GEO-5 GEO-7 HYD-5 HAZ-6	BIO-1a BIO-1b BIO-1c	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTS (all wildlife species except bumble bees) S&U (bumble bees)	Impact BIO-2, pp 3.6-138–3.6-184	Yes	AD-1 BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-9 BIO-10 BIO-11 BIO-12 HAZ-5 HAZ-6 HYD-1 HYD-3 HYD-4 HYD-5	BIO-2a BIO-2b BIO-2e BIO-2g BIO-3a BIO-3b BIO-3c BIO-4	LTSM	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function	LTS	Impact BIO-3, pp 3.6-186–3.6-191	Yes	AD-1 BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-6 BIO-7 BIO-9 HYD-4 HYD-5 HAZ-5 HAZ-6	BIO-3a BIO-3b BIO-3c	LSTM	No	Yes

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTS	Impact BIO-4, pp 3.6-191–3.6-192	Yes	AD-1 BIO-1 HYD-1 HYD-3 HYD-4	BIO-4	LTS	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTS	Impact BIO-5, pp 3.6-192–3.6-196	Yes	AD-1 BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-10 BIO-11 BIO-12 HYD-1 HYD-4	BIO-5	LTS	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197–3.6-198	Yes	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	No Impact	Impact BIO-7, pp 3.6-198–3.6-199	Yes	AD-1 AD-3 BIO-1 BIO-3	NA	No Impact	No	Yes
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	No Impact	Impact BIO-8, pp 3.6-199–3.6-200	Yes	AD-1 AD-3	NA	No Impact	No	Yes

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

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

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

Discussion

Pursuant to SPR BIO-1, qualified RPFs, Adam Frese and Byron Krempl, conducted a data review of project-specific biological resources, including habitat and vegetation types, likelihood of presence of special status plants, wildlife and sensitive habitats with potential to occur in both Phase I and Phase II

of the project area. CAL FIRE's Fire and Resource Assessment Program (FRAP) vegetation layer was used to identify the general habitat/vegetation types within the project area (California Department of Forestry and Fire Protection (CalFIRE) 2022).

The Summerville Project is located entirely in the Sierra Nevada Ecoregion as identified in the CalVTP PEIR, but resembles the transition zone of the foothills and higher elevation species ecotypes. The project area ranges in elevation from approximately 2,500 to 3,300 feet. Vegetation types, classified according to California Wildlife Habitat Relationships (CWHR) classification system, within the project area display as primarily Montane Hardwood and Montane-Hardwood Conifer with some smaller inclusions of Ponderosa Pine, Blue Oak Woodland, Blue Oak-Foothill Pine, and Annual Grassland (see Table 4 in Attachment B).

Phase I

The qualified RPFs noted above conducted reconnaissance surveys and protocol level surveys in Phase I in June 2025 to assess the accuracy of mapped vegetation, suitability of habitat in the project area for special-status plant and wildlife species, and to document any observations. Based on these surveys, the RPFs found that the majority of Phase I of the project area was dominated by interior live oak, California gray pine, California black oak, buckeye, valley oak, blue oak, ponderosa pine and incense cedar overstory species and notable amounts of regeneration of toyon, poison oak, live oak sprouts and yerba santa in the understory. These understory species were plentiful across the project area despite the fuels reduction work that took place a few years ago under a CEQA NOE. The Phase I project area also contains some seasonal watercourses and two perennial watercourses, but the 0.14 acres of Riverine habitat identified by the National Watershed Inventory (NWI) within the 136 acres of Phase I as Freshwater Pond (PUBFx) was non-existent on the ground (United States Fish and Wildlife Service (USFWS) 2025). There were no special-status incidental observations or protocol level observations of any of the special-status plant species within Phase I of the project area.

Reconnaissance and protocol level surveys included walking the 136 acres of Phase I. Characteristics of these habitats (e.g. species composition, percent cover of dominant vegetation type, total canopy percent cover, human disturbance level) were observed and informed by the desktop review of resources described below under *Species with Potential to Occur.* **Overall, no special status plant or wildlife species were found in Phase I of the project area.**

Phase II

Due to the fact that Phase II of the Summerville project does not currently have grant funding and landowner permission to access properties has not yet been obtained, cursory level surveys for this area were conducted through visual observations from public roads and desktop data review including orthoimagery and LiDAR analysis gathered for Phase II. In areas able to be accessed, the RPFs observed that Phase II was dominated by an overstory of mixed oak and pine species with dense understory thickets in most areas of what looked like toyon, poison oak, live oak seedlings, and yerba santa. A large number of dead or dying trees were also noted in the area of the Phase II project that is northeast of Tuolumne Road. There were at least two obvious pond/lake riparian areas as well as at least one perennial watercourse that runs through the project area and along the project boundary on the eastern side. It is expected that there may be other scattered freshwater emergent wetlands, drainages, and riparian areas throughout the Phase II project area.

Once funding has been secured and landowner permission granted for treatment areas in Phase II, reconnaissance level surveys will be conducted and followed up by protocol level surveys if necessary prior to any implementation. Given the nature of rural local governments and funding constraints, it is logistically infeasible to fully survey Phase II at this time and is unnecessary to achieve compliance with

SPR BIO-1 and prepare this analysis. The reconnaissance level surveys were designed to sample as many different habitat types and conditions as possible, with a focus on sensitive habitats. It is likely that some un-surveyed areas in this cursory approach may have unique characteristics that were not directly observed or comparable to the surveyed areas. As such, the identification of sensitive species that may be likely to occur in the project area and the SPRs and MMs described below are applied conservatively to account for the heightened need of further surveys prior to implementation of Phase II.

Species with Potential to Occur in Phase I and Phase II
A list of special-status plant and wildlife species with potential to occur in Phase I and Phase II of the project area was compiled by completing a review of the California Natural Diversity Database (CNDDB) and California Native Plant Society Inventory of Rare and Endangered Plants of California records for the US Geological Survey (USGS) quadrangles containing and surrounding the project area; the US Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool (USFWS 2025a); and Appendix BIO-3 (Table 13a, 13b, and 19) in the PEIR for special-status plants and wildlife that could occur in the Sierra Nevada Ecoregion. Additionally, a list of sensitive natural communities with potential to occur within the project area was compiled by completing a MCV alliance search (California Native Plant Society (CNPS) 2025).

Based on the implementation of SPR BIO-1, including review of occurrence data, species ranges, habitat requirements for each species, results of reconnaissance-level surveys in Phase I and cursory surveys in Phase II, including classification of the habitat types present, a complete list of species with potential to occur in the vicinity of the proposed project was assembled (Table 3 in Attachment B). “May Occur” designations were applied conservatively to account for limitations in access to Phase II of the project area. Of the species analyzed and included in Attachment B, there are 36 special-status plants and 54 special-status wildlife species with potential to occur in the project area based on desktop reviews. From there, it was determined that only 15 of the special status-plants and only 17 special status-wildlife species might actually occur. The likelihood of presence of these species may go down once reconnaissance level surveys have been completed for Phase II. These species are discussed in detail under Impact BIO-1 and Impact BIO-2.

Impact BIO-1
Initial vegetation treatments and maintenance treatments could result in direct or indirect effects on the 15 special status plant species that may occur in the project area, if these species are present. Treatment frequency and intensity can determine whether effects on certain plant species are beneficial or adverse. Initial treatments that reduce overgrowth, open the tree canopy to allow for some light penetration, or remove 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 populations.

SPR BIO-7 applies to all treatment activities, including maintenance treatments, and protocol-level surveys for special-status plants shall be conducted pursuant to *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (California Department of Fish and Wildlife (CDFW) 2018) prior to implementing any initial and maintenance treatments in any habitat potentially suitable for special-status plants. For other special status plants not listed under CESA or ESA, surveys may not be required if the target special-status species is an herbaceous annual, stump sprouting, or geophyte species and the treatments are carried out during the dormant season for each species or when the species has completed its annual life cycle, provided that the treatments would not alter habitat in a way that would make it unsuitable for the special-status plants to reestablish following treatment or destroy seedbanks, stumps, roots, rhizomes, bulbs or other underground parts. However, this would require that treatments in potentially suitable habitat for these species be limited to the dormant season and to treatments that do not disturb below the soil surface (i.e.

manual, herbicide application, and prescribed burning) without prior knowledge of their presence, which may unnecessarily or infeasibly constrain treatment implementation. If surveys could be conducted to determine presence or absence, and depending on the results, this may provide greater flexibility with timing and types of treatments that may be implemented in this habitat.

Ten of the 15 special status plant species that may occur within the project area are characterized as either an herbaceous annual or geophyte species and are not listed under ESA or CESA (Table 3 in Attachment B). Impacts on these species would be avoided by implementing non-ground-disturbing treatment activities (i.e., manual treatments, herbicide application, prescribed burning) during the dormant season (i.e., when the plant has no aboveground parts), which would typically occur after seed set and before germination according to the species. Ground-disturbing treatment activities (i.e., mechanical treatments, prescribed herbivory) and pile burning may result in impacts on these plant species even when dormant and would not be conducted without prior implementation of SPR BIO-7. If non-ground-disturbing treatments cannot be completed in the dormant season and would be implemented during the growing period of these herbaceous annual and geophyte species, protocol surveys (per SPR BIO-7) and avoidance of any identified plants (per Mitigation Measures BIO-1a and BIO-1b) must be implemented, as described below.

The remaining 5 of the total 15 special-status plant species that have potential to occur within the project area do not have the same dormant season protections. These 5 species do *not* occur within the Phase I area of the project (based on reconnaissance and protocol level surveys), but may occur within the Phase II area of the project. As such, Phase II requires reconnaissance level assessment and potentially protocol level surveys under SPR BIO-7 to identify and avoid any of these special status species that may be present in the project area prior to implementing treatment activities regardless of the timing of treatments.

Five of the 15 special-status plant species that have habitat potentially suitable in the project are typically associated with wet areas (e.g., creeks, streams, ponds, seeps, vernal pools, wetlands, marshes, mesic areas in forest or grassland, bogs, drainages). Pursuant to SPR HYD-4, WLPZs of 50 to 150 feet adjacent to all Class I and Class II streams and ponds/lakes within the project area 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 for mechanical treatments, manual treatments, prescribed burning, herbicide application, and prescribed herbivory, which would minimize some adverse effects on these species. However, many types of wetland habitats are not associated with streams and suitable wetland habitat for special-status plants as well as ponds smaller than 1 acre may occur outside of WLPZs. Furthermore, SPR HYD-4 is not an avoidance measure for special-status plants because it allows for vegetation removal within WLPZs as long as at least 75 percent surface cover is retained. Wetland delineations will be conducted to determine if other wetland, spring, and seep habitats are present within a project area, and where aquatic habitats are delineated, no-disturbance buffers of at least 25 feet will be implemented. Although these measures would avoid and minimize some adverse effects on special-status plants typically associated with aquatic habitats, all habitat potentially suitable for these 5 species cannot be avoided and existing WLPZs and protective buffers would not fully prevent impacts on the species. As a result, SPR BIO-7 would be implemented.

The other 21 special-status plant species that were analyzed during desktop review were primarily found to not have suitable habitat in the project area during reconnaissance level and cursory surveys. Others needed specific soil types that are not located in the project area and some are not within the elevation range of the project area. See Table 3 in Attachment B for more species specific information.

Where protocol-level surveys are required per SPR BIO-7 and special-status plants are identified during these surveys, Mitigation Measures BIO-1a and BIO-1b would be implemented to avoid loss of identified special-status plants by demarcating a no-disturbance buffer of at least 50 feet around the area

occupied by the species within which no initial or maintenance treatment activities would occur unless a qualified RPF or biologist determines, based on substantial evidence, that the species would benefit from treatment in the occupied area. In the case of plants listed under ESA or CESA, the determination of beneficial effects would need to be made in consultation with USFWS and/or CDFW. If treatments are determined to be beneficial and would be implemented in areas occupied by special-status plants, under the specific conditions described under MM BIO-1a and BIO-1b, additional impact minimization and avoidance measures or design alternatives to reduce impacts would be identified by a qualified RPF or botanist. Therefore, habitat function for special-status plants would be maintained because treatment activities and maintenance treatments would be designed to ensure that treatments, including follow-up maintenance retain habitat conditions suitable for the special-status plant species present such that these plants persist. If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided, then Mitigation Measure BIO-1c will apply and compensatory mitigation will be required.

Pursuant to SPR HYD-5, nontarget vegetation and special-status plant species would be protected from herbicides. 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, herbicides containing dye will be used to prevent overspray. Only herbicides labeled for use in aquatic environments would be used when working in areas where there is a possibility the herbicide could come into direct contact with water. In riparian habitats, herbicides would be applied by hand and only during low-flow periods or when seasonal streams are dry. To avoid nontarget vegetation via run-off or aerial drive, herbicide application will not occur during precipitation events, sustained winds, or when weather parameters exceed label specifications.

As described above in Section 1. Proposed Project Revisions, the TCRCD proposes to revise the language in SPR GEO-1 to suspend mechanical treatments and prescribed herbivory if: 1) soils are saturated, and/or 2) soils are wet enough to be compacted by mechanical activities. Activities that cause mechanical disturbance may resume when soils are no longer saturated. This proposed revision is not in regards to herbicide application. Herbicide application will be applied according to the specifications in SPR HYD-5. In the region where the project is located, forecasts often include a chance of rain but that precipitation sometimes does not materialize. Additionally, in the area where the project is located, occasional limited precipitation occurs across the operating season but would not warrant a full stop of activities when the soil and environmental conditions can absorb precipitation without mechanical activities impacting the soil. Therefore, suspension of treatment activities when there is a chance of rain or limited precipitation that does not impact erosion or compaction potential could result in unnecessary loss of work time and high mobilization costs for removing equipment and/or livestock. The project proponent would be prepared to suspend all mechanical activities in the event that sufficient active precipitation creates saturated soils or soils wet enough to be compacted by mechanical activities. Indicators of saturated soil conditions that the project proponent may use to suspend treatment activities 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. Suspending soil disturbance activities during precipitation events that saturate soils will still minimize the risk of soil compaction and erosion potential. The SPR as revised would not result in any new or substantially more severe significant impacts related to erosion. This revision is consistent with the purpose of SPR GEO-1 to suspend disturbance during heavy precipitation to minimize the risk of soil compaction and disturbance.

Additionally, the TCRCD proposes to revise the language under SPR GEO-3 to stabilize bare soils disturbed by treatments within WLPZs, equipment limitation zones, or in other areas deemed necessary by a qualified RPF. The SPR as written could require that soil stabilization occur in many areas where

runoff and sediment discharge would not result in environmental impacts making the treatments unnecessarily costly and more time consuming. Soils will be stabilized in areas where runoff and sediment discharge have the potential to occur, and only ground into the soil where appropriate as determined by a qualified RPF. As such, this revision would still meet the purpose of SPR GEO-3 and would not result in any new or substantially more severe significant impacts related to runoff or sediment discharge that could have adverse effects on special-status plants if present.

The potential for treatment activities to result in adverse effects on special status plants was examined in the PEIR. This impact on special-status plants is within the scope of the PEIR because the types of pre-implementation protection measures, treatment activities, intensity of disturbance of each activity, and avoidance measures during implementation are consistent with those analyzed in the PEIR.The SPRs that apply to this impact are AD-1, BIO-1, BIO-2, BIO-5, BIO-7, BIO-9, AQ-3, AQ-4, GEO-1, GEO-2, GEO-3, GEO-4, GEO-5, GEO-7, HYD-5 and HAZ-6. Biological resource MMs that apply to this impact are BIO-1a, BIO-1b, and BIO-1c. Given the proper application of all SPRs and MMs, the determination of this impact is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Impact BIO-2
Initial and maintenance treatment activities could result in direct or indirect adverse effects on special-status wildlife species and their habitat within the project area as described in the following section and in Attachment B.

Pursuant to Mitigation Measure BIO-2a, consultation must occur with USFWS and CDFW, as applicable, about each agency's determination that, with the implementation of the proposed project, mortality, injury, or disturbance would not occur and habitat function would be maintained for species listed as endangered or threatened under ESA; listed as endangered, threatened or candidates for listing under CESA; or designated as fully protected under California Fish and Game Code. These consultations are noted below where the TCRCD has conducted the wildlife agency consultation required under MM BIO-2a. Therefore, further consultation with USFWS and CDFW pursuant to MM BIO-2a for treatments covered by this PSA/Addendum would not be required.

California Red-Legged frog
California red-legged frogs historically occupied portions of the western slope of the Sierra Nevada from Shasta County south to Tulare County; however, these populations have been fragmented and nearly eliminated (USFWS 2002). Today, they are known to occur in 35 counties in California with only isolated populations in the Sierra Nevada foothills (USFWS 2025b). There are no documented occurrences in or adjacent to the project area (CNDDB 2025).

Phase I of the project area does not have aquatic features that are likely to support the habitat needs of the California red-legged frog. There are no ponds in the Phase I project area and the seasonal streams do not provide aquatic habitat during the period of breeding of the frogs. The other two watercourses within the Phase I project area are narrow and do not have pools necessary to nursery larvae. **Overall, California red-legged frog is not expected to occur in the Phase I area of the project. The "May Occur" ranking of this species is specific to Phase II of the project.**

Phase II of the project area has not had reconnaissance level or protocol level surveys conducted throughout much of the area, and aquatic habitat, including perennial streams with deep pools, stock ponds, seeps, and wetlands that may be present may provide suitable habitat for this species. The potential for initial treatment activities and maintenance treatments to result in adverse effects on California red-legged frogs was examined in the PEIR.

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. Also pursuant to SPR HYD-4, pile burning would be conducted outside of the WLPZs. Wetland delineations will be conducted to determine if other wetland, spring, and seep habitats are present within the project area, and where aquatic habitats are delineated, no-disturbance buffers of at least 25 feet will be implemented. Additionally, pursuant to SPR HYD-3, livestock would be excluded within 50 feet of environmentally sensitive areas such as Class I and II streams, ponds (including stock ponds suitable for California red-legged frog as determined by a qualified RPF or biologist), wetlands, or riparian areas during prescribed herbivory treatments using temporary fencing or active herding. However, these measures may not avoid impacts on California red-legged frogs if frogs are present outside of established WLPZs or buffers (e.g., greater than 150 feet from aquatic habitat), are present within ponds smaller than 1 acre, or if manual treatment activities implemented within the WLPZ resulted in injury or mortality of frogs.

As noted above, aquatic breeding habitat potentially suitable for California red-legged frogs may be present in any associated aquatic habitats that may be identified throughout Phase II. Aquatic nonbreeding habitat potentially suitable for California red-legged frogs is also potentially present. However, due to the isolation of populations in the Sierra Nevada foothills and no documented populations within or adjacent to the project area, injury or mortality of California red-legged frogs is unlikely to occur as a result of treatments near these potentially suitable habitats. Pursuant to SPR BIO-1, reconnaissance level surveys will be conducted in the Phase II project area prior to implementation in order to determine the presence of potentially suitable habitat. If suitable habitat exists, a qualified RPF or biologist will determine appropriate no disturbance buffers around the potentially suitable habitat or will determine that protocol level surveys will be conducted pursuant to SPR BIO-10 and the Revised Guidance on Site Assessments and Field Surveys for the California Red-Legged Frog (USFWS 2005a). If California red-legged frogs are not detected within the project area during protocol-level surveys, then no mitigation for the species would be required and mitigation measures would not be required aside from those already required in SPRs HYD-3 and HYD-4. If California red-legged frogs are identified during focused surveys, then appropriate mitigation measures and no disturbance buffers will be determined by a qualified RPF or biologist and incorporated into the PSA documentation. If California red-legged frogs are detected, all treatment activities will pause, and USFWS will be contacted pursuant to MM BIO-2a to provide further guidance regarding avoidance measures.

