Midpeninsula Regional
Open Space District

R-21-56
Meeting 21-12
April 28, 2021

AGENDA ITEM 8

AGENDA ITEM

Project-Specific Analysis and CEQA Compliance for the Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project

GENERAL MANAGER'S RECOMMENDATION

Adopt a resolution of the Board of Directors of the Midpeninsula Regional Open Space District that includes the following:

1. A determination that the Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project qualifies as an activity covered under the California Vegetation Treatment Program Environmental Impact Report;
2. Adoption of the Findings of Fact and Statement of Overriding Considerations;
3. Adoption of the Mitigation Monitoring and Reporting Plan; and
4. Approval of the Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project.

SUMMARY

The Midpeninsula Regional Open Space District (District) seeks to implement a proposed ecological restoration project to provide wildland fire protection and fuels management at Bear Creek Redwoods Open Space Preserve (Bear Creek Redwoods). This work is referred to as the Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project (Project).[1] The District has an opportunity to partner with the California Board of Forestry and Fire Protection (Board of Forestry), at their request, to utilize the Project as part of their statewide training program for streamlining vegetation treatment work. As part of this partnership, the Project was evaluated per the California Environmental Quality Act (CEQA) as an activity covered by the Board of Forestry California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR) using a Project-Specific Analysis (PSA). The proposed treatment type (i.e., ecological restoration) and the treatment activities (i.e., manual and mechanical treatments) are consistent with those evaluated in the CalVTP PEIR and would occur within the CalVTP treatable landscape. The District may adopt the PEIR findings as they apply to the PSA to satisfy CEQA and approve the Project. Under this partnership, the District will play a significant role in expediting fuel management work statewide and may benefit from receiving State funding to support implementation.

[1] The Project is alternatively titled the Ecologically Sensitive Vegetation Management at Bear Creek Redwoods Open Space Preserve

BACKGROUND

The CalVTP PEIR (full document can be found at: https://bof.fire.ca.gov/projects-and-programs/calvtp/peir-certification/) evaluates the potential environmental effects of implementing qualifying vegetation treatments to reduce the risk of wildfire throughout the State Responsibility Area in California, which encompasses over 20.3 million acres. The CalVTP was designed for use by state, special districts, and local agencies to accelerate vegetation treatment project approvals. To support this effort, the Board of Forestry is developing CalVTP training modules, including example PSA documents, to guide state and local agencies in preparing their own PSAs under the CalVTP PEIR.

DISCUSSION

The Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project (Project) will implement ecological restoration treatments for the dual purpose of enhancing natural habitats and reducing wildfire risk. The Project seeks to return the landscape closer to natural conditions where natural fire processes and fire resiliency can be reestablished and habitat quality can be improved, including controlling and eliminating nonnative, invasive plants and excess buildup of fire fuel. The Project is consistent with the CalVTP treatment types (e.g. handwork and mechanical equipment) as well as the District's Integrated Pest Management (IPM) Program requirements. Specific restoration objectives include promoting forest health and resiliency by removing trees killed by sudden oak death (SOD), removing invasive species and the density of heavy brush, and providing ecosystem and habitat improvements to increase fire resiliency. An additional objective is to support the success of Hickman's popcornflower (*Plagiobothrys chorisianus* var. *hickmanii*), a rare Californian plant species known to occur within the Preserve. Hickman's popcornflower has a California Rare Plant Rank of 4.2, which indicates that it is of limited distribution and is moderately threatened in California.

During discussions about the Project, the Board of Forestry asked District staff if the Project could be used as an example project in the Board of Forestry's statewide CalVTP training. The Board of Forestry selected the District's Project to prepare a PSA (Attachment 1; Exhibit B to the resolution) that will provide CEQA compliance for the District, provide a means to approve and implement the Project, and serve as an example PSA for other agencies seeking to use the CalVTP PEIR to accelerate their vegetation treatment projects. The Board of Forestry provided and funded the consultant contract to complete the PSA.

CalVTP CEQA Streamlining

The Project's environmental review differs from the District's typical CEQA compliance process. In accordance with CEQA streamlining guidelines, the District may achieve environmental compliance under the CalVTP PEIR if the Project is consistent with the vegetation management activities analyzed in the CalVTP PEIR. The Department of Forestry prepared a specialized checklist (the PSA) to analyze projects for consistency with the CalVTP PEIR. If a PSA concludes that a vegetation management project is within the scope of the CalVTP PEIR, no further environmental review is required.

The District's PSA prepared for the Project resembles the Initial Study checklist commonly used for CEQA review of District-led projects. The PSA concluded that the Project's impacts to air quality and greenhouse gases cannot be mitigated and therefore require adoption of a statement of overriding consideration. As evidenced in the CalVTP PEIR and the District's Wildland Fire

Resiliency Program (WFRP) Draft EIR, these CEQA findings are typical for vegetation management activities. The CEQA process and findings are described in more detail below and in the CEQA Compliance section of this Board report.

Overlap and Consistency with the District's Wildland Fire Resiliency Program EIR (WFRP)
During the initial planning stage of the District's WFRP, staff evaluated the CalVTP for use on District-managed lands. Although there is overlap, there are important differences. The CalVTP was written to be used anywhere in California and thus uses general descriptions of habitats, treatment methods and mitigation measures to cover many foreseeable situations. Therefore, use of the CalVTP requires further CEQA analysis (i.e., the PSA). Additionally, some District lands are not within the "treatable landscape" covered by the CalVTP (e.g. high priority areas within La Honda Creek Open Space Preserve, the Mindego Hill area in Russian Ridge Open Space Preserve, and the majority of Fremont Older, Los Trancos, Monte Bello, Teague Hill, and Windy Hill Open Space Preserves).

The WFRP provides an adaptive framework for prioritizing ecosystem resiliency and enhanced fire management activities over the 60,000 acres managed by the District. The WFRP also provides a process for receiving fire agency recommendations and folding them into the best available science to produce transparent and defensible annual vegetation management plans. Additional components to the WFRP that are not included in the CalVTP include pre-plans, resource advisor maps, and a robust monitoring plan.

After evaluating the potential use of the CalVTP for the District's vegetation fuel reduction projects, it was determined that proceeding with the WFRP was the most efficient use of resources. While it is unlikely that the District will utilize the CalVTP for many projects in the future, the CalVTP and the training developed by the state will be crucial for statewide vegetation management efforts, and may facilitate multi-agency partnership projects that include the District. Use of the Project as a trial run for the CalVTP also positions the District favorably for receiving future state funding to support vegetation treatment work.

Related Project – the Los Gatos Creek Watershed Collaborative
Separately and related to this work, the District is partnering in a regional, multi-agency collaborative project led by the Santa Clara County FireSafe Council (Fire Safe Council) to improve forest health conditions and fire resiliency in the Lexington basin. This project, titled the Los Gatos Creek Watershed Collaborative (Collaborative) Forest Health Project (Forest Health Project), includes San Jose Water Company, Santa Clara County Parks, and neighboring private landowners. Together, the collaborative partnership is preparing to pursue funding from the Department of Forestry and Fire Protection (CAL FIRE) Forest Health Grant Program to support fuel reduction and forest resiliency work on approximately 960 acres, of which 214 acres are located within the District's Bear Creek Redwoods.[2] CAL FIRE has indicated that they expect to release a grant solicitation and a notice of award this fiscal year.

FISCAL IMPACT

The proposed Fiscal Year 2021-22 budget for the Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project is $350,000, which the Board will consider for approval as part of

[2] An additional 140 acres of District land within Long Ridge, Saratoga Gap, and Sierra Azul Preserves are also included in the treatments identified in the collaborative project but are not part of this Project.

the annual Budget and Action Plan process. The total multi-year budget for implementation of the Project as outlined in the PSA is $1,175,000, with the majority anticipated to be covered by grant funds. The District is in discussion with the Wildlife Conservation Board (WCB) to apply for $1M in grant funds to support this Project.

For the Los Gatos Creek Watershed Collaborative Project, CAL FIRE has indicated an interest in making a direct award of $7.5M, should funding be approved by the state. At CAL FIRE's request and on behalf of the Collaborative, the Fire Safe Council submitted a preliminary proposal in March 2021. Project scheduling/implementation will be dependent on grant funding.

BOARD AND COMMITTEE REVIEW

Board Committee review is not required for this item, and it was not previously reviewed by the Board of Directors.

PUBLIC NOTICE

Public notice was provided as required by the Brown Act. In addition, on October 5, 2020, the project was posted on the Proposed Projects Under the CalVTP Online Viewer for the public. This viewer allows the public to see all proposed CalVTP projects.

CEQA COMPLIANCE

In compliance with CEQA and as a project proponent for an activity covered by the CalVTP PEIR, the District conducted independent CEQA review of the proposed vegetation treatments on 214 acres of land within Bear Creek Redwoods. This CEQA review entailed preparation of a PSA checklist to ensure the Project's qualified vegetation management actions would occur within the treatable landscape, as defined by the CalVTP PEIR. Project proponents (such as the District) prepare PSAs to determine if the environmental effects resulting from vegetation treatment projects are disclosed in the CalVTP PEIR. If a project falls within the scope of the CalVTP PEIR, then the project proponent is a responsible agency under CEQA for implementing a project under the CalVTP.

As outlined in the District's PSA, the Project's proposed treatment type (i.e., ecological restoration) and treatment activities (i.e., manual and mechanical treatments) are consistent with those evaluated in the CalVTP PEIR and would take place within the CalVTP treatable landscape. Therefore, the District is a CEQA responsible agency and relies upon the CalVTP PEIR to evaluate the Project's potential environmental effects.

The District's PSA also assessed if the Project requires additional environmental documentation or independent environmental review, and concluded the following:

- Environmental effects resulting from the Project are covered in the PEIR.
- The Project would not cause new impacts previously unevaluated in the PEIR.
- The Project would not substantially increase the severity of significant impacts disclosed in the PEIR.
- There are no mitigation measures or Project alternatives that are substantially different from those in the PEIR or found infeasible in the PEIR, but that are now feasible, or that the project proponent declines to implement.

Given the above, no additional environmental documentation is required. For projects within the scope of the PEIR, the project proponent may implement the project using the PSA and PEIR without public circulation of any additional environmental document. Upon Board approval of the project, the District will file a Notice of Determination.

The PSA identifies potentially significant impacts to the following environmental resource topics: (1) archaeological, historical, and tribal cultural resources; (2) biological resources; and (3) hazardous materials, public health, and safety. Impacts to these resources will be avoided or mitigated to a less-than-significant level through implementation of the mitigation measures proposed as part of the Project and included in the Mitigation Monitoring and Reporting Program (e.g., pre-treatment biological surveys, locating staging areas away from residences and schools to reduce impacts due to noise).

The PSA determined that effects related to air quality and greenhouse gas (GHG) emissions would remain significant and unavoidable, even after the application of all feasible mitigation measures to lessen these impacts due to the generation of criteria air pollutants and greenhouse gases during treatment activities. In accordance with CEQA Guidelines Section 15093, projects that result in significant unavoidable impacts require adoption of a statement of overriding considerations that describes the reasons for the Board's approval of an action despite the environmental effects, and outline the Project benefits that render the significant effects acceptable. The District's Statement of Overriding Considerations (Attachment 2; Exhibit C to the resolution) concludes that the benefits resulting from the implementation of the CalVTP (fuel reduction leading to greater forest/fire resiliency and habitat improvement for rare species) and the Project outweigh significant unavoidable impacts associated with air quality and GHG emissions.

The PSA also analyzed the maintenance of the proposed vegetation treatments that would involve the same vegetation treatment activities used in the original treatment (i.e., manual and mechanical treatments), as well as invasive plant removal. Maintenance activities currently occur throughout District properties, consistent with, and covered by, the District's existing Integrated Pest Management Program (IPMP) and associated EIR and Addendum, which were certified in 2014 and 2019, respectively. Therefore, approval of the proposed project would rely on this PSA, as supported by both the CalVTP PEIR and the IPMP EIR and Addendum.

NEXT STEPS

Upon certification, the District will file a Notice of Determination with the State Clearinghouse. Implementation of the proposed work would begin in the Fall of 2021 pending the approval of the budget and action plan and completion of resource surveys that are already underway.
The General Manager will return to the Board for approval of a grant funding application to the WCB. Additionally, the General Manager will seek Board authorization to enter into an agreement with the Fire Safe Council for use of CAL FIRE grant funds, should CAL FIRE award the proposed Collaborative Forest Health grant to the Fire Safe Council.

Attachments

1. Final CalVTP PSA Bear Creek Redwoods
2. PSA Findings of Fact and Statement of Overriding Considerations
3. Resolution adopting Findings of Fact and Statement of Overriding Considerations, Mitigation Monitoring and Reporting Plan and Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project

Responsible Department Heads:
Kirk Lenington, Natural Resources
Jane Mark, Planning Manager

Prepared by:
Coty Sifuentes-Winter, Senior Resource Management Specialist
Alex Casbara, Planner III

Attachment 1

ASCENT ENVIRONMENTAL

CalVTP PROJECT-SPECIFIC ANALYSIS FOR THE

Bear Creek Redwoods Vegetation Treatment Project

Prepared for:

MIDPENINSULA REGIONAL OPEN SPACE

Midpeninsula Regional Open Space District

March 2021

CalVTP PROJECT-SPECIFIC ANALYSIS FOR THE

Bear Creek Redwoods Vegetation Treatment Project

Prepared for:

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March 2021

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LIST OF ABBREVIATIONS

AB	Assembly Bill
Board	California Board of Forestry and Fire Protection
CAAQS	California ambient air quality standards
CalVTP	California Vegetation Treatment Program
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	California Natural Diversity Database
CRHR	California Register of Historical Resources
dbh	diameter at breast height
GHG	greenhouse gas
IPMP	Integrated Pest Management Program
Midpen	Midpeninsula Regional Open Space District
NAAQS	national ambient air quality standards
NAHC	Native American Heritage Commission
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
PEIR	Program Environmental Impact Report
Preserve	Bear Creek Redwoods Open Space Preserve
PSA	Project-Specific Analysis
SOD	sudden oak death
SPR	standard project requirement
SR	State Route
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VMT	vehicle miles traveled
WLPZ	Watercourse and Lake Protection Zone

1 INTRODUCTION

1.1 PROJECT OVERVIEW

The California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR) evaluates the potential environmental effects of implementing qualifying vegetation treatments to reduce the risk of wildfire throughout the State Responsibility Area in California. It was designed for use by many state, special district, and local agencies to accelerate vegetation treatment project approvals by finding them to be within the scope of the PEIR. To support this effort, the California Board of Forestry and Fire Protection (Board) is developing CalVTP training modules, including example Project-Specific Analysis (PSA) documents, to help guide state and local agencies in preparing their own PSAs under the CalVTP PEIR.

In July 2020, the Midpeninsula Regional Open Space District (Midpen) submitted information regarding proposed vegetation treatments at the Bear Creek Redwoods Open Space Preserve to the Board to be considered for use in the Board's statewide CalVTP training. The Board selected Midpen's proposed vegetation treatment project to be used to prepare a PSA that will provide both California Environmental Quality Act (CEQA) compliance for Midpen to approve and implement the project, as well as serve as an example PSA for other agencies seeking to use the CalVTP PEIR to accelerate approval of their own vegetation treatment projects.

1.1.1 CEQA Responsible Agency and Proposed Project

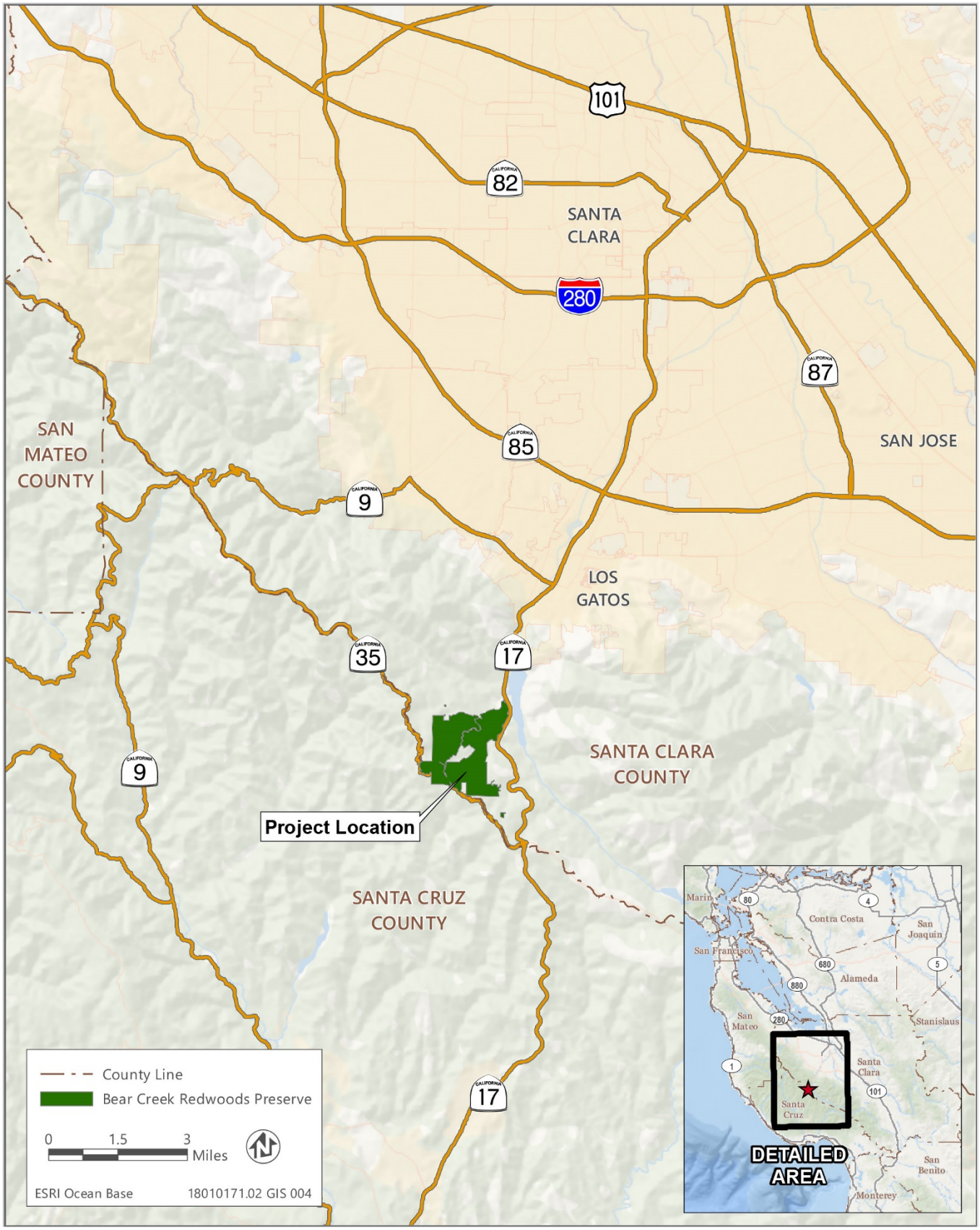
Serving as the Responsible Agency under CEQA, Midpen proposes to implement vegetation treatments on 214.4 acres of land (proposed project) within the Bear Creek Redwoods Open Space Preserve in Santa Clara County (Figure 1-1). Midpen is seeking CEQA compliance for the proposed project as a later activity covered by the CalVTP PEIR, using its PSA checklist. The proposed treatment type (i.e., ecological restoration) and the treatment activities (i.e., manual and mechanical treatments) are consistent with those evaluated in the CalVTP PEIR. In addition, the treatment areas are entirely within the CalVTP treatable landscape.

Maintenance of the proposed vegetation treatments would involve the same vegetation treatment activities used in the original treatment (i.e., manual and mechanical treatments), as well as invasive plant removal through herbicide application and flaming. Flaming is a method of killing weeds with a very brief and targeted application of heat via a small handheld propane torch. Flaming and herbicide application currently occur throughout Midpen's properties, consistent with, and covered by, Midpen's existing Integrated Pest Management Program (IPMP) and associated EIR and Addendum, which were certified in 2014 and 2019, respectively. Therefore, approval of the proposed project would rely on this PSA, as supported by both the CalVTP PEIR and the IPMP EIR and Addendum.

1.1.2 Purpose of This Document

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

The project-specific mitigation monitoring and reporting program, which identifies the CalVTP standard project requirements (SPRs) and mitigation measures applicable to the proposed project, is presented in Attachment A.



Source: Adapted by Ascent Environmental in 2020

Figure 1-1 Regional Location of the Bear Creek Redwoods Open Space Preserve

2 PROJECT DESCRIPTION

The proposed project consists of vegetation treatments within Midpen's Bear Creek Redwoods Open Space Preserve (Preserve). The Preserve is located immediately west of State Route (SR) 17, 3 miles south of Los Gatos, and spans Santa Clara and Santa Cruz Counties (refer to Figure 1-1). The CalVTP treatments would occur within several treatment areas totaling 214.4 acres, all of which are within Santa Clara County. The CalVTP treatment type that would be implemented is ecological restoration, and proposed treatment activities to implement the proposed project are manual and mechanical treatments. The proposed CalVTP treatments are shown in Figure 2-1 and are summarized in Table 2-1, below.

Table 2-1 Proposed CalVTP Treatments

CalVTP Treatment Type	Treatment Description	CalVTP Treatment Activity	Treatment Size (acres)	Equipment Used for Treatments	Timing of CalVTP Treatments
Ecological Restoration	Treatment of forestland areas affected by SOD	Mechanical (skidding, mastication, mowing, biomass chipping)	186.3	2 tractors/skidders, 1 slope mower, 2 masticators, 1 chipper	9/2021 – 12/2021 9/2022 – 12/2022 9/2023 – 12/2023
Ecological Restoration	Treatment of areas with heavy brush	Manual and mechanical (cutting, mastication, mowing)	18.7	2 masticators, 1 slope mower, 1–2 chainsaws	9/2022 – 12/2022 9/2023 – 12/2023
Ecological Restoration	Habitat improvement/fire resiliency treatments	Manual (cutting, biomass chipping)	9.4	5 chainsaws or hand saws, 5 brush cutters, 1 chipper	9/2021 – 12/2021 or 9/2022 – 12/2022
Total Acres			214.4		

Note: SOD = sudden oak death.

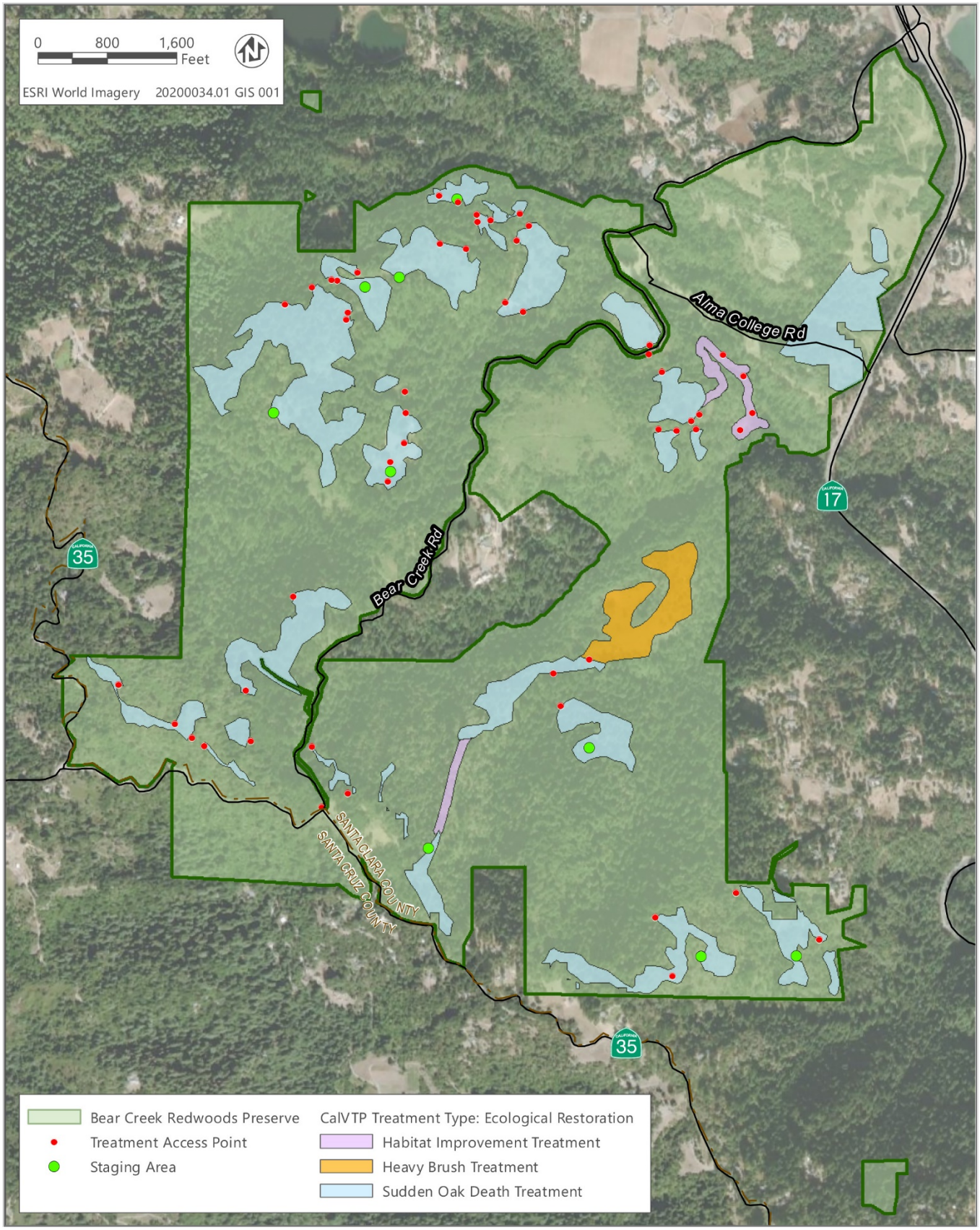
Source: Data and information provided by Midpen in 2020

2.1 TREATMENT TYPE: ECOLOGICAL RESTORATION

The proposed project would implement ecological restoration treatments for the dual purpose of wildfire risk reduction and enhancement of natural habitats. Consistent with the CalVTP ecological restoration treatment type, Midpen's proposed ecological restoration treatments would seek to return the landscape closer to natural conditions where natural fire processes can be reestablished and habitat quality can be improved, including controlling and eliminating nonnative, invasive plants and excess buildup of fire fuel. Specific restoration objectives include promoting forest health and resiliency by removing trees heavily damaged by sudden oak death (SOD), removing heavy brush and invasive species, and providing ecosystem and habitat improvements to increase fire resiliency and to support the success of a California rare plant species known to occur within the Preserve: Hickman's popcornflower (*Plagiobothrys chorisianus* var. *hickmanii*). Hickman's popcornflower has a California Rare Plant Rank of 4.2, which indicates that it is of limited distribution and is moderately threatened in California (CNPS 2020).

2.2 TREATMENT ACTIVITIES

The proposed vegetation treatment activities are manual and mechanical treatments. Biomass would be disposed of through chipping or lopping and scattering within the Preserve. Each of these activities is included in the CalVTP PEIR and is described in more detail below.



Source: Data received from Midpen in 2020

Figure 2-1 Proposed Project Treatments

2.2.1 Mechanical Vegetation Treatment

Mechanical treatments would occur on up to 205 of the 214.4 acres proposed for treatment and would primarily include skidding, mowing, and masticating target vegetation. Equipment would include tractors/skidders, slope mowers, and masticators (see details in Table 2-1). Generally, mechanical treatments would:

- remove or masticate target brush and trees 8 inches diameter at breast height (dbh) or less;
- masticate downed woody debris less than 8 inches in diameter;
- maintain at least 35 percent relative final density of chaparral vegetation; and
- to the extent feasible, retain live oak trees, blue elderberry, California buckeye, big-leaf maple, and other desirable species as determined by Midpen. The primary and secondary criteria for determining whether a species should remain include its level of association with beneficial organisms (e.g., pollinators) and if it is a species with characteristics qualifying it as a sensitive natural community, respectively.

2.2.2 Manual Vegetation Treatment

Manual treatments would be implemented exclusively on 9.4 acres and could be used on up to 28.1 acres (i.e., where manual and mechanical treatments would be used in combination). To implement manual treatments, hand tools and hand-operated power tools, including chainsaws, hand saws, and/or brush cutters, would be used to cut, clear, or prune herbaceous and woody species (see details in Table 2-1). Activities would include tree thinning and removal, invasive plant removal, and heavy brush removal. The same general guidelines for tree and vegetation removal and retention would be followed as described above for mechanical treatments.

2.2.3 Biomass Disposal

The proposed mechanical vegetation treatments described above would masticate (mulch) much of the vegetative debris and place it on the ground concurrently with vegetation removal. Additional biomass generated from the CalVTP treatments would primarily be disposed of by chipping (95 percent of biomass). Chipped biomass would be spread over treatment areas and would not exceed 6 inches in thickness. The remaining biomass (approximately 5 percent) would be lopped and scattered within the Preserve.

2.3 PROPOSED TREATMENTS

The proposed project includes SOD treatments, heavy brush treatments, and habitat improvement treatments, which are shown in Figure 2-1, summarized in Table 2-1, and further described below. Treatment crews could consist of up to 20 crew members but would typically range between eight and 12 personnel, and up to three crews would be working simultaneously. Treatment areas would be accessed by four-wheel-drive vehicles using existing seasonal roads and trails, and all equipment and vehicle staging would occur within treatment area boundaries.

The treatments would be implemented consistent with Midpen's ecologically sensitive vegetation management practices, which are focused on maintaining and improving high biodiversity and ecological health, and would be planned in coordination with a qualified botanist.

The CalVTP PEIR includes SPRs that are required to be incorporated, as applicable, into all proposed vegetation treatments under the CalVTP as a standard part of treatment design and implementation. Several of the SPRs are consistent with and expand upon Midpen's ecologically sensitive vegetation management practices. The CalVTP SPRs that are applicable to the proposed project are included in Attachment A.

2.3.1 Sudden Oak Death Treatments

SOD treatments would be implemented on 186.3 acres of the Preserve in forested areas heavily affected by SOD and involve treatment activities covered in the CalVTP PEIR (i.e., mechanical treatments). Using tractors/skidders, slope mowers, or masticators, all stems 8 inches dbh or less and downed woody debris less than 8 inches in diameter would be removed. Live oak trees less than 8 inches dbh on transition lines between forested and nonforested areas would be retained. Other species, such as hazelnut, blue elderberry, California buckeye, big-leaf maple, and other species meeting the criteria described in Section 2.2, "Treatment Activities," would also be retained, to the extent feasible. These treatments would occur between September and December in years 2021, 2022, and 2023; accordingly, they would take up to 12 months over 3 years to complete.

2.3.2 Heavy Brush Treatments

Heavy brush treatments proposed by Midpen would involve treatment activities covered by the CalVTP PEIR (i.e., manual and mechanical treatments). Heavy brush treatments would be implemented over 18.7 acres. Equipment would include masticators, a slope mower, and one to two chainsaws. In the areas consisting of heavy brush, all brush including dead and downed brush would be removed and masticated, along with Douglas-fir trees less than 8 inches dbh. Downed woody debris less than 8 inches in diameter would also be masticated. All live oak trees, blue elderberry, and other desirable species would be retained in these areas, to the extent feasible. Where chaparral vegetation is present, at least 35 percent relative final density would be maintained in the treatment area. Heavy brush treatments would be completed in 8 months over 2 years, occurring between September and December in 2022 and 2023.

2.3.3 Habitat Improvement Treatments

Habitat improvement treatments are proposed on 9.4 acres that are entirely within the CalVTP treatable landscape to support the success of a rare plant known to occur within the Preserve, Hickman's popcornflower, and to improve fire resiliency. The proposed habitat improvement treatments have been designed by qualified professionals with the specific purpose of benefitting the local population of this rare plant. Habitat improvement treatments would be implemented using manual treatment activities that are covered by the CalVTP PEIR.

Hickman's popcornflower is known to respond favorably to increased water availability and regular disturbances, as evidenced by previous treatments in areas that contain this species (Kelley 2012; Sifuentes-Winter pers. comms. 2020). In addition, some populations are being shaded out by understory woody plants in forested areas within the Preserve (Sifuentes-Winter pers. comms. 2020). Habitat improvement treatments would be implemented using chainsaws, hand saws, and/or brush cutters. Activities would include thinning forested areas surrounding Hickman's popcornflower to increase water and sunlight available to the rare plant, and removing competing understory woody plants that are encroaching where these rare plants are known to occur.

Habitat improvement treatments would occur over 4 months outside of the plant's critical life history, between September and December in year 2021 or 2022. Midpen would annually monitor the treated population relative to other populations nearby to determine whether the treatment is successful for 10 years following the initial treatment.

2.4 TREATMENT MAINTENANCE

Maintenance, or retreatment, of the areas treated under the proposed project would follow Midpen's existing general land management maintenance schedule, and would be based on real-time monitoring of site conditions. In forested areas, retreatment is anticipated to occur every 10 years, and in brush-dominated areas, retreatment is anticipated to occur every 5 years. Retreatment methods would involve the same vegetation treatment activities used in the original treatment (i.e., manual and mechanical treatments); however, Midpen anticipates the use of more hand crews than mechanical equipment. Maintenance treatments would be implemented between August and April 15; from April 15 through July, no retreatment would occur.

Treatment maintenance would also involve removing invasive plant species (e.g., French broom) and weeds through herbicide application and flaming. As previously described in Section 1.1, "Project Overview," herbicide application and flaming are covered by Midpen's IPMP EIR. Therefore, these treatment maintenance activities are not part of the proposed project and are not addressed further in this document.

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3 ENVIRONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

1. **Project Title:** Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project

2. **Project Proponent's Name and Address:** Midpeninsula Regional Open Space District
330 Distel Circle
Los Altos, CA 94022

3. **Contact Person Information and Phone Number:** Coty Sifuentes-Winter
650.691.1200
csifuentes@openspace.org

4. **Project Location:** Santa Clara County (see Chapter 2, "Project Description," and Figure 1-1)

5. **Total Area to Be Treated (acres)** 214.4 acres

6. **Description of Project**:

   a. Initial Treatment

   Initial treatments would include ecological restoration treatments by manual and mechanical treatment methods. See Chapter 2, "Project Description," for additional details.

   Treatment Types

   ☐ Wildland-Urban Interface Fuel Reduction

   ☐ Fuel Break

   ☒ Ecological Restoration

   Treatment Activities

   ☐ Prescribed Burning (Broadcast), _____ acres

   ☐ Prescribed Burning (Pile Burning)

   ☒ Mechanical Treatment, 205 acres

   ☒ Manual Treatment, 9.4 acres

   ☐ Prescribed Herbivory, _____ acres

   ☐ Herbicide Application, _____ acres

   Fuel Type

   ☐ Grass Fuel Type

   ☒ Shrub Fuel Type

   ☒ Tree Fuel Type

   b. Treatment Maintenance

   Maintenance of the areas treated under the proposed project would follow Midpen's existing general land management maintenance schedule, but would be based on real-time monitoring of site conditions. In forested areas, retreatment is anticipated to occur every 10 years, and in brush-dominated areas, retreatment is anticipated to occur every 5 years. Retreatment methods would involve the same vegetation treatment activities

used in the original treatment (i.e., manual and mechanical treatments); however, Midpen anticipates the use of more hand crews than mechanical equipment.

Treatment maintenance would also involve removing invasive plant species (e.g., French broom) and weeds through herbicide application and flaming. As previously described in Section 1.1, "Project Overview," herbicide application and flaming are covered by Midpen's IPMP. Therefore, these treatment maintenance activities are not part of the proposed project and are not addressed further in this document.

7. Regional Setting and Surrounding Land Uses:

The proposed CalVTP treatments are in Midpen's Bear Creek Redwoods Open Space Preserve in Santa Clara County, west of State Route (SR) 17, north and east of SR 35, and 3 miles south of Los Gatos. The area is undeveloped, mountainous, and primarily forested public lands surrounded by additional forestlands; the Lexington Reservoir; and areas of scattered residents, vineyards, tree farms, and a few public services, such as an elementary school, a church, and a fire station.

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

None.

Coastal Act Compliance

☒ The proposed project is NOT within the Coastal Zone

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

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

9. Native American Consultation. *For treatment projects that are within the scope of the CalVTP PEIR, Assembly Bill (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 Public Resources Code Sections 21080.3.1, 21080.3.2, and 21082.3, project partners 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 partners must begin consultation before the release of the environmental document and must follow the requirements of the cited Public Resources Code sections.*

Pursuant to CalVTP SPR BIO-2, Native American tribal contacts in Santa Clara County were sent letters via certified mail on October 20, 2020. Tribal contacts included Valentin Lopez, Chairperson, Amah Mutsun Tribal Band; Irene Zwierlein, Chairperson, Amah Mutsun Tribal Band of Mission San Juan Bautista; Patrick Orozco, Chairperson, Costanoan Ohlone Rumsen-Mutsen Tribe; Ann Marie Sayers, Chairperson, Indian Canyon Mutsun Band of Costanoan; Kanyon Sayers-Roods, Indian Canyon Mutsun Band of Costanoan; Monica Arellano, Vice Chairperson, Muwekma Ohlone Indian Tribe of the San Francisco Bay Area; Katherine Erolinda Perez, Chairperson, North Valley Yokuts Tribe; Timothy Perez, Most Likely Descendent Contact, North Valley Yokuts Tribe; and Andrew Galvan, Ohlone Indian Tribe. No responses were received from any Native American tribes.

DETERMINATION

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 partners that would avoid or reduce the effects so that clearly no significant effects would occur. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

☐ I find that the proposed project will have significant environmental effects that are (a) new and were not covered in the CalVTP 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	

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4 PROJECT-SPECIFIC ANALYSIS

4.1 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	AES-2	NA	LTS	No	Yes
Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Wildland Urban Interface Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	LTS	Impact AES-2, pp. 3.2-20 – 3.2-25	Yes	AES-1 AES-3	NA	LTS	No	Yes
Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Nonshaded Fuel Break Treatment Type	SU	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.

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

The proposed project would be implemented using manual and mechanical treatments activities. The potential for these treatment activities to result in short-term degradation of visual character was examined in the PEIR. The proposed treatments would occur within Midpen's Bear Creek Redwoods Open Space Preserve, which contains public hiking trails that pass through or in close proximity to some of the areas proposed for treatment. In addition, although there are no designated state scenic highways with views of the treatment areas, SR 17 and SR 35 are eligible state scenic highways and provide views of portions of the treatments areas in certain locations (Caltrans 2018). Consistent with the PEIR, the presence of large mechanical equipment could contrast with the natural environment where publicly visible, such as adjacent to a public trail or roadway. However, a treatment and its visibility would be temporary and would not dominate a view or block any views from scenic vistas or state scenic highways. It also would not substantially degrade the existing visual character or quality of an area given that the treatment activities would be limited in geographic extent. The potential for the project to result in short-term substantial degradation of the visual character of the project area is within the scope of the PEIR, because the proposed treatment activities and types of equipment proposed for use are consistent with those analyzed in the PEIR. SPR AES-2 would be applicable to the proposed project. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT AES-2

The proposed project would include only the ecological restoration treatment type. The potential for this treatment type to result in long-term degradation of the visual character of a treatment area was examined in the PEIR. Portions of the treatment areas would be publicly visible from recreation areas, such as trails, and from eligible state scenic highways, as described under Impact AES-1. However, consistent with the PEIR, the proposed ecological restoration treatments would seek to return the landscape to a more natural condition. Treatments would be limited to removing trees suffering from SOD, removing heavy brush, and improving habitat for a rare plant species. In addition, visually dominant trees would remain in place; tree and vegetation removal would be limited to small trees 8 inches dbh or less and downed woody debris that are 8 inches in diameter or less. For these reasons, the project would not substantially degrade public views or damage scenic resources in a state scenic highway. The potential for the project to result in long-term substantial degradation of the visual character the project area is within the scope of the PEIR, because the proposed treatment type and activities are consistent with those analyzed in the PEIR. The SPRs applicable to the proposed treatment project are AES-1 and AES-3. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT AES-3

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

NEW AESTHETIC AND VISUAL RESOURCE IMPACTS

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to aesthetics and visual resources would occur that is not covered in the PEIR.

4.2 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.

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

Vegetation treatments would include ecological restoration through manual and mechanical treatment activities. The potential for this treatment type and the treatment activities to result in the loss of forestland or conversion of forestland to non-forest use was examined in the PEIR. The treatment areas include forested lands, and tree removal would occur under the project. However, tree and vegetation removal under the proposed project would target brush and small-diameter trees, whereas trees over 8 inches dbh would be retained. In addition, treatments would occur in small, discrete areas of the greater Preserve. Consistent with the PEIR, the vegetation remaining after treatments would meet the definition of forestland as defined in Public Resources Code Section 12220(g), and no substantial loss of forestland or conversion to non-forest uses would occur. Therefore, the potential for the project to result in the loss or conversion of forestland is within the scope of the PEIR. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW AGRICULTURE AND FORESTRY RESOURCE IMPACTS

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.3.1, "Environmental Setting," and Section 3.3.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to agriculture and forestry resources would occur that is not covered in the PEIR.

4.3 AIR QUALITY

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

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Air Quality Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP PEIR?

☐ Yes ☒ No If yes, complete row(s) below and discussion

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

Discussion

IMPACT AQ-1

Use of vehicles and equipment during vegetation treatments would result in emissions of criteria pollutants that could exceed California ambient air quality standards (CAAQS) or national ambient air quality standards (NAAQS) thresholds. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was examined in the PEIR. Emissions of criteria air pollutants as a result of vehicle and equipment use under the proposed project would be potentially significant and are within the scope of the PEIR because the size of crews, the types of equipment, and the duration of equipment use would be consistent with those analyzed in the PEIR. The SPRs applicable to the proposed project are AQ-1 and AQ-4. Emission reduction techniques, including Mitigation Measure AQ-1, would be infeasible for the project proponent to implement because the treatments would be implemented by Midpen, a special district with variable funding. It would be cost prohibitive to use equipment meeting the latest efficiency standards, including meeting the U.S. Environmental Protection Agency's Tier 4 emission standards, using renewable diesel fuel, using electric- and gasoline-powered equipment, and using equipment with Best Available Control Technology. In addition, carpooling may not be feasible or recommended during an active COVID-19 outbreak. Therefore, this impact would remain unavoidable and potentially significant for the same reasons explained in the PEIR, but for the reasons explained above, would not constitute a substantially more severe significant impact.