Pursuant to MM BIO-2a, TCRCD contacted USFWS by email on August 18, 2025 to notify them of the proposed avoidance measures and that habitat function would be maintained for California Red-Legged frog (if deemed present). USWFS responded by email on August 26, 2025 that they were able to review the project documents and have no comments to provide. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Foothill Yellow-Legged Frog

Foothill yellow-legged frogs (FYLF) - south Sierra Distinct Population Segment (DPS) generally prefer slower streams and rivers with sunny, sandy, rocky, or gravely banks; and they are rarely encountered far from permanent water spending most of their time in or near streams during all seasons (USFWS 2025b). The Summerville project is located outside of the USFWS proposed critical habitat, but does have one non-specific documented occurrence from 1951 within a 1 mile radius of Tuolumne City (CNDDB 2025). Thus, evaluations for FYLF habitat were conducted across the project area as aquatic habitat potentially suitable for FYLF may be present across Phase I and Phase II.

In Phase I of the project area, it was identified during reconnaissance level surveys that there are two watercourses within the project area that have free flowing water into the fall that could provide habitat for non-fish aquatic species. However, the watercourses are narrow, lack rocky substrate or deep pools, and are shaded with dense overstory cover and blackberries. **Overall, it was determined by the qualified RPF to not be suitable habitat for FYLF.**

Phase II of the project was unable to be fully surveyed through reconnaissance level surveys due to a lack of current access across private property. Based on cursory surveys, it is likely that additional aquatic habitat may be present in Phase II that would need to be evaluated for suitability for FYLF. As such, reconnaissance surveys pursuant to BIO-1 still need to be conducted in Phase II and based on the results of those surveys, SPR BIO-10 may apply.

In both phases of the project 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. Additionally, pursuant to SPR HYD-3, livestock would be excluded with 50 feet of environmentally sensitive areas such as Class I and II streams or riparian areas during prescribed herbivory treatments using temporary fencing or active herding. However, these measures may not result in full avoidance of FLYF if frogs are present within ponds smaller than 1 acre or if manual activities implemented within the WLPZ resulted in injury or mortality of frogs. The potential for treatment activities, including maintenance treatments, to result in adverse effects on FYLF was examined in the PEIR.

Per SPR BIO-1, to fully avoid habitat potentially suitable for FYLF, a 200-foot no-disturbance buffer would be implemented prior to commencement of treatment activities by flagging an exclusion zone along perennial streams (Class I and Class II) adjacent to the project area. If the 200-foot no-disturbance buffer is determined to be infeasible for certain treatments, then SPR BIO-10 would apply, and focused visual encounter surveys for FYLF would be conducted by a qualified RPF or biologist within suitable habitat areas prior to treatment activities. If FYLFs are not detected within the project area during focused surveys, then no mitigation for the species would be required. If FYLFs are identified during focused surveys, MM BIO-2a for this species would be implemented. Under MM BIO-2a, flagging 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 these species would be required.

Habitat function for FYLF 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 (e.g., no mechanical treatment, no fire ignition for broadcast burning, retention of at least 75 percent surface cover).

Pursuant to MM BIO-2a, TCRCD must consult with USFWS and CDFW about its determination that mortality, injury, or disturbance would not occur, and habitat function would be maintained for FYLFs. TCRCD contacted USFWS and CDFW by email on August 18, 2025 to notify them of the proposed avoidance measures and that habitat function for FYLF would be maintained (if deemed present). USFWS responded by email on August 26, 2025 that they were able to review the project documents and have no comments to provide. CDFW responded by email on September 18, 2025 that they are unable to review projects at this time due to staffing issues. 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 proposed for listing under ESA, and as such, currently does not have protection under ESA, but it is also a CDFW Species of Special Concern and

may be federally listed during the life of this project. Generally northwestern pond turtles are associated with permanent water, such as ponds, lakes, streams, irrigation ditches, or permanent pools along intermittent streams, in a wide variety of habitat types. They require basking sites such as partially submerged logs, rocks, and mats of vegetation (USFWS 2025b). It has been noted that northwestern pond turtles may be present within upland habitat up to approximately 1,500 feet from aquatic habitat (Thomson et al. 2016).

In Phase I of the project area, no suitable habitat was identified for the northwestern pond turtle. While two watercourses do occur in the project area, there is no permanent water or pools and the narrowness of the channel precludes ample space for basking sites. **Overall, it was determined by the qualified RPF that Phase I does not contain suitable habitat for northwestern pond turtles.**

In Phase II, only cursory surveys were conducted due to limited access to the private properties at the time. Aquatic habitat suitable for northwestern pond turtles may be present within ponds and streams in and adjacent to the project area, and this species (if present) may use upland habitat within the project area in the vicinity of these features. Thus, Phase II will need to be evaluated through reconnaissance surveys pursuant to SPR BIO-1 and potentially SPR BIO-10 prior to implementation of treatment activities if suitable habitat is deemed to be present.

In both Phases I and II, 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. Additionally, pursuant to SPR HYD-3, livestock would be excluded within 50 feet of 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. However, these measures may not avoid impacts on northwestern pond turtles if turtles are present further than 150 feet from stream or lake habitat, are present within ponds smaller than 1 acre, or if manual activities implemented within the WLPZ resulted in injury or mortality of turtles. The potential for treatment activities and maintenance treatments to result in adverse effects on northwestern pond turtles was examined in the PEIR.

Per SPR BIO-1, if it is determined that adverse effects on northwestern pond turtles can be clearly avoided by physically avoiding the habitat suitable for these species, then no mitigation would be required. However, because northwestern pond turtles may be present at relatively large distances (i.e. up to approximately 1,500 feet) from aquatic habitat in the project area, it is unlikely that all habitat potentially suitable for the species can be avoided. As a result, SPR BIO-10 would apply, and focused visual encounter surveys for northwestern pond turtles would be conducted by a qualified RPF or biologist within upland habitat areas suitable for the species prior to ground-disturbing treatment activities (i.e., mechanical treatments) and pile burning. If western pond turtles are identified during focused surveys, MM BIO-2b for this species would be implemented. Under MM BIO-2b, additional measures would be required, including flagging areas for avoidance, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury to or mortality of northwestern pond turtles.

Habitat function for northwestern pond turtle would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat, and pursuant to SPR HYD-4 treatments within stream WLPZs adjacent to the project area would be limited (e.g., no mechanical treatment, no fire ignition for prescribed burning, retention of at least 75 percent surface cover). Due to the proposal to list northwestern pond turtles under ESA and the CDFW Species of Special Concern ranking, TCRCD contacted USFWS and CDFW by email on August 18, 2025 to notify each agency of the proposed avoidance measures for northwestern pond turtles and that habitat function would be maintained (if

deemed present). USFWS responded by email on August 26, 2025 that they were able to review the project documents and have no comments to provide. CDFW responded by email on September 18, 2025 that they are unable to review projects at this time due to staffing issues. 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 special-status birds have been identified through desktop review, reconnaissance-level surveys (Phase I), and cursory surveys (Phase II) as having the potential to occur within the project area: yellow warbler (*Setophaga petechia*), long-eared owl (*Asio otus*), purple martin (*Progne subis*), willow flycatcher (*Empidonax traillii*), little willow flycatcher (*Empidonax traillii brewsteri*), and olive-sided flycatcher (*Contopus cooperi*). See Attachment B for more details on these species and the rest of the species analyzed. **Reconnaissance-level surveys were conducted in Phase I of the project area where it was determined that suitable habitat for these species does not exist.**

Due to access issues with Phase II of the project area, reconnaissance level surveys were not completed across the entirety of the area. As such, reconnaissance level surveys to determine the presence or absence of species specific habitat will be conducted prior to treatment once access is secured. Based on that reconnaissance, SPR BIO-10 may apply if suitable habitat is deemed to be present for any of the listed species.

For these six species, all initial and maintenance treatment activities conducted in Phase II during the nesting bird season (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, treatment activities including mechanical and manual treatments, prescribed burning, herbicide application, and prescribed herbivory could result in disturbance to active nests from auditory and visual stimuli potentially resulting in abandonment and loss of eggs or chicks. Some of these species are associated with habitats that would not be targeted by treatments (e.g. riverbanks, marshes, and wetlands), but treatments conducted near these habitats could result in disturbance to the species. The potential for treatment activities to result in adverse effects on special-status birds was examined in the PEIR.

Per SPR BIO-1, if it is determined that adverse effects on habitat suitable for nesting special-status birds can be clearly avoided by physically avoiding habitat suitable for the species or conducting treatments outside of the season of sensitivity, then no mitigation would be required. Adverse effects on nesting special-status birds would be clearly avoided for treatments that would occur outside of the nesting bird season, which is generally February 1 to August 31.

If conducting some treatments outside of the nesting bird season is determined to be infeasible, then SPR BIO-10 would apply and focused nesting bird surveys would be conducted for the yellow warbler, long-eared owl, purple martin and olive-sided flycatcher by a qualified RPF or biologist prior to implementation of treatment activities. Established survey protocols will be followed for certain species including but not limited to the willow flycatcher. 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 focused surveys, then MM BIO-2a (for little willow flycatcher and willow flycatcher) and MM BIO-2b (for yellow warbler, long-eared owl, purple martin, and olive-sided flycatcher) would be implemented. Under these MMs, a no-disturbance buffer of at least 0.25 mile around active willow flycatcher and little willow flycatcher nests, at least 300 feet around active long-eared owl nests, and at least 100 feet around any active yellow warbler, purple martin, and

olive-sided flycatcher nests, and no treatment activities would occur within this buffer until the chicks have fledged as determined by a qualified RPF or biologist.

Habitat function for special-status birds would be maintained because treatment activities would not result in removal of trees greater than 12" DBH and where present three to five snags greater than 20" DBH would be retained per acre in areas more than 500 feet from infrastructure and roads. Additionally, pursuant to SPR HYD-4, treatment within riparian habitat that is included within a WLPZ would be limited to no mechanical treatment, no fire ignitions/pile burning and retention of at least 75% surface cover. Pursuant to SPR HYD-3, livestock would be excluded within 50 feet of environmentally sensitive areas such as Class I and II streams or riparian areas during prescribed herbivory treatments using temporary fencing or active herding.

Pursuant to MM BIO-2a, this determination for willow flycatcher and little willow flycatcher must be made in consultation with CDFW. For the reasons summarized above, TCRCD determined that there is currently no suitable habitat for willow flycatcher and little willow flycatcher in Phase I of the project area and that surveys for the Phase II project area are yet to be conducted. TCRCD consulted with CDFW to seek technical input on this determination, as required. On August 18, 2025, TCRCD sent an email to CDFW describing the conditions above to maintain compliance with MM BIO-2a. CDFW responded by email on September 18, 2025 that they are unable to review projects at this time due to staffing issues.

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

Special Status Fish

One special-status fish species may occur within the project area: central California roach. The potential for treatment activities and maintenance treatments to result in adverse effects on special-status fish was examined in the PEIR.

Per SPR BIO-1, if it is determined that adverse effects on special-status fish can be clearly avoided by physically avoiding habitat for these species, then mitigation would not be required. 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. Additionally, pursuant to SPR HYD-3, livestock would be excluded within 50 feet of 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. Adverse effects on special-status fish would be clearly avoided through implementation of these SPRs and further mitigation would not be required.

Habitat function for special-status fish would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat and treatments within WLPZs adjacent to the project area would be limited pursuant to 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). This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Special-Status Bats
Potentially suitable habitat for four special-status bat species – spotted bat (*Euderma maculatum*), pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), and western red bat (*Lasiurus blossevillii*) – is present within the forested habitat, rocky areas, and human-made structures in the project area. Per SPR BIO-1, if it is determined that adverse effects on special-status bats can be clearly avoided by conducting treatments outside of the maternity season, then mitigation would not be required. Adverse effects on special-status bat maternity roosts would be clearly avoided by conducting initial and maintenance treatments outside of the bat maternity season (April 1 - August 31) within suitable habitat. **It is noted that during reconnaissance level surveys in Phase I of the project area, the qualified RPF did not identify suitable habitat for any of the bat species. Phase II of the project area was not able to be fully accessed, thus suitable habitat in Phase II would need to be assessed through reconnaissance level surveys prior to implementation. Based on the results of those surveys, SPR BIO-10 may apply.**

All proposed treatment activities conducted within suitable habitat for bats during the maternity season (April 1 - August 31) could disturb active bat maternity roosts from auditory and visual stimuli or smoke potentially resulting in abandonment of the roost and loss of young. Herbicide treatments 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 1-5 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 PEIR.

If conducting some mechanical treatments, manual treatments, prescribed burning, or prescribed herbivory would occur during April through August, 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, MM BIO-2b for special-status bats would be implemented. Under MM BIO-2b, a no-disturbance buffer of 250 feet would be established around active roosts and no treatments would occur within this buffer in order to provide adequate protection such that impacts would be less than significant under the PEIR (Caltrans 2019).

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” DBH, three to five snags would be retained per acre in areas more than 500 feet from infrastructure and roads, and rocky outcrops, mines, and other human made structures are not targeted for treatment. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Monarch Butterfly
Monarch Butterflies (*Danaus plexippus*) are a candidate for listing under ESA, and as such currently do not have protection under ESA and are considered an “other special-status species” in the PEIR. It is possible, however, that the species will be listed during the life of the project. There are no documented occurrences of breeding monarchs in the project area, but it is likely that there are additional undocumented occurrences of both monarch butterflies and their obligate milkweed plants (*Asclepias* spp.) in the project area. Additionally, there were occurrences of milkwood species noted during reconnaissance level surveys in Phase I of the project area. Given that, it is likely that there are instances of milkweed occurrences on the adjacent Phase II area of the project as well. The project area is outside of the monarch overwintering range (Xerces Society 2019); however it is within the spring and summer breeding and foraging range and contains various natural habitats and floral resources that could likely

provide foraging or breeding habitat suitable for the species. All the proposed initial and maintenance treatment activities could result in the removal of floral resources, including monarch host plants (i.e. milkweed spp.), or direct mortality of monarch butterflies. The potential for treatment activities to result in adverse effects on monarch butterflies was examined in the PEIR.

As noted above, implementation of treatments would not result in the loss of overwintering habitat because the project is outside of the monarchs' overwintering range. Treatments would occur in habitat that may provide foraging or breeding habitat. During the foraging and breeding season, monarchs are typically found in prairies, meadows, grasslands, and along roadsides. In the project area, some foraging and breeding habitat for monarchs may occur in the small grassland inclusions (about 6% of the total project area) and potentially in sunny open areas within the forest land habitat or along roadsides. Most of the woodland habitat does not contain openings or significant light infiltration; thus, high quality habitat for milkweed is not likely present in the forest lands in a majority of the project area. Where conditions are suitable, focused surveys will be conducted to identify any milkweed individuals or populations prior to implementation. If found, milkweed will be flagged and avoided by 10 feet during treatments. Common California milkweed species can also occur in riparian areas and wetlands. Treatments within riparian areas and wetlands would be avoided or limited pursuant to SPRs HYD-3, HYD-4, BIO-4, and MM BIO-4, and milkweed would not be targeted for treatments in these habitats. Where prescribed herbivory occurs for maintenance, any flagged milkweeds will be excluded from grazing when possible.

All treatments are unlikely to have direct impacts on monarch eggs and larvae in the Sierra Nevada ecoregion if management activities are conducted between September 30 and June 1 as recommended by the Xerces Society for Invertebrate Conservation (2019). While treatments would not target and are not expected to remove significant amounts of milkweed plants as those that can be identified prior to treatments will be flagged and avoided, treatments may occur during the monarch breeding season and could result in the loss of monarch eggs and larvae. SPR BIO-10 would apply, and prior to implementation of treatment activities within habitats suitable for milkweeds, focused 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, but identified milkweed would still be flagged and avoided. If monarchs are detected during focused surveys, or are assumed to be present, then MM BIO-2e would be implemented. MM BIO-2e requires that host plants (i.e. native milkweed) be retained and that treatments are conducted in a patchy pattern to retain some floral resources and provide refuge for any butterflies.

Habitat function for monarchs would be maintained because treatment activities and maintenance treatments would not target monarch host plants and prescribed fire and herbivory would reduce encroachment of woody species into grassland inclusions where monarchs are more likely to occur. Because the monarch is a candidate for listing under ESA, the TCRCD contacted USFWS by email on August 18, 2025 to notify USFWS of their proposed avoidance measures and to seek technical assistance on the determinations made above. USFWS responded by email on August 26, 2025 that they were able to review the project documents and have no comments to provide. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Revisions to SPR HYD-3 and BIO-11 and MM BIO-3a

As noted above in Section 1. Proposed Project Revisions, the TCRCD proposes to add language to SPR HYD-3 that enables the project proponent to use virtual fencing as a temporary fencing option. This gives the TCRCD's contractors the ability to utilize emerging technologies and maximize implementing

efficiencies by reducing the need for capacity to install, move, and dismantle temporary fencing or to actively herd livestock. According to a variety of studies, virtual fencing technologies are becoming more common and are seemingly effective at keeping livestock contained to a desired area (Staahltoft et al 2023, Boyd et al 2022, and Silber et al. 2024). This addition to SPR HYD-3 would provide contractors with additional flexibility while still maintaining the overall intent of SPR HYD-3 to maintain water quality protections during prescribed herbivory treatments. Therefore, it is determined that this would not be a substantially more severe significant impact than what was analyzed in the PEIR.

Additionally, the TCRCD proposes to add language to SPR BIO-11 to enable the project proponent to use virtual fencing as a "wildlife friendly" fencing option (see Section 1. Proposed Project Revisions). This gives the TCRCD's contractors the ability to utilize emerging technologies, maximize implementing efficiencies by reducing the need for capacity to install, move, and dismantle temporary fencing, and further ensure the protection of wildlife species. According to a variety of studies, virtual fencing technologies are becoming more common and are seemingly effective at keeping livestock contained to a desired area (Staahltoft et al 2023, Boyd et al 2022, and Silber et al. 2024). Additionally, there is no risk of entanglement and no need for maintenance or increased visibility. This addition to SPR BIO-11 would provide contractors with additional flexibility while still maintaining the overall intent of SPR BIO-11 to ensure the protection of wildlife species in the project area that may encounter prescribed herbivory treatments. Therefore, it is determined that this would not be a substantially more severe significant impact than what was analyzed in the PEIR.

Lastly, the TCRCD proposes to revise MM BIO-3a by adding the exclusion of herbivory from identified areas of oak woodlands that would be especially susceptible to regenerative harm from grazing activities. Pursuant to MM BIO-3a, these areas will be mapped by a qualified RPF, botanist, or CRM who will also review the treatment design to ensure that habitat functions of sensitive natural communities and oak woodlands are not damaged by treatment activities. All other elements of MM BIO-3a would remain the same as presented in the PEIR. This revision is consistent with the purpose of MM BIO-3a and does not involve any changes to the implementation measures required to protect identified sensitive natural communities and oak woodlands. For the reasons described, proposed revisions to MM BIO-3a would not result in a substantially more severe significant effect related to sensitive natural communities and oak woodlands than what was covered in the PEIR.

Conclusion
The potential for treatment activities to result in adverse effects on special-status wildlife was examined in the PEIR. This impact on special-status wildlife is within the scope of the PEIR because the treatment activities and intensity of disturbance are consistent with those analyzed. The SPRs that apply to this impact are AD-1, BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-9, BIO-10, BIO-11, BIO-12, HAZ-5, HAZ-6, HYD-1, HYD-3, HYD-4, and HYD-5. The Mitigation Measures that apply to this impact are BIO-2a, BIO-2b, BIO-2e, BIO-2g, BIO-3a, BIO-3b, BIO-3c, and BIO-4. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

<u>Impact BIO-3</u>
Initial and maintenance vegetation treatments could result in direct or indirect adverse effects on sensitive habitats, including designated sensitive natural communities, oak woodland, chaparral, and riparian habitats. Potential impacts from treatments occurring too frequently during maintenance activities could have additional adverse effects. The potential for treatment activities, including this maintenance, to result in adverse effects on sensitive habitats was examined in the PEIR.

Based on the desktop review of vegetation types present in the project area pursuant to SPR BIO-1, 38 sensitive natural communities or MCV alliances with a rarity rank of S1, S2, or S3 were identified as having potential to occur in the ecoregion and within the project area (Table 2). Of these, only 6 seemed like they had potential to occur within the habitat types of the project area: Bigleaf maple forest and woodland, Tanoak forest, California buckeye groves, Blue wild rye montane meadows, deer grass beds, and Canyon live oak - Interior live oak chaparral. Reconnaissance level surveys in Phase I yielded no initial identification of any of the 5 sensitive natural communities that had potential to occur within the project area. Reconnaissance level surveys were not able to be conducted across Phase II of the project area and will need to be completed prior to implementation. Despite this initial look, inclusions of any of these sensitive natural communities may occur across the project area. As a result, prior to implementation of treatment activities, SPR BIO-3 would be implemented and a qualified RPF or botanist would identify sensitive natural communities in the project area to the alliance level pursuant to *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018).

Table 2. Sensitive Natural Communities/MCV Alliances Analyzed

Sensitive Natural Community	Rarity Rank	CWHR Type	Potential for Occurrence
Forest/Woodland			
Bigleaf maple forest and woodland	S3	Douglas Fir, Montane Hardwood-Conifer, Montane Hardwood	*May occur.* The project area may contain suitable habitat for these species.
Tanoak forest	S3.2	Montane Hardwood	*May occur.* The project area may contain suitable habitat for these species.
Black cottonwood forest and woodland	S3	Montane Riparian, Valley Foothill Riparian	*Not expected to occur.,* The project area does not contain the CWHR type or habitat for these species.
California buckeye groves	S3	Montane Hardwood	*May occur.* The project area may contain the habitat for these species.
Incense cedar forest and woodland	S3	Sierran Mixed Conifer	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Oregon ash groves	S3.2	Montane Riparian, Valley Foothill Riparian	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Ultramafic cypress woodland	S3	Closed-Cone Pine-Cypress	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Valley oak woodland and forest	S3	Valley Oak Woodland	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Valley oak riparian forest and woodland	S3	Valley Oak Woodland	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Goodding's willow - red willow riparian woodland and forest	S3	Desert Riparian, Fresh Emergent Wetland, Valley Foothill Riparian	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
California bay forest and woodland	S3	Coastal Oak Woodland, Montane Hardwood	*Not expected to occur.* The project area does not contain the habitat for these species.

Herbaceous			
Onion - twistflower - dwarf-flax serpentinite rock outcrop	S2S3	Barren	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Water foxtail meadows	S3?	Perennial Grassland, Wet Meadow	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
California pitcher plant fens	S3	Freshwater marsh	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Three-way sedge meadows	S1	Freshwater marsh	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Blue wild rye montane meadows	S3?	Perennial Grassland	*May occur.* The project area may contain suitable habitat for these species.
Jones's sedge turf	S3	Alpine dwarf shrub, Wet Meadow	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Field horsetail - scouringrush horsetail - variegated scouringrush wet meadow	S3S4	Fresh emergent wetland	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Quillwort beds	S3?	Freshwater marsh	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Iris-leaf rush seeps	S2?	Fresh emergent wetland, wet meadow	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Yellow pond-lily mats	S3?	Fresh emergent wetland	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Hardstem and California bulrush marshes	S3S4	Fresh emergent wetland	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Arrowleaf ragwort - white corn lily - monkeyflower mesic meadow	S3S4	Wet Meadow	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Pondweed mats	S3?	Fresh emergent wetland	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Western false asphodel - California bog asphodel fens	S2?	Wet Meadow	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Long-stalk clover meadows	S3?	Wet Meadow	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Torrent sedge patches	S3	Montane Riparian, Valley Foothill Riparian	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Deer grass beds	S2?	Perennial Grassland	*May occur.* The project area may contain suitable habitat for these species.

Needle grass - Melic grass grassland	S3S4	Perennial Grassland	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Coast Range stonecrop draperies	S3	Coastal Scrub	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Shrub			
Green leaf manzanita - Pinemat manzanita chaparral	S3S4	Montane Chaparral	*Not expected to occur.* The project area does not contain the habitat for at least one of these species.
Sugarberry - skunkbush sumac scrub	S1	Desert Riparian, Desert wash	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Red-osier dogwood - interior rose - currant thickets	S3	Montane Riparian, Valley Foothill Riparian	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Wright's buckwheat - Heermann's buckwheat - Utah butterfly-bush scrub	S3	Desert Scrub	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Western Labrador-tea thickets	S2	Montane Riparian	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Bog blueberry wet meadows	S3	Alpin dwarf shrub, Wet Meadow	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Button willow thickets	S2	Valley Foothill Riparian	*Not expected to occur.* The project area does not contain the CWHR type or the habitat for these species.
Canyon live oak - Interior live oak chaparral	S3S4	Mixed Chaparral	*May occur.* The project area does contain suitable habitat for these species.

Additionally, the CWHR data identifies two oak woodland forest types – blue oak woodland and blue oak-foothill pine woodland– within the project area that are classified as sensitive habitats according to the definition of oak and forestland in the Oak Woodlands Conservation Act, Public Resources Code Section 21083.4, and Public Resources Code Section 12220[g] and which provides direction to counties in the event of the conversion of oak woodland (FindLaw 2023a and FindLaw 2023b). According to this data, there are about 26.77 acres of Blue Oak-Foothill Pine woodland in Phase II of the project area and about 27.17 acres of Blue Oak Woodland in both Phase I and Phase II. PRC 21083.4d(3) states that oak conversion on agricultural land that includes land that is used to produce or process plant and animal products for commercial purposes are exempt from this code. For the remaining acres of oak woodland not on agricultural zoned land, oak woodlands will not be converted through the proposed project and will be enhanced by the proposed project. It is estimated the proposed project area currently contains approximately 52% overstory composed of various hardwood and conifer species with only some potential inclusions of areas that meet the definition of oak woodland. Treatment prescriptions will be designed to ensure that the relative percentage of oak canopy will not permanently decrease by prioritizing overstory oak retention and, where appropriate, identifying understory oaks to be retained to enhance overstory canopy position over the long term.

According to the Oak Woodlands Conservation Act, the Sierra Nevada section of oak woodlands are primarily threatened by residential development, agriculture conversion of vineyards, and high fire risk

(CDFW 2001). It is also recognized that oaks are adapted to survive frequent, low intensity ground fires (CDFW 2001, Standiford 1994), with the United States Department of Agriculture estimating California oak woodlands as having an average historical fire return interval of 8-16 years (United States Department of Agriculture (USDA) 2012). The more severe the fire intensity, the more likely it is to have a stand replacing fire with complete oak mortality. In this case, the project area has not seen fire since 1908, meaning that the fire return interval departure (FRID) is greater than 67% as fire has been excluded from the project area for the 117 year duration of the fire record (CalFIRE 2025, Tuolumne County 2024). Conducting treatments in this area and reducing the increasing fuel load will help to reduce some of the wildfire risk in this area that is one of the highest contributors to oak loss in this ecoregion and increase ecosystem resiliency (California Wildfire and Forest Resiliency Task Force 2024). Removal of understory fuels will also reduce competition for regeneration, provide growing space for mature oaks, and protect the trees from stand replacing fires. Due to the dense brush in the understory, it is expected that fires burning under normal conditions would kill mature trees and would be highly resistant to fire control efforts.

Treatment activities are proposed to occur within habitat that has been mapped by CalFIRE's FRAP vegetation layer as blue oak woodland and blue oak-foothill pine. During reconnaissance-level surveys in Phase I and cursory surveys in Phase II, many of these oak woodland areas consisted of primary overstory species of interior live oak, California gray pine, California black oak, valley oak and blue oak which may meet the definition of sensitive habitats in some locations. Qualified RPFs noted that due to the limited acreage of what may be oak woodland and the amount of dense understory vegetation, some treatment through these areas would protect the existing trees from potential future stand replacing fire events. The intent of the proposed project is to retain mature oaks while also mitigating hazardous fuel loading, reducing competition, and creating opportunities for new age classes of oak to be introduced.

As required under SPR BIO-3, areas meeting the definition of oak woodlands within the project area will be identified and mapped by an RPF or qualified botanist prior to treatment activities. If areas meet the definition of oak woodlands, MM BIO-3a would apply in these areas, and a qualified RPF or botanist would determine the natural fire regime, condition class, and fire return interval for each sensitive natural community and oak woodland type present, design treatments to restore the natural fire regime and vegetation condition to maintain or improve habitat function. No fuel breaks are proposed for this project. If habitat function would not be maintained in these sensitive habitats and communities through implementation of MM BIO-3a, then MM BIO-3b and BIO-3c would apply. It is expected, however, that in a majority of the oak woodland in the project area, treatment will be beneficial to the oak woodland as detailed above. In those cases, MM BIO-3a would not apply.

The TCRCD proposes to revise MM BIO-3a by adding the exclusion of herbivory from identified areas of oak woodlands that would be especially susceptible to regenerative harm from grazing activities. Pursuant to MM BIO-3a, these areas will be mapped by a qualified RPF, botanist, or CRM who will also review the treatment design to ensure that habitat functions of sensitive natural communities and oak woodlands are not damaged by treatment activities. All other elements of MM BIO-3a would remain the same as presented in the PEIR. This revision is consistent with the purpose of MM BIO-3a and does not involve any changes to the implementation measures required to protect identified sensitive natural communities and oak woodlands. For the reasons described, proposed revisions to MM BIO-3a would not result in a substantially more severe significant effect related to sensitive natural communities and oak woodlands than what was covered in the PEIR.

Some riparian habitat is also present in the project area that, per SPR BIO-4, will be protected from loss or degradation by designing treatments to minimize impacts on these habitats. Under SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and II streams would be implemented for mechanical

treatments, manual treatments, prescribed burning, and prescribed herbivory which would limit the treatment activity within riparian habitats. Prior to implementation of treatment activities, SPR BIO-3 would need to be implemented to identify and map the extent of riparian habitat within the project area; and per SPR BIO-4, treatments in riparian habitats would retain at least 75% of the overstory and 50% of the understory canopy of native riparian vegetation and would be limited to removal of uncharacteristic fuel loads. Additionally, prior to any treatments in riparian habitat, CDFW would be notified pursuant to California Fish and Game Code 1602, when required.

As described in Table 4 in Attachment B, there are about 2.74 acres in Phase II of the project area only defined in the CWHR classification as Mixed Chaparral. This area was not able to be fully accessed during cursory surveys, but will be visited prior to the implementation of Phase II. On initial observation, it appeared that this area may contain greater than 10% tree cover and was more characteristic of woodland/forest with a dense shrub understory. Pursuant to SPR BIO-3, a qualified RPF or biologist will identify and map chaparral habitat in the project area prior to treatment activities if necessary; and if sensitive natural communities within this chaparral habitat are identified, treatments will be designed to maintain the characteristics and membership rules of any vegetation alliance that is designed as a sensitive natural community. Additionally, SPR BIO-5 requires avoidance of the environmental effects of type conversion within chaparral and that the habitat function of chaparral communities be maintained. The spatial scale within which the effects of type conversion are evaluated for this project comprises the project area and the general composition of vegetation in the surrounding land area. The WUI fuel reduction treatments would not result in type conversion of any chaparral habitat because brush/shrub species will not be eliminated from the project area. Proposed treatments will result in a mosaic landscape with portions of the project area receiving no treatment. This includes maintaining at least 35 percent relative cover of chaparral vegetation and retaining a mix of middle to older aged shrubs to maintain heterogeneity and provide nurse plants for seeding. The proposed treatments are expected to mimic the disturbance from a natural fire regime and make the entire project area more resilient regarding wildland fires. Even in treated areas that receive follow-up maintenance treatments, new age classes of shrub/brush species will occur.

The potential for initial and maintenance treatment activities to result in adverse effects on sensitive habitats, as described above, was examined in the PEIR. The potential impact on sensitive habitats is within the scope of the PEIR because the treatment activities and resulting intensity of disturbance are consistent with those analyzed. The SPRs applicable to this impact are AD-1, BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-7, BIO-9, HYD-4, HYD-5, HAZ-5, and HAZ-6. The Mitigation Measures applicable to this impact are BIO-3a, BIO-3b, and BIO-3c. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Impact BIO-4

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on state or federally protected wetlands. The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the Program EIR.

During the reconnaissance-level surveys (Phase I) and cursory surveys (Phase II) conducted pursuant to SPR BIO-1, several different types of aquatic habitats were observed including creeks of various sizes and ponds. The National Wetland Inventory of the project area includes approximately 4.79 acres of riverine habitat, 0.587 acres of freshwater pond, and 1.292 acres of freshwater forested/shrub wetland (Table 4 in Attachment B); however, it is very likely that this is an over or undercalculation of the amount of wetland habitat present in the project area because many aquatic and herbaceous wetland habitats, including seasonal streams and wetlands, are often too small or obstructed from aerial or satellite view by overstory vegetation.

Pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented, and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV streams within the project area for mechanical treatments, manual treatments, prescribed burning, herbicide application, and prescribed herbivory. In addition, prescribed herbivory treatments would be excluded within 50 feet of environmentally sensitive areas such as waterbodies, wetlands, or riparian areas using temporary fencing or active herding, pursuant to SPR HYD-3.

Additional wetlands may be present throughout the project area that have not been identified or mapped as well as ponds smaller than 1 acre. MM BIO-4 would apply for all treatment activities, and a qualified RPF or biologist would delineate the boundaries of these features; establish an appropriate buffer (with a minimum of 25 feet) around seasonal wetlands, springs, seeps, and other wetlands; and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). 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., California red-legged frog, northwestern pond turtle; see Impact BIO-2).

The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the PEIR. This impact on wetlands is within the scope of the PEIR because the treatment activities and the protection measures applied are of the same type and duration as those analyzed in the PEIR. The SPRs that apply to this impact are AD-1, BIO-1, BIO-4, HYD-1, HYD-3 and HYD-4. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Impact BIO-5

Initial and maintenance vegetation treatment activities could result in direct or indirect adverse effects on wildlife movement corridors and nurseries. The potential for treatments to result in adverse effects on wildlife movement corridors and nurseries was examined in the PEIR.

Based on desktop review and reconnaissance level and cursory surveys of the project specific biological resources (SPR BIO-1), there are no mapped Essential Connectivity Areas (ds620) or Natural Landscape Blocks (ds621) within the project area (CDFW 2025a). However, the project area does contain natural habitat for species and is likely used as a wildlife movement corridor to some degree.

WUI fuel reduction treatments will occur near existing roads and residences. The size and traffic level of the roads and the level of development within residential areas varies, but these areas are generally subject to ongoing disturbances and habitat fragmentation due to historical development. While habitat directly adjacent to this development would not be considered optimal habitat, wildlife may move through these areas or use some habitats for cover or as nursery sites, especially in the relatively undeveloped portions of the project area.

Additionally, pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to Class I and Class II streams would be implemented, which would limit the extent of treatment activities within riparian habitat – retaining at least 75% surface cover – that would likely function as a wildlife movement corridor. Within WLPZs, removal of understory vegetation would occur in a mosaic pattern, where some herbaceous understory remained, such that cover is still available for amphibians with a minimum retention of 10% 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. If during surveys conducted pursuant to SPR BIO-10 wildlife nursery sites are detected, MM 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 RPF or biologist. Trees larger than 12”

DBH would be retained and pursuant to SPRs BIO-3, BIO-4, and BIO-5, treatments in sensitive natural communities, riparian habitat, and chaparral habitat respectively would be designed to maintain habitat function of these communities. Implementation of proposed treatments would not result in any conversion of land cover or create new barriers to wildlife movements within (locally) or across (regionally) the project area. With implementation of SPRs, habitat function within the project area would be maintained and there would not be a substantial change in the existing conditions that facilitate wildlife movement in the project area.

The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the PEIR. This impact is within the scope of the PEIR because the treatment activities and extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed. The SPRs applicable to this impact are AD-1, BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-10, BIO-11, BIO-12, HYD-1, and HYD-4. MM BIO-5 applies to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Impact BIO-6

Initial and maintenance treatment activities could result in direct or indirect adverse effects resulting in the reduction of habitat or abundance of common wildlife, including nesting birds, because nesting habitat is present throughout the project area. All treatment activities conducted during the nesting bird season (February 1-August 31) could result in direct loss of active nests or disturbance to active nests from auditory and visual stimuli 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 will be conducted within the project area by a qualified RPF or biologist prior to treatment activities. If no active bird nests are observed during focused surveys, then additional mitigation would not be required. If active nests of common birds or raptors are observed during focused surveys, disturbance to nests will be avoided by establishing an appropriate buffer around the nests, modifying treatments to avoid disturbance to the nests, or deferring treatment until the nests are no longer active as determined by a qualified RPF or biologist.

While treatment activities would remove vegetation and alter habitat structure in some locations 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 and SPRs. The potential for treatment activities to result in adverse effects on these resources was examined in the PEIR and their potential impact is within the scope of the PEIR because the treatment activities and the extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed. The SPRs applicable to this impact are AD-1, BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and BIO-12. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Impact BIO-7

The only additional applicable local ordinance relevant to biological resources is in Tuolumne County Ordinance 2903 chapter 9.24 related to oak woodland conservation (Tuolumne County 2008, Tuolumne County 2018). This ordinance states that in Tuolumne County landowners are discouraged from the premature removal of oak resources. The ordinance does note, however, that the removal of oaks in conduction with plans approved by the California Department of Forestry and Fire Protection are exempt from this ordinance. There would be no conflict with local ordinances as a result of implementation of treatment activities.

The potential for treatment activities to result in conflicts with local policies or ordinances was

examined in the PEIR. The potential for the treatment project to conflict with local policies is within the scope of the PEIR because vegetation treatment projects implemented under the CalVTP that are subject to local policies or ordinances would be required to comply with any applicable county, city, or other local policies, ordinances, and permitting procedures related to the protection of biological resources, per SPR AD-3. The SPRs applicable to this impact are AD-1, AD-3, BIO-1, and BIO-3. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Impact BIO-8

Implementation of the proposed vegetation treatment activities would not result in a conflict with any adopted or planned Habitat Conservation Plans (HCP) or Natural Community Conservation Plans (NCCP) because there are currently no HCPs or NCCPs that have been adopted or are being planned as of the writing of this document that overlap the proposed project area (CDFW 2023b). The potential for treatment activities to conflict with an adopted HCP or NCCP was examined in the PEIR. The impact of the proposed project area conflicting with an HCP or NCCP is within the scope of the PEIR because it does not overlap any and therefore does not conflict. The SPRs applicable to this impact are AD-1 and AD-3. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

New Biological Resource Impacts

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the final CalVTP PEIR (refer to PEIR Section 3.2.1, “Environmental Setting,” and Section 3.2.2, “Regulatory Setting,” in Volume II). No changed circumstances are present. Therefore, no new impact related to biological resources would occur.