IMPACT AQ-2

Use of vehicles and mechanical equipment during vegetation treatments could expose people to diesel particulate matter emissions. The potential to expose people to diesel particulate matter emissions during vegetation treatments was examined in the PEIR. Consistent with the PEIR, because of the short and intermittent nature of treatment activities (e.g., SOD treatments would occur between September and December in years 2021, 2022, and 2023), and because treatment activities would move throughout the treatment areas and not take place near the same people for an extended period of time, treatment activities would not expose any person to an incremental increase in cancer risk associated with diesel particulate matter greater than 10 in one million or a Hazard Index of 1.0 or greater. Diesel particulate matter emissions from the proposed treatments would be within the scope of the PEIR, because the types and amount of equipment that would be used, as well as the duration of use during proposed treatments, are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are AQ-1, HAZ-1, NOI-4, and NOI-5. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT AQ-3

This impact does not apply to the proposed project because no naturally occurring asbestos is mapped in the treatment areas (USGS 2010, 2011).

IMPACT AQ-4

This impact does not apply to the proposed project because no prescribed burning would occur.

IMPACT AQ-5

Use of diesel-powered equipment during vegetation treatments could expose people to objectionable odors from diesel exhaust. The potential to expose people to objectionable odors from diesel exhaust was examined in the PEIR. Consistent with the PEIR, diesel exhaust emissions would be temporary, would not be generated at any one location for an extended period of time, and would dissipate rapidly from the source with an increase in distance. In addition, treatments would occur in undeveloped areas where humans are present intermittently and for brief periods. This

impact is within the scope of the PEIR because the equipment that would be used and the duration of use under the proposed project are consistent with what was analyzed in the PEIR. SPRs applicable to the proposed project are AQ-1, HAZ-1, NOI-4, and NOI-5. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT AQ-6

This impact does not apply to the proposed project because no prescribed burning would occur.

NEW AIR QUALITY IMPACTS

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.4.1, "Environmental Setting," and Section 3.4.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to air quality would occur that is not covered in the PEIR.

4.4 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	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-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-5 CUL-6 CUL-7 CUL-8	CUL-2	LTSM	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.

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

Midpen completed and certified an EIR in 2017 for a use and management plan for the Bear Creek Redwoods Open Space Preserve (Preserve EIR). As a part of this effort, a cultural resources report was prepared that included a cultural records search from the Northwest Information Center (NWIC), which included the currently proposed treatment areas. A total of 27 cultural resources were identified as previously recorded within the Preserve: 10 historical resources, nine historic-era archaeological resources, six prehistoric archaeological resources/sites, and two multicomponent sites containing both historic and prehistoric constituents. The majority of these cultural resources

had not been evaluated for eligibility for the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR), and one historical resource and one historic-era archaeological resource were determined to have been previously destroyed. In addition to the previously recorded cultural resources, the Preserve EIR noted 11 undocumented resources present within the Preserve: five historical resources, five historic-era archaeological resources, and one prehistoric archeological resource that could not be re-located during two subsequent investigations. These resources had been previously identified by Midpen personnel and/or were noted in previous cultural resource investigations but had never been formally recorded on DPR 523 forms or otherwise evaluated for NRHP or CRHR eligibility.

Two additional cultural resource reports, prepared in 2018 and 2019, include the results of archaeological surveys of the Preserve. They were prepared to complete the remaining requirements of the Preserve EIR as they relate to unevaluated cultural resources, including recording them on DPR 523 forms or otherwise evaluating for NRHP or CRHR eligibility. According to these reports, 21 of the previously recorded archaeological sites, some of which overlap with or are immediately adjacent to the proposed treatment areas, were recommended as eligible for the CRHR (Albion Environmental 2018, 2019). The requirements of SPRs CUL-1, CUL-3, and CUL-4 from the CalVTP PEIR have been met by the recent archaeological and historical records search and additional archaeological studies and surveys that occurred for the Preserve EIR.

Consistent with CalVTP SPR CUL-2, an updated Native American contact list was obtained from the Native American Heritage Commission (NAHC). On October 20, 2020, letters inviting the tribes to consult were mailed to the nine tribal representatives indicated by NAHC. No responses were received from any Native American tribes. A September 9, 2020, search of NAHC's sacred lands database returned negative results.

IMPACT CUL-1

Vegetation treatment activities include manual and mechanical treatments, which could damage historical resources if present within a treatment area. The potential for these treatment activities to result in disturbance to, damage to, or destruction of historic resources, including built-environment structures that have not yet been evaluated for historical significance, was examined in the PEIR. According to the NWIC records search and other previous studies of the Preserve, historical resources are located within the Preserve, some of which are within or immediately adjacent to treatment areas. In addition, structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historical significance may be present within treatment areas. However, the proposed project would remove trees and other vegetation, and any structures present within treatment areas would be avoided, per SPR CUL-7. This impact is within the scope of the PEIR, because the treatment activities and the intensity of ground disturbance that would occur under the proposed project are consistent with those analyzed in the PEIR. SPRs applicable to this impact are CUL-7 and CUL-8. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT CUL-2

Vegetation treatment activities would include mechanical treatments that use heavy equipment that could result in ground disturbance as vegetation is removed; this could result in damage to known or unknown archaeological resources if present within a treatment area. The potential for these treatment activities to result in disturbance to, damage to, or destruction of archaeological resources was examined in the PEIR. This impact is within the scope of the PEIR, because the treatment activities and the intensity of ground disturbance that would occur under the proposed project are consistent with those analyzed in the PEIR. SPRs applicable to this impact are CUL-5 through CUL-8. Mitigation Measure CUL-2 would also apply to this treatment to protect any inadvertent discoveries of archaeological resources. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT CUL-3

As previously summarized, Native American contacts were sent an invitation to consult via certified mail on October 20, 2020, consistent with the requirements of SPR CUL-2. No responses were received from any Native American tribes.

The potential for treatment activities to cause a substantial adverse change in the significance of a tribal cultural resource was examined in the PEIR. Proposed treatment activities include manual and mechanical treatments. Ground-disturbing activities, such as the use of heavy machinery, could inadvertently damage or destroy tribal cultural resources if they are present in treatment areas. The potential for adverse effects on tribal cultural resources during implementation of the proposed project is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and intensity of ground disturbance are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are CUL-1 through CUL-6 and CUL-8. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT CUL-4

Vegetation treatment activities would include mechanical treatments using heavy equipment; these treatments may use tractors, skidders, masticators, and/or chippers, which could uncover human remains if present in a treatment area. The potential for treatment activities to uncover human remains was examined in the PEIR. The NWIC records search did not reveal any burials or sites containing human remains. This impact is within the scope of the PEIR, because the intensity of ground disturbance under the proposed project is consistent with what was analyzed in the PEIR. Additionally, consistent with the PEIR, the proposed project would comply with California Health and Safety Code Sections 7050.5 and 7052 and Public Resources Code Section 5097 in the event of a discovery. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCE IMPACTS

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to archaeological, historical, or tribal cultural resources would occur that is not covered in the PEIR.

4.5 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	BIO-1 BIO-2 BIO-6 BIO-7 BIO-9 GEO-1 GEO-3 GEO-4 GEO-5 GEO-7 HYD-4	BIO-1a BIO-1b	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTSM (all wildlife species except bumble bees) SU (bumble bees)	Impact BIO-2, pp 3.6-138 – 3.6-184	Yes	BIO-1 BIO-2 BIO-9 BIO-10 GEO-1 HYD-4	BIO-2a BIO-2b	LTSM	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation That Leads to Loss of Habitat Function	LTSM	Impact BIO-3, pp 3.6-186 – 3.6-191	Yes	BIO-1 BIO-2 BIO-3 BIO-6 BIO-9	BIO-3a BIO-3b	LTSM	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTSM	Impact BIO-4, pp 3.6-191 – 3.6-192	Yes	BIO-1 BIO-2 HYD-4	None	LTS	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTSM	Impact BIO-5, pp 3.6-192 – 3.6-196	Yes	BIO-1 BIO-2 BIO-3 HYD-4	None	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	BIO-1 BIO-2 BIO-12	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	NI	Impact BIO-7, pp 3.6-198 – 3.6-199	Yes	AD-3	NA	NI	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?
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	NI	Impact BIO-8, pp 3.6-199 – 3.6-200	No	--	--	--	--	--

[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, an Ascent biologist conducted a data review of project-specific biological resources, including habitat and vegetation types, and special-status plants, special-status wildlife, and sensitive habitats (i.e., sensitive natural communities, wetlands) with potential to occur in the treatment areas. Habitat and vegetation types in the treatment areas were identified using mapping provided by Midpen on August 26, 2020. The treatment areas together occupy approximately 214 acres, and vegetation within the treatment areas includes redwood forest, oak woodland, nonnative/ornamental shrubland, mixed hardwood forest, mixed Douglas fir forest, Douglas fir forest, coyote brush scrub, coast live oak, California bay, California annual grassland, riverine, freshwater pond, freshwater emergent wetland, and stream habitats, as well as some built-up/urban and agricultural areas.

A list of special-status plant and wildlife species with potential to occur within the treatment areas 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 database records for the nine U.S. Geological Survey (USGS) quadrangles containing and surrounding the treatment areas (CNDDB 2020; CNPS 2020), a special-status plant survey report (EcoSystems West 2008), a California red-legged frog survey report (Biosearch Environmental Consulting 2018a), a special-status bat survey report (H. T. Harvey and Associates 2016), a special-status species assessment (H. T. Harvey & Associates 2006), and Appendix BIO-3 (Table 1a, Table 1b, and Table 19) in the PEIR (Volume II) for special-status plants and wildlife that could occur in the Central California Coast ecoregion. A list of sensitive natural communities with potential to occur within the treatment areas was compiled by completing a CNDDB search of the nine USGS quads surrounding the treatment areas (CNDDB 2020) and reviewing Table 3.6-3 (pages 3.6-25 – 3.6-27) in the PEIR (Volume II) for sensitive natural communities that could occur in the Central California Coast ecoregion.

Ascent conducted a reconnaissance survey on September 24, 2020, to identify and document sensitive resources (e.g., aquatic habitat, riparian habitat, sensitive natural communities) and to assess the suitability of habitat in the treatment areas for special-status plant and wildlife species. Vegetation communities and soil characteristics were identified, and incidental wildlife observations were recorded.

Based on implementation of SPR BIO-1, including review of occurrence data, species ranges, habitat requirements for each species, results of surveys conducted in the Preserve, and habitat present within the treatment areas as assessed during reconnaissance surveys, a complete list of all species with potential to occur in the vicinity of the proposed project was assembled (Attachment B). Twenty-three of the special-status plants and 21 of the special-status wildlife from the complete list of species were determined to have potential to occur in the treatment areas (Table 4.5-1). These species are discussed in detail under Impact BIO-1 (special-status plants) and Impact BIO-2 (special-status wildlife).

Of the 23 special-status plant species with potential to occur in the treatment areas, only one has been documented in the Preserve during protocol-level surveys for special-status plants: Hickman's popcornflower (EcoSystems West 2008). Since 2008, several special-status plant species have been assigned a rare plant rank of 1B that may not have been included in the initial protocol-level surveys (CNDDB 2020; CNPS 2020). Additionally, Townsend's big-eared bat and pallid bat have been detected in the Preserve during focused surveys for special-status bats (H. T. Harvey & Associates 2016), and satellite telemetry data from the Santa Cruz Puma Project and remote camera data from Midpen show that mountain lions frequently traverse the Preserve (Midpen 2020; Yovovich et al. 2020).

Table 4.5-1 Special-Status Plant and Wildlife Species That May Occur in the Treatment Areas

Species	Listing Status[1]	Listing Status[1]	Listing Status[1]	Habitat	Potential for Occurrence
	Federal	State	CRPR		
Special-Status Plants					
Bent-flowered fiddleneck *Amsinckia lunaris*	–	–	1B.2	Cismontane woodland, valley and foothill grassland, coastal bluff scrub. 10–2,608 feet in elevation. Blooms March–June. Annual.	May occur. Treatment areas contain woodland habitat potentially suitable for this species.
Anderson's manzanita *Arctostaphylos andersonii*	–	–	1B.2	Open sites, redwood forest. 197–2,493 feet in elevation. Blooms November–May. Perennial.	May occur. Treatment areas contain redwood forest habitat potentially suitable for this species.
Santa Cruz Mountains pussypaws *Calyptridium parryi* var. *hesseae*	–	–	1B.1	Chaparral, cismontane woodland. Sandy or gravelly openings. 984–5,036 feet in elevation. Blooms May–August. Annual.	May occur. Treatment areas contain woodland habitat potentially suitable for this species.
Robust spineflower *Chorizanthe robusta* var. *robusta*	FE	–	1B.1	Sandy terraces and bluffs or in loose sand. 30–804 feet in elevation. Blooms April–September. Annual.	May occur. Treatment areas contain woodland and coyote brush scrub habitat potentially suitable for this species.
San Francisco collinsia *Collinsia multicolor*	–	–	1B.2	On decomposed shale (mudstone) mixed with humus; sometimes on serpentine. 98–820 feet in elevation. Blooms March–May. Annual.	May occur. Treatment areas contain forest and coyote brush scrub habitats potentially suitable for this species.
Tear drop moss *Dacryophyllum falcifolium*	–	–	1B.3	Limestone substrates and rock outcrops. 164–902 feet in elevation. Perennial.	May occur. Treatment areas contain forest habitat potentially suitable for this species.
Western leatherwood *Dirca occidentalis*	–	–	1B.2	On brushy slopes, mesic sites; mostly in mixed evergreen and foothill woodland communities. 82–1,394 feet in elevation. Blooms January–March. Perennial.	May occur. Treatment areas contain forest and woodland habitat potentially suitable for this species.
Minute pocket moss *Fissidens pauperculus*	–	–	1B.2	Moss growing on damp soil along the coast. In dry streambeds and on	May occur. Treatment areas contain forest habitat potentially suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	Listing Status[1] CRPR	Habitat	Potential for Occurrence
				streambanks. 33–3,360 feet in elevation. Perennial.	
Fragrant fritillary *Fritillaria liliacea*	–	–	1B.2	Often on serpentine; various soils reported though usually on clay, in grassland. 10–1,312 feet in elevation. Blooms February–April. Perennial geophyte.	May occur. Treatment areas contain grassland habitat potentially suitable for this species.
Toren's grimmia *Grimmia torenii*	–	–	1B.3	Openings, rocky, boulder and rock walls, carbonate, volcanic. 1,066–3,806 feet in elevation. Perennial.	May occur. Treatment areas contain forest habitat potentially suitable for this species.
Arcuate bush-mallow *Malacothamnus arcuatus*	–	–	1B.2	Gravelly alluvium in chaparral, coastal sage scrub, or woodland. 3–2,411 feet in elevation. Blooms April–September. Perennial.	May occur. Treatment areas contain woodland habitat potentially suitable for this species.
Hall's bush-mallow *Malacothamnus hallii*	–	–	1B.2	Chaparral, coastal scrub. 33–2,395 feet in elevation. Blooms May–September. Perennial.	May occur. Treatment areas contain coyote brush scrub habitat potentially suitable for this species.
Marsh microseris *Microseris paludosa*	–	–	1B.2	Closed-cone coniferous forest, cismontane woodland, coastal scrub, valley and foothill grassland. 16–984 feet in elevation. Blooms April–June. Perennial.	May occur. Treatment areas contain woodland and grassland habitat potentially suitable for this species.
Woodland woollythreads *Monolopia gracilens*	–	–	1B.2	Grassy sites, openings in broadleaved upland forest, chaparral, cismontane woodland, North Coast coniferous forest; valley and foothill grassland; sandy to rocky soils. Often seen on serpentine after burns but may have only weak affinity to serpentine. 328–3,937 feet in elevation. Blooms March–July. Annual.	May occur. Treatment areas contain grassland habitat potentially suitable for this species.
Santa Cruz Mountains beardtongue *Penstemon rattanii* var. *kleei*	–	–	1B.2	Sandy shale slopes; sometimes in the transition between forest and chaparral. 1,312–3,609 feet in elevation. Blooms May–June. Perennial.	May occur. Treatment areas contain forest habitat potentially suitable for this species.
White-rayed pentachaeta *Pentachaeta bellidiflora*	FE	SE	1B.1	Open dry rocky slopes and grassy areas, often on soils derived from serpentine bedrock. 115–2,001 feet in elevation. Blooms March–May. Annual.	May occur. Treatment areas contain grassland habitat potentially suitable for this species.
Monterey pine *Pinus radiata*	–	–	1B.1	Closed-cone coniferous forest, cismontane woodland. Three primary stands are native to California. Dry bluffs and slopes. 197–410 feet in elevation. Perennial.	May occur. Treatment areas contain woodland habitat potentially suitable for this species.
White-flowered rein orchid *Piperia candida*	–	–	1B.2	Sometimes on serpentine. Forest duff, mossy banks, rock outcrops, and muskeg. 148–5,299 feet in	May occur. Treatment areas contain forest duff habitat potentially suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	Listing Status[1] CRPR	Habitat	Potential for Occurrence
				elevation. Blooms May–September. Perennial.	
Choris' popcornflower *Plagiobothrys chorisianus* var. *chorisianus*	–	–	1B.2	Wetlands in chaparral, coastal scrub, coastal prairie. 49–525 feet in elevation. Blooms March–June. Annual.	May occur. Treatment areas may contain wetland habitat potentially suitable for this species.
Hickman's popcornflower *Plagiobothrys chorisianus* var. *hickmanii*	–	–	4.2	Wetland. 49–607 feet in elevation. Blooms April–June. Annual.	Known to occur. This species was detected during protocol-level special-status plant surveys conducted in the Preserve in 2008 (EcoSystems West 2008).
Rock sanicle *Sanicula saxatilis*	–	SR	1B.2	Bedrock outcrops and talus slopes in chaparral or oak woodland habitat. 2,198–4,101 feet in elevation. Blooms April–May. Perennial.	May occur. Treatment areas contain oak woodland habitat potentially suitable for this species.
Santa Cruz clover *Trifolium buckwestiorum*	–	–	1B.1	Moist grassland. Gravelly margins. 344–2,001 feet in elevation. Blooms April–October. Annual.	May occur. Treatment areas contain grassland habitat potentially suitable for this species.
Caper-fruited tropidocarpum *Tropidocarpum capparideum*	–	–	1B.1	Valley and foothill grassland. Alkaline clay. 0–1,181 feet in elevation. Blooms March–April. Annual.	May occur. Treatment areas contain grassland habitat potentially suitable for this species.
Special-Status Wildlife					
California giant salamander *Dicamptodon ensatus*	–	SSC	–	Known from wet coastal forests near streams and seeps from Mendocino County south to Monterey County and east to Napa County. Aquatic larvae found in cold, clear streams, occasionally in lakes and ponds. Adults known from wet forests under rocks and logs near streams and lakes.	May occur. There are several documented occurrences of this species within approximately 5 miles of the treatment areas (CNDDB 2020). Habitat suitable for California giant salamander is present within forest habitat near streams in the treatment areas.
California red-legged frog *Rana draytonii*	FT	SSC	–	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	May occur. California red-legged frogs have not been detected within the treatment areas; however, there are several known occurrences of the species within approximately 1 mile of the treatment areas (CNDDB 2020; Biosearch Environmental Consulting 2018a). Recent surveys of potential breeding habitat (e.g., ponds) adjacent to the treatment areas did not result in detection of California red-legged frogs (Biosearch Environmental Consulting 2018a). This species is not expected to breed within ponds adjacent to the treatment areas; however, individuals may use upland habitat in the treatment areas for dispersal.
Foothill yellow-legged frog *Rana boylii*	–	SE SSC	–	Partly-shaded, shallow streams, and riffles with a rocky substrate in a variety of habitats. Need at least some cobble-sized substrate for egg-laying. Need at least 15 weeks to attain metamorphosis.	May occur. The nearest known occurrence of foothill yellow-legged frog is approximately 3 miles west of the treatment areas (CNDDB 2020). The treatment areas contain habitat potentially suitable for this species within streams and drainages.