Geology, Soils, Paleontology, and Mineral Resources

Impact in the PEIR	Project-Specific Checklist

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	LTS	Impact GEO-1, pp. 3.7-26 – 3.7-29	Yes	GEO-1 GEO-2 GEO-3 GEO-4 GEO-5 GEO-6 GEO-7 GEO-8 AQ-3 AQ-4 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	AQ-3 GEO-1 GEO-3 GEO-4 GEO-7 GEO-8	NA	LTS	No	Yes

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

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

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

Discussion

The project area is located in the Sierra Nevada geomorphic province. The high topographic relief of the Sierra Nevada province, along with the most productive soils, is subject to more shallow-seated landslides which typically occur on slopes greater than 65% and in steep convergent areas. The Sierra Nevada geomorphic province, especially the western slope, is one of the most susceptible to erosion.

The project area is located along the western slope of the Sierra Nevada province. Soils throughout the project area are predominantly alfisols – mesic and thermic Ultic Haploxeralfs – generally moderately deep, well drained soils (USDA 2025). Slopes in the project area are generally gradual, but can vary between less than 10% to over 50%.

Impact GEO-1

WUI Fuel Reduction may include the use of mechanical, manual, prescribed burning, prescribed herbivory, and herbicide application treatments. These activities could result in varying levels of soil

disturbance and vegetation removal, both with the potential to increase the rates of erosion and loss of topsoil. The use of heavy machinery during mechanical treatments is the most likely activity to cause soil disturbance that could lead to substantial erosion or loss of topsoil, especially in areas with steep slopes. The potential impacts of these activities fall within the analysis of the PEIR because the use and type of equipment, extent of vegetation removal, and intensity of prescribed burning are consistent with those examined in the PEIR.

As described above in Section 1. Proposed Project Revisions, the TCRCD proposes to revise the language in SPR GEO-1 to suspend mechanical treatments and prescribed herbivory if: 1) soils are saturated, and/or 2) soils are wet enough to be compacted by mechanical activities. This proposed revision is not in regards to herbicide application. Herbicide application will be applied according to the specifications in SPR HYD-5. Activities that cause mechanical disturbance may resume when soils are no longer saturated. In the region where the project is located, forecasts often include a chance of rain but that precipitation sometimes does not materialize. Additionally, in the area where the project is located, occasional limited precipitation occurs across the operating season but would not warrant a full stop of activities when the soil and environmental conditions can absorb precipitation without mechanical activities impacting the soil. Therefore, suspension of treatment activities when there is a chance of rain or limited precipitation that does not impact erosion or compaction potential could result in unnecessary loss of work time and high mobilization costs for removing equipment and/or livestock. The project proponent would be prepared to suspend all mechanical activities in the event that sufficient active precipitation creates saturated soils or soils wet enough to be compacted by mechanical activities. Indicators of saturated soil conditions that the project proponent may use to suspend treatment activities 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. Suspending soil disturbance activities during precipitation events that saturate soils will still minimize the risk of soil compaction and erosion potential. The SPR as revised would not result in any new or substantially more severe significant impacts related to erosion. This revision is consistent with the purpose of SPR GEO-1 to suspend disturbance during heavy precipitation to minimize the risk of soil compaction and disturbance.

Additionally, the TCRCD proposes to revise the language under SPR GEO-3 to stabilize bare soils disturbed by treatments within WLPZs, equipment limitation zones, or in other areas deemed necessary by a qualified RPF. The SPR as written could require that soil stabilization occur in many areas where runoff and sediment discharge would not result in environmental impacts making the treatments unnecessarily costly and more time consuming. Soils will be stabilized in areas where runoff and sediment discharge have the potential to occur, and only ground into the soil where appropriate as determined by a qualified RPF. As such, this revision would still meet the purpose of SPR GEO-3 and would not result in any new or substantially more severe significant impacts related to runoff or sediment discharge.

Finally, as noted in Section 1. Proposed Project Revisions, the TCRCD proposes to add language to SPR HYD-3 that enables the project proponent to use virtual fencing as a temporary fencing option. This gives the TCRCD's contractors the ability to utilize emerging technologies and maximize implementing efficiencies by reducing the need for capacity to install, move, and dismantle temporary fencing or to actively herd livestock. According to a variety of studies, virtual fencing technologies are becoming more common and are seemingly effective at keeping livestock contained to a desired area (Staahltoft et al 2023, Boyd et al 2022, and Silber et al. 2024). This addition to SPR HYD-3 would provide contractors with additional flexibility while still maintaining the overall intent of SPR HYD-3 to maintain water quality protections during prescribed herbivory treatments. Therefore, it is determined

that this would not be a substantially more severe significant impact than what was analyzed in the PEIR. SPRs applicable to this impact are GEO-1, GEO-2, GEO-3, GEO-4, GEO-5, GEO-6, GEO-7, GEO-8, AQ-3, AQ-4, HYD-3 and HYD-4. This determination, including revisions to SPR GEO-1 and GEO-3, is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact GEO-2

The Summerville initial and maintenance treatment activities may include mechanical treatment, manual treatment, prescribed burning, prescribed herbivory, and herbicide application. No areas with known landslide activity have been identified within the project area. Along roadways, small slip outs and slumps may be relatively common during severe winter storms. However, given the variable topography in some of the treatment area, the occasional steep terrain, and wet winter conditions, there is the potential for landslides due to these treatment activities. The potential for treatment activities to increase landslide risk was examined in the PEIR, and this impact is within the scope because the extent of vegetation removal, intensity of prescribed burning, and characteristics of the geographical terrain are consistent with those analyzed in the PEIR.

As described above and in Section 1. Proposed Project Revisions, the TCRCD proposes to revise the language in SPR GEO-3 to stabilize bare soils disturbed by treatments within WLPZs, equipment limitation zones, and other areas deemed necessary by a qualified RPF. The SPR as written could require that soil stabilization occur in many areas where runoff and sediment discharge would not result in environmental impacts making the treatments unnecessarily costly and more time consuming. Soils will be stabilized in areas where runoff and sediment discharge have the potential to occur. As such, this revision would still meet the purpose of SPR GEO-3 and would not result in any new or substantially more severe significant impacts related to runoff or sediment discharge. For these reasons, the proposed revisions to SPR GEO-3 would not result in substantial erosion, loss of topsoil or increased risk of landslides. Thus, there would not be a substantially more severe significant impact than what was analyzed in the PEIR. SPRs applicable to this impact are AQ-3, GEO-1, GEO-3, GEO-4, GEO-7, and GEO-8. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered.

New Geology, Soils, Paleontology, and Mineral Resource Impacts

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the final CalVTP PEIR (refer to PEIR Section 3.2.1, “Environmental Setting,” and Section 3.2.2, “Regulatory Setting,” in Volume II). No changed circumstances are present. Therefore, no new impact related to geology, soils, paleontology, or mineral resources would occur.

Greenhouse Gas Emissions

Impact in the PEIR	Project-Specific Checklist

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs	LTS	Impact GHG-1, pp. 3.8-10 – 3.8-11	Yes	None	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	AQ-3	GHG-2	PSU	No	Yes

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

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

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

Discussion

Impact GHG-1

For all initial and maintenance treatment activities proposed for the Summerville project a use of vehicles and/or mechanical equipment is required and this use will result in greenhouse gas (GHG) emissions. However, consistency of these treatments with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the PEIR. While it is accepted that GHG emissions will occur from equipment and vehicles used to implement treatments, the purpose of the proposed project is to reduce wildfire risk which in turn could reduce GHG emissions and increase carbon sequestration over the long term. This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment, duration of use, and resultant GHG emissions, are consistent with those analyzed in the PEIR. SPR GHG-1 is not applicable to the proposed project because the TCRCD is not subject to the reporting requirements under the Board of Forestry and Fire Protection's Assembly Bill 1504 Carbon Inventory Process because this project is not a registered offset project. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact GHG-2

For all initial and maintenance treatment activities proposed for the project a use of vehicles and/or mechanical equipment is required and this use will result in GHG emissions. The potential for these emissions was analyzed in the PEIR and found to be significant and unavoidable even after the application of MM GHG-2 because of the infeasibility of implementing specific emission reduction

techniques and the uncertainties associated with all the parameters and objectives of prescribed burning. Emissions generated by the proposed treatments will still contribute to the annual emissions generated by the CalVTP. This impact is within the scope of the PEIR because the proposed activities, equipment types, duration of equipment use, and intention of treatment to reduce wildfire risk and the GHG emissions associated with wildfires are consistent with those examined in the PEIR. The SPR applicable to this impact is AQ-3 which would contain the description of feasible GHG reduction techniques implemented per MM GHG-2. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Impacts Related to GHG Emissions

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the final CalVTP PEIR (refer to PEIR Section 3.2.1, “Environmental Setting,” and Section 3.2.2, “Regulatory Setting,” in Volume II). No changed circumstances are present. Therefore, no new impact related to GHG emissions would occur.

Energy Resources

Impact in the PEIR	Project-Specific Checklist

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

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

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

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

Discussion

Impact ENG-1

The use of mechanical equipment, vehicles, and some manual equipment is necessary to conduct the suite of proposed initial and maintenance treatment activities. This use will result in the consumption of energy through the combustion of fossil fuels. This use of fossil fuels and subsequent energy consumption during implementation was examined in the PEIR, and the impact is within the scope of the PEIR because the types of activities and equipment and duration of use is consistent with those analyzed. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more significant impact than covered in the PEIR.

New Energy Resource Impacts

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the final CalVTP PEIR (refer to PEIR Section 3.2.1, “Environmental Setting,” and Section 3.2.2, “Regulatory Setting,” in Volume II). No changed circumstances are present. Therefore, no new impact related to energy resources would occur.

Hazardous Materials, Public Health and Safety

Impact in the PEIR	Project-Specific Checklist

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials	LTS	Impact HAZ-1, pp. 3.10-14 – 3.10-15	Yes	HYD-4 HAZ-1	NA	LTS	No	Yes
Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	LTS	Impact HAZ-2, pp. 3.10-15 – 3.10-18	Yes	HYD-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	PS	Impact HAZ-3, pp. 3.10-18 – 3.10-19	Yes	NA	HAZ-3	LTSM	No	Yes

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

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

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

Discussion

Impact HAZ-1

Initial and maintenance treatment activities may include the use of mechanical, manual, prescribed herbivory and prescribed burning which all would require some use of hazardous materials in the form of fuels and related accelerants. The potential for the treatment activities to cause a significant health hazard from the use of hazardous materials was examined in the PEIR and this impact is within the scope of the PEIR because the types of treatments, associated equipment, and hazardous materials are consistent with those analyzed in the PEIR. SPRs HYD-4 and HAZ-1 are applicable to this impact.

Additionally, the TCRCD proposes to revise the language in SPR HAZ-1 such that any equipment found to be leaking may be addressed promptly on site rather than completely removing the equipment from the treatment area. All other elements of SPR HAZ-1 would remain the same as presented in the PEIR. This revision is consistent with the intent of SPR HAZ-1 to minimize hazardous material releases in the treatment area from equipment use, and would allow the TCRCD's contractors to fix equipment promptly on site if feasible. If infeasible, the equipment will be promptly removed from the treatment area. For the reasons described above and in Section 1. Proposed Project Revisions, the proposed

modification to SPR HAZ-1 would not result in substantially more severe significant effects than what was covered in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact HAZ-2

Initial and maintenance treatments may include the application of herbicides using ground-based methods, such as with a backpack sprayer. No aerial spraying of herbicides will occur. The potential for herbicide application to cause a significant health hazard from their use was examined in the PEIR. The impact is within the scope of the PEIR because the herbicides proposed and application methods that would be used are consistent with those analyzed in the PEIR. In addition, herbicides would be applied by licensed applicators in compliance with applicable laws, regulations and herbicide label instructions, consistent with the herbicide use described in the PEIR. SPRs applicable to this impact are HYD-4, HAZ-5, HAZ-6, HAZ-7, HAZ-8, and HAZ-9. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact HAZ-3

Mechanical and prescribed burning treatment activities may include soil disturbance which could expose workers or the environment to hazardous materials if a contaminated site is present within the project area. The potential for workers to encounter contamination that could expose them or the environment to hazardous materials was examined in the PEIR. This impact was identified as potentially significant because hazardous material sites could be present within the treatment area and soil disturbance and burning in those areas could expose people or the environment to hazards. By implementing MM HAZ-3, landowner coordination and database searches for hazardous material sites within the project area have been (Phase I) or will be conducted (Phase II) prior to treatment activities. In both Phase I and Phase II of the project area, there are only two documented sites and they have been closed in the project area as of 2000 and 2011 (Summerville High School - T0610993674 and Summerville High School - 55820001) according to the California Environmental Protection Agency and California Department of Toxic Substances Control. Given that the historic concerns for these sites have been closed and there has been no other hazardous site disclosures, no exposure-related risks to the public or environment associated with disturbance will occur in Phase I of the project area. Once funding has been secured for Phase II, landowner coordination will occur to assess for other potential hazardous material sites in Phase II. It is not expected that this will yield any additional site occurrences, but if a site should be identified in Phase II of the project area, MM HAZ-3 will be implemented to avoid the site. No SPRs are applicable to this impact. MM HAZ-3 applies to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

New Hazardous Materials, Public Health and Safety Impacts

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the final CalVTP PEIR (refer to PEIR Section 3.2.1, “Environmental Setting,” and Section 3.2.2, “Regulatory Setting,” in Volume II). No changed circumstances are present. Therefore, no new impact related to hazardous materials, public health, or safety would occur.

Hydrology and Water Quality

Impact in the PEIR	Project-Specific Checklist

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

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
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				HAZ-6 HAZ-7				
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-31	Yes	HYD-1 HYD-2 HYD-3 HYD-4 HYD-6 GEO-1 GEO-5	NA	LTS	No	Yes

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

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

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

Discussion

The project area is in the San Joaquin River hydrologic region and is located in the larger Upper Tuolumne watershed and smaller Turnback Creek watershed (CDFW 2025a; California State Water Resources Control Board (CSWRCB) 2025). Significant hydrologic features in the project area include but are not limited to Turnback Creek and several retention ponds. Numerous intermittent and ephemeral drainages may also be scattered throughout the project area.

Several of the impacts below evaluate compliance with water quality standards or waste discharge requirements. All include implementation of SPR HYD-1, which requires compliance with such water quality regulations. The California State Water Resources Control Board is requiring all projects using the CalVTP PEIR to follow the requirements of their Vegetation Treatment General Order, which would meet the requirements of SPR HYD-1.

<u>Impact HYD-1</u>

Initial and maintenance treatments may include prescribed burning. As a result, ash and debris from the treatment area could be washed by runoff into adjacent drainages and streams. Prescribed burning would only occur outside of WLPZs, and WLPZs ranging from 50 to 150 feet would be implemented for Class I and II streams or lakes that are within the treatment areas (SPR HYD-4). WLPZs will also be identified and implemented for Class III and IV watercourses based on a size sufficient enough to prevent the degradation of downstream beneficial uses of water. The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the PEIR.

This impact is within the scope of the PEIR because the parameters of prescribed burning and associated impacts to water quality are consistent with those analyzed. SPRs applicable to this treatment are AQ-3, GEO-4, GEO-5, GEO-6, HYD-1, HYD-4, HYD-6, BIO-4 and BIO-5. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact HYD-2

Initial and maintenance treatments would include manual and mechanical treatment activities. Pursuant to SPR HYD-4, treatment areas would avoid streams and watercourses. The potential for mechanical and manual treatments to violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR because types of equipment and their use, extent of vegetation removal, and intensity of proposed mechanical treatments are consistent with those analyzed.

As described above in Section 1. Proposed Project Revisions, the TCRCD proposes to revise the language in SPR GEO-1 to suspend mechanical treatments and prescribed herbivory if: 1) soils are saturated, and/or 2) soils are wet enough to be compacted by mechanical activities. This proposed revision is not in regards to herbicide application. Herbicide application will be applied according to the specifications in SPR HYD-5. Activities that cause mechanical disturbance may resume when soils are no longer saturated. In the region where the project is located, forecasts often include a chance of rain but that precipitation sometimes does not materialize. Additionally, in the area where the project is located, occasional limited precipitation occurs across the operating season but would not warrant a full stop of activities when the soil and environmental conditions can absorb precipitation without mechanical activities impacting the soil. Therefore, suspension of treatment activities when there is a chance of rain or limited precipitation that does not impact erosion or compaction potential could result in unnecessary loss of work time and high mobilization costs for removing equipment and/or livestock. The project proponent would be prepared to suspend all mechanical activities in the event that sufficient active precipitation creates saturated soils or soils wet enough to be compacted by mechanical activities. Indicators of saturated soil conditions that the project proponent may use to suspend treatment activities 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. Suspending soil disturbance activities during precipitation events that saturate soils will still minimize the risk of soil compaction and erosion potential. The SPR as revised would not result in any new or substantially more severe significant impacts related to erosion. This revision is consistent with the purpose of SPR GEO-1 to suspend disturbance during heavy precipitation to minimize the risk of soil compaction and disturbance.

The TCRCD proposes to revise the language under SPR GEO-3 to stabilize bare soils disturbed by treatments within WLPZs, equipment limitation zones, or in other areas deemed necessary by a qualified RPF. The SPR as written could require that soil stabilization occur in many areas where runoff and sediment discharge would not result in environmental impacts making the treatments unnecessarily costly and more time consuming. Soils will be stabilized in areas where runoff and sediment discharge have the potential to occur. As such, this revision would still meet the purpose of SPR GEO-3 and would not result in any new or substantially more severe significant impacts related to runoff or sediment discharge and water quality degradation.

Finally, the TCRCD proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on-site. All other elements of SPR HAZ-1 would remain the same as presented in the PEIR. 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 TCRCD's contractors to

stabilize and fix leaking equipment promptly on-site, if feasible, otherwise the equipment would be promptly removed. For the reasons described, proposed revisions to HAZ-1 would not result in a substantially more severe significant effect related to degradation of water quality from manual and mechanical treatment activities than what was covered in the PEIR.

SPRs applicable to this impact are HYD-1, HYD-2, HYD-4, HYD-6, BIO-1, BIO-4, BIO-5, GEO-1, GEO-2, GEO-3, GEO-4, GEO-5, GEO-7, GEO-8, and HAZ-1. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact HYD-3

Prescribed herbivory may be a maintenance treatment activity for the Summerville project. Prescribed herbivory has the potential to impact environmentally sensitive areas such as waterbodies, wetlands, or riparian areas, if those areas are not identified and livestock is not excluded from those areas. Pursuant to SPR HYD-3 and HYD-4, environmentally sensitive areas and WLPZs will be identified and protected during implementation. The potential for prescribed herbivory to violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR because the use of grazing animals and the grazing intensity to manage and remove vegetation are consistent with those analyzed.

As described above in Section 1. Proposed Project Revisions, the TCRCD proposes to revise the language in SPR GEO-1 to suspend mechanical treatments and prescribed herbivory if: 1) soils are saturated, and/or 2) soils are wet enough to be compacted by mechanical activities. This proposed revision is not in regards to herbicide application. Herbicide application will be applied according to the specifications in SPR HYD-5. Activities that cause mechanical disturbance may resume when soils are no longer saturated. In the region where the project is located, forecasts often include a chance of rain but that precipitation sometimes does not materialize. Additionally, in the area where the project is located, occasional limited precipitation occurs across the operating season but would not warrant a full stop of activities when the soil and environmental conditions can absorb precipitation without mechanical activities impacting the soil. Therefore, suspension of treatment activities when there is a chance of rain or limited precipitation that does not impact erosion or compaction potential could result in unnecessary loss of work time and high mobilization costs for removing equipment and/or livestock. The project proponent would be prepared to suspend all mechanical activities in the event that sufficient active precipitation creates saturated soils or soils wet enough to be compacted by mechanical activities. Indicators of saturated soil conditions that the project proponent may use to suspend treatment activities 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. Suspending soil disturbance activities during precipitation events that saturate soils will still minimize the risk of soil compaction and erosion potential. The SPR as revised would not result in any new or substantially more severe significant impacts related to erosion. This revision is consistent with the purpose of SPR GEO-1 to suspend disturbance during heavy precipitation to minimize the risk of soil compaction and disturbance.

Additionally, the TCRCD proposes to revise the language under SPR GEO-3 to stabilize bare soils disturbed by treatments within WLPZs, equipment limitation zones, or in other areas deemed necessary by a qualified RPF. The SPR as written could require that soil stabilization occur in many areas where runoff and sediment discharge would not result in environmental impacts making the treatments unnecessarily costly and more time consuming. Soils will be stabilized in areas where runoff and sediment discharge have the potential to occur. As such, this revision would still meet the purpose of

SPR GEO-3 and would not result in any new or substantially more severe significant impacts related to runoff or sediment discharge and water quality degradation.

Finally, as noted in Section 1. Proposed Project Revisions, the TCRCD proposes to add language to SPR HYD-3 that enables the project proponent to use virtual fencing as a temporary fencing option. This gives the TCRCD's contractors the ability to utilize emerging technologies and maximize implementing efficiencies by reducing the need for capacity to install, move, and dismantle temporary fencing or to actively herd livestock. According to a variety of studies, virtual fencing technologies are becoming more common and are seemingly effective at keeping livestock contained to a desired area (Staahltoft et al 2023, Boyd et al 2022, and Silber et al. 2024). This addition to SPR HYD-3 would provide contractors with additional flexibility while still maintaining the overall intent of SPR HYD-3 to maintain water quality protections during prescribed herbivory treatments. Therefore, it is determined that this would not be a substantially more severe significant impact than what was analyzed in the PEIR.

The SPRs applicable to this impact are HYD-3, GEO-1, GEO-3, GEO-4, and GEO-7. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact HYD-4

Initial and maintenance activities in the project may include the ground based application of herbicides in order to control resprouting vegetation that may compromise the integrity of reduced fuel connectivity adjacent to sensitive infrastructure and communities. All herbicide applications would comply with the California Environmental Protection Agency and California Department of Pesticide Regulation labeling requirements. The potential use of herbicides to violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR because the use of herbicides to remove vegetation and associated impacts to water quality are consistent with those analyzed. The SPRs applicable to this impact are HYD-1, HYD-5, BIO-4, HAZ-5, HAZ-6, and HAZ-7. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact HYD-5

Initial and maintenance treatment activities could cause ground disturbance and erosion which could directly or indirectly modify existing drainage patterns. The potential for treatment activities to substantially alter the existing drainage pattern of a project area was examined in the PEIR. This impact on site drainage is within the scope of the PEIR because the type, duration, and intensity of mechanical and manual treatments and prescribed herbivory treatment activities are consistent with those analyzed in the PEIR.

As described above in Section 1. Proposed Project Revisions, the TCRCD proposes to revise the language in SPR GEO-1 to suspend mechanical treatments and prescribed herbivory if: 1) soils are saturated, and/or 2) soils are wet enough to be compacted by mechanical activities. This proposed revision is not in regards to herbicide application. Herbicide application will be applied according to the specifications in SPR HYD-5. Activities that cause mechanical disturbance may resume when soils are no longer saturated. In the region where the project is located, forecasts often include a chance of rain but that precipitation sometimes does not materialize. Additionally, in the area where the project is located, occasional limited precipitation occurs across the operating season but would not warrant a full stop of activities when the soil and environmental conditions can absorb precipitation without mechanical activities impacting the soil. Therefore, suspension of treatment activities when there is a chance of rain or limited precipitation that does not impact erosion or compaction potential could result in unnecessary loss of work time and high mobilization costs for removing equipment and/or livestock.

The project proponent would be prepared to suspend all mechanical activities in the event that sufficient active precipitation creates saturated soils or soils wet enough to be compacted by mechanical activities. Indicators of saturated soil conditions that the project proponent may use to suspend treatment activities 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. Suspending soil disturbance activities during precipitation events that saturate soils will still minimize the risk of soil compaction and erosion potential. The SPR as revised would not result in any new or substantially more severe significant impacts related to erosion. This revision is consistent with the purpose of SPR GEO-1 to suspend disturbance during heavy precipitation to minimize the risk of soil compaction and disturbance.

The SPRs applicable to this treatment are HYD-1, HYD-2, HYD-3, HYD-4, HYD-6, GEO-1 and GEO-5. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

New Hydrology and Water Quality Impacts

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the final CalVTP PEIR (refer to PEIR Section 3.2.1, “Environmental Setting,” and Section 3.2.2, “Regulatory Setting,” in Volume II). No changed circumstances are present. Therefore, no new impact related to hydrology and water quality would occur.

Land Use and Planning, Population and Housing

Impact in the PEIR	Project-Specific Checklist

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

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

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

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

Discussion

Impact LU-1

Initial and maintenance treatment activities would occur on parcels in Tuolumne County that are primarily owned by private parties. The land use in this area is zoned mostly agriculture (grazing), public (the school property) and rural/estate residential development (Tuolumne County 2025, California Department of Conservation 2022). The project is intended to protect people, houses, and communities from destructive wildfire. The treatment activities proposed are consistent with Tuolumne County's Hazardous Vegetation Management Ordinance (Tuolumne County 2022). The potential for vegetation treatment activities to cause a significant environmental impact due to a conflict with a land use plan, policy or regulation was examined in the PEIR. This impact is within the scope of the PEIR because the treatment types and activities are consistent with those analyzed in the PEIR. No conflict would occur because of the adherence to SPR AD-3. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

Impact LU-2

The potential for initial and maintenance treatment activities to result in substantial unplanned population growth as a result of increases in demand for employees was examined in the PEIR. Impacts associated with short term increases in the demand for labor during implementation are within the scope of the PEIR because the number of workers required for implementation is consistent with the crew sizes analyzed in the PEIR for the types of treatment proposed. Implementation of treatments would require between 1 and 60 crew members depending on the treatment, along with their associated

vehicles to travel to and from the project area. Typically, crews would consist of 2 to 10 people, with up to 5 crews conducting treatments simultaneously throughout the project area. In addition, the project planning work (i.e surveys for different resources) is currently being conducted by qualified RPFs who live in Tuolumne County, and local contractors will be given preference over other bidders for the vegetation management work. In the future, new position(s) could be created to assist with implementation, but positions would be few in number compared to the current population in the area and therefore would be consistent with the PEIR. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more significant impact.

New Land Use and Planning, Population and Housing Impacts

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the final CalVTP PEIR (refer to PEIR Section 3.2.1, “Environmental Setting,” and Section 3.2.2, “Regulatory Setting,” in Volume II). No changed circumstances are present. Therefore, no new impact related to land use and planning would occur.

Noise

Impact in the PEIR	Project-Specific Checklist

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

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

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

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

Discussion

Impact NOI-1

Initial and maintenance treatments would include the use of heavy, noise generating equipment. Manual, mechanical, and prescribed burning treatment activities that may include chipping, masticating, and pile burning could occur adjacent to sensitive land uses thus temporarily exposing those receptors to noise levels that exceed local standards. The potential for a substantial short-term increase in ambient noise levels from the use of heavy equipment was examined in the PEIR. This impact is within the scope of the PEIR because the number, type, and duration of use of different equipment are consistent with those analyzed in the PEIR. The use would be temporary and sporadic, and would not include the use of helicopters.

Tuolumne County currently does not have a Noise Ordinance and as such this project is designed to adhere to the working hours outlined in SPR NOI-1. As discussed in the PEIR, noise levels generated by individual equipment range from 75 to 87.9 dB at 50 feet from the noise source with the loudest equipment that would be used in this project being chainsaws and large equipment like dozers and excavators. Simultaneously used, the combined noise level for mechanical, manual, and prescribed burning activities if the loudest equipment was all operated together is very similar for all of the treatments. Though multiple types of this heavy equipment will be used simultaneously for this project, they would typically be spread out (i.e. usually more than 100 feet apart) across the 1,067 acre project

area. This is particularly true of the larger equipment - like masticators - that have a certain safe operational radius. This dispersal across the project area would limit any short term noise increases at any one sensitive receptor. For any sensitive receptors that are within 1,500 feet of the treatment area, they will be notified about the work prior to implementation starting pursuant to NOI-6. Additionally, for any future maintenance done on or immediately adjacent to the Summerville High School property, treatment activities will be designed to occur when students and staff are not present on campus, such as on weekends, holidays, or during the summer season (if weather permits). The SPRs applicable to this impact are AD-3, NOI-1, NOI-2, NOI-3, NOI-4, NOI-5, and NOI-6. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered.

Impact NOI-2

Initial and maintenance treatment activities will require the use of large trucks hauling heavy equipment and/or livestock into the project area. This hauling would occur on private and public roadways in the project area and as such these trips would pass by residential receptors and the event of each truck passing could increase the Single-Event Noise Level (SENL). The potential for a substantial short-term increase in SENL was examined in the PEIR. This impact is within the scope of the PEIR because the number and types of equipment proposed and equipment use being limited to daytime hours (NOI-1) are consistent with those analyzed in the PEIR. The SPRs that are applicable to this impact are NOI-1. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

New Noise Impacts

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the final CalVTP PEIR (refer to PEIR Section 3.2.1, “Environmental Setting,” and Section 3.2.2, “Regulatory Setting,” in Volume II). No changed circumstances are present. Therefore, no new impact related to noise would occur.

Recreation

Impact in the PEIR	Project-Specific Checklist

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

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

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

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

Discussion

The only public/potentially recreational facility within the project area is Summerville High School. The school ground facilities such as the baseball field and track can be used on the weekends by the public. Adjacent to the eastern boundary of the project area is land zoned for Parks and Recreation and Open Space which eventually backs up to Tuolumne Memorial Park. Additionally, the project is located some distance west of the Westside Pavilion event center.

Impact REC-1

Initial and maintenance vegetation treatment activities have the potential to directly and indirectly disrupt recreational activities by degrading the experience of recreationists through the creation of noise, dust, degradation of scenic views, or increased traffic when treatments are implemented near recreation areas. The Phase I treatments will be designed to occur on the weekends in order to avoid schooltime activities or during the weekdays of the summer months when school is not in session. Phase II treatments will be on private land adjacent to the High School and should not directly impact school time operations. The potential for vegetation treatment activities to disrupt recreation activities was examined in the PEIR. The potential for the proposed treatment project to impact recreation is within the scope of the PEIR because the treatment activities, and their duration and intensity are consistent with those analyzed in the PEIR. The SPR applicable to this treatment is REC-1. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

New Recreation Impacts

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the final CalVTP PEIR (refer to PEIR Section

3.2.1, “Environmental Setting,” and Section 3.2.2, “Regulatory Setting,” in Volume II). No changed circumstances are present. Therefore, no new impact related to recreation would occur.

Transportation

Impact in the PEIR	Project-Specific Checklist

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures	LTS	Section 3.15.2; Impact TRAN-1 pp. 3.15-9 – 3.15-10	Yes	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	PSU	No	Yes

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

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

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

Discussion

Impact TRAN-1

Initial and maintenance treatments would temporarily increase traffic along both public and private roadways throughout the project area. The potential for a temporary increase in traffic to conflict with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures was examined in the PEIR. The proposed treatments would be short term, and temporary increases in traffic related to treatments are within the scope of the PEIR because the treatment duration and limited number of vehicles associated with the proposed treatments are consistent with those analyzed in the PEIR. In addition, the proposed treatments would not all occur concurrently, and increases in vehicle trips associated with the treatments would be dispersed on multiple roadways. The SPRs applicable to this impact are AD-3 and TRAN-1. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Impact TRAN-2
Initial and maintenance treatment activities would not require the construction or alteration of any roadways, but prescribed burning would produce smoke that could potentially affect visibility along nearby roadways and the operation of large trucks hauling heavy machinery along roadways could pose transportation hazards. The potential for increased hazards along roadways during implementation of projects was examined in the PEIR. This impact is within the scope of the PEIR because the lack of new roadway construction, burn durations, and limited number of large trucks along roadways are consistent with the PEIR analysis. The SPRs applicable to this impact are AD-3, HYD-2, and TRAN-1. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Impact TRAN-3
Initial and maintenance treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the proposed project would require vehicle trips to transport equipment, livestock, and crews to the treatment areas. This impact was examined in the PEIR and identified to be potentially significant and unavoidable because implementation of the CalVTP across the state would result in a net increase in VMT. The extent of this impact within the proposed project is within the scope of the PEIR because the number and duration of increased vehicle trips, the size and number of crews, and the types of treatment activities are consistent with the PEIR analysis. The increase in vehicle trips would be temporary and dispersed over multiple roadways. Additionally, the project would adhere to MM AQ-1 to the extent feasible by encouraging car pooling. It should be noted, however, that small crew sizes working in different areas of the project at different times and for different companies may make this infeasible. In conjunction with the rest of the projects being implemented through the CalVTP, this project would contribute to the increase in VMT and as such this impact remains potentially significant and unavoidable. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

New Transportation Impacts
The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the final CalVTP PEIR (refer to Section 3.2.1, “Environmental Setting,” and Section 3.2.2, “Regulatory Setting,” in Volume II). No changed circumstances are present. Therefore, no new impact related to transportation would occur.

Public Services, Utilities and Service Systems

Impact in the PEIR	Project-Specific Checklist

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

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

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

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

Discussion

Impact UTIL-1

Initial and maintenance treatments would include prescribed burning and may require dust abatement, which would require an on-site water supply (water trucks) to be available. Water would be available to be applied as needed for safety and air quality control. The potential increased demand for water was examined in the PEIR. The impact is within the scope of the PEIR because the size of the area proposed for prescribed burning, amount of water required to be onsite, and water source type are consistent with those analyzed. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Impact UTIL-2

Initial and maintenance treatments would generate some amount of biomass as a result of vegetation management within the project area. Biomass generated by mechanical and manual treatments would primarily be disposed of by pile burning or broadcast burning, but material may also be left on site as chips or lopped and scattered. Vegetation may leave the site as biomass if demand from local facilities makes removal feasible. If local facilities do not have the capacity for biomass from this project, biomass will not be removed offsite to biomass facilities. This impact was identified as potentially significant and unavoidable in the PEIR because biomass hauled off-site in some parts of the Treatable Landscape could exceed the capacity of existing infrastructure for handling biomass. However, through implementation of SPR UTIL-1 and the creation of a Solid Organic Waste Disposition Plan prior to any biomass leaving the site, it will be determined ahead of time if local facilities have the infrastructure for biomass removed offsite from this project. If the local facilities do not have the infrastructure to support the amount of biomass that could leave the project area, biomass would not be removed. Therefore, this impact is determined here to be Less than Significant. The SPR applicable to this impact is UTIL-1. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Impact UTIL-3

As mentioned above, initial and maintenance treatments would generate biomass within the project area that will be disposed of primarily by pile burning, broadcast burning, chipping, or lop and scattering, but there is some potential for transporting biomass offsite to an appropriate waste collection facility. The implementing entity would comply with all federal, state, and local management and reduction goals, statutes, and regulations related to solid waste. Compliance with solid waste reduction goals and objectives was examined in the PEIR. These treatment activities and offsite biomass removal is within the scope of the activities and impacts addressed in the PEIR because the types and amount of biomass that may need to be hauled off-site are consistent with those analyzed. The SPRs applicable to this impact are SPR UTIL-1. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

New Impacts to Public Services, Utilities and Service Systems

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the final CalVTP PEIR (refer to Section PEIR 3.2.1, “Environmental Setting,” and Section 3.2.2, “Regulatory Setting,” in Volume II). No changed circumstances are present. Therefore, no new impact related to public services, utilities, or service systems would occur.

Wildfire

Impact in the PEIR	Project-Specific Checklist

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Section 3.17.1; Impact WIL-1 pp. 3.17-14 – 3.17-15	Yes	AD-3 HAZ-2 HAZ-3 HAZ-4	NA	LTS	No	Yes
Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides	LTS	Section 3.17.1; Impact WIL-2 pp. 3.17-15 – 3.17-16	Yes	AQ-3 GEO-3 GEO-4 GEO-5 GEO-8	NA	LTS	No	Yes

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

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

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

Discussion

Impact WIL-1

Initial treatment types would include WUI Fuel Reduction through the use of herbicide application, mechanical treatment, manual treatment, and prescribed burning. Maintenance treatment types would include WUI Fuel Reduction through the use of mechanical treatment, manual treatment, prescribed herbivory, herbicide application, and prescribed burning. The use of motorized equipment and fire with this suite of treatment activities could pose a risk of accidental ignition or uncontrolled fire respectively. The potential increase in exposure to wildfire during implementation of treatment activities was examined in the PEIR. Increased wildfire risk associated with the use of heavy equipment in vegetated areas and during prescribed burning is within the scope of the PEIR because the types of equipment and burning methods and treatment durations are consistent with those analyzed. The SPRs applicable to this impact are AD-3, HAZ-2, HAZ-3, and HAZ-4. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact.

Impact WIL-2

The initial and maintenance treatment activities proposed for this project do include prescribed burning. The potential for post-fire landslides and flooding was evaluated in the PEIR. The potential exposure of people or structures to post-wildfire landslides and flooding are within the scope of the PEIR because the equipment types, durations and proposed burning methods are consistent with those analyzed.

As described above in Section 1. Proposed Project Revisions, the TCRCD proposes to revise the language under SPR GEO-3 to stabilize bare soils disturbed by treatments within WLPZs, equipment limitation zones, or in other areas deemed necessary by a qualified RPF. The SPR as written could require that soil stabilization occur in many areas where runoff and sediment discharge would not result in environmental impacts making the treatments unnecessarily costly and more time consuming. Soils will be stabilized in areas where runoff and sediment discharge have the potential to occur. As such, this revision would still meet the purpose of SPR GEO-3 and would not result in any new or substantially more severe significant impacts related to runoff or sediment discharge and water quality degradation. The SPRs applicable to this impact are AQ-3, GEO-3, GEO-4, GEO-5 and GEO-8. This determination is consistent with the PEIR and would not constitute a substantially more significant impact.

New Impacts to Wildfire

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the final CalVTP PEIR (refer to PEIR Section 3.2.1, “Environmental Setting,” and Section 3.2.2, “Regulatory Setting,” in Volume II). No changed circumstances are present. Therefore, no new impact related to wildfire would occur.