Species	Listing Status[1] Federal	Listing Status[1] State	Listing Status[1] CRPR	Habitat	Potential for Occurrence
Santa Cruz black salamander *Aneides niger*	–	SSC	–	Mixed deciduous and coniferous woodlands and coastal grasslands in San Mateo, Santa Cruz, and Santa Clara Counties. Adults found under rocks, talus, and damp woody debris.	May occur. There are several known occurrences of Santa Cruz black salamander within approximately 3 miles of the treatment areas (CNDDB 2020). The treatment areas contain habitat potentially suitable for this species within woodlands and forests.
Western pond turtle *Actinemys marmorata*	–	SSC	–	Ponds, marshes, rivers, streams, and irrigation ditches, usually with aquatic vegetation, below 6,000 feet elevation. Need basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 kilometer from water for egg-laying.	May occur. Habitat suitable for western pond turtle is present within ponds adjacent to the treatment area. Individual western pond turtles were detected during live-trapping surveys conducted in 2017. All captured turtles were located at Lower Lake and were determined to be male (Biosearch Environmental Consulting 2018b; H. T. Harvey & Associates 2006). No breeding attempts, nesting, or young have been observed to date. While the Preserve likely does not support a viable population of the species, there have been individual detections of pond turtles within the vicinity of the treatment areas (Biosearch Environmental Consulting 2018b).
American peregrine falcon *Falco peregrinus anatum*	FD	SD FP	–	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site.	May occur. Peregrine falcons may forage within the treatment areas; however, nesting habitat suitable for the species is not present.
Bald eagle *Haliaeetus leucocephalus*	FD	SE FP	–	Lower montane coniferous forest, old growth. Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests within 1 mile of water. Nests in large, old-growth, or dominant live tree with open branches, especially ponderosa pine. Roosts communally in winter.	May occur. Nesting habitat potentially suitable for bald eagle is present within forest habitat in the treatment areas.
Golden eagle *Aquila chrysaetos*	–	FP	–	Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.	May occur. Golden eagles may forage within the treatment areas; however, nesting habitat suitable for the species is not present.
Loggerhead shrike *Lanius ludovicianus*	–	SSC	–	Prefers open country for hunting, with perches for scanning, and fairly dense shrubs and brush for nesting.	May occur. The treatment areas contain habitat potentially suitable for this species within brushy areas.
Long-eared owl *Asio otus*	–	SSC	–	Riparian bottomlands grown to tall willows and cottonwoods; also, belts of live oak paralleling stream courses. Require adjacent open land productive of mice and the presence of old nests of crows, hawks, or magpies for breeding.	May occur. The treatment areas contain habitat potentially suitable for this species within forested portions of the treatment areas.
Northern harrier *Circus hudsonius*	–	SSC	–	Coastal salt and fresh-water marsh. Nest and forage in grasslands, from salt grass in desert sink to mountain cienagas. Nests on ground in	May occur. Habitat potentially suitable for this species is present adjacent to the treatment areas near freshwater marsh or pond habitat.

Species	Listing Status[1] Federal	Listing Status[1] State	Listing Status[1] CRPR	Habitat	Potential for Occurrence
				shrubby vegetation, usually at marsh edge; nest built of a large mound of sticks in wet areas.	
Olive-sided flycatcher *Contopus cooperi*	–	SSC	–	Nesting habitats are mixed conifer, montane hardwood-conifer, Douglas-fir, redwood, red fir, and lodgepole pine. Most numerous in montane conifer forests where tall trees overlook canyons, meadows, lakes, or other open terrain.	May occur. The treatment areas contain habitat potentially suitable for olive-sided flycatcher in forest habitat and there are several recent observations of the species in the vicinity of the treatment areas (eBird 2020).
Purple martin *Progne subis*	–	SSC	–	Inhabits woodlands, low-elevation coniferous forest of Douglas-fir, ponderosa pine, and Monterey pine. Nests in old woodpecker cavities mostly, also in human-made structures. Nest often located in tall, isolated tree/snag.	May occur. The treatment areas contain habitat potentially suitable for purple martin within large conifer trees.
Vaux's swift *Chaetura vauxi*	–	SSC	–	Redwood, Douglas-fir, and other coniferous forests. Nests in large hollow trees and snags. Often nests in flocks. Forages over most terrains and habitats but shows a preference for foraging over rivers and lakes.	May occur. The treatment areas contain forest habitat potentially suitable for this species and there have been several recent observations of the species in the vicinity of the treatment areas (eBird 2020).
White-tailed kite *Elanus leucurus*	–	FP	–	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	May occur. The treatment areas contain nesting habitat potentially suitable within woodlands and there have been several recent observations of the species in the vicinity of the treatment areas (eBird 2020).
Mountain lion Puma concolor	–	SC	–	Mountain lions inhabit a wide range of ecosystems, including mountainous regions, forests, deserts, and wetlands. Mountain lions establish and defend large territories and can travel large distances in search of prey or mates. The Central Coast and Southern California Evolutionarily Significant Units (ESUs) were granted emergency listing status in April of 2020, and CDFW is currently reviewing a petition to list these ESUs as threatened under CESA.	Known to occur. Mountain lions have been documented traversing the treatment areas, and it is likely that the treatment areas occupy a portion of the home range of many individual lions (Midpen 2020; Yovovich et al. 2020). Although denning in treatment areas is unlikely, potential den habitat (e.g., caves, cavities, thickets) may be present within treatment areas.
Pallid bat *Antrozous pallidus*	–	SSC	–	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	Known to occur. Pallid bats have been detected in the vicinity of the treatment areas during surveys conducted at Alma College (H. T. Harvey & Associates 2016). Habitat potentially suitable for pallid bat is present within large trees and rocky areas in treatment areas.

Species	Listing Status[1] Federal	Listing Status[1] State	Listing Status[1] CRPR	Habitat	Potential for Occurrence
Ringtail *Bassariscus astutus*	–	FP	–	Suitable habitat for ringtails consists of a mixture of forest and shrubland in close association with rocky areas or riparian habitats. Hollow trees, logs, snags, cavities in talus and other rocky areas, and other recesses are used for cover. Usually found within 0.6 mile of a permanent water source.	May occur. Habitat potentially suitable for ringtail is present within riparian areas and forested areas near streams and drainages in the treatment areas.
San Francisco dusky-footed woodrat *Neotoma fuscipes annectens*	–	SSC	–	Chaparral, redwood. Forest habitats of moderate canopy and moderate to dense understory. May prefer chaparral and redwood habitats. Constructs nests of shredded grass, leaves, and other material. May be limited by availability of nest-building materials.	Known to occur. San Francisco dusky-footed woodrat nests have been observed in the Preserve, and habitat suitable for this species is present throughout forest and brushy areas within the treatment areas (H. T. Harvey & Associates 2006).
Townsend's big-eared bat *Corynorhinus townsendii*	–	SSC	–	Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	Known to occur. Townsend's big-eared bats have been detected in the vicinity of the treatment areas during surveys conducted at Alma College (H. T. Harvey & Associates 2016). Habitat potentially suitable for Townsend's big-eared bat is present within large trees and human-made structures (e.g., buildings, bridges) in the treatment areas.
Western red bat *Lasiurus blossevillii*	–	SSC	–	Roosts primarily in trees, 2-40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	May occur. Western red bats have not been detected during previous surveys conducted in the vicinity of the treatment areas (H. T. Harvey & Associates 2016). Habitat potentially suitable for western red bat is present within trees in the treatment areas.

1. Legal Status Definitions:

California Rare Plant Ranks (CRPR):

1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA).
4 Plant species with limited distribution or infrequent throughout a broader area in California.

CRPR Threat Ranks:

0.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)
0.2 Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)
0.3 Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

State: SR State Listed as Rare (legally protected by NPPA)
FP Fully Protected (legally protected)
SSC Species of Special Concern (no formal protection other than CEQA consideration)
SE State Listed as Endangered (legally protected)
SD State Delisted
SC State Candidate for Listing

Federal: FE Federally Listed as Endangered (legally protected)
FT Federally Listed as Threatened (legally protected)
FD Federally Delisted

CDFW = California Department of Fish and Wildlife; CESA = California Endangered Species Act; CEQA = California Environmental Quality Act; CRPR = California Rare Plant Rank; ESA = Endangered Species Act; NPPA = Native Plant Protection Act

Sources: Biosearch Environmental Consulting 2018a, 2018b; CNDDB 2020; CNPS 2020; eBird 2020; EcoSystems West 2008; H. T. Harvey & Associates 2006; Kauffmann et al. 2015

IMPACT BIO-1

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on the 23 special-status plant species with suitable habitat in treatment areas, as described in the following sections. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments, because the same treatment activities would occur.

Five of the special-status plant species with suitable habitat in the treatment areas—western leatherwood, minute pocket moss, Choris' popcornflower, Hickman's popcornflower, and Santa Cruz clover—are typically associated with wet areas (e.g., wetlands, mesic areas in forest or grassland, springs, seeps). Pursuant to SPR HYD-4, Watercourse and Lake Protection Zones (WLPZs) ranging from 50 to 150 feet adjacent to all aquatic habitat within the treatment areas, which would include wetlands, springs, and seeps, would be implemented, which would avoid some adverse effects on these species.

SPR BIO-7 would apply to all treatment activities, including maintenance treatments. Pursuant to SPR BIO-7, protocol-level surveys for special-status plants would not be required if the target special-status plant species are herbaceous annual species, stump sprouting species, or geophyte species, and the treatment may be carried out during the dormant season for that species or when the species has completed its annual life cycle provided the treatment would not alter habitat in a way that would make it unsuitable for the special-status plants to reestablish following treatment, or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts of special-status plants.

Eleven of the 23 special-status plant species that may occur within the treatment areas are herbaceous annual species or geophytes, as indicated in Table 4.5-1. Impacts on these species would be avoided by implementing non-ground-disturbing treatment activities (e.g., manual treatment activities) during the dormant season (i.e., when the plant has no aboveground parts). If treatments cannot be completed in the dormant season and would be implemented during the growing period of these 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 12 of the 23 special-status plant species that have potential to occur within the treatment areas are perennial species, which could not be avoided in the same manner as herbaceous annual species or geophytes; therefore, protocol-level surveys under SPR BIO-7 to identify them would be necessary prior to implementing treatment activities.

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. Per Mitigation Measures BIO-1a and BIO-1b, if special-status plants are identified during protocol-level surveys, a no-disturbance buffer of at least 50 feet would be established around the area occupied by the species within which mechanical treatment and manual treatment would not occur unless Midpen determines that the species would benefit from treatment in the occupied habitat area.

Hickman's popcornflower has been identified previously in treatment areas. Implementation of treatments would place treatment activities within 50 feet of individual plants and result in potential loss of individual plants. Pursuant to Mitigation Measure BIO-1b, avoidance by 50 feet would be required unless it is determined that a special-status plant would benefit from treatments in occupied habitat even though some individual plants may be lost. As described in Section 2.3.3, "Habitat Improvement Treatments," Hickman's popcornflower is known to respond favorably to regular disturbances (e.g., mowing of roads and trails) and to increased water, and proposed habitat improvement treatments have been designed by qualified professionals with the specific purpose of benefitting this local population (Kelley 2012; Sifuentes-Winter pers. comms. 2020). Treatments within occupied habitat would result in reduced forest canopy and reduced understory canopy, which would increase available water and sunlight to Hickman's popcornflower and reduce encroachment by woody vegetation, further reducing competition for water and sunlight (Sifuentes-Winter pers. comms. 2020). Initial treatments would occur between September 1 and December 31, which would be after the plants have set and dispersed seed, which would minimize impacts on the species (EcoSystems West 2008). Additionally, Midpen would conduct 10 years of annual monitoring of the Hickman's popcornflower population in the treatment area and nearby reference populations to monitor the anticipated

benefits of treatment to the population. For these reasons, Midpen determined that implementation of initial and maintenance treatments would improve habitat function for Hickman's popcornflower and benefit the population.

The potential for treatment activities, including maintenance treatments, 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 affected special-status plant species were covered in the PEIR, and the initial treatment activities, maintenance treatment activities, and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. SPRs applicable to this impact are BIO-1, BIO-2, BIO-6, BIO-7, BIO-9, GEO-1, GEO-3, GEO-4, GEO-5, GEO-7, and HYD-4. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-2

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

Special-Status Salamanders

Two special-status salamanders have potential to occur within treatment areas: California giant salamander and Santa Cruz black salamander (Table 4.5-1). Habitat potentially suitable for these species includes perennial and intermittent streams adjacent to the treatment areas and associated uplands, including forest habitat under duff and logs. WLPZs ranging from 50 to 150 feet adjacent to all aquatic habitat within the treatment areas would be implemented per SPR HYD-4; however, these measures may not result in full avoidance of special-status salamanders if these species are present further than 150 feet from stream habitat. The potential for treatment activities and maintenance treatments to result in adverse effects on special-status salamanders was examined in the PEIR.

Per SPR BIO-1, if it is determined that adverse effects on special-status salamanders can be clearly avoided by physically avoiding the suitable habitat, then no mitigation would be required. However, because California giant salamander and Santa Cruz black salamander may be present relatively large distances from aquatic habitat throughout the forest habitat in the treatment areas, it is unlikely that all potentially suitable habitat for these species can be avoided. As a result, SPR BIO-10 would apply, and focused surveys for special-status salamanders would be conducted within suitable habitat prior to implementation of mechanical and manual treatments.

If special-status salamanders are not detected within the treatment areas during focused surveys, then no mitigation for the species would be required. If special-status salamanders are detected during focused surveys, then Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, Midpen would require biological monitoring for treatment activities within or adjacent to sensitive habitat areas (e.g., streams, seeps, springs, talus slopes), flagging areas for avoidance, relocation of individual animals, and/or other measures recommended by the California Department of Fish and Wildlife (CDFW) as necessary to avoid injury to or mortality of these species.

Habitat function for special-status salamanders would be maintained because initial treatment activities and maintenance treatments would not occur within aquatic habitat, riparian habitat, or WLPZs adjacent to treatment areas. 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.

California Red-Legged Frog

Breeding habitat potentially suitable for California red-legged frog comprises three perennial ponds adjacent to treatment areas: Upper Lake, Lower Lake, and Mud Lake. Protocol-level surveys for California red-legged frog were conducted within the three perennial ponds adjacent to the treatment areas in 2018, and the species was not detected (Biosearch Environmental Consulting 2018a). In addition to the negative survey results, all three ponds have populations of bullfrogs and predatory fish, which typically precludes use by California red-legged frogs (Biosearch Environmental Consulting 2018a). Additional aquatic habitat suitable for this species has not been documented within

any of the treatment areas. The potential for initial treatment activities and maintenance treatments to result in adverse effects on California red-legged frogs was examined in the PEIR.

Studies have demonstrated that California red-legged frogs remain very close to breeding ponds during the breeding season and typically do not move more than approximately 500 feet into upland habitats (Bulger et al. 2003; Fellers and Kleeman 2007). WLPZs ranging from 50 to 150 feet adjacent to all aquatic habitat within the treatment areas would be implemented per SPR HYD-4; however, these measures may not result in full avoidance of California red-legged frogs if these species are present further than 150 feet from aquatic habitat. Adult and juvenile California red-legged frog are known to travel through upland habitat (e.g., riparian, woodland, grassland) to move between breeding and nonbreeding sites (e.g., other ponds, deep pools in streams, moist and cool riparian understory, burrows) for access to refugia and foraging habitat, or to disperse to new breeding locations. During migration, California red-legged frogs may travel long distances from aquatic habitat and typically travel in straight lines irrespective of vegetation types and have been documented to move over 1.7 miles between aquatic habitat sites (Bulger et al. 2003). Despite the lack of breeding habitat suitable for California red-legged frog within and adjacent to the treatment areas, it is unlikely, albeit possible, that individuals from known populations within approximately 1 mile of the Preserve (i.e., Lake Couzzens, Briggs Creek, Lake Kittredge) (Biosearch Environmental Consulting 2018a) may disperse through treatment areas.

Because this species could be present within a variety of different habitats throughout the treatment areas while dispersing, there is no feasible way to avoid all potentially suitable habitat for these species. Treatment activities, including removal of invasive and nonnative vegetation and fuel load reduction have been identified by the U.S. Fish and Wildlife Service (USFWS) as recovery actions for California red-legged frog that are likely to improve habitat for the species (USFWS 2016). Midpen would include treatment activities within or adjacent to sensitive habitat areas (e.g., streams, ponds, seeps, springs) in the annual work plan submitted to CDFW and USFWS for the agency's 10(a)1(A) recovery permit for California red-legged frog.

Consistent with recovery permit conservation measures, SPR BIO-10 would apply, and focused surveys for California red-legged frogs within upland habitats in treatment areas (including all access routes, parking areas, equipment staging areas, and debris storage areas) would be conducted by a qualified biologist within 24 hours prior to implementation of all mechanical and manual treatments to determine whether California red-legged frogs are present. Additionally, pursuant to recovery permit conservation measures and Mitigation Measure BIO-2a, Midpen would require biological monitoring during treatment activities. If a California red-legged frog enters a treatment area, all work would stop, and the frog will be allowed to leave on its own. If a California red-legged frog enters a treatment area and will not or cannot leave on its own, the biological monitor will contact a USFWS- and CDFW-approved Midpen biologist who will relocate the individual frog outside of the treatment area.

Habitat function for California red-legged frogs would be maintained because treatment activities, including maintenance treatments, would not occur within aquatic habitat, riparian habitat, or WLPZs adjacent to treatment areas. Additionally, treatment activities, including removal of invasive and nonnative vegetation, as well as fuel load reduction, have been identified by USFWS as recovery actions for California red-legged frog that are likely to improve habitat for the species (USFWS 2016). 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

Habitat potentially suitable for foothill yellow-legged frog includes perennial streams adjacent to treatment areas and associated uplands. Foothill yellow-legged frog is known to occur within upland habitat up to approximately 200 feet away, but typically no more than 50 to 70 feet away, from aquatic habitat (CDFW 2018a). WLPZs ranging from 50 to 150 feet adjacent to all aquatic habitat within the treatment areas would be implemented per SPR HYD-4; however, these measures may not result in full avoidance of foothill yellow-legged frogs, if frogs are present further than 150 feet from stream habitat. The potential for treatment activities, including maintenance treatments, to result in adverse effects on foothill yellow-legged frog was examined in the PEIR.

Per SPR BIO-1, to fully avoid habitat potentially suitable for foothill yellow-legged frog, a 200-foot buffer would be implemented prior to commencement of treatment activities by flagging along perennial streams (Class I and Class II)

adjacent to the treatment areas. If the 200-foot buffer is determined to be infeasible for certain treatments (e.g., habitat improvement treatments), then SPR BIO-10 would apply, and focused visual encounter surveys for foothill yellow-legged frog would be conducted within suitable habitat areas prior to treatment activities. If foothill yellow-legged frogs are identified during focused surveys, Mitigation Measure BIO-2a for this species would be implemented.

Under Mitigation Measure BIO-2a, Midpen would require biological monitoring for treatment activities within or adjacent to sensitive habitat areas (e.g., streams). If necessary, Midpen would consult with CDFW to identify adequate seasonal restrictions, no-disturbance buffers, or other measures to avoid disturbance to, injury to, or mortality of foothill yellow-legged frogs.

Habitat function for foothill yellow-legged frog would be maintained because treatment activities, including maintenance treatments, would not occur within aquatic habitat, riparian habitat, or WLPZs adjacent to treatment areas. Pursuant to Mitigation Measure BIO-2a, and because this species is listed under the California Endangered Species Act (CESA), this determination must be made by Midpen in consultation with CDFW. Therefore, if Mitigation Measure BIO-2a is required, Midpen would contact CDFW to seek technical input on the determination that habitat function would be maintained. 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.

Western Pond Turtle

Aquatic habitat potentially suitable for western pond turtle is present within ponds adjacent to the treatment areas, and this species could use upland habitat within treatment areas in the vicinity of these ponds. WLPZs ranging from 50 to 150 feet adjacent to all aquatic habitat within the treatment areas would be implemented per SPR HYD-4; however, these measures may not avoid impacts on western pond turtles, if turtles are present further than 150 feet from stream habitat. The potential for treatment activities and maintenance treatments to result in adverse effects on western pond turtle was examined in the PEIR.

As described above for foothill yellow-legged frog, a 200-foot buffer would be implemented prior to commencement of treatment activities by flagging along perennial streams (Class I and Class II) adjacent to the treatment areas, which would provide additional protection for western pond turtle. If the 200-foot buffer is determined to be infeasible for certain treatments (e.g., habitat improvement treatments), then SPR BIO-10 would apply, and focused visual encounter surveys for western pond turtle would be conducted within suitable upland habitat areas prior to treatment activities. If western pond turtles are identified during focused surveys, Mitigation Measure BIO-2b for this species would be implemented.

Under Mitigation Measure BIO-2b, Midpen would require biological monitoring for treatment activities within or adjacent to sensitive habitat areas (e.g., streams), relocation of individual animals, flagging of areas for avoidance, and/or other measures recommended by CDFW as necessary to avoid injury to or mortality of these species.

Habitat function for western pond turtle would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat, riparian habitat, or WLPZs adjacent to treatment areas. 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 Birds

Ten special-status bird species may occur within the treatment area: American peregrine falcon, bald eagle, golden eagle, loggerhead shrike, long-eared owl, northern harrier, olive-sided flycatcher, purple martin, Vaux's swift, and white-tailed kite (Table 4.5-1). American peregrine falcon and golden eagle are not expected to nest within the treatment areas but could forage in some habitats present in the treatment areas. Nesting habitat potentially suitable for the other special-status bird species is present within and adjacent to the treatment areas. Treatment activities, including maintenance treatments, are not expected to result in adverse effects on occasional foragers, like American peregrine falcon and golden eagle, because the character of foraging habitat would not be significantly altered by treatment activities and these birds would likely be present within the treatment areas only occasionally.