Section 5. List of Preparers

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Attachment A: Mitigation Monitoring and Reporting Program for the Summerville-Tuolumne Vegetation Management Project

Mitigation Monitoring and Reporting Program

Introduction

The California Environmental Quality Act (CEQA) Guidelines (PRC Section 21081.6, 15091[d] and 15097) require public agencies "to adopt a reporting and monitoring project 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 Project (MMRP) is required for approval of the proposed project because the Project-Specific Analysis/Addendum to the CalVTP PEIR 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 the SPRs, Mitigation Measures (MMs) have been identified to further reduce and/or compensate for those impacts. This MMRP includes all applicable SPRs and MMs related to the proposed project in order to assist in implementation of all environmental protection features for initial and eventual maintenance treatments.

Purpose of the MMRP

This MMRP has been prepared to facilitate the implementation of the applicable SPRs and MMs by summarizing the conditions and requirements of each. The following table presents the text of each SPR and MM from the CalVTP PEIR that is applicable to the project, the timing of its planned implementation, the implementing entity, and the entity with monitoring responsibility. The numbering of the SPRs and MMs follows the numbering used in the PEIR. Where deemed necessary, instructions for supplemental guidance of certain SPRs and MMs have been added to tailor the protection measures relevant to the proposed treatments. Additionally, proposed revisions to some SPRs have been noted in underlines and strikethroughs, and are explained in the PSA/Addendum as being equivalent or more effective than those presented in the PEIR. This MMRP will be adopted by the Tuolumne County Resource Conservation District (TCRCD), with regard to its discretionary approval for the proposed project, and Tuolumne Fire Safe Council (TFSC).

Roles and Responsibilities

As the CEQA Lead Agency, the TCRCD - in conjunction with the Tuolumne Fire Safe Council - will be responsible for ensuring that implementation of SPRs and MMs related to its discretionary approval occurs in accordance with the MMRP pursuant to Section 15097(a) of the CEQA Guidelines. TCRCD may partner with contractors and other agencies to implement the MMs and SPRs. As pertinent to its discretionary approval, TCRCD is responsible for taking actions necessary to implement the SPRs and mitigation measures according to the specifications provided for each measure and for demonstrating that the action has been successfully completed.

If desired by the lead or a responsible agency and pursuant to CEQA Guidelines Section 15097(a), the agency can delegate monitoring and reporting responsibilities to another public agency or to a private entity that accepts the delegation; however, until the MMs and SPRs have been completed, the agency remains responsible for ensuring that implementation of the measures occurs in accordance with this MMRP.

Reporting

TCRCD will document and describe the compliance of their work with the required SPRs and MMs either by adapting the project-specific Completion Report pursuant to the requirements of SPR AD-7. Pursuant to State CEQA Guidelines Section 15097(a), TCRCD may delegate monitoring and reporting responsibilities to another public agency or private entity who accepts this delegation.

Standard Project Requirements			
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.			
Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: N Treatment Maintenance: Y	Prior to broadcast burning maintenance treatments	TCRCD	TCRCD
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.			
Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	TCRCD	TCRCD
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.			
Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	TCRCD	TCRCD
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 or email 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.			
Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	At least three days prior to prescribed burning activities	TCRCD	TCRCD
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.			
Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	One to three days prior to treatment activities	TCRCD	TCRCD

SPR AD-7 Provide Information on Proposed, Approved, and Completed Treatment Projects. For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism.

Information on proposed projects (PSA in progress):

- GIS data that include project location (as a point), or project latitude/longitude;
- project size (typically acres);
- treatment types and activities;
- 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.

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 includes a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, and WUI Fuel Reduction)

Information on complete projects (following initial treatment):

- GIS data that includes a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI Fuel Reduction);
- A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes:
    - Size of treated area (typically acres);
    - Treatment types and activities;
    - Dates of work;
    - A list of the SPRs and MMs that were implemented;
    - Any explanations regarding implementation if required by the SPRs and MMs.

This SPR applies to all treatment activities and all treatment types, including treatment maintenance.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to, during, and following treatment activities. *Proposed data was submitted August 20, 2025 to the Board of Forestry.*	TCRCD	TCRCD

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 fade into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During treatment	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During treatment	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During treatment	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During treatment	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to prescribed burning activities	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: N Treatment Maintenance: Y	Prior to broadcast burning maintenance treatments	TCRCD	TCRCD

SPR AQ-4 Minimize Dust: To minimize dust during treatment activities, the project proponent will implement the following measures:

- Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol.
- If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by ARB, EPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the water results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations.

- Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113.
- Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property," per Health and Safety Code Section 41700.

This SPR applies to all treatment activities and treatment types, including treatment maintenance.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During treatment	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During prescribed burning treatment activities	TCRCD	TCRCD

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 with applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment - *Record search of Phase I of the project area and 330' buffer surrounding the project area has been conducted in 2025; see PSA for a summary of results.* *Record search of Phase II of the project area will be conducted after the design of that treatment area is completed, but prior to implementation*	KCI - for Phase I TBD for Phase II	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to Treatment - *Tribes have been contacted and Sacred Lands File (SFL) query completed for Phase I; see PSA for a summary of consultation and SLF results.* *Contact with tribes for Phase II of the project area will be conducted after the design of that treatment area is completed, but prior to implementation.*	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment - *initial research has been conducted in 2025 for Phase I; see PSA for results.* *Further research for Phase II will occur after the design of that treatment area is completed, but prior to implementation*	KCI - for Phase I TBD for Phase II	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment - *surveys have been conducted in 2025 for Phase I; see PSA for results.* *Surveys for Phase II will occur after the design of that treatment area is completed, but prior to implementation*	KCI - for Phase I TBD for Phase II	TCRCD

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.

Project Specific Supplemental Guidance to Implement SPR CUL-5

The qualified archaeologist will be a contracted Registered Professional Archeologist certified to work in the State of California.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	KCI - prior to for Phase I TBD - prior to Phase II TCRCD - during	TCRCD

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.

Project Specific Supplemental Guidance to Implement SPR CUL-6

If tribal cultural resources are identified within a treatment area and determined to be significant by the culturally affiliated tribe(s), the site will be temporarily flagged. Measures to avoid impacts to an identified tribal cultural resource during treatment may include the following:

- For Phase I: No treatment activities will occur within 100 feet of the two tribal cultural resource sites.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	KCI - prior to for Phase I TBD - prior to for Phase II TCRCD - during	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	KCI - prior to for Phase I TBD - prior to for Phase II	TCRCD

		TCRCD - during	

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	TCRCD	TCRCD

Biological Resources Standard Project Requirements

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

1. **Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided**. If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment:

   a. by physically avoiding the suitable habitat, or

   b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites).

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

2. **Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided**. Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-Protocols. Specific survey requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7).

This SPR applies to all treatment activities and treatment types, including treatment maintenance.

Project-Specific Supplemental Guidance to Implement SPR BIO-1

Surveys will be conducted by a qualified RPF or biologist.

Special-status plants

- For special-status plants not listed under CESA or ESA, to avoid impacts on the annual and perennial geophyte species identified in Table 4.5-2 of the PSA, non-ground-disturbing treatment activities (i.e., manual treatments) will be implemented only during the dormant season for these species (i.e., when the plant has no aboveground parts), which would generally occur during the winter, if feasible. If the limited operating period for annual and perennial 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) 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 special-status nesting birds, mechanical treatments, manual treatments, herbicide application, prescribed burning, and prescribed herbivory could not be implemented from February 1 to August 31, 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, and prescribed burning from April 1 to August 31 will be implemented, if feasible. If it is infeasible to follow the limited operating period, special status bats will be assumed present in areas of suitable habitat and a no-disturbance buffer of 250 feet will be implemented during the LOP.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment - *initial data and reconnaissance-level surveys have been conducted for Phase I and the portions of Phase II that were accessible, see PSA for results.*	KCI - Phase I TBD - Phase II	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	TCRCD	TCRCD

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 California Fish and Game Code Section 1602 prior to implementing any treatment activities in riparian habitats. Notification will identify the treatment activities, map the vegetation to be removed, identify the impact avoidance identification methods to be used (e.g., flagging), and appropriate protections for the retention of shaded riverine habitat, including buffers and other applicable measures to prevent erosion into the waterway.
- In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment goals objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those

expected to result from application of the above measures. Deviation from the above design specifications, different protection measures and design standards will only be approved when the treatment plan incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW.

This SPR applies to all treatment activities and treatment types, including treatment maintenance.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	TCRCD	TCRCD

SPR BIO-5: **Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub.** The project proponent will design treatment activities to avoid type conversion where native coastal sage scrub and chaparral are present. An ecological definition of type conversion is used in the CalVTP PEIR for assessment of environmental effects: a change from a vegetation type dominated by native shrub species that are characteristic of chaparral and coastal sage scrub vegetation alliances to a vegetation type characterized predominantly by weedy herbaceous cover or annual grasslands. For the PEIR, type conversion is considered in terms of habitat function, which is defined here as the arrangement and capability of habitat features to provide refuge, food source, and reproduction habitat to plants and animals, and thereby contribute to the conservation of biological and genetic diversity and evolutionary processes (de Groot et al. 2002). Some modification of habitat characteristics may occur provided habitat function is maintained (i.e., the location, essential habitat features, and species supported are not substantially changed).

During the reconnaissance-level survey required in SPR BIO-1, a qualified RPF or biologist will identify chaparral and coastal sage scrub vegetation to the alliance level and determine the condition class and fire return interval departure of the chaparral and/or coastal sage scrub present in each treatment area.

For all treatment types in chaparral and coastal sage scrub, the project proponent, in consultation with a qualified RPF or qualified biologist will:

- Develop a treatment design that avoids environmental effects of type conversion in chaparral and coastal sage scrub vegetation alliances, which will include evaluating and determining the appropriate spatial scale at which the proponent would consider type conversion, and substantiating its appropriateness. The project proponent will demonstrate with substantial evidence that the habitat function of chaparral and coastal sage scrub would be at least maintained within the identified spatial scale at which type conversion is evaluated for the specific treatment project. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, spatial needs of sensitive species, presence of sufficient seed plants and nurse plants, light availability, and edge effects may inform the determination of an appropriate spatial scale.
- The treatment design will maintain a minimum percent cover of mature native shrubs within the treatment area to maintain habitat function; the appropriate percent cover will be identified by the project proponent in the development of treatment design and be specific to the vegetation alliances that are present in the identified spatial scale used to evaluate type conversion. Mature native shrubs that are retained will be distributed contiguously or in patches within the stand. If the stand consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity, to the extent needed to avoid type conversion.

These SPR requirements apply to all treatment activities and all treatment types, including treatment maintenance.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	TCRCD	TCRCD

Special Status Plants

SPR BIO-7: Survey for Special-Status Plants. If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities."

Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status.

If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS.

For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances:

- If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys.
- If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment.

This SPR applies to all treatment activities and treatment types, including treatment maintenance.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	TCRCD	TCRCD

Invasive Plants and Wildlife

SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife. The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail):

- clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, or invasive wildlife;
- for all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species;

- inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas;
- stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area;
- identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include herbicide application, manual or mechanical treatments, prescribed burning, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles;
- treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and
- implement Fire and Fuel Management BMPs outlined in the "Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers" (Cal-IPC 2012, or current version).

This SPR applies to all treatment activities and treatment types, including treatment maintenance.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	TCRCD	TCRCD

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 Supplemental Guidance to Implement SPR BIO-10

- If the limited operating period for nesting birds is determined to be infeasible, to avoid impacts on special-status birds, focused surveys (i.e., nest searches) for nests of these species will be conducted prior to implementing treatment activities during the nesting bird season (February 1– August 31). If active special-status bird nests are observed during focused surveys, then mitigation measures BIO-2a and BIO-2b will be implemented.
- Because monarchs may use habitat in the project area for large portions of the year, a limited operating period or no-disturbance buffer would not be feasible to avoid impacts on monarchs. Focused noninvasive visual surveys for butterflies will be conducted during the flight season or presence would be assumed. If the presence of monarch butterflies is assumed or the species is detected during focused surveys, Mitigation Measure BIO-2e will be implemented. Additionally, focused surveys for milkweed will be conducted throughout the project area and a no-disturbance buffer of 10 feet will be identified if milkweed is found.
- If the limited operating period for special-status bats is determined to be infeasible, to avoid impacts on special-status bats, focused surveys for maternity roosts of these species will be conducted prior to implementing manual, mechanical, and prescribed burning treatment activities during the bat maternity season (April

1–August 31), or species will be assumed present in suitable habitat. If special-status bat roosts are identified during focused surveys or are assumed present, Mitigation Measure BIO-2b for special-status bats will be implemented.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	No more than 14 days prior to treatment, unless otherwise specified in a protocol.	TCRCD	TCRCD

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.
- Virtual fencing technology may be utilized.

This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: N Treatment Maintenance: Y	Prior to and during prescribed herbivory maintenance treatments	TCRCD	TCRCD

SPR BIO-12. Protect Common Nesting Birds, Including Raptors. The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP PEIR. The active nesting season will be defined by the qualified RPF or biologist.

If active nesting season (February 1 - August 31) avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identify the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food).

If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following:

- **Establish Buffer.** The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. Treatment activities will be implemented outside of the buffer. The buffer location will be determined by a qualified RPF or biologist. Factors to

be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician.

- **Modify Treatment.** The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment methods). Treatment modifications will be determined by the project proponent in coordination with the qualified RPF or biologist.
- **Defer Treatment.** The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician.

Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests:

- **Monitor Active Raptor Nest During Treatment**. A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases.
- **Retention of Raptor Nest Trees**. Trees with visible raptor nests, whether occupied or not, will be retained.

This SPR applies to all treatment activities and treatment types, including treatment maintenance.

Project Specific Supplemental Guidance for Implementation:

- If 21 days has elapsed between survey and treatment within an area, a qualified RPF or biologist will ensure that surveys are conducted again within the appropriate timeframe prior to implementation.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	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 no more than 21 days prior to treatment. If an active nest is observed, implement avoidance strategies prior to and during treatment.	TCRCD	TCRCD

Geology, Soils, and Mineral Resource Standard Project Requirements

SPR GEO-1 Suspend Disturbance during Heavy Precipitation: The project proponent will suspend mechanical and prescribed herbivory~~, and herbicide~~ treatments if: 1) soils are saturated, and/or 2) soils are wet enough to be compacted by mechanical activities~~ the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours~~. This proposed revision is not in regards to herbicide application. Herbicide application will be applied according to the specifications in SPR HYD-5. 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.

Project Specific Supplemental Guidance to Implement SPR GEO-1:
The project proponent would be prepared to suspend all mechanical activities in the event that sufficient active precipitation creates saturated soils or soils wet enough to be compacted by mechanical activities.
Additionally, no herbicide application will occur during precipitation events or if precipitation is forecast 24 hours before or after project activities.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During initial mechanical and herbicide treatments and during mechanical, prescribed herbivory, and herbicide maintenance treatments	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During mechanical treatment activities	TCRCD	TCRCD

SPR GEO-3 Stabilize Disturbed Soil Areas: The project proponent will stabilize bare soil disturbed during mechanical, prescribed herbivory treatments, and prescribed burns within WLPZs, equipment exclusion zones, and anywhere else deemed necessary by a qualified RPF in order to maintain the natural ability of ground cover in the WLPZs to filter sediment, minimize soil erosion, stabilize banks where the potential erosion risk is higher, and ~~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 bare soils within WLPZs, equipment limitation zones, and anywhere else deemed necessary by a qualified RPF ~~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 may be ~~is~~ used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface; slash mulch will not be packed into the ground surface with heavy equipment in WLPZs or equipment exclusion zones. This SPR only applies to mechanical, prescribed herbivory, and prescribed burn treatment activities that result in exposure of bare soil within WLPZs, equipment limitation zones, and anywhere else deemed necessary by a qualified RPF ~~over 50 percent of the project area and~~ all treatment types, including treatment maintenance.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During mechanical, prescribed herbivory, and prescribed burn treatment activities within WLPZs, equipment limitation zones, and anywhere else deemed necessary by a qualified RPF	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during mechanical, prescribed herbivory, and prescribed burning treatment activities	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During mechanical, manual, and prescribed burn treatment activities	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During mechanical, manual, and prescribed burn treatment activities	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During treatment	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during mechanical treatment on slopes greater than 50%	TCRCD	TCRCD

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 fixed on-site if feasible and if infeasible then it will be promptly removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment activities	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During manual treatment activities	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During manual treatment activities	TCRCD	TCRCD

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.

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

Initial Treatment: Y Treatment Maintenance: Y	During treatments	TCRCD	TCRCD

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.

Project Specific Supplemental Guidance to Implement SPR HAZ-5

The SPRP will include instructions as to how to determine appropriate staging, storage, loading, and mixing areas for herbicides. A site-specific, suitable location for each treatment area will be determined according to the SPRP instructions after the SPRP is prepared but prior to herbicide treatment.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prepare SPRP prior to beginning any herbicide treatment activities; implement measures during herbicide treatment activities	TCRCD	TCRCD

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.

Project Specific Supplemental Guidance to Implement SPR HAZ-6

Certain herbicide brands will not be used on the Summerville High School property pursuant to Assembly Bill 405 and pesticide products using glyphosate will not be used on the Summerville High School property.

This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during herbicide treatments	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During and following herbicide treatments	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During herbicide treatments	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to, during, and 72 hours after herbicide treatment activities occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet	TCRCD	TCRCD

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 Supplemental 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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During treatment activities	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment activities	TCRCD	TCRCD

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, virtual 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.

Appliable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: N Treatment Maintenance: Y	Prior to and during prescribed herbivory activities	TCRCD	TCRCD

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 presence of aquatic life. Wider WLPZs are required for steep slopes.

Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths - Source: 14 CCR Section 916.5 [936.5, 956.5] (February 2019 version)

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

< 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	Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.
> 50% slope	150	100	Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Establish WLPZs during design of treatment project; implement WLPZ protections during all treatments	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During herbicide treatment activities	TCRCD	TCRCD

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 the 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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Identify features **prior to** treatments; if a drainage structure or infiltration system is inadvertently disturbed or modified **during** treatment, coordination with the owner will occur to repair damage, and restore pre-project drainage conditions	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During treatments	TCRCD	TCRCD

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.			
Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During treatments	TCRCD	TCRCD
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.			
Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During mechanical treatments	TCRCD	TCRCD
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.			
Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During treatments	TCRCD	TCRCD
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.			
Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During treatments	TCRCD	TCRCD
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.			
Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to mechanical treatment activities within 1,500 feet of noise-sensitive receptors	TCRCD	TCRCD
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.			
Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Identify impacted locations prior to treatment and coordinate with the owner/manager of the site; If a temporary closure of a public recreation area or facility is	TCRCD	TCRCD

	required, post notifications at least 14 days prior to treatment		
Transportation Standard Project Requirements			
SPR TRAN-1 Implement Traffic Control during Treatments: Prior to initiating vegetation treatment activities the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. A TMP will be needed if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments. If needed, a TMP will be prepared to provide measures to reduce potential traffic obstructions, hazards, and service level degradation along affected roadway facilities. The scope of the TMP will depend on the type, intensity, and duration of the specific treatment activities under the CalVTP. Measures included in the TMP could include (but are not be limited to) construction signage to provide motorists with notification and information when approaching or traveling along the affected roadway facilities, flaggers for lane closures to provide temporary traffic control along affected roadway facilities, treatment schedule restrictions to avoid seasons or time periods of peak vehicle traffic, haul-trip, delivery, and/or commute time restrictions that would be implemented to avoid peak traffic days and times along affected roadway facilities. If the TMP identifies impacts on transportation facilities outside of the jurisdiction of the project proponent, the TMP will be submitted to the agency with jurisdiction over the affected roadways prior to commencement of vegetation treatment projects. This SPR applies to all treatment activities and treatment types, including treatment maintenance. Smoke generated during prescribed burn operations could potentially affect driver visibility and traffic operations along nearby roadways. Direct smoke impacts to roadway visibility and indirect impacts related to driver distraction will be considered during the planning phase of burning operations. Smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations will be identified and addressed within the TMP. The TMP will include measures to monitor smoke dispersion onto public roadways, and traffic control operations will be initiated in the event burning operations could affect traffic safety along any roadways. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.			
Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Identify if TMP is needed prior to treatments; if needed, prepare TMP prior to treatments and implement during treatments.	TCRCD	TCRCD
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.			
Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prepare an Organic Waste Disposition Plan prior to mechanical or manual treatment activities; implement plan during mechanical or manual treatment activities	TCRCD	TCRCD
Mitigation Measures			
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 be feasible. The			

project proponent will document the emission reduction techniques that will be applied and will explain the reasons other techniques that could reduce emissions are infeasible.

Techniques for reducing emissions may include, but are not limited to, the following:

- Diesel-powered off-road equipment used in construction will meet EPA's Tier 4 emission standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. Tier 3 models can be used if a Tier 4 version of the equipment type is not yet produced by manufacturers. This measure can also be achieved by using battery-electric off-road equipment as it becomes available. Prior to implementation of treatment activities, the project proponent will demonstrate the ability to supply the compliant equipment. A copy of each unit's certified tier specification or model year specification and operating permit (if applicable) will be available upon request at the time of mobilization of each unit of equipment.
- Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria:
  - meet California's Low Carbon Fuel Standards and be certified by CARB Executive Officer;
  - be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables;
  - contain no fatty acids or functionalized fatty acid esters; and
  - have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines.
- Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment.
- Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes.
- Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NO_X and PM.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatments	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During ground disturbing activities	TCRCD	TCRCD

Biological Resources

Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA

If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape

demarcations (e.g., edge of a roadway), exceptions to this requirement are listed later in this measure. The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report) with a science-based justification for the deviation. No fire ignition (nor use of associated accelerants) will occur within 50 feet of listed plants.

For species listed under ESA or CESA, if the project proponent cannot avoid loss by implementing no-disturbance buffers, the project proponent will implement Mitigation Measure BIO-1c.

The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist, in consultation with CDFW and USFWS, as appropriate depending on species status and location, that the listed plants would benefit from treatment in the occupied habitat area even though some of the listed plants may be lost during treatment activities. For a treatment to be considered beneficial to listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is 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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatments	TCRCD	TCRCD

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 (nor use of associated accelerants) will occur within the special-status plant buffer.

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

The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	TCRCD	TCRCD

Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants

If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment.

The first priority for compensatory mitigation will be preserving and enhancing existing populations outside of the treatment area in perpetuity, or if that is not an option because existing populations that can be preserved in perpetuity are not available, one of the following mitigation options will be implemented by the project proponent instead:

- creating populations on mitigation sites outside of the treatment area through seed collection and dispersal (annual species) or transplantation (perennial species);
- purchasing mitigation credits from a CDFW- or USFWS-approved conservation or mitigation bank in sufficient quantities to offset the loss of occupied habitat; and
- if the affected special-status plants are not listed under ESA or CESA, compensatory mitigation may include restoring or enhancing degraded habitats so that they are made suitable to support special-status plant species in the future.

If relocation efforts are part of the Compensatory Mitigation Plan, the plan will include details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements. The following performance standards will be applied for relocation:

- the extent of occupied area will be substantially similar to the affected occupied habitat and will be suitable for self-producing populations. Re-located/re-established populations will be considered suitable for self-producing when:
- habitat conditions allow for plants to reestablish annually for a minimum of 5 years with no human intervention, such as supplemental seeding; and
- reestablished habitats contain an occupied area comparable to existing occupied habitat areas in similar habitat types in the region.

If preservation of existing populations or creation of new populations is part of the mitigation plan, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands and actions (e.g., the number and type of credits, location of mitigation bank or easement, restoration or enhancement actions), parties responsible for the long-term management of the land, and the legal and funding mechanisms (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity.

If mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, funding assurances, and success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations.

If mitigation includes restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat.

If the loss of occupied habitat cannot be offset (e.g., if preservation of existing populations or creation of new populations through relocation efforts are not available for a certain species), and as a result treatment activities would substantially reduce the number or restrict the range of listed plant species, then the treatment will not qualify as within the scope of this PEIR.

Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to, during, and after treatment	TCRCD	TCRCD

Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)

If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species by implementing the following.

Avoid Mortality, Injury, or Disturbance of Individuals

The project proponent will implement one of the following 2 measures to avoid mortality, injury, or disturbance of individuals:

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.

Maintain Habitat Function

- 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., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted [e.g., 50 percent for coastal California gnatcatcher]) such that habitat function is maintained.
- A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. If consultation determines that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c.

Project-Specific Supplemental Guidance for Implementation

- If the limited operating period for nesting birds is determined to be infeasible (pursuant to SPR BIO-1) and a golden eagle nest is detected during focused surveys (pursuant to SPR BIO-10), a no-disturbance buffer of at least 0.5 mile for golden eagle will be established around the nest, and no treatment activities will occur within this buffer until the chicks have fledged 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. Additionally, the final determination for habitat function maintenance for golden eagles was made in consultation with CDFW. Therefore, if Mitigation Measure BIO-2a is required for treatment activities, the TCRCD will contact CDFW to seek technical input on the determination that habitat function will be maintained for golden eagles.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to, during, and after treatment	TCRCD	TCRCD

Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)

If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following.

Avoid Mortality, Injury, or Disturbance of Individuals

- The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to

be considered in determining buffer size will include, but not be limited to, the species' tolerance to disturbance; the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; baseline levels of noise and human activity; and treatment activity. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below 100 feet from an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

- No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, or other occurrence is no longer active; or reducing the buffer would not likely result in disturbance, mortality, or injury. A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, 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.
    - 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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatments	TCRCD	TCRCD

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-2e, 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.

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	TCRCD	TCRCD

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.
- Host plants for federally listed butterflies within the occupied habitat will be marked with high-visibility flagging, fencing, or stakes, and no treatment activities will occur within 10 feet of these plants.
- Because prescribed herbivory could result in the indiscriminate removal of the host plants for federally listed butterflies, this treatment type will not be used within occupied habitat of any federally listed butterfly species, unless it is known that the host plant is unpalatable to the herbivore.
- Treatment areas that are not occupied but are within the range of the federally listed butterfly will be divided into as many treatment units as feasible such that the entirety of the habitat is not treated within the same year.
- Treatments will be conducted in a patchy pattern to the extent feasible in areas that are not occupied but are within the range of the federally listed butterfly, such that the entirety of the habitat is not burned or removed and untreated portions of suitable habitat are retained.

If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of federally listed butterflies or degradation of occupied habitat (host plants) such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.

CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of any feasible impact avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed butterflies or degradation of occupied habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c.

Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable 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 Supplemental Guidance for Implementation

To avoid impacts on the monarch butterfly, a candidate for listing under ESA, treatments will be designed to retain milkweed (*Asclepias* spp.) plants in the project area. Contractors will be trained in the identification of milkweed plants, and milkweed plants in a treatment area will be identified and demarcated (e.g. high-visibility flagging, fencing, stakes, other methods). Milkweed plants will not be removed or trampled during treatment activities if feasible.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatments	TCRCD	TCRCD

Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands

The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3:

- Reference the *Manual of California Vegetation*, Appendix 2, Table A2, *Fire Characteristics* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class and fire return interval departure of the vegetation alliances present will also be determined.
- Design treatments in sensitive natural communities and oak woodlands to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function of the affected sensitive natural community. Treatments will be designed to replicate the fire regime attributes for the affected sensitive natural community or oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fireline intensity, severity, and fire type as described in *Fire in California's Ecosystems* (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval (i.e., time since last burn is less than the average time required for that vegetation type to recover from fire) or within Condition Class 1.
- To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled).
- To the extent feasible, fuel breaks will not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in sensitive natural communities with a rarity rank of S3 (vulnerable) or in oak woodlands. In forest and woodland sensitive natural communities with a rarity rank of S3, and in oak woodlands, only shaded fuel breaks will be installed, and they will not be installed in more than 20 percent of the stand of sensitive natural community or oak woodland vegetation (i.e., if the sensitive natural community covers 100 acres, no more than 20 acres will be converted to create the fuel break).
- Use prescribed burning as the primary treatment activity in sensitive natural communities that are fire dependent (e.g., closed-cone forest and woodland alliances, chaparral alliances characterized by fire-stimulated, obligate seeders), to the extent feasible and appropriate based on the fire regime attributes as described in *Fire in 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.
- Exclude herbivory as a treatment from sensitive natural communities that are deemed to be adversely affected by herbivory. A qualified RPF, botanist, or Certified Range Manager (CRM) 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 feasibility of implementing the avoidance measures will be determined by the project proponent based on whether implementation of this mitigation measure will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. If the avoidance measures are determined by the project proponent to be infeasible, the project proponent will document the reasons implementation of the avoidance strategies are infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

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

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

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatments	TCRCD	TCRCD

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.

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	TCRCD	TCRCD

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 (nor use of associated accelerants) will occur within the wetland buffer

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatments	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatments	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	Prior to and during prescribed burn treatments	TCRCD	TCRCD

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.

Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Initial Treatment: Y Treatment Maintenance: Y	During PSA preparation; *database searches are complete, see PSA for results*	KCI	TCRCD

Attachment B: Biological Resources

Table 3: Special Status Species Table

Special Status Plant Species either Known or with Potential to Occur in the Project Area						
Species	**Federal Listing**	**State Listing**	**CFDW Status**	**CA Rare Plant Rating**	**Habitat**	**Potential for Occurrence**
Red Hills soaproot *Chlorogalum grandiflorum*	None	None	-	1B.2	Cismontane woodland, chaparral, lower montane coniferous forest. Occurs frequently on serpentine or gabbro, but also on non-ultramafic substrates; often on "historically disturbed" sites. 804 to 4068 ft in elevation. Blooms May-June.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Sanfords arrowhead *Sagittaria sanfordii*	None	None	-	1B.2	Marshes and swamps. In standing or slow-moving freshwater ponds, marshes, and ditches. 0 to 2133 ft in elevation. Blooms May-October (November).	*Not expected to occur.* The project area is not within the elevational band of the species.
Jepsons onion *Allium jepsonii*	None	None	-	1B.2	Chaparral, cismontane woodland, lower montane coniferous forest. On serpentine soils in Sierra foothills, volcanic soil on Table Mountain. On slopes and flats; usually in an open area. 1165 to 3707 ft in elevation. Blooms April-August.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Rawhide Hill onion *Allium tuolumnense*	None	None	-	1B.2	Cismontane woodland. Restricted to serpentine soil, usually in gray pine chaparral. steep, rocky, south-facing slopes or small drainages. 984 to 1969 ft in elevation. Blooms March-May.	*Not expected to occur.* The project area is not within the elevation band for this species.
Three bracted onion *Allium tribracteatum*	None	None	-	1B.2	Chaparral, lower montane coniferous forest, upper montane coniferous forest. Volcanic slopes and ridges. 2887 to 9301 ft in elevation. Blooms April-August.	*May occur.* The project area may contain suitable habitat for this species.**
big-scale balsamroot *Balsamorhiza macrolepis*	None	None	-	1B.2	Chaparral, valley and foothill grassland, cismontane woodland. Sometimes on serpentine. 115 to 4806 ft in elevation. Blooms March-June.	*May occur*. Phase II of the project area may contain suitable habitat for this species.**
Tuolumne button-celery *Eryngium pinnatisectum*	None	None	-	1B.2	Vernal pools, cismontane woodland, lower montane coniferous forest. Volcanic soils; vernal pools and mesic sites within other natural communities. 230 to 3002 ft in elevation. Blooms May-August.	*May occur.* Phase II of the project area may contain suitable habitat for this species. There is a non-specific occurrence from 1918 north of the project area and a non-specific population occurrence documented west of the project area.
Laynes ragwort *Packera layneae*	Threatened	Rare	-	1B.2	Chaparral, cismontane woodland. Ultramafic soil (serpentine or gabbro); occasionally along streams. 656 to 3560 ft in elevation. Blooms April-August.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Congdons lomatium *Lomatium congdonii*	None	None	-	1B.2	Cismontane woodland, chaparral. Serpentine soils with serpentine chaparral plants and gray pines. 1099 to 2051 ft in elevation. Blooms March-June.	*Not expected to occur.* The project area is not within the elevation band for this species.
Mariposa cryptantha *Cryptantha mariposae*	None	None	-	1B.3	Valley and foothill grassland, inland dunes. In coarse sand. 30 to 492 ft in elevation. Blooms April-May.	*Not expected to occur.* The project area is not within the elevation band for this species.
Red Hills ragwort *Senecio clevelandii var.*	None	None	-	1B.2	Cismontane woodland. Drying serpentine soils; often along streams.	*Not expected to occur.* The project area is not within the elevation band for this species.

heterophyllus					853 to 1263 ft in elevation. Blooms May-July.	
delicate bluecup *Githopsis tenella*	None	None	-	1B.3	Chaparral, cismontane woodland. Mesic sites. 3609 to 6234 ft in elevation. Blooms April-June.	*Not expected to occur.* The project area is not within the elevation or geographical range of the species.
Red Hills cryptantha *Cryptantha spithamaea*	None	None	-	1B.3	Chaparral. On serpentine outcrops. 656 to 2133 ft in elevation. Blooms April-June.	*Not expected to occur.* The project area is not within the elevation band for this species.
copper-flowered birds-foot trefoil *Hosackia oblongifolia var. cuprea*	None	None	-	1B.3	Meadows, upper montane coniferous forest (mesic). Wet meadow borders. 7874 to 9022 ft in elevation. Blooms June-August.	*Not expected to occur.* The project area is not within the elevation band of the species.
Stebbins lomatium *Lomatium stebbinsii*	None	None	-	1B.1	Lower montane coniferous forest, chaparral. Thin, gravelly volcanic clay in open yellow pine forest. Grows where other vegetation is absent. 3740 to 7710 ft in elevation. Blooms March-May.	*Not expected to occur.* The project area is not within the elevation band of the species.
Tuolumne iris *Iris hartwegii ssp. columbiana*	None	None	-	1B.2	Cismontane woodland, lower montane coniferous forest. 1394 to 4593 ft in elevation. Blooms May-June.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
shaggyhair lupine *Lupinus spectabilis*	None	None	-	1B.2	Chaparral, cismontane woodland. Open rocky slopes of serpentine. Mostly on serpentine chaparral surrounded by gray pine woodland. 853 to 2707 ft in elevation. Blooms April-May.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Tuolumne fawn lily *Erythronium tuolumnense*	None	None	-	1B.2	Broadleaved upland forest, chaparral, cismontane woodland, lower montane coniferous forest. Often on clay soils; on cliffs and near drainages. 1591 to 4610 ft in elevation. Blooms March-June.	*May occur.* Portions of the project area may contain some suitable habitat for this species. There is a non-specific occurrence documented to the west of the project area from 1922.**
Nissenan manzanita *Arctostaphylos nissenana*	None	None	-	1B.2	Closed-cone coniferous forest, chaparral. Usually on metamorphics, associated with other chaparral species. 1526 to 5282 ft in elevation. Blooms February-March.	*May occur*. Phase II of the project area may contain suitable habitat for this species.
yellow-lip pansy monkeyflower *Diplacus pulchellus*	None	None	-	1B.2	Broadleafed upland forest, cismontane woodland. In bare ground around gooseberry bushes or around granite rock outcrops. 328 to 4692 ft in elevation. Blooms March-May.	*May occur.* Phase II of the project area may contain suitable habitat for this species.**
grassland suncup *Camissonia lacustris*	None	None	-	1B.2	This annual herb is native to California where it grows on the grasslands of the Sierra Nevada foothills; 1300 to 2200 feet in elevation; blooms April to June	*Not expected to occur.* The project area is outside of the elevational band of this species.
Mariposa clarkia *Clarkia biloba ssp. australis*	None	None	-	1B.2	Chaparral, cismontane woodland. On serpentine. Several sites occur in the foothill woodland/riparian ecotone. 394 to 4806 ft in elevation. Blooms April-July	*May occur.* The project area may contain suitable habitat for this species.**
Smalls southern clarkia *Clarkia australis*	None	None	-	1B.2	Cismontane woodland, lower montane coniferous forest. Open, rocky sites in conifer forest or oak woodland. 2986 to 6808 ft in elevation. Blooms May-August.	*May occur.* The project area may contain suitable habitat for this species.**
Mi-Wuk navarretia	None	None	-	1B.2	This species is associated with	*May occur.* The project area may contain

Navarretia miwukensis					meadows and is found from 2,430 to 3,675 feet in elevation. Blooms from May to August.	suitable habitat for this species.**
Slender-stemmed monkeyflower *Erythranthe filicaulis*	None	None	-	1B.2	Cismontane woodland, lower montane coniferous forest, meadows and seeps, upper montane coniferous forest. Within the transition zone of the Sierra Nevada; moist granitic sand and meadow edges; vernally mesic sites. 2034 to 5528 ft in elevation. Blooms April-August.	*May occur.* The project area may contain suitable habitat for this species.**
golden-carpet gilmania *Gilmania luteola*	None	None	-	1B.3	Associated with Shadscale scrub communities. Found from 15 to 2,590 feet in elevation and blooms from March to April.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Stanislaus monkeyflower *Erythranthe marmorata*	None	None	-	1B.1	Cismontane woodland, lower montane coniferous forest. 328 to 2953 ft in elevation. Blooms March-May.	*May occur.* The project area may contain suitable habitat for this species.**
Chinese Camp brodiaea *Brodiaea pallida*	Threatened	Endangered	-	1B.1	Valley and foothill grassland, cismontane woodland. Often in rocky, intermittent streambeds. At least sometimes on serpentine. 541 to 1263 ft in elevation. Blooms May-June.	*Not expected to occur.* The project area is not within the elevation band for this species.
Pattersons navarretia *Navarretia paradoxiclara*	None	None	-	1B.3	Meadows and seeps. Serpentinite, openings, vernally mesic, often drainages. 492 to 1411 ft in elevation. Blooms May-June (July).	*Not expected to occur.* The project area is not within the elevation band for this species.
Parry's horkelia *Horkelia parryi*	None	None	-	1B.2	Ione formation. Chaparral, cismontane woodland. Openings in chaparral or woodland; especially known from the Ione formation in Amador County. 279 to 3658 ft in elevation. Blooms April-September.	*May occur.* The project area may contain suitable habitat for this species.
Red Hills vervain *Verbena californica*	Threatened	Threatened	-	1B.1	Cismontane woodland, valley and foothill grassland. Mesic sites on serpentine; usually serpentine seeps or creeks. 837 to 1148 ft in elevation. Blooms May-September.	*Not expected to occur.* The project area does not contain suitable habitat for this species. The project area is outside of the elevation band for this species.
Brownish beaked-rush *Rhynchospora capitellata*	None	None	-	2B.2	Lower montane coniferous forest, meadows and seeps, marshes and swamps, upper montane coniferous forest. Mesic sites. 148 to 5610 ft in elevation. Blooms July-August.	*May occur.* The project area may contain suitable habitat for this species.
Scalloped moonwort *Botrychium crenulatum*	None	None	-	2B.2	Bogs and fens, meadows and seeps, upper montane coniferous forest, lower montane coniferous forest, marshes and swamps. Moist meadows, freshwater marsh, and near creeks. 3888 to 10203 ft in elevation. Blooms June-September.	*Not expected to occur.* The project area is outside of the elevation band for this species.
beaked clarkia *Clarkia rostrata*	None	None	-	1B.3	Cismontane woodland, valley and foothill grassland. North-facing slopes; sometimes on sandstone. 197 to 3002 ft in elevation. Blooms April-May.	*May occur.* The project area may contain suitable habitat for this species.**
Stebbins' monardella *Monardella stebbinsii*	None	None	-	1B.3	Broadleaved upland forest, chaparral, lower montane coniferous forest. On steep, loose slopes of generally reddish serpentine talus and boulders. 2493 to 6102 ft in elevation. Blooms July-September.	*Not expected to occur.* The project area does not contain suitable habitat for this species.