Per SPR BIO-1, if it is determined that adverse effects on suitable habitat for nesting special-status birds can be clearly avoided by conducting treatments outside of the season of sensitivity (i.e., nesting bird season), then no mitigation would be required. Adverse effects on nesting special-status birds would be clearly avoided by conducting initial treatments between September 1 and December 31, outside of the nesting bird season (February 1–August 31). Maintenance treatments, including manual and mechanical treatment activities, may be conducted during portions of the nesting bird season (e.g., February–March, August). These activities could result in direct loss of active special-status bird nests or disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chain saws, vehicles, personnel), potentially resulting in abandonment and loss of eggs or chicks. The potential for treatment activities and maintenance treatments to result in adverse effects on special-status birds was examined in the PEIR.

If maintenance treatments would occur during the nesting season, then SPR BIO-10 would apply, and focused nesting bird surveys for bald eagle, loggerhead shrike, long-eared owl, northern harrier, olive-sided flycatcher, purple martin, Vaux's swift, and white-tailed kite would be conducted prior to maintenance treatments. If no active bird nests are observed during focused surveys, then additional mitigation for these species would not be required. If active special-status bird nests are observed during focused surveys, then Mitigation Measures BIO-2a (for bald eagle and white-tailed kite) and BIO-2b (for loggerhead shrike, long-eared owl, northern harrier, olive-sided flycatcher, purple martin, and Vaux's swift) would be implemented.

Under Mitigation Measures BIO-2a and BIO-2b, a no-disturbance buffer of at least 500 feet would be established around active bald eagle and white-tailed kite nests, and at least 100 feet around the nests of other special-status birds, and no maintenance treatment activities would occur within this buffer until the chicks have fledged as determined by a qualified biologist. Additionally, trees containing active or inactive bald eagle nests would not be removed pursuant to the Bald and Golden Eagle Protection Act.

Habitat function for special-status birds would be maintained because treatment activities would not result in removal of trees (i.e., conifers, hardwoods) or snags greater than 8 inches dbh, which would be the most likely features to be used by these species due to the cover provided by larger trees. Pursuant to Mitigation Measure BIO-2a, this determination for bald eagle and white-tailed kite must be made by Midpen in consultation with CDFW. Therefore, if Mitigation Measure BIO-2a is required for maintenance treatment activities, Midpen would contact CDFW to seek technical input on the determination that habitat function would be maintained for bald eagle and white-tailed kite. 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.

Mountain Lion

Mountain lions have been documented traversing the Preserve, including the treatment areas, and it is likely that treatment areas encompass a portion of the home range for many individual lions (Midpen 2020; Yovovich et al. 2020). Den (i.e., nursery) habitat potentially suitable for mountain lions may be present within thickets and cavities (e.g., rocky areas or downed woody debris) in the treatment areas. There is a likelihood that mountain lions would occur within the treatment areas, but treatment activities, including maintenance treatments, would not occur at the time of day when mountain lions would be active. Furthermore, SPR BIO-2 would require biological resources training for workers and would instruct workers to stop work and allow wildlife, including mountain lion, to leave the area unharmed. Therefore, it is unlikely that implementation of initial and maintenance vegetation treatments would result in adverse effects on mountain lions. However, although unlikely, there is a possibility that a mountain lion could use rocky areas or areas with thick vegetation in the treatment areas for denning. If a mountain lion den is present within the treatment areas, mountain lions and cubs could be disturbed by the presence of equipment and personnel and could be inadvertently injured or killed by heavy machinery, personnel, and vehicles. The potential for treatment activities and maintenance treatments to result in adverse effects on burrowing or denning special-status wildlife species was examined in the PEIR.

Because mountain lions use den habitat year-round, may have cubs year-round, and could be present within treatment areas year-round, there is no reliable season during which impacts on this species could be avoided. As a result, SPR BIO-10 would apply and focused, noninvasive surveys for mountain lion dens would be conducted within

habitat suitable for denning prior to implementation of mechanical and manual treatments to determine whether occupied mountain lion dens are present within treatment areas.

If no occupied dens or signs of occupied dens are observed during focused surveys, then no additional mitigation would be required. If occupied mountain lion dens are identified or assumed present during focused surveys, Mitigation Measure BIO-2a would be implemented. Under Mitigation Measure BIO-2a, Midpen would be required to either avoid the occupied area by a distance of at least 2,000 feet, following the most current and commonly accepted science (Wilmers et al. 2013), or consult with CDFW to identify other measures to avoid disturbance to, injury to, or mortality of mountain lions.

Habitat function for mountain lion would be maintained because treatment activities, including maintenance treatments, would not result in removal of downed woody debris greater than 8 inches dbh, which would be the most likely features to be used by this species for denning. There would not be a significant change in the existing habitat within treatment areas because trees greater than 8 inches dbh would be retained, only targeted brush would be removed (e.g., invasive nonnative vegetation), and additional desirable tree species would be retained to the extent possible. Where chaparral vegetation is present, at least 35 percent relative final density would be maintained in the treatment area. The treatment areas are relatively small, and treatments would not result in landscape-scale or home-range-scale modifications; rather, treatments would restore the natural processes of the ecosystem and promote wildfire resiliency, which may benefit mountain lion.

Pursuant to Mitigation Measure BIO-2a, and because this species is a candidate for listing under CESA, Midpen must consult with CDFW about its determination that habitat function would be maintained. For the reasons summarized in the previous paragraph, Midpen determined that implementation of initial and maintenance treatments would maintain habitat function for mountain lion and contacted CDFW to seek technical input on this determination, as required. On January 28, 2021, Midpen met with Robynn Swan, a senior environmental scientist and vegetation management specialist with the CDFW Bay Delta Region. During this meeting, CDFW concurred that implementation of treatments under the proposed project would not result in an adverse effect on habitat function for mountain lion and would likely result in an overall beneficial impact on the species due to removal of invasive nonnative vegetation and areas affected by SOD. Additionally, due to the patchy nature of the treatment areas in the Preserve, CDFW concurred that habitat connectivity for mountain lions would also be maintained with project implementation. 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

Habitat potentially suitable for three special-status bat species—pallid bat, Townsend's big-eared bat, and western red bat—is present within forest habitat, rocky areas, and human-made structures (e.g., bridges) in the treatment areas, and pallid bat and Townsend's big-eared bat have been detected in the vicinity of the treatment areas (H. T. Harvey & Associates 2016). Adverse effects on special-status bat maternity roosts would be clearly avoided by conducting initial treatments between September 1 and December 31, outside of the bat maternity season (April 1–August 31). Maintenance treatments, including manual and mechanical treatment activities, may be conducted during portions of the bat maternity season (e.g., August). Maintenance treatment activities, including mechanical treatments and manual treatments, conducted within habitat suitable for bats during the bat maternity season could disturb active bat roosts from auditory and visual stimuli (e.g., heavy equipment, chain saws, vehicles, personnel), potentially resulting in abandonment of the roost and loss of young. The potential for treatment activities, including maintenance treatments, to result in adverse effects on special-status bats was examined in the PEIR.

If maintenance treatments would occur during the bat maternity season, then SPR BIO-10 would apply, and focused surveys for these species would be conducted within suitable habitat areas prior to maintenance treatment activities. If special-status bat roosts are identified during focused surveys, Mitigation Measure BIO-2b for special-status bats would be implemented.

Under Mitigation Measure BIO-2b, a no-disturbance buffer of 250 feet would be established around active pallid bat, Townsend's big-eared bat, or western red bat roosts, and mechanical and manual treatments would not occur within this buffer. A no-disturbance buffer of 250 feet is necessary to protect sensitive roosts; this buffer size was adjusted to

be larger than the general no-disturbance buffer of 100 feet provided in Mitigation Measure BIO-2b in order to provide adequate protection such that impacts would be less than significant under CEQA.

Habitat function for special-status bats would be maintained because treatment activities, including maintenance treatments, would not result in removal of trees (i.e., conifers, hardwoods) or snags greater than 8 inches dbh, which would be the most likely features to be used by these species due to the cover provided by larger trees. 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.

Ringtail

Ringtail is primarily nocturnal, and typically occurs in riparian areas, forests (including stands of various ages), and shrub habitats within approximately 0.6 mile of a permanent water source (CDFW 2005). This species may occur within portions of the treatment areas that are within 0.6 mile of perennial creeks and ponds adjacent to the treatment areas. Potential denning habitat includes rock outcrops, crevices, snags, large hardwoods, large conifers, and brush. Most of these habitats would be avoided, as trees and snags larger than 8 inches dbh would not be removed during treatment or maintenance activities and because rocky areas would not be targeted for vegetation treatment; however, brush would be targeted for treatment and would not be avoided through implementation of other measures. The potential for treatment activities, including maintenance treatments, to result in adverse effects on ringtail was examined in the PEIR.

Per SPR BIO-1, if it is determined that adverse effects on suitable habitat for ringtail can be clearly avoided by conducting treatments outside of the season of sensitivity (i.e., maternity season), then mitigation would not be required. Outside of the breeding season, resting ringtails would likely flee due to the presence of equipment, vehicles, or personnel, and injury or mortality would not be expected. Adverse effects on ringtail would be clearly avoided by conducting initial treatments between September 1 and December 31, and maintenance treatments between August 1 and April 15, outside of the ringtail maternity season (April 15–July 31).

Habitat function for ringtail would be maintained because treatment activities would not result in removal of trees (i.e., conifers, hardwoods) or snags greater than 8 inches dbh, which would be the most likely features to be used by this species due to the cover provided by larger trees and because rocky areas would not be targeted for vegetation treatment. 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.

San Francisco Dusky-Footed Woodrat

Habitat potentially suitable for San Francisco dusky-footed woodrat is present within forest, woodland, and scrub, habitats in the treatment areas with moderate canopy coverage and moderate to dense understory density. Woodrats construct nests, which are also known as houses or middens, with shredded grass, leaves, and other material. Woodrats use these nests during the breeding season and outside of the breeding season. Treatment activities, including maintenance treatments, may result in inadvertent disturbance to, injury to, or mortality of individual woodrats or destruction of nests. If present, San Francisco dusky-footed woodrats could be disturbed due to the presence of equipment and personnel and could be inadvertently injured or killed or have their nests destroyed by heavy machinery, personnel, vehicles, and fire. The potential for treatment and maintenance activities to result in adverse effects on San Francisco dusky-footed woodrat was examined in the PEIR.

Because woodrats use their nests year-round, there is no reliable season during which impacts on this species could be avoided. As a result, SPR BIO-10 would apply, and focused surveys for San Francisco dusky-footed woodrats would be conducted within suitable habitat prior to implementation of mechanical and manual treatments. Although woodrats have been detected in the project vicinity and are likely to be within the treatment areas, if woodrat nests are not detected within the treatment areas during focused surveys, then mitigation for the species would not be required. If woodrat nests are detected during focused surveys, then Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, a no-disturbance buffer of sufficient size to prevent disturbance would be established around active woodrat nests to prevent accidental encroachment by vehicles, equipment, or personnel. If woodrat nests within treatment areas cannot be avoided, a qualified biologist would implement nest

relocation procedures outside of the woodrat breeding season (April through mid-July). The biologist would determine whether the nest is active through live-trapping, and would dismantle the woodrat nest by hand, and rebuild the nest outside of the treatment area footprint.

Habitat function for San Francisco dusky-footed woodrat would be maintained because treatment activities, including maintenance treatments, would not result in removal of trees (i.e., conifers, hardwoods) or snags greater than 8 inches dbh, and there would not be a significant change in the existing habitat within treatment areas. 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.

Conclusion

The potential for treatment activities and maintenance treatments 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 affected special-status wildlife species were analyzed in the PEIR, and the proposed treatment activities and intensity of disturbance as a result of implementing vegetation treatments are consistent with those analyzed in the PEIR. SPRs applicable to this impact are BIO-1, BIO-2, BIO-9, BIO-10, GEO-1, and HYD-4.

IMPACT BIO-3

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on sensitive habitats, including designated sensitive natural communities. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities are proposed. The potential for treatment activities, including maintenance treatments, to result in adverse effects on sensitive habitats was examined in the PEIR.

Data review identified the following sensitive natural communities with potential to occur in the treatment areas: maritime coast range ponderosa pine forest, Monterey pine forest, northern coastal salt marsh, northern interior cypress forest, northern maritime chaparral, madrone forest, Shreve oak forest, California bay forest, bigleaf maple forest, Douglas fir-tanoak forest, Santa Lucia fir grove, California buckeye forest, tanoak forest, western azalea patch, redwood forest, tar plant field, and monolopia–leafy-stemmed tickseed field.

Using species occurrence information, mapping of the treatment areas, and a reconnaissance-level survey conducted pursuant to SPR BIO-1, it was determined that the treatment areas do not contain maritime coast range ponderosa pine forest, Monterey pine forest, northern coastal salt marsh, northern interior cypress forest, northern maritime chaparral, or Santa Lucia fir grove communities.

During the reconnaissance-level survey conducted pursuant to SPR BIO-1, madrone (*Arbutus menziesii*), California bay (*Umbellularia californica*), bigleaf maple (*Acer macrophyllum*), Douglas fir (*Pseudotsuga menziesii*), tanoak (*Notholithocarpus densiflorus*), and redwood (*Sequoia sempervirens*) were observed within treatment areas. Bigleaf maple, madrone, and tanoak were not dominant and did not make up a large percentage of the canopy where present. However, some portions of the treatment areas have been mapped as California bay forest or redwood forest, and these areas would likely be considered sensitive natural communities if the species assemblage, percent cover, and patch size are sufficient to meet membership rules and sensitive natural community requirements. While Shreve oak (*Quercus parvula*), California buckeye (*Aesculus californica*), western azalea (*Rhododendron occidentale*), tarplant (*Centromadi*a spp.), woollythreads (*Monolopia* spp.), or tickseed (*Coreopsis* spp.) were not observed during reconnaissance-level surveys, these species could occur in the treatment areas. These species may be present in varying concentrations and species assemblages, but it is possible that occurrences of these species could meet the defined membership rules to qualify as sensitive natural communities. In summary, the following sensitive natural communities may occur in the treatment areas: madrone forest, Shreve oak forest, California bay forest, bigleaf maple forest, Douglas fir-tanoak forest, California buckeye forest, tanoak forest, western azalea patch, redwood forest, tar plant field, and monolopia–leafy-stemmed tickseed field.

In addition, coast live oak and oak woodland has been mapped in treatment areas, which are sensitive habitats. Riparian habitat is not present within the treatment areas, as the streams that occur in treatment areas are heavily

shaded by surrounding forest habitat, are on fairly steep gradients that do not allow floodwaters to pool, and do not support typical riparian vegetation, such as willow (*Salix* spp.), cottonwood (*Populus* spp.), or alder (*Alnus* spp.).

Pursuant to SPR BIO-3, a qualified biologist would conduct a survey following the CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" prior to the start of treatment activities (CDFW 2018b). Because other sensitive natural communities may be present in addition to redwood forest and California bay forest and woodland, sensitive natural communities and oak woodlands within the treatment areas would be mapped by a qualified biologist or botanist during this survey, as required under SPR BIO-3.

Midpen would retain vegetation types with characteristics qualifying as sensitive natural communities to the extent possible, including the retention of live oak trees, California buckeye, and bigleaf maple (see Section 2, "Project Description"). However, if treatment activities within identified sensitive natural communities or oak woodlands cannot be avoided, then Mitigation Measure BIO-3a would apply in these areas. Under Mitigation Measure BIO-3a, the qualified biologist would determine the natural fire regime, condition class, and fire return interval for each sensitive natural community and oak woodland type. Treatment activities in sensitive natural communities and oak woodlands would be designed to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function. If habitat function of sensitive natural communities or oak woodlands would not be maintained through implementation of Mitigation Measure BIO-3a, then Mitigation Measure BIO-3b would apply, and unavoidable losses of these resources would be compensated for through restoration or preservation of these vegetation types within or outside of the treatment areas.

This potential impact on sensitive habitats is within the scope of the PEIR because the affected sensitive natural communities and oak woodlands were analyzed in the PEIR, and the treatment activities and intensity of disturbance as a result of implementing vegetation treatments and maintenance treatments are consistent with those analyzed in the PEIR. SPRs applicable to this impact are BIO-1, BIO-2, BIO-3, BIO-6, and BIO-9. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-4

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

Most of the aquatic habitat in the vicinity of the treatment areas has been excluded during design of the treatments. However, based on review and survey of project-specific biological resources (SPR BIO-1), some portions of the treatment areas may contain small segments of perennial, intermittent, and ephemeral streams. Under SPR HYD-4, WLPZs ranging from 50 to 150 feet would be established adjacent to all Class I and Class II streams within the treatment areas, and WLPZs of at least 25 feet would be established around all Class III ephemeral streams within the treatment areas. Establishment of WLPZs would avoid all state or federally protected wetlands.

This potential impact on wetlands is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing vegetation treatments and maintenance treatments are consistent with those analyzed in the PEIR. SPRs applicable to this impact are BIO-1, BIO-2, and HYD-4. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-5

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on wildlife movement corridors and nurseries because suitable habitat is present in treatment areas. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same

treatment activities are proposed. The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the PEIR.

Based on review and survey of project-specific biological resources (SPR BIO-1), the treatment areas contain a modeled essential connectivity area characterized as "more permeable" and therefore likely functions as a wildlife movement corridor and provides connectivity with other natural habitats surrounding the treatment areas (CDFW 2020). Due to the nature of the proposed treatment activities, implementation of these treatment activities would not result in a substantial change in the existing conditions that facilitate wildlife movement in treatment areas. Through treatments of heavy brush, primarily characterized by invasive nonnative plant species, and through treatments of areas affected by SOD, habitat would likely be improved and would function better for wildlife movement posttreatment. Additionally, no known wildlife nursery sites or indications of nursery sites, such as deer fawning habitat or potential rookery trees with whitewash, were identified within any treatment areas during implementation of SPR BIO-1. However, the natural habitat within treatment areas may be used for movement (e.g., mule deer migration) and cover for common wildlife species.

This impact is within the scope of the PEIR because the treatment activities and extent of expected disturbance as a result of implementing vegetation treatments are consistent with those analyzed in the PEIR. Habitat function within treatment areas would be maintained because treatment activities, including maintenance treatments, would not result in removal of trees (i.e., conifers, hardwoods) or snags greater than 8 inches dbh. Additionally, WLPZs ranging from 25 to 150 feet would be implemented adjacent to all streams in treatment areas, which could function as wildlife movement corridors, pursuant to SPR HYD-4. The treatment areas are relatively small, and treatments are not expected to result in landscape-scale modifications; rather, treatments are expected to result in improved habitat quality and wildfire resiliency. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-6

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds, because habitat suitable for these species is present throughout treatment areas. The potential for treatment activities, including maintenance treatments, to result in adverse effects on these resources was examined in the PEIR.

Adverse effects on nesting birds would be clearly avoided by conducting initial treatments between September 1 and December 31, outside of the nesting bird season (February 1–August 31). Maintenance treatments, including manual and mechanical treatment activities, may be conducted during portions of the nesting bird season (e.g., February–March, August). These activities could result in direct loss of active nests or disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chain saws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks.

If maintenance treatments would occur during the nesting season, then SPR BIO-12 would apply, and a survey for common nesting birds would be conducted within the treatment areas by a qualified 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 the nests would be avoided by establishing an appropriate buffer around the nests, modifying treatments to avoid disturbance to the nests, or deferring treatment until the nests are no longer active as determined by a qualified biologist.

The potential for adverse effects on common wildlife, including nesting birds, is within the scope of the PEIR because the treatment activities and extent of expected disturbance as a result of implementing vegetation treatments, including maintenance treatments, are consistent with those analyzed in the PEIR. SPRs applicable to this impact are BIO-1, BIO-2, and BIO-12. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-7

The potential for treatment activities to result in conflicts with local policies or ordinances was examined in the PEIR. The only applicable local ordinance relevant to biological resources is the Santa Clara County Tree Preservation and Removal Ordinance (Division C16). This ordinance requires permits from the County Planning Office for removal of any protected tree on private or public property. Protected trees include those with a dbh greater than 12 inches and heritage trees, defined as any tree that, because of its history, girth, height, species, or other unique quality, has been recommended for inclusion on the heritage resources inventory. Treatment activities, including maintenance treatments, would not result in removal of any trees greater than 8 inches dbh; thus, none of these trees would qualify as protected trees under this ordinance. In addition, the ordinance includes exceptions for removal of trees that are irreversibly diseased, dead, dying, or substantially damaged from natural causes. SOD treatments would be focused on trees that meet this criterion. There would be no conflict with local ordinances as a result of implementation of treatment activities.

The potential for the proposed treatments to conflict with local policies is within the scope of the PEIR because vegetation treatment locations, types, and activities are consistent with those analyzed in the PEIR. In addition, all projects implemented under the CalVTP that are subject to local policies or ordinances would be required to comply with them, per SPR AD-3. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-8

This impact does not apply to the proposed project because the treatment areas are not within the plan area of any adopted habitat conservation plan or natural community conservation plan. Therefore, this impact does not apply to the proposed project.

NEW BIOLOGICAL RESOURCE IMPACTS

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.6.1, "Environmental Setting," and Section 3.6.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances are present that would give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to biological resources would occur that is not covered in the PEIR.

4.6 GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	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-7 GEO-8	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	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.