Nuttall's ribbon-leaved pondweed *Potamogeton epihydrus*	None	None	-	2B.2	Marshes and swamps. Shallow water, ponds, lakes, streams, irrigation ditches. 968 to 8661 ft in elevation. Blooms (June), July-September.	*May occur.* The project area may contain suitable habitat for this species.
Special Status Wildlife Species either Known or with Potential to Occur in the Project Area						
Gray wolf *Canis lupus*	Endangered	Endangered	-	-	Habitat generalists, historically occupying diverse habitats including tundra, forests, grasslands, and deserts. Primary habitat requirements are the presence of adequate ungulate prey, water, and low human contact.	*Not expected to occur.* The project area is located in an area with substantial human activity and development, thus there is not large connectivity between suitable habitat types. Additionally, all occurrences of gray wolf detections are located in northern California.
California red-legged frog *Rana draytonii*	Threatened	None	SSC	-	The red-legged frog inhabits quiet pools of streams, marshes and occasionally ponds. Requires permanent or near permanent pools for larval development.	*May occur.* Phase II of the project area may contain suitable habitat for this species.
northwestern pond turtle *Actinemys marmorata*	Proposed Threatened	None	SSC	-	Associated with permanent to near permanent water in a wide variety of habitat types. Usually associated with permanent ponds, lakes, streams, irrigation ditches or permanent pools along intermittent streams. Pond turtles require basking sites such as partially submerged logs, rocks and mats of vegetation.	*May occur.* Phase II of the project area may contain suitable habitat for this species.
Foothill yellow-legged frog - south Sierra DPS *Rana boylii pop. 5*	Endangered	Endangered	-	-	This species is found in or near rocky streams in a variety of habitats including valley-foothill hardwood, valley-foothill conifer-hardwood, riparian, ponderosa pine, coastal scrub, mixed chaparral and wet meadow. This species is rarely encountered (even on rainy nights) far from permanent water.	*May occur.* While the project area is outside of the proposed critical habitat, it is within the modeled range of the species. Riparian habitat within the project area, like Turnback Creek, may be potential habitat for this species.
Monarch butterfly *Danaus plexippus*	Proposed Threatened	None	-	-	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves, cypress, with nectar and water sources nearby. Along migration routes and within summer ranges, monarch butterflies require two suites of plants: (1) host plants for monarch caterpillars, which are primarily milkweeds (Asclepias spp.) within the family Apocynaceae upon which adult monarchs lay eggs; and (2) nectar-producing flowering plants of many other species that provide food for adult butterflies. Having both host and nectar plants available from early spring to late fall and along migration corridors is critical to the survival of migrating pollinators.	*May occur.* The project area does contain obligate milkweed species and is within the modeled foraging and breeding habitat for this species.
California Spotted Owl *Strix occidentalis occidentalis*	Proposed Endangered ; Proposed Threatened	None	SSC	-	Resides in dense, old growth, multi-layered mixed conifer, redwood and Douglas-fir habitats. Usually nests in a tree or snag cavity. Requires blocks of mature forest with permanent water and suitable nesting trees and snags.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
spotted bat *Euderma maculatum*	None	None	SSC	-	This species prefers to roost in rock crevices. Cliffs provide optimal roosting habitat.	*May occur.* Phase II of the project area may contain suitable habitat for this species. There is a nonspecific occurrence in the southwest edge of the project area from 1995.

western mastiff bat *Eumops perotis californicus*	None	None	SSC	-	Suitable habitat consists of extensive open areas with abundant roost locations provided by crevices in rock outcrops and buildings.	*May occur.* The project area may contain suitable habitat for this species.
Bald eagle *Haliaeetus leucocephalus*	Delisted	Endangered	FP	-	Requires large bodies of water or free-flowing rivers with abundant fish.	*Not expected to occur.* The project area is devoid of large bodies of water and does not contain foraging or nesting habitat.
American goshawk *Accipiter atricapillus*	None	None	SSC	-	This species is typically found above 4,500 feet in elevation in dense, mature or medium age coniferous forest with trees 40 feet or more in height. Prefers intermediate canopy density and large limbs more than 20 feet above the ground on north facing slopes.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Lesser sandhill crane *Antigone canadensis canadensis*	None	None	SSC	-	When feeding, prefers open, shortgrass plains, grain fields and open wetlands. Nests in remote portions of extensive wetlands.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Great blue heron *Ardea herodias*	None	None	-	-	Prefers shallow estuaries and fresh and saline emergent wetlands. For nesting, prefers secluded groves of tall trees near shallow-water feeding areas.	*Not expected to occur.* The project area is devoid of large bodies of water or wetlands and does not contain foraging or nesting habitat. This species is a bird that the Board of Forestry recognizes as a species of interest. That is why it was evaluated here.
Tricolored blackbird *Agelaius tricolor*	None	Threatened	SSC	-	Breeds near fresh water, preferably in emergent wetland with tall, dense cattails or tules. Feeds in grassland or cropland habitat.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Greater sandhill crane *Antigone canadensis tabida*	None	Threatened	FP	-	When feeding, prefers open, shortgrass plains, grain fields and open wetlands. Nests in remote portions of extensive wetlands.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Loggerhead shrike *Lanius ludovicianus*	None	None	SSC	-	Prefers open habitats with scattered shrubs, trees or fence posts or other perches. Highest densities occur in open canopied valley-foothill hardwood, pinyon-juniper, desert-riparian and Joshua tree habitats.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Yellow-headed blackbird *Xanthocephalus xanthocephalus*	None	None	SSC	-	Nests in fresh emergent wetland with dense vegetation and deep water, often along borders of lakes and ponds.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Osprey *Pandion haliaetus*	None	None	WL	-	Preys primarily on fish and requires open, clear waters for foraging. Uses rivers, bays, lakes, reservoirs, estuaries and surf zones. Uses large trees and snags for nesting.	*Not expected to occur.* The project area is devoid of large bodies of water and does not contain foraging or nesting habitat.
Burrowing owl *Athene cunicularia*	None	Candidate Endangered	SSC	-	Yearlong resident of open, dry grassland and desert habitats. Uses rodent and other burrows for nesting and roosting cover.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Great gray owl *Strix nebulosa*	None	Endangered	-	-	Forages in wet meadows, and nests and roosts in nearby dense coniferous forests.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Olive-sided flycatcher	None	None	SSC	-	Summer resident in a wide variety of	*May occur.* The project area may contain

Contopus cooperi					woodland and forest habitats below 9,000 feet. Requires large, tall trees, usually conifers, for nesting and roosting sites. Most numerous in montane coniferous forests.	suitable habitat for this species.
vernal pool fairy shrimp *Branchinecta lynchi*	Threatened	None	-	-	Usually found below 1,000 feet in elevation. This species is found in vernal pools and swales with impervious bottoms to hold shallow water with annual wetland plants.	*Not expected to occur.* The project area is above the elevation range of this species and does not have any suitable habitat.
Red Hills roach *Hesperoleucus symmetricus serpentinus*	None	None	SSC	-	Prefers slow moving streams with perennial pools in serpentine soils. Feeds on filamentous algae. They avoid fast water and are tolerant of warm water with low oxygen. The Red Hills Roach is limited in distribution to Six Bit Gulch and its tributary streams in the Red Hills area of Tuolumne County.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
central California roach *Hesperoleucus symmetricus symmetricus*	None	None	SSC	-	Found in intermittent streams throughout central California in a wide variety of habitats. This species tends to be more common in water with low to moderate flow and shallow depths. Can survive where most other fishes cannot because of their small size and tolerance of low oxygen levels and high temperatures.	*May occur.* The project area may contain suitable habitat for this species. There is a nonspecific occurrence north of the project area.
Sacramento hitch *Lavinia exilicauda exilicauda*	None	None	SSC	-	This species is associated with warm, lowland waters and can be found in lakes, sloughs, slow moving rivers and streams. They have a tolerance of high temperatures and salt.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
hardhead *Mylopharodon conocephalus*	None	None	SSC	-	Found in large to medium foothill streams and some reservoirs. Prefers slow moving water deeper than 40 inches with sandy, gravelly or boulder bottoms.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Crotch's bumble bee *Bombus crotchii*	None	Candidate Endangered	-	-	In California, the Crotch bumble bee inhabits open grassland and scrub habitats. This bee requires a diverse supply of flowers that bloom throughout the free flying portion of their life cycle from spring to autumn.	*Not expected to occur.* The project area is best described as oak woodland and montane hardwood forest and does not contain the floristic resources required throughout the free flight period for this species. While small inclusions of grass and shrub are present in the project area, these features do not constitute the open grassland and scrub habitats needed for this species.
western bumble bee *Bombus occidentalis*	None	Candidate Endangered	-	-	The western bumble bee was historically found in much of California and is now thought to be limited to high elevation mountain meadows and coastal areas. Meadows and grasslands with abundant flowering resources are considered preferred habitats.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
valley elderberry longhorn beetle *Desmocerus californicus dimorphus*	Threatened	None	-	-	Found below 500 feet in elevation in elderberry shrubs in the Central Valley and foothills. Elderberry bushes in riparian areas are preferred. Larvae burrow through the pith of green stems where it overwinters for up to two years. Adults are found on flowers and foliage of elderberries.	*Not expected to occur.* The project is outside of the elevation band of the species.
Golden eagle	None	None	FP | WL	-	Needs open terrain for hunting;	*Not expected to occur*. The project area does

Aquila chrysaetos					grasslands, deserts, savannah, and early succession stage of forest and shrub habitat. Nests on cliffs and in trees in open areas.	not contain suitable habitat for this species.
Wolverine *Gulo gulo*	Threatened	Threatened	FP	-	This species is found in high montane chaparral, mixed conifer, red fir, lodgepole forests, Jeffrey pine, alpine dwarf shrub, wet meadow, rocky slopes, and montane riparian habitats. Prefers areas with low human disturbance.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
American badger *Taxidea taxus*	None	None	SSC	-	Suitable habitat for badgers is characterized by herbaceous, shrub, and open stages of most habitats with dry, friable soils.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
pallid bat *Antrozous pallidus*	None	None	SSC	-	This species prefers open, dry habitats with rocky areas for roosting. They prefer rocky outcrops and cliffs with access to open habitats for foraging.	*May occur.* The project area may contain suitable habitat for this species.
Townsends big-eared bat *Corynorhinus townsendii*	None	None	SSC	-	This species is found in all but alpine and sub-alpine habitats. Requires caves, tunnels, mines and buildings for roosting.	*May occur.* The project area may contain suitable habitat for this species.
western red bat *Lasiurus blossevillii*	None	None	SSC	-	This species prefers riparian areas dominated by walnut, oaks, willows, cottonwoods and sycamores. They roost in tree foliage and prefer roost sites that are protected from above and open below.	*May occur.* The project area may contain suitable habitat for this species.
coast horned lizard *Phrynosoma blainvillii*	None	None	SSC	-	Inhabits open country, especially sandy areas, washes, flood plains and wind blown deposits in a variety of habitats.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Little willow flycatcher *Empidonax traillii brewsteri*	None	Endangered	-	-	Inhabits riparian areas, typically with dense vegetation from northwestern Oregon to Southern California.	*May occur.* The project area may contain suitable habitat for this species.
Willow Flycatcher *Empidonax traillii*	None	Endangered	-	-	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.	*May occur.* Phase II of the project may contain suitable habitat for this species.
Steelhead - Central Valley DPS *Oncorhynchus mykiss irideus* pop. 11	Threatened	None	SSC	-	This species requires highly oxygenated rivers and streams with moderate to swift water currents.	*Not expected to occur.* The project area no longer has access for this species.
California tiger salamander *Ambystoma californiense*	Threatened	Threatened	-	-	Most commonly found in annual grass habitat, but also occurs in grassy understory of valley-foothill hardwood habitats. Adults exist in subterranean refugia most of the year. Seasonal ponds and vernal pools are crucial to breeding.	*Not expected to occur.* The project area does not contain suitable habitat for this species. The project area is also outside of the geographical range of the species.
Sierra Nevada yellow-legged frog *Rana sierrae*	Endangered	Threatened	-	-	Inhabits lakes, ponds, meadow streams, isolated pools and sunny river banks in the Sierra Nevada Mountains from 4,500 to 12,000 feet in elevation. Open stream and lake edges with a gentle slope up to a depth of 5-8 cm appear to be preferred.	*Not expected to occur.* The project is outside of the elevation band for this species.

California roach *Lavinia symmetricus*	None	None	SSC	-	They are predominately found in small warm streams but are capable of thriving in larger colder streams with diverse conditions. California roach breed in gravel beds or riffles where groups of females lay eggs on and into the substrate.	*Not expected to occur.* The project area is not within the typical watersheds of this species.
San Joaquin roach *Lavinia symmertricus symmetricus*	None	None	SSC	-	Found in rivers, perennial and intermittent streams with isolated pools and little canopy cover.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Great egret *Ardea alba*	None	None	-	-	This species nests in colonies within ¼ mile of a large river or within ¼ mile of a lake, reservoir or pond 5 acres or larger in size. They nest in large trees and feed in shallow water along shore lines.	*Not expected to occur.* The project area does not contain suitable habitat for this species. This species is a Board of Forestry species which is why it was analyzed here.
White-tailed kite *Elanus leucurus*	None	Fully Protected	-	-	The White-tailed Kite thrives in open habitats such as grasslands, meadows, and agricultural fields, often near groves of trees for nesting and roosting. They prefer areas with herbaceous lowlands and scattered trees, which provide both foraging opportunities and cover. These birds primarily hunt small mammals like voles in open fields and require dense tree canopies for nesting.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Short-eared owl *Asio flammeus*	None	None	SSC	-	Widespread winter migrant, this species is found primarily in the Central Valley and western Sierra Nevada foothills. Found in open treeless areas with elevated sites for perching and dense vegetation for nesting and roosting.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Vaux's swift *Chaetura vauxi*	None	None	SSC	-	A summer resident of northern California, this species prefers redwood and Douglas-fir habitats with nest sites in large, hollow trees and snags, especially tall, burned-out stubs.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Purple martin *Progne subis*	None	None	SSC		Woodlands and low-elevation coniferous forest of Douglas-fir, ponderosa pine, and Monterey pine provide cover. Often nests in tall, old trees near a body of water. Also nests occasionally in residential areas.	*May occur.* The project area may contain suitable habitat for this species.
Long-eared owl *Asio otus*	None	None	SSC	-	This species is generally found below 5,000 feet in elevation, and usually associated with wet meadows or riparian woodlands from blue oak woodlands to ponderosa pine and black oak woodlands. Owls usually nest in dense foliage in abandoned hawk nests.	*May occur.* The project area may contain suitable habitat for this species.
Yellow warbler *Setophaga petechia*	None	None	SSC	-	Usually found in riparian deciduous habitats in summer; cottonwoods, willows, alders and other small trees. Also breeds in montane shrubbery in open conifer forests.	*May occur.* The project area may contain suitable habitat for this species.
Northern harrier *Circus cyaneus*	None	None	SSC	-	Occurs from annual grassland up to alpine meadow habitats. Mostly found in flat or hummocky, open areas of tall, dense grasses, moist or dry shrubs and edges for nesting and feeding.	*Not expected to occur.* The project area does not contain suitable habitat for this species.

American peregrine falcon *Falco peregrinus anatum*	None	Fully Protected	-	-	Requires protected cliffs and ledges for cover. Breeds near wetlands, lakes, rivers or other water on high cliffs, dunes, banks or mounds.	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Oregon vesper sparrow *Pooecetes gramineus affinis*	None	None	SSC	-	Use grasslands and prairie habitats with high structural diversity for foraging and nesting. These typically include grassy areas interspersed with trees and shrubs and some bare ground.	*Not expected to occur.* The project area does not contain suitable habitat for this species and it is believed that these have been extirpated from California.
Ringtail *Bassariscus astutus*	None	None	FP	-	Nocturnal; primarily found in desert habitat; can be found in rocky habitats associated with water like riparian canyons and caves	*Not expected to occur.* The project area does not contain suitable habitat for this species.
Belding's Savannah Sparrow *Passerculus sandwichensis beldingi*	None	Endangered	-	-	Wetland dependent avian species. Forms ground nests and typically lives in the salt marshes found along the California coast.	*Not expected to occur.* The project area does not contain suitable habitat for this species.

*Habitat information primarily came from CDFW 1988, CDFW 2025a, and USFWS 2025a and 2025b.
**Species not listed under CESA or ESA that are characterized as either an herbaceous annual or geophyte species.

Table 4: CWHR and Acreage in the Project Area

Vegetation Type	Acreage
Forest/Woodland	
Blue Oak-Foothill Pine	26.77 - Phase II
Blue Oak Woodland	13.83 - Phase I; 13.34 - Phase II
Montane-Hardwood Conifer	0.95 - Phase I; 90.46 - Phase II
Montane Hardwood	87.07 - Phase I; 670.46 - Phase II
Ponderosa Pine	87.48 - Phase II
Forest/Woodland Total	**990.36 acres**
Shrub/Scrub	
Mixed Chaparral	2.74 - Phase II
Shrub/Scrub Total	**2.74 acres**
Herbaceous	
Annual Grassland	34.2 - Phase I; 39.53 - Phase II
Herbaceous Total	**73.73 acres**
Wetland/Riparian**	
Riverine	4.79 acres
Freshwater Pond	0.587 acres
Freshwater Forested/Shrub Wetland	1.292 acres
Wetland/Riparian Total	**6.67 acres**
Developed/Disturbed/Barren	
Urban	0.01 - Phase II
Developed/Disturbed/Barren Total	**0.01**
All Vegetation Types Total	**1073.51 acres*****

**Wetland and riparian habitats are generally underrepresented in Cal FIRE FRAP Vegetation Data.
*** Note that the vegetation type total is greater than the ~1067 acres within the project area. This is due to the finer scale of the National Wetlands Inventory. The Riverine habitat overlaps the FRAP data of different types.

Source: Cal FIRE FRAP vegetation data and National Wetlands Inventory, compiled by KCI in 2025.