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

☐ Yes ☒ No If yes, complete row(s) below and discussion

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

Discussion

IMPACT GEO-1

Vegetation treatments would include manual and mechanical treatment activities involving vegetation removal and varying levels of soil disturbance, which have the potential to increase rates of erosion and loss of topsoil. The potential for these treatment activities to cause substantial erosion or loss of topsoil was examined in the PEIR. Mechanical treatments using heavy machinery are the most likely to cause soil disturbance that could lead to substantial erosion or loss of topsoil, especially in areas of steep slopes. The proposed project would implement mechanical treatments on approximately 205 acres within the Preserve, including areas where steep slopes occur. Consistent with the PEIR, SPRs GEO-1 through GEO-5, GEO-7, and GEO-8 would be implemented, which would avoid and minimize the risk of substantial erosion and loss of topsoil as a result of project implementation. This impact is within the scope of the PEIR because the proposed treatment activities and intensity of vegetation removal and associated ground disturbance under the proposed project is consistent with what was analyzed in the PEIR. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT GEO-2

Vegetation treatments would include vegetation removal in areas with steep slopes, which could decrease the stability of slopes and increase the risk of landslide. The potential for treatment activities to increase landslide risk was examined in the PEIR. The Preserve is located on the Black Road landslide, which encompasses all of the land mass on the west side of Lexington Reservoir north of Black Road. Based on the age of the Black Road landslide (estimated at 100,000 to 235,000 years before present) the landslide is inactive. Shallow-seated landslides are also present in the Preserve on oversteepened slopes, including road cuts and incised stream channels. Channel incision and bank erosion during severe storms undermine the toes of slopes and remove colluvium and talus, which play an important role in initiating shallow-seated landslides near streams (Knapp Architects 2010). Removing vegetation during treatments implemented under the proposed project could potentially increase the risk of landslide by removing root systems that stabilize slopes. Consistent with the PEIR, this risk is addressed with the implementation of SPRs GEO-3, GEO-4, GEO-7, and GEO-8, which require stabilization of mechanically disturbed soil, erosion inspections, prohibiting mechanical treatment on steep slopes, and that a registered professional forester or licensed geologist evaluate treatment areas with slopes greater than 50 percent for unstable areas. This impact is within the scope of the PEIR because the extent and methods of vegetation removal and required avoidance of steep slopes and areas of instability are consistent with those analyzed in the PEIR. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCE IMPACTS

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.7.1, "Environmental Setting," and Section 3.7.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to geology, soils, paleontology, or mineral resources would occur that is not covered in the PEIR.

4.7 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	NA	None	SU	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

Use of vehicles and mechanical equipment during vegetation treatments would result in greenhouse gas (GHG) emissions. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the PEIR. Consistent with the PEIR, although GHG emissions would occur from equipment and vehicles used to implement treatments, the purpose of the proposed project is to reduce wildfire risk and increase postwildfire resilience, which could reduce GHG emissions and increase carbon sequestration over the long-term. This impact is within the scope of the PEIR because the proposed treatment activities, associated equipment, duration of use, and resultant GHG emissions, as well as the project purpose, are consistent with those analyzed in the PEIR. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT GHG-2

Use of vehicles and mechanical equipment during vegetation treatments would result in GHG emissions. The potential for treatments under the CalVTP to generate GHG emissions was examined in the PEIR. Consistent with the PEIR, treatment activities implemented under the proposed project would result in GHG emissions directly generated

by off-road equipment, on-road vehicles, machine-powered hand tools, worker commute trips, and hauling of equipment and materials associated with manual and mechanical treatment activities. However, unlike under the CalVTP, no prescribed burning, which results in substantially more GHG emissions than manual or mechanical treatments, would occur under the proposed project. Nonetheless, this impact would be potentially significant under the proposed project. Mitigation Measure GHG-2 would not be applicable to the proposed project because it requires GHG emissions reduction techniques to be implemented during prescribed burning, which is not a proposed treatment activity. Other measures could include the purchase and retirement of carbon credits to offset the one-time GHG emissions directly associated with the proposed project; however, this approach would consume financial resources needed to achieve wildfire risk reduction objectives. No other feasible and effective mitigation exists that would reduce this impact to a less-than-significant level without compromising the effectiveness of the proposed project. This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment and duration of use are consistent with those analyzed in the PEIR. In addition, the intent of the proposed vegetation treatments is to reduce wildfire risk and GHG emissions related to wildfire. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW IMPACTS RELATED TO GHG EMISSIONS

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.8.1, "Environmental Setting," and Section 3.8.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to GHG emissions would occur that is not covered in the PEIR.

4.8 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.

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

Use of vehicles and mechanical equipment during treatment activities would result in the consumption of energy through the use of fossil fuels. The use of fossil fuels for equipment and vehicles was examined in the PEIR. Consistent with the PEIR, and in consideration of the project's purpose to reduce wildfire, implementation of treatment activities under the proposed project are reasonably expected to reduce the intensity of response to wildfire, specifically the resources needed for fire suppression (e.g., equipment and vehicles). With less intense wildfire suppression response and its relatively inefficient consumption of energy, fuel and energy consumption for wildfire suppression response would decrease, as well. The consumption of energy during implementation of the proposed treatment project from the use of equipment and vehicles is within the scope of the PEIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the PEIR. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW ENERGY RESOURCE IMPACTS

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.9.1, "Environmental Setting," and Section 3.9.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to energy use would occur that is not covered in the PEIR.

4.9 HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	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	HAZ-1	NA	LTS	No	Yes
Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	LTS	Impact HAZ-2, pp. 3.10-15 – 3.10-18	No	--	--	--	--	--
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.

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

Vegetation treatments would include manual and mechanical treatment activities, which would require the use of fuels, which are considered common hazardous materials. The potential for treatment activities to cause a significant health hazard from the use of hazardous materials was examined in the PEIR. This impact is within the scope of the PEIR because the types and locations of treatments and associated equipment and types of hazardous materials that would be used are consistent with those analyzed in the PEIR. SPR HAZ-1 would be applicable to the proposed project. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT HAZ-2

This impact does not apply to the proposed project because herbicide application is not part of the proposed project.

IMPACT HAZ-3

Vegetation treatments would include soil disturbance through mechanical treatment activities, which could expose workers or the environment to hazardous materials if a contaminated site is present within a treatment area. The potential for treatment activities to encounter contamination that could expose workers or the environment to hazardous materials was examined in the PEIR. This impact was identified as potentially significant in the PEIR because of the large geographic extent of the treatable landscape, hazardous materials sites could be present within treatment sites, and soil disturbance in those areas could expose people or the environment to hazards.

As directed by Mitigation Measure HAZ-3, a database search and review of the Cortese List for hazardous materials sites within the Preserve have been conducted. There are no active Cortese List hazardous materials sites within or adjacent to the Preserve. Four previous leaking underground storage tank sites are present within or adjacent to the Preserve; however, they have been cleaned up to regulatory standards and are considered to present no further threat under current land uses (DTSC 2020).

Although it is not included on the Cortese List, a historic-era dump site/landfill is located in the northeastern portion of the Preserve, adjacent to the former Alma College "village." Concentrations of lead, zinc, and copper were found in excess of hazardous waste toxicity criteria, but due to the use of the site as open space, removal was not recommended (Geocon Consultants 2019; Albion Environmental 2019). The dump site is located in close proximity to an area of proposed habitat improvement treatments and an area of proposed SOD treatments. Consistent with the requirements of Mitigation Measure HAZ-3, the landfill area will be marked/flagged, and no soil-disturbing treatment activities will occur within 100 feet of the site boundaries. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY IMPACTS

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.10.1, "Environmental Setting," and Section 3.10.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to hazardous materials and public health and safety would occur that is not covered in the PEIR.

4.10 HYDROLOGY AND WATER QUALITY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning	LTS	Impact HYD-1, pp. 3.11-25 – 3.11-27	No	--	--	--	--	--
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 GEO-1 GEO-2 GEO-3 GEO-4 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	No	--	--	--	--	--
Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides	LTS	Impact HYD-4, pp. 3.11-30 – 3.11-31	No	--	--	--	--	--
Impact HYD-5: Substantially Alter the Existing Drainage	LTS	Impact HYD-5, p. 3.11-31	Yes	HYD-1 HYD-2	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?
Pattern of a Treatment Site or Area				HYD-4 HYD-6 GEO-1 GEO-2 GEO-5				

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Hydrology and Water Quality Impacts: Would the treatment result in other impacts to hydrology and water quality that are not evaluated in the CalVTP PEIR?

☐ Yes ☒ No If yes, complete row(s) below and discussion

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

Discussion

IMPACT HYD-1

This impact does not apply to the proposed project because no prescribed burning would occur.

IMPACT HYD-2

Vegetation treatments would include manual and mechanical treatment activities. These treatment activities would disturb soils and require the use of fuels, which have the potential to enter waterways and degrade water quality. The potential for mechanical and manual treatment activities 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 types and locations of treatment activities and use of heavy equipment and hand-held tools to remove vegetation are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are HYD-1, HYD-2, HYD-4, HYD-6, GEO-1 through GEO-4, GEO-7, GEO-8, and HAZ-1. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT HYD-3

This impact does not apply to the proposed project because no prescribed herbivory would occur.

IMPACT HYD-4

This impact does not apply to the proposed project because herbicide application is not part of the proposed project.

IMPACT HYD-5

Use of mechanical equipment and off-road vehicles during treatments could cause ground disturbance and erosion, which could directly or indirectly modify existing drainage patterns. The potential for treatment activities to substantially alter the existing drainage pattern of a treatment site was examined in the PEIR. This impact on site drainage is within the scope of the PEIR, because the types and locations of treatments and treatment intensity are consistent with those analyzed in the PEIR. SPRs applicable to this treatment are HYD-1, HYD-2, HYD-4, HYD-6, GEO-1, GEO-2, and GEO-5. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW HYDROLOGY AND WATER QUALITY IMPACTS

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.11.1, "Environmental Setting," and Section 3.11.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to hydrology and water quality would occur that is not covered in the PEIR.

4.11 LAND USE AND PLANNING, POPULATION AND HOUSING

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

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

Vegetation treatment activities would occur within the boundaries of the Preserve, which is owned and operated by Midpen. 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 locations, types, and activities are consistent with those analyzed in the PEIR. No conflicts with a land use plan or policy would occur because Midpen would adhere to SPR AD-3 and the proposed treatments have been designed to be consistent with Midpen policies for its Preserve. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT LU-2

Crews implementing the proposed project would typically range between eight and 12 personnel, and up to three crews would be working simultaneously to implement the proposed project. The potential for treatments to result in substantial 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 workers during implementation of the proposed project are within the scope of the PEIR because the number of workers required for implementation of treatments is generally

consistent with the crew size analyzed in the PEIR for the types of treatments proposed (i.e., two to 10 workers for mechanical treatments, and up to 10 workers for manual treatments). Although Midpen would temporarily contract workers to implement the proposed project or hire an additional six to eight staff, it is expected that this demand could be met by new employees who are existing residents in the vicinity of where treatments would occur. The potential also exists for people to relocate to the area for vegetation treatment employees, but there would be sufficient housing to meet the housing demand associated with these new six to eight employees that may relocate from outside of the area. Thus, implementation of the proposed project would not induce substantial unplanned population growth to cause a need for new housing and other infrastructure. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW LAND USE AND PLANNING, POPULATION AND HOUSING IMPACTS

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.12.1, "Environmental Setting," and Section 3.12.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to land use and planning or population and housing would occur that is not covered in the PEIR.

4.12 NOISE

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation	LTS	Impact NOI-1, pp. 3.13-9 – 3.13-12; Appendix NOI-1	Yes	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 Single-Event Noise Levels 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.

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

Manual and mechanical treatments would require the use of noise-generating equipment during implementation. The potential for a substantial short-term increase in ambient noise levels from use of heavy equipment was examined in the PEIR. The Santa Clara County Code identifies noise limits for construction activities, which would also apply to vegetation treatment activities. Noise limits under the code are more stringent during the nighttime and early morning hours, between the hours of 7:00 p.m. and 7:00 a.m., as well as on Sundays and legal holidays. Although the treatment areas are undeveloped, there are noise-sensitive receptors, such as residents, an elementary school, and a church, located within 1,500 feet of proposed treatments. However, treatments would be limited to Monday through Saturday during daytime hours, consistent with the County Code, and no work would occur on Sundays or holidays. In addition, several SPRs would be implemented, including AD-3 and NOI-1 through NOI-5. For any properties where residences are within 1,500 feet of a treatment area, SPR NOI-6 would also apply. This impact is within the scope of the PEIR, because the number and types of equipment proposed and the duration of equipment use are consistent with those analyzed in the PEIR. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT NOI-2

Treatments would involve large trucks hauling heavy equipment to the treatment areas. These haul truck trips could pass by residential receptors, and the event of each truck passing by could increase single-event noise levels. The potential for a substantial short-term increase in single-event noise levels was examined in the PEIR. This impact is within the scope of the PEIR because the number and types of equipment proposed are consistent with those analyzed in the PEIR. The haul trips associated with the proposed treatments would occur during daytime hours, which avoids the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. SPR NOI-1 would be applicable to the proposed project. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW NOISE IMPACTS

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.13.1, "Environmental Setting," and Section 3.13.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to noise would occur that is not covered in the PEIR.

4.13 RECREATION

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

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

New Recreation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP PEIR?

☐ Yes ☒ No If yes, complete row(s) below and discussion

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

Discussion

IMPACT REC-1

Vegetation treatment activities have the potential to disrupt recreational activities within the Preserve through temporary trail closures during active treatments and by degrading the experience of recreationists through the creation of noise, dust, degradation of scenic views, or increased traffic. The potential for vegetation treatment activities to disrupt recreation activities was examined in the PEIR. The potential for the proposed project to disrupt recreation is within the scope of the PEIR because the treatment activities and intensity are consistent with those analyzed in the PEIR. SPR REC-1 would be applicable to the proposed project. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW RECREATION IMPACTS

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.14.1, "Environmental Setting," and Section 3.14.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to recreation would occur that is not covered in the PEIR.

4.14 TRANSPORTATION

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures	LTS	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 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	None	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 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

Vegetation treatments would temporarily increase vehicular traffic along several roads in the project area, including Bear Creek Road, Chase Road, Thompson Road, Old Well Road, and Brush Road, as well as SR 35 and SR 17. 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 required (i.e., equipment transport and crew vehicles for crew members) 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. SPRs that would be applicable to the proposed project are AD-3 and TRAN-1. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT TRAN-2

Vegetation treatments would not require the construction or alteration of any roadways. However, the proposed treatments would require the transportation of heavy equipment along small and mountainous roadways, which could create increased transportation hazards due to incompatible uses. The potential for the hauling of machinery to remote treatment areas was examined in the PEIR. This impact is within the scope of the activities and impacts addressed in the PEIR because the quantity and types of equipment proposed for use that would require transport to treatment areas are the same as those analyzed in the PEIR. In addition, the transport of equipment would be infrequent and dispersed on multiple roadways, occurring at the start and the end of treatment activities. SPRs that would be applicable to the proposed project are AD-3 and TRAN-1. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT TRAN-3

Treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the proposed project would require vehicle trips to transport crew members and equipment to the treatment areas. This impact was identified as potentially significant and unavoidable in the PEIR because implementation of the CalVTP would result in a net increase in VMT. However, as noted under Impact TRAN-3 in the PEIR, individual vegetation treatment projects under the CalVTP are reasonably expected to generate fewer than 110 trips per day, which would cause a less-than-significant transportation impact for specific later activities, as described in the *Technical Advisory on Evaluating Transportation Impacts* published by the Governor's Office of Planning and Research (OPR 2018). Manual and mechanical treatments under the proposed project would typically require eight to 12 personnel, and up to three treatments would be implemented simultaneously. Therefore, even if three treatments occur simultaneously, the crew sizes are sufficiently small such that the total increase in VMT would not exceed 110 trips per day. In addition, the increase in vehicle trips would be temporary and dispersed to multiple roadways. A temporary increase in VMT is within the scope of the activities and impacts addressed in the PEIR because the number and duration of increased vehicle trips are consistent with that analyzed in the PEIR. This impact would be less than significant, and Mitigation Measure AQ-1 would not be required for this impact of the proposed project. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW IMPACTS ON TRANSPORTATION

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.15.1, "Environmental Setting," and Section 3.15.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to transportation would occur that is not covered in the PEIR.

4.15 PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

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

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

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

Water may be required to implement the proposed project to minimize dust if excessive dust is created through the use of unpaved roads, or to remove visible dust or mud that gets tracked out onto public paved roadways, pursuant to SPR AQ-4. The potential increase in water demand as a result of treatment activities was examined in the PEIR. The most water-intensive activities described in the PEIR would be providing on-site water for prescribed burning and during vegetation removal within nonshaded fuel breaks. Prescribed burning and the creation of nonshaded fuel breaks would not occur under the proposed project. This impact is within the scope of the impacts addressed in the PEIR because the treatment types and activities are consistent with those included in the PEIR and the amount of water required during

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

IMPACT UTIL-2

Vegetation treatments would generate biomass as a result of vegetation removal within the treatment areas. Biomass generated by mechanical and manual treatments would be disposed of by chipping, mulching, or lopping and scattering within treatment areas. This impact was identified as potentially significant and unavoidable in the PEIR because biomass hauled off-site could exceed the capacity of existing infrastructure for handling biomass. For the proposed treatment project, no biomass would be hauled off-site; therefore, there is no potential to exceed the capacity of existing infrastructure, and this impact does not apply to the proposed project. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT UTIL-3

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

NEW IMPACTS ON PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.16.1, "Environmental Setting," and Section 3.16.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to public services or utilities and service systems would occur that is not covered in the PEIR.

4.16 WILDFIRE

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

[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

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

Vegetation treatments would include the use of heavy equipment, which pose a risk of accidental fire ignition. The potential increase in exposure to wildfire during implementation of treatments was examined in the PEIR. Increased wildfire risk associated with the use of heavy equipment in vegetated areas is within the scope of the PEIR, because the types of equipment and treatment duration of the proposed project are consistent with those analyzed in the PEIR. In addition, no prescribed burning would occur under the propose project. SPRs that would be applicable to the proposed project are HAZ-2, HAZ-3, and HAZ-4. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT WIL-2

The proposed project would not implement prescribed burning, which could result in postfire flooding or landslides. It also does not include new housing, nor would it result in population growth, thereby potentially exposing more people to postfire risks of flooding or landslides. Furthermore, because the treatments reduce wildfire risk, they would also decrease post wildfire landslide and flooding risk in areas that could otherwise burn in a high-severity wildfire without treatment. Therefore, this impact does not apply to the project.

NEW IMPACTS ON WILDFIRE

The proposed treatments are entirely within the CalVTP treatable landscape and are consistent with the treatment types and activities considered in the CalVTP PEIR. Midpen has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.17.1, "Environmental Setting," and Section 3.17.2, "Regulatory Setting," in Volume II of the Final PEIR). Midpen has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to wildfire would occur that is not covered in the PEIR.

5 LIST OF PREPARERS

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Attachment A

Mitigation Monitoring and Reporting Program for the Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project

MITIGATION MONITORING AND REPORTING PROGRAM

INTRODUCTION

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

PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

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

ROLES AND RESPONSIBILITIES

Unless otherwise specified herein, Midpen is responsible for taking all actions necessary to implement the mitigation measures under its jurisdiction according to the specifications provided for each measure and for demonstrating that the action has been successfully completed. Midpen will be responsible for implementation of mitigation measures pursuant to Section 15097 of the State CEQA Guidelines.

REPORTING

Midpen shall document and describe the compliance of the project treatment work with the required SPRs and mitigation measures either by adapting the project-specific MMRP table or preparing a separate post-project implementation report (referred to by CAL FIRE as a Completion Report) pursuant to the requirements of SPR AD-7.

MITIGATION MONITORING AND REPORTING PROGRAM TABLE

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

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Administrative Standard Project Requirements				
SPR AD-2: Delineate Protected Resources. The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly-visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Midpen	Midpen
SPR AD-5: Maintain Site Cleanliness: If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Midpen	Midpen
SPR AD-6: Public Notifications for Treatment Projects. One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.	Initial Treatment: Y Treatment Maintenance: Y	One to three days prior to treatments	Midpen	Midpen
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):	Initial Treatment: Y Treatment Maintenance: N	Prior to, during, and following treatment Information has been submitted for the proposed project phase	Midpen	Midpen

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
◦ GIS data that include project location (as a point); ◦ project size (typically acres); ◦ treatment types and activities; and ◦ contact information for a representative of the project proponent. The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public no later than two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent's own website). Information on approved projects (PSA complete): ◦ A completed PSA Environmental Checklist; ◦ A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); ◦ GIS data that include a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction). Information on completed projects: ◦ GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction) ◦ A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes: ▪ Size of treated area (typically acres); ▪ Treatment types and activities; ▪ Dates of work; ▪ A list of the SPRs and mitigation measures that were implemented ▪ Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). This SPR applies to all treatment activities and all treatment types.				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Aesthetic and Visual Resource Standard Project Requirements				
SPR AES-1: Vegetation Thinning and Edge Feathering. The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During mechanical and manual treatment activities	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Midpen	Midpen
SPR AES-3: Provide Vegetation Screening. The project proponent will preserve sufficient vegetation within, at the edge of, or adjacent to treatment areas to screen views from public trails, parks, recreation areas, and roadways as reasonable or appropriate for vegetation conditions. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Midpen	Midpen
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	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Midpen	Midpen

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.				
Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements				
SPR CUL-1: Conduct Record Search: An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment Record search of project area and 0.25-mile buffer surrounding project area has been conducted; see PSA for a summary of results.	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment Tribes have been contacted and SLF query completed; see PSA for a summary of consultation and SLF results.	Midpen	Midpen

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
◦ 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.				
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Midpen	Midpen
SPR CUL-5: Treatment of Archaeological Resources: If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist or archaeologically-trained resource professional 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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Midpen	Midpen

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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 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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Midpen	Midpen
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) 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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Midpen	Midpen
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 or tribal 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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Midpen	Midpen
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	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment Initial data review and reconnaissance-level survey have been conducted, see PSA for results.	Midpen	Midpen

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified RPF or biologist, will determine which one of the following best characterizes the treatment:				
1. *Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided.* If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment: 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. *Project-Specific Implementation* › To avoid impacts from manual treatment on herbaceous annual or geophyte special-status plant species, non-ground disturbing initial treatment activities would be conducted between September 1 and December 31; outside the growing season.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Midpen	Midpen

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
◦ To avoid impacts on foothill yellow-legged frog, a 200-foot buffer would be implemented along stream habitat prior to commencement of treatment activities, where feasible (if infeasible, see SPR BIO-10). ◦ To avoid impacts on western pond turtle, a 200-foot buffer would be implemented along stream habitat prior to commencement of treatment activities, where feasible (if infeasible, see SPR BIO-10). ◦ To avoid impacts on special-status birds, initial treatment activities would be conducted between September 1 and December 31; outside of the nesting bird season. ◦ To avoid impacts on special-status bats, initial treatment activities would be conducted between September 1 and December 31; outside of the bat maternity season. ◦ To avoid impacts on ringtail, treatment activities and maintenance treatments would be conducted between September and December 31; outside of the ringtail maternity season. 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.				
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	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Midpen	Midpen; CDFW and USFWS, as applicable

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.				
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Midpen	Midpen
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;	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	Midpen	Midpen

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
◦ If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Midpen	Midpen

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.				
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 Implementation › To avoid impacts on special-status salamanders (i.e., California giant salamander, Santa Cruz black salamander), focused surveys (i.e., walk and turn surveys) would be conducted within habitat suitable for the species. › To determine whether California red-legged frogs are present within upland habitats in treatment areas, focused surveys would be conducted by a qualified biologist within 24 hours prior to implementation of all mechanical and manual treatments.	Initial Treatment: Y Treatment Maintenance: Y	No more than 14 days prior to treatment (unless otherwise specified)	Midpen	Midpen

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
◦ If implementation of 200-foot buffers along stream habitat is deemed infeasible for certain treatments (e.g., habitat improvement treatments), then focused visual encounter surveys for foothill yellow-legged frog would be conducted within habitat areas suitable for the species prior to treatment activities. ◦ If implementation of 200-foot buffers along stream habitat is deemed infeasible for certain treatments (e.g., habitat improvement treatments), then focused visual encounter surveys for western pond turtle would be conducted within habitat areas suitable for the species (i.e., aquatic and upland) prior to treatment activities. ◦ For maintenance treatments that cannot be avoided during the nesting bird season and to avoid impacts on special-status birds (i.e., American peregrine falcon, bald eagle, golden eagle, loggerhead shrike, long-eared owl, northern harrier, olive-sided flycatcher, purple martin, Vaux's swift, white-tailed kite), 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). ◦ To avoid impacts on mountain lions, focused, non-invasive surveys for mountain lion nurseries within nursery habitat suitable for the species will be implemented by a qualified wildlife biologist. Nursery habitat suitable for the species will be determined through desktop analysis (e.g., land cover, slope, distance from development), coordination with local experts studying or tracking the species (if available), and field surveys. Potential mountain lion nursery dens will include caves, large natural cavities within rocky areas, or thickets deemed appropriate for use by mountain lions based on size and other characteristics (e.g., proximity to human development, surrounding habitat). The qualified wildlife biologist will survey for signs of mountain lion (e.g., tracks, scat, prey items) in the vicinity of potential nursery habitat to help determine whether an area may contain a mountain lion nursery. If signs of a mountain lion nursery are found during surveys or monitoring, further investigation will be required to determine if a mountain lion nursery is present. No treatment will occur in the area while further investigation is occurring. Survey methods will include the use of trail cameras, track plates, hair snares, and/or other noninvasive methods, as well as coordination with local experts tracking the species (if available). Surveys using these noninvasive methods will be conducted for three days and three nights to determine whether a nursery may be present. ◦ For maintenance treatments that cannot be avoided during the bat maternity season and to avoid impacts on special-status bats (i.e., pallid bat, Townsend's big-eared bat, western red bat), focused surveys for maternity roosts of these				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
species will be conducted prior to implementing treatment activities during the bat maternity season (April 1–August 31). › To avoid impacts on San Francisco dusky-footed woodrats, focused surveys for the specie would be conducted within habitat suitable for the species prior to implementation of mechanical and manual treatments.				
SPR BIO-12: Protect Common Nesting Birds, Including Raptors. The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP PEIR. The active nesting season will be defined by the qualified RPF or biologist. If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identity the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The 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	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 (typically, up to 3 weeks before treatment maintenance); if an active nest is observed, implement avoidance strategies prior to and during treatment maintenance	Midpen	Midpen

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases. › Retention of Raptor Nest Trees. Trees with visible raptor nests, whether occupied or not, will be retained. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Geology, Soils, and Mineral Resource Standard Project Requirements				
SPR GEO-1: Suspend Disturbance during Heavy Precipitation: The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types.	Initial Treatment: Y Treatment Maintenance: Y	During treatment if there is a "chance" (30 percent or more) of rain within the next 24 hours	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Midpen	Midpen
SPR GEO-3: Stabilize Disturbed Soil Areas: The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments, and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, prescribed	Initial Treatment: Y Treatment Maintenance: Y	During mechanical activities that result in exposure of bare soil over 50 percent or more of the treatment area	Midpen	Midpen

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
herbivory, or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery, animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical, prescribed herbivory, and prescribed burns that result in exposure of bare soil over 50 percent of the project area treatment activities and all treatment types.				
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Midpen	Midpen

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
(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.				
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment on slopes greater than 50 percent	Midpen	Midpen
Hazardous Material and Public Health and Safety Standard Project Requirements				
SPR HAZ-1: Maintain All Equipment: The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	During manual treatment activities	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	During manual treatment activities	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Midpen	Midpen

<table>
<tr><th>Standard Project Requirements</th><th>Applicable? (Y/N)</th><th>Timing</th><th>Implementing Entity</th><th>Verifying/Monitoring Entity</th></tr>
<tr><td colspan="5">Hydrology and Water Quality Standard Project Requirements</td></tr>
<tr><td>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.</td><td>Initial Treatment: Y

Treatment Maintenance: Y</td><td>During treatment</td><td>Midpen</td><td>Midpen</td></tr>
<tr><td>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.</td><td>Initial Treatment: Y

Treatment Maintenance: Y</td><td>Prior to treatment</td><td>Midpen</td><td>Midpen</td></tr>
<tr><td>SPR HYD-4: Identify and Protect Watercourse and Lake Protection Zones: The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916.5 of the California Forest Practice Rules (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.

Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) Widths
<table><tr><th>Water Class</th><th>Class I</th><th>Class II</th><th>Class III</th><th>Class IV</th></tr><tr><td>Water Class Characteristics or</td><td>1) Domestic supplies, including springs, on site</td><td>1) Fish always or seasonally present offsite within 1000</td><td>No aquatic life present, watercourse</td><td>Man-made watercourses, usually</td></tr></table></td><td>Initial Treatment: Y

Treatment Maintenance: Y</td><td>Establish WLPZs prior to treatment; implement WLPZ protections during treatments</td><td>Midpen</td><td>Midpen</td></tr>
</table>

Standard Project Requirements					Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Key Indicator Beneficial Use	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.	feet downstream and/or 2) Aquatic habitat for nonfish aquatic species. 3) Excludes Class III waters that are tributary to Class I waters.	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.	downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.				
WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ								
< 30 % Slope	75	50	Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.					
30-50 % Slope	100	75						
>50 % Slope	150	100						

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

The following WLPZ protections will be applied for all treatments:

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
◦ Equipment used in vegetation removal operations will not be serviced in WLPZs, within wet meadows or other wet areas, or in locations that would allow grease, oil, or fuel to pass into lakes, watercourses, or wet areas. ◦ WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately. ◦ Burn piles will be located outside of WLPZs. ◦ No fire ignition (nor use of associated accelerants) will occur within WLPZs however low intensity backing fires may be allowed to enter or spread into WLPZs. ◦ Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of soil into water bodies and may include but are not limited to mulching, rip-rap, grass seeding, or chemical soil stabilizers. ◦ Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse. ◦ Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes. ◦ Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water. This SPR applies to all treatment activities and treatment types.				
SPR HYD-6: Protect Existing Drainage Systems: If a treatment activity is adjacent to a roadway with stormwater drainage infrastructure, the existing stormwater drainage infrastructure will be marked prior to ground disturbing activities. If a drainage structure or infiltration system is inadvertently disturbed or modified during project activities, the project proponent will coordinate with owner of the system or feature to repair any damage and restore pre-project drainage conditions. This SPR applies to all treatment activities and treatment types.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Midpen	Midpen

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	Midpen	Midpen

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to mechanical treatment activities within 1,500 feet of noise-sensitive receptors	Midpen	Midpen
Transportation Standard Project Requirements				
SPR TRAN-1: Implement Traffic Control during Treatments: Prior to initiating vegetation treatment activities the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. A TMP will be needed if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments. If needed, a TMP will be prepared to provide measures to reduce potential traffic obstructions, hazards, and service level degradation along affected roadway facilities. The scope of the TMP will depend on the type, intensity, and duration of the specific treatment activities under the CalVTP. Measures included in the TMP could include (but are not be limited to) construction signage to provide motorists with notification and information when approaching or traveling along the affected roadway facilities, flaggers for lane closures to provide temporary traffic control along affected roadway facilities, treatment schedule restrictions to avoid seasons or time periods of peak vehicle traffic, haul-trip, delivery, and/or commute time restrictions that would be implemented to avoid peak traffic days and times along affected roadway facilities. If the TMP identifies impacts on transportation facilities outside of the jurisdiction of the project proponent, the TMP will be submitted to the agency with jurisdiction over the affected roadways prior to commencement of vegetation treatment projects. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prepare TMP prior to treatment and implement during treatments	Midpen	Midpen

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Archaeological, Historical, and Tribal Cultural Resources				
Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist or archaeologically-trained resource professional will assess the significance of the find. The qualified archaeologist or archaeologically-trained resource professional 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 or archaeologically-trained resource professional (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or tribal cultural resource), the archaeologist or archaeologically-trained resource professional 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. If a tribal cultural resource is identified, the culturally affiliated tribe will be consulted regarding their preferred method of treatment for the feature. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center.	Initial Treatment: Y Treatment Maintenance: Y	During ground-disturbing activities	Midpen	Midpen
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Midpen	Midpen

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report) with a science-based justification for the deviation. No fire ignition (and associated use of accelerants) will occur within 50 feet of listed plants. For species listed under ESA or CESA, if the project proponent cannot avoid loss by implementing no-disturbance buffers, the project proponent will implement Mitigation Measure BIO-1c. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist, in consultation with CDFW and USFWS, as appropriate depending on species status and location, that the listed plants would benefit from treatment in the occupied habitat area even though some of the listed plants may be lost during treatment activities. For a treatment to be considered beneficial to listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to listed plants, no compensatory mitigation for loss of individuals will be required. *Project-Specific Implementation.* If listed special-status plant species are detected during protocol-level surveys, a no-disturbance buffer of at least 50 feet will be established around the area occupied by the species within which mechanical treatment and manual treatment will not occur.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed under ESA or CESA If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement the following measures to avoid loss of individuals and maintain habitat function of occupied habitat: › Physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape. › Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank. › Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the special-status plant itself, habitat function would be diminished and the treatment would need to be modified or precluded from implementation.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Midpen	Midpen

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
◦ 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. *Project-Specific Implementation.* If special-status plant species are detected during protocol-level surveys, a no-disturbance buffer of at least 50 feet will be established around the area occupied by the species within which mechanical treatment and manual treatment will not occur. For habitat improvement treatments to support Hickman's popcornflower, treatment activities may occur within the no-disturbance buffer because Midpen determined that Hickman's popcornflower would benefit from treatment in the occupied area even though some of the individual plants may be adversely affected during treatment activities (see PSA for substantial evidence).				

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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 <u>of the lead agency</u> 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~~ <u>If the lead agency determines after consultation</u> that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c. Project-Specific Implementation. • Pursuant to recovery permit (Permit Number TE2259774-2) conservation measures, biological monitoring by a qualified biologist during treatment activities would be implemented to avoid injury to or mortality of California red-legged frogs. If a California-red legged frog enters a treatment area, all work would stop, and the frog would be allowed to leave on its own. If a California red-legged frog enters a treatment area and will not or cannot leave on its own, the biological monitor will contact a USFWS-approved Midpen biologist who will relocate the individual frog outside of the treatment area.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
◦ If foothill yellow-legged frogs are detected during focused surveys, biological monitoring by a qualified biologist during treatment activities within or adjacent to sensitive habitat areas (e.g., streams) will be implemented to avoid injury to or mortality of foothill yellow-legged frogs. If a foothill yellow-legged frog enters a treatment area, all work would stop, and the frog would be allowed to leave on its own. Additionally, if detected, Midpen will determine whether habitat function will remain for foothill yellow-legged frogs after implementation of the treatment, and will consult with CDFW regarding Midpen's determination. ◦ If a bald eagle or white-tailed kite nest is detected during focused surveys, a no-disturbance buffer of at least 500 feet 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. Additionally, if detected, Midpen will determine whether habitat function will remain for bald eagle or white-tailed kite after implementation of the treatment, and will consult with CDFW regarding Midpen's determination. ◦ If an occupied mountain lion den is identified or assumed to be present during focused surveys, a buffer of at least 2,000 feet will be established around the den, within which treatment activities will not occur.				
Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities) If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following. <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: ◦ For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Midpen	Midpen

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
that will avoid or minimize mortality, injury, or disturbance of the species. The project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate limited operating periods. Maintain Habitat Function For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following: › While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; tree snags; large raptor nests [including inactive nests]; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. › If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained. › A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function. › A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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. *Project-Specific Implementation:* › If special-status salamanders (i.e., California giant salamander, Santa Cruz black salamander) are detected during focused surveys, biological monitoring by a qualified biologist during treatment activities within or adjacent to sensitive habitat areas (e.g., streams, seeps, springs, talus slopes) will be implemented to avoid injury to or mortality of individual salamanders. If the qualified biologist detects a special-status salamander during treatments, treatment activities will cease until the salamander has left the area or has been moved out of harm's way and to other nearby habitat suitable for the species by the qualified biologist. › If western pond turtles are detected during focused surveys, biological monitoring by a qualified biologist during treatment activities within or				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
adjacent to sensitive habitat areas (e.g., streams) will be implemented to avoid injury to or mortality of western pond turtle. If the qualified biologist detects a western pond turtle during treatments, treatment activities will cease until the turtle has left the area or has been moved out of harm's way and to other nearby habitat suitable for the species by the qualified biologist. › If a loggerhead shrike, long-eared owl, northern harrier, olive-sided flycatcher, purple martin, or Vaux's swift nest is detected during focused surveys, a no-disturbance buffer of at least 100 feet 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. › If a pallid bat, Townsend's big-eared bat, or western red bat roost is detected during focused surveys, a no-disturbance buffer of 250 feet will be established around the roost, and no treatment activities will occur within this buffer until the roost is no longer being used as determined by a qualified RPF or biologist. › If woodrat nests are detected within treatment areas during focused surveys, a no-disturbance buffer of sufficient size to prevent disturbance would be established around the nests to prevent accidental encroachment by vehicles, equipment, or personnel. If woodrat nests within treatment areas cannot be avoided, a qualified biologist will implement nest relocation procedures outside of the woodrat breeding season (April through mid-July). The biologist would determine whether the nest is active through live-trapping, dismantle the woodrat nest by hand, and rebuild the nest outside of the treatment footprint.				
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	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	Midpen	Midpen

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
◦ Time prescribed herbivory to occur when non-target vegetation is not susceptible to damage (e.g. non-target vegetation is dormant or has completed its reproductive cycle for the year). For example, use herbivores to control invasive plants growing in sensitive habitats or sensitive natural communities when sensitive vegetation is dormant but invasive plants are growing. Timing of herbivory to avoid non-target vegetation will be determined by a qualified botanist, RPF, or biologist based on the specific vegetation alliance being treated, the life forms and life conditions of its characteristic plant species, and the sensitivity of the non-target vegetation to the effects of herbivory. The feasibility of implementing the avoidance measures will be determined by the project proponent based on whether implementation of this mitigation measure will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. If the avoidance measures are determined by the project proponent to be infeasible, the project proponent will document the reasons implementation of the avoidance strategies are infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). A qualified RPF or botanist with knowledge of the affected sensitive natural community will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat functions of the sensitive natural community or oak woodland. If the project proponent determines the impact on sensitive natural communities or oak woodlands would be less than significant, no further mitigation will be required. If the project proponent determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-3b will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the 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				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the community (or similar community) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.				

Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
 	
If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will implement the following actions:
› Compensate for unavoidable losses of sensitive natural community and oak woodland acreage and function by:
  ' restoring sensitive natural community or oak woodland functions and acreage within the treatment area;
  ' restoring degraded sensitive natural communities or oak woodlands outside of the treatment area at a sufficient ratio to offset the loss of acreage and habitat function; or
  ' preserving existing sensitive natural communities or oak woodlands of equal or better value to the sensitive natural community lost through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function.
› The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and:
1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project
	Initial Treatment: Y
	
	Treatment Maintenance: Y
		Prior to treatment projects	Midpen	Midpen

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

Attachment B

Biological Resources

Special-Status Plant Species Known to Occur in the Vicinity of the Treatment Areas and Their Potential for Occurrence in the Treatment Areas

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Blasdale's bent grass *Agrostis blasdalei*	–	–	1B.2	Coastal dunes, coastal bluff scrub, coastal prairie. Sandy or gravelly soil close to rocks; often in nutrient-poor soil with sparse vegetation. 16–1,198 feet in elevation. Blooms May–July.	Not expected to occur. Treatment areas do not contain coastal dune, coastal bluff scrub, or coastal prairie habitat.
Bent-flowered fiddleneck *Amsinckia lunaris*	–	–	1B.2	Cismontane woodland, valley and foothill grassland, coastal bluff scrub. 10–2,608 feet in elevation. Blooms March–June.	May occur. Treatment areas contain woodland habitat potentially suitable for this species.
Anderson's manzanita *Arctostaphylos andersonii*	–	–	1B.2	Open sites, redwood forest. 197–2,493 feet in elevation. Blooms November–May.	May occur. Treatment areas contain redwood forest habitat potentially suitable for this species.
Schreiber's manzanita *Arctostaphylos glutinosa*	–	–	1B.2	Mudstone or diatomaceous shale outcrops; often with *Pinus attenuata*. 558–2,247 feet in elevation. Blooms March–April.	Not expected to occur. This species has a limited range which does not overlap with the treatment areas (Kauffmann et al. 2015).
Ohlone manzanita *Arctostaphylos ohloneana*	–	–	1B.1	Coastal scrub, closed cone coniferous forests. Monterey shale. 1,476–1,739 feet in elevation. Blooms February–March.	Not expected to occur. This species has a limited range which does not overlap with the treatment areas (Kauffmann et al. 2015).
Kings Mountain manzanita *Arctostaphylos regismontana*	–	–	1B.2	Granitic or sandstone outcrops. 787–2,313 feet in elevation. Blooms December–April.	Not expected to occur. This species has a limited range which does not overlap with the treatment areas (Kauffmann et al. 2015).
Pajaro manzanita *Arctostaphylos pajaroensis*	–	–	1B.1	Chaparral. Sandy soils. 98–509 feet in elevation. Blooms December–March.	Not expected to occur. This species has a limited range which does not overlap with the treatment areas (Kauffmann et al. 2015).
Bonny Doon manzanita *Arctostaphylos silvicola*	–	–	1B.2	Only known from Zayante (inland marine) sands in Santa Cruz County. 492–1,706 feet in elevation. Blooms January–March.	Not expected to occur. Treatment areas do not contain Zayante soils. This species has a limited range which does not overlap with the treatment areas (Kauffmann et al. 2015).
Marsh sandwort *Arenaria paludicola*	FE	SE	1B.1	Growing up through dense mats of *Typha*, *Juncus*, *Scirpus*, etc. in freshwater marsh. Sandy soil. 10–558 feet in elevation. Blooms May–August.	Not expected to occur. Treatment areas do not contain freshwater marsh habitat.
Santa Cruz Mountains pussypaws *Calyptridium parryi* var. *hesseae*	–	–	1B.1	Chaparral, cismontane woodland. Sandy or gravelly openings. 984–5,036 feet in elevation. Blooms May–August.	May occur. Treatment areas contain woodland habitat potentially suitable for this species.
Swamp harebell *Campanula californica*	–	–	1B.2	Bogs and marshes in a variety of habitats; uncommon where it occurs. 3–1,329 feet in elevation. Blooms June–October.	Not expected to occur. Treatment areas do not contain bog or marsh habitat.
Bristly sedge *Carex comosa*	–	–	2B.1	Lake margins, wet places; site below sea level is on a Delta island. -16–5,315 feet in elevation. Blooms May–September.	Not expected to occur. Treatment areas do not contain lake margin habitat.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Deceiving sedge *Carex saliniformis*	–	–	1B.2	Coastal prairie, coastal scrub, meadows and seeps, swamps, saltmarsh. Mesic sites. 10–755 feet in elevation. Blooms June.	Not expected to occur. Treatment areas do not contain costal, swamp, or marsh habitat for this species.
Coyote ceanothus *Ceanothus ferrisiae*	FE	–	1B.1	Serpentine sites in the Mt. Hamilton range. 490–1,500 feet in elevation. Blooms January–May.	Not expected to occur. Treatment areas do not contain serpentine soils.
Congdon's tarplant *Centromadia parryi* ssp. *congdonii*	–	–	1B.1	Alkaline soils sometimes described as heavy white clay. 0–755 feet in elevation. Blooms May–October.	Not expected to occur. Treatment areas do not contain alkaline soils.
Ben Lomond spineflower *Chorizanthe pungens* var. *hartwegiana*	FE	–	1B.1	Zayante coarse sands in maritime ponderosa pine sandhills. 344–1,558 feet in elevation. Blooms April–July.	Not expected to occur. Treatment areas do not contain Zayante soils.
Monterey spineflower *Chorizanthe pungens* var. *pungens*	FT	–	1B.2	Sandy soils in coastal dunes or more inland within chaparral or other habitats. 0–558 feet in elevation. Blooms April–June.	Not expected to occur. Treatment areas do not contain coastal dune or chaparral habitat.
Scotts Valley spineflower *Chorizanthe robusta* var. *hartwegii*	FE	–	1B.1	In grasslands with mudstone and sandstone outcrops. 344–804 feet in elevation. Blooms April–July.	Not expected to occur. Treatment areas are outside of the range of this species.
Robust spineflower *Chorizanthe robusta* var. *robusta*	FE	–	1B.1	Sandy terraces and bluffs or in loose sand. 30–804 feet in elevation. Blooms April–September.	May occur. Treatment areas contain woodland and coyote brush scrub habitat potentially suitable for this species.
Mt. Hamilton fountain thistle *Cirsium fontinale* var. *campylon*	–	–	1B.2	In seasonal and perennial drainages on serpentine. 328–2,920 feet in elevation. Blooms April–October.	Not expected to occur. Treatment areas do not contain serpentine soils.
Lost thistle *Cirsium praeteriens*	–	–	1A	Little information exists on this plant; it was collected from the Palo Alto area at the turn of the 20th Century. 0–100 feet in elevation. Blooms June–July.	Not expected to occur. Treatment areas are outside of the known, historic range of this species.
San Francisco collinsia *Collinsia multicolor*	–	–	1B.2	On decomposed shale (mudstone) mixed with humus; sometimes on serpentine. 98–820 feet in elevation. Blooms March–May.	May occur. Treatment areas contain forest and coyote brush scrub habitats potentially suitable for this species.
Tear drop moss *Dacryophyllum falcifolium*	–	–	1B.3	Limestone substrates and rock outcrops. 164–902 feet in elevation.	May occur. Treatment areas contain forest habitat potentially suitable for this species.
Western leatherwood *Dirca occidentalis*	–	–	1B.2	On brushy slopes, mesic sites; mostly in mixed evergreen and foothill woodland communities. 82–1,394 feet in elevation. Blooms January–March.	May occur. Treatment areas contain forest and woodland habitat potentially suitable for this species.
Santa Clara Valley dudleya *Dudleya abramsii* ssp. *setchellii*	FE	–	1B.1	On rocky serpentine outcrops and on rocks within grassland or woodland. 197–1,493 feet in elevation. Blooms April–October.	Not expected to occur. Treatment areas do not contain serpentine soils.
Ben Lomond buckwheat *Eriogonum nudum* var. *decurrens*	–	–	1B.1	Ponderosa pine sandhills in Santa Cruz County. 164–2,625 feet in elevation. Blooms June–October.	Not expected to occur. Treatment areas do not contain sandhills habitat.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
San Mateo woolly sunflower *Eriophyllum latilobum*	FE	SE	1B.1	Foothill (oak) woodland; often on roadcuts; found primarily on serpentine. 98–2,001 feet in elevation. Blooms May–June. Perennial.	Not expected to occur. Treatment areas contain forest and coyote brush scrub habitat potentially suitable for this species.
Santa Cruz wallflower *Erysimum teretifolium*	FE	SE	1B.1	Inland marine sands (Zayante coarse sand). 591–1,690 feet in elevation. Blooms March–July.	Not expected to occur. Treatment areas do not contain Zayante soils.
Minute pocket moss *Fissidens pauperculus*	–	–	1B.2	Moss growing on damp soil along the coast. In dry streambeds and on stream banks. 33–3,360 feet in elevation.	May occur. Treatment areas contain forest habitat potentially suitable for this species.
Fragrant fritillary *Fritillaria liliacea*	–	–	1B.2	Often on serpentine; various soils reported though usually on clay, in grassland. 10–1,312 feet in elevation. Blooms February–April.	May occur. Treatment areas contain grassland habitat potentially suitable for this species.
Toren's grimmia *Grimmia torenii*	–	–	1B.3	Openings, rocky, boulder and rock walls, carbonate, volcanic. 1,066–3,806 feet in elevation.	May occur. Treatment areas contain forest habitat potentially suitable for this species.
Vaginulate grimmia *Grimmia vaginulata*	–	–	1B.1	Openings; rocky, boulder and rock walls, carbonate. 2,247–3,724 feet in elevation.	Not expected to occur. Treatment areas do not contain rocky areas of carbonate origin.
Short-leaved evax *Hesperevax sparsiflora* var. *brevifolia*	–	–	1B.2	Sandy bluffs and flats. 0–705 feet in elevation. Blooms March–June.	Not expected to occur. Treatment areas do not contain coastal bluff habitat.
Santa Cruz cypress *Hesperocyparis abramsiana* var. *abramsiana*	FT	SE	1B.2	Restricted to the Santa Cruz Mountains, on sandstone and granitic-derived soils; often with *Pinus attenuata*, redwoods. 984–3,560 feet in elevation.	Not expected to occur. Treatment areas are outside of the known range of this species.
Butano Ridge cypress *Hesperocyparis abramsiana* var. *butanoensis*	FT	SE	1B.2	Sandstone. 1,312–1,608 feet in elevation. Blooms October.	Not expected to occur. Treatment areas are outside of the known range of this species.
Loma Prieta hoita *Hoita strobilina*			1B.1	Serpentine; mesic sites. 197–3,199 feet in elevation. Blooms May–July.	Not expected to occur. Treatment areas do not contain serpentine soils.
Santa Cruz tarplant *Holocarpha macradenia*	FT	SE	1B.1	Light, sandy soil or sandy clay; often with nonnatives. 33–722 feet in elevation. Blooms June–October.	Not expected to occur. Treatment areas are outside of the known range of this species.
Kellogg's horkelia *Horkelia cuneata* var. *sericea*	–	–	1B.1	Old dunes, coastal sandhills; openings. 16–705 feet in elevation. Blooms April–September.	Not expected to occur. Treatment areas do not contain coastal sandhills or dune habitat.
Point Reyes horkelia *Horkelia marinensis*	–	–	1B.2	Sandy flats and dunes near coast; in grassland or scrub plant communities. 7–2,543 feet in elevation. Blooms May–September.	Not expected to occur. Treatment areas do not contain coastal dune habitat.
Contra Costa goldfields *Lasthenia conjugens*	FE	–	1B.1	Vernal pools, swales, low depressions, in open grassy areas. 3–1,480 feet in elevation. Blooms March–June.	Not expected to occur. Treatment areas do not contain vernal pool habitat.
Legenere *Legenere limosa*	–	–	1B.1	In beds of vernal pools. 3–2887 feet in elevation. Blooms April–June.	Not expected to occur. Treatment areas do not contain vernal pool habitat.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Smooth lessingia *Lessingia micradenia* var. *glabrata*	–	–	1B.2	Serpentine; often on roadsides. 394–1,378 feet in elevation. Blooms July–November.	Not expected to occur. Treatment areas do not contain serpentine habitat.
Arcuate bush-mallow *Malacothamnus arcuatus*	–	–	1B.2	Gravelly alluvium in chaparral, coastal sage scrub, or woodland. 3–2,411 feet in elevation. Blooms April–September. Perennial.	May occur. Treatment areas contain woodland habitat potentially suitable for this species.
Davidson's bush-mallow *Malacothamnus davidsonii*	–	–	1B.2	Sandy washes in chaparral, northern coastal scrub, and coastal sage scrub. 492–5,003 feet in elevation. Blooms June–January. Perennial.	Not expected to occur. Treatment areas do not contain sandy wash habitat.
Hall's bush-mallow *Malacothamnus hallii*	–	–	1B.2	Chaparral, coastal scrub. 33–2,395 feet in elevation. Blooms May–September.	May occur. Treatment areas contain coyote brush scrub habitat potentially suitable for this species.
Marsh microseris *Microseris paludosa*	–	–	1B.2	Closed-cone coniferous forest, cismontane woodland, coastal scrub, valley and foothill grassland. 16–984 feet in elevation. Blooms April–June.	May occur. Treatment areas contain woodland and grassland habitat potentially suitable for this species.
Northern curly-leaved monardella *Monardella sinuata* ssp. *nigrescens*	–	–	1B.2	Coastal dunes, coastal scrub, chaparral, lower montane coniferous forest. Sandy soils. 0–984 feet in elevation. Blooms May–July.	Not expected to occur. Treatment areas do not contain dune habitat or sandy soils.
Woodland woollythreads *Monolopia gracilens*	–	–	1B.2	Grassy sites, openings in broadleaved upland forest, chaparral, cismontane woodland, North Coast coniferous forest; valley and foothill grassland; sandy to rocky soils. Often seen on serpentine after burns but may have only weak affinity to serpentine. 328–3,937 feet in elevation. Blooms March–July. Annual.	May occur. Treatment areas contain grassland habitat potentially suitable for this species.
Kellman's bristle moss *Orthotrichum kellmanii*	–	–	1B.2	Rock outcrops in small openings within dense chaparral with overstory of scattered *Pinus attenuata*. 1,125–2,247 feet in elevation. Blooms January–February.	Not expected to occur. Treatment areas do not contain rocky chaparral habitat suitable for this species.
Dudley's lousewort *Pedicularis dudleyi*	–	SR	1B.2	Deep shady woods of older coast redwood forests; also in maritime chaparral. 197–2,953 feet in elevation. Blooms April–June.	Not expected to occur. Treatment areas are outside of the known range of this species.
Santa Cruz Mountains beardtongue *Penstemon rattanii* var. *kleei*	–	–	1B.2	Sandy shale slopes; sometimes in the transition between forest and chaparral. 1,312–3,609 feet in elevation. Blooms May–June.	May occur. Treatment areas contain forest habitat potentially suitable for this species.
White-rayed pentachaeta *Pentachaeta bellidiflora*	FE	SE	1B.1	Open dry rocky slopes and grassy areas, often on soils derived from serpentine bedrock. 115–2,001 feet in elevation. Blooms March–May.	May occur. Treatment areas contain grassland habitat potentially suitable for this species.
Monterey pine *Pinus radiata*	–	–	1B.1	Closed-cone coniferous forest, cismontane woodland. Three primary stands are native to California. Dry bluffs and slopes. 197–410 feet in elevation.	May occur. Treatment areas contain woodland habitat potentially suitable for this species.
White-flowered rein orchid *Piperia candida*	–	–	1B.2	Sometimes on serpentine. Forest duff, mossy banks, rock outcrops, and muskeg. 148–5,299 feet in elevation. Blooms May–September.	May occur. Treatment areas contain forest duff habitat potentially suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Choris' popcornflower *Plagiobothrys chorisianus* var. *chorisianus*	–	–	1B.2	Wetlands in chaparral, coastal scrub, coastal prairie. 49–525 feet in elevation. Blooms March–June. Annual.	May occur. Treatment areas may contain wetland habitat potentially suitable for this species.
Hickman's popcornflower *Plagiobothrys chorisianus* var. *hickmanii*	–	–	4.2	Wetland. 49–607 feet in elevation. Blooms April–June.	Known to occur. This species was detected during protocol-level special-status plant surveys conducted in the Preserve in 2008 (EcoSystems West 2008).
San Francisco popcornflower *Plagiobothrys diffusus*	–	SE	1B.1	Historically from grassy slopes with marine influence. 148–1,181 feet in elevation. Blooms March–June.	Not expected to occur. Treatment areas are outside of the known range of this species.
Hairless popcornflower *Plagiobothrys glaber*	–	–	1A	Coastal salt marshes and alkaline meadows. 16–591 feet in elevation. Blooms March–May.	Not expected to occur. Treatment areas do not contain salt marsh or alkaline meadow habitat.
Scotts Valley polygonum *Polygonum hickmanii*	FE	SE	1B.1	Purisima sandstone or mudstone with a thin soil layer; vernally moist due to runoff. 689–755 feet in elevation. Blooms May–August.	Not expected to occur. Treatment areas are outside of the known range of this species and do not contain Purisima soils.
Rock sanicle *Sanicula saxatilis*	–	SR	1B.2	Bedrock outcrops and talus slopes in chaparral or oak woodland habitat. 2,198–4,101 feet in elevation. Blooms April–May.	May occur. Treatment areas contain oak woodland habitat potentially suitable for this species.
Chaparral ragwort *Senecio aphanactis*	–	–	2B.2	Drying alkaline flats. 66–2,805 feet in elevation. Blooms January–April.	Not expected to occur. Treatment areas are outside of the known range of this species and do not contain alkaline soils.
San Francisco campion *Silene verecunda* ssp. *verecunda*	–	–	1B.2	Often on mudstone or shale; one site on serpentine. 98–2,116 feet in elevation. Blooms March–June.	Not expected to occur. Treatment areas are outside of the known range of this species.
Santa Cruz microseris *Stebbinsoseris decipiens*	–	–	1B.2	Open areas in loose or disturbed soil, usually derived from sandstone, shale, or serpentine, on seaward slopes. 33–1,640 feet in elevation. Blooms April–May.	Not expected to occur. Treatment areas are outside of the known range of this species.
Metcalf Canyon jewelflower *Streptanthus albidus* ssp. *albidus*	FE	–	1B.1	Relatively open areas in dry grassy meadows on serpentine soils; also on serpentine balds. 148–2,625 feet in elevation. Blooms April–July.	Not expected to occur. Treatment areas do not contain serpentine soils.
Most beautiful jewelflower *Streptanthus albidus* ssp. *peramoenus*	–	–	1B.2	Serpentine outcrops, on ridges and slopes. 312–3,281 feet in elevation. Blooms April–September.	Not expected to occur. Treatment areas do not contain serpentine soils.
Santa Cruz clover *Trifolium buckwestiorum*	–	–	1B.1	Moist grassland. Gravelly margins. 344–2,001 feet in elevation. Blooms April–October.	May occur. Treatment areas contain grassland habitat potentially suitable for this species.
Saline clover *Trifolium hydrophilum*	–	–	1B.2	Mesic, alkaline sites. 0–984 feet in elevation. Blooms April–June.	Not expected to occur. Treatment areas do not contain marsh, swamp, or vernal pool habitat suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Pacific Grove clover *Trifolium polyodon*	–	SR	1B.1	Along small springs and seeps in grassy openings. 16–394 feet in elevation. Blooms April–June.	Not expected to occur. Treatment areas are outside of the known range of this species.
Caper-fruited tropidocarpum *Tropidocarpum capparideum*	–	–	1B.1	Valley and foothill grassland. Alkaline clay. 0–1,181 feet in elevation. Blooms March–April.	May occur. Treatment areas contain grassland habitat potentially suitable for this species.

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

1 Legal Status Definitions

Federal:

FE Federally Listed as Endangered (legally protected by ESA)

FT Federally Listed as Threatened (legally protected by ESA)

State:

SE State Listed as Endangered (legally protected by CESA)

SR State Listed as Rare (legally protected by NPPA)

California Rare Plant Ranks (CRPR):

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

1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA).

2B Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA).

4 Plant species with limited distribution or infrequent throughout a broader area in California.

CRPR Threat Ranks:

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

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

0.3 Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

2 Potential for Occurrence Definitions

Not expected to occur: Species is unlikely to be present because of poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.

May occur: Suitable habitat is available and there have been nearby recorded occurrences of the species.

Known to occur: The species has been observed within the treatment areas.

Sources: CNDDB 2020; CNPS 2020; EcoSystems West 2008; Kauffmann et al. 2015

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

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Amphibians and Reptiles				
California giant salamander *Dicamptodon ensatus*	–	SSC	Known from wet coastal forests near streams and seeps from Mendocino County south to Monterey County and east to Napa County. Aquatic larvae found in cold, clear streams, occasionally in lakes and ponds. Adults known from wet forests under rocks and logs near streams and lakes.	May occur. There are several known occurrences of this species within approximately 5 miles of the treatment areas (CNDDB 2020). Habitat suitable for California giant salamander is present within forest habitat near streams in the treatment areas.
California red-legged frog *Rana draytonii*	FT	SSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	May occur. California red-legged frogs have not been detected within the treatment areas; however, there are several known occurrences of the species within approximately 2 miles of the treatment areas (CNDDB 2020, Biosearch Environmental Consulting 2018). Recent surveys of potential breeding habitat (e.g., ponds) adjacent to the treatment areas did not result in detection of California red-legged frogs (Biosearch 2018). This species is not expected to breed within ponds adjacent to the treatment areas; however, individuals may use upland habitat in the treatment areas for dispersal.
California tiger salamander *Ambystoma californiense*	FT	ST	Need underground refuges, especially ground squirrel burrows, and vernal pools or other seasonal water sources for breeding.	Not expected to occur. Treatment areas do not contain habitat suitable for this species.
Coast horned lizard *Phrynosoma blainvillii*	–	SSC	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	Not expected to occur. Treatment areas do not contain wash habitat or low bushes suitable for this species.
Foothill yellow-legged frog *Rana boylii*	–	SE SSC	Partly-shaded, shallow streams, and riffles with a rocky substrate in a variety of habitats. Need at least some cobble-sized substrate for egg-laying. Need at least 15 weeks to attain metamorphosis.	May occur. The nearest known occurrence of foothill yellow-legged frog is approximately 3 miles west of the treatment areas (CNDDB 2020). Treatment areas contain habitat potentially suitable for this species within streams and drainages.
Northern California legless lizard *Anniella pulchra*	–	SSC	Sandy or loose loamy soils under sparse vegetation. Soil moisture is essential. They prefer soils with a high moisture content.	Not expected to occur. Treatment areas are outside of the known range of this species.

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Red-bellied newt *Taricha rivularis*	–	SSC	Coastal drainages from Humboldt County south to Sonoma County, inland to Lake County. Isolated population of uncertain origin in Santa Clara County. Lives in terrestrial habitats, juveniles generally underground, adults active at surface in moist environments. Will migrate over 1 km to breed, typically in streams with moderate flow and clean rocky substrate.	Not expected to occur. Treatment areas are outside of the known range of this species.
San Francisco gartersnake *Thamnophis sirtalis tetrataenia*	FE	SE FP	Vicinity of freshwater marshes, ponds and slow-moving streams in San Mateo County and extreme northern Santa Cruz County. Prefers dense cover and water depths of at least one foot. Upland areas near water are also very important.	Not expected to occur. Treatment areas are outside of the known range of this species.
Santa Cruz black salamander *Aneides niger*	–	SSC	Mixed deciduous and coniferous woodlands and coastal grasslands in San Mateo, Santa Cruz, and Santa Clara counties. Adults found under rocks, talus, and damp woody debris.	May occur. There are several known occurrences of Santa Cruz black salamander within approximately three miles of the treatment areas (CNDDB 2020). Treatment areas contain habitat potentially suitable for this species within woodlands and forests.
Western pond turtle *Actinemys marmorata*	–	SSC	Ponds, marshes, rivers, streams, and irrigation ditches, usually with aquatic vegetation, below 6,000 feet elevation. Need basking sites and suitable (sandy banks or grassy open fields) upland habitat up to 0.5 km from water for egg-laying.	May occur. Habitat suitable for western pond turtle is present within ponds adjacent to the treatment area. Individual western pond turtles were detected during live-trapping surveys conducted in 2017. All captured turtles were located at Lower lake and were determined to be male. (Biosearch Environmental Consulting 2018, HT Harvey 2006). No breeding attempts, nesting or young have been observed to date. While the Preserve likely does not support a viable population of the species, there have been individual detections of pond turtles within the vicinity of the treatment areas (Biosearch Environmental Consulting 2018b).
Birds				
American peregrine falcon *Falco peregrinus anatum*	FD	SD FP	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site.	May occur. Peregrine falcons may forage within the treatment areas; however, nesting habitat suitable for the species is not present.
Bald eagle *Haliaeetus leucocephalus*	FD	SE FP	Lower montane coniferous forest, old growth. Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests within 1 mile of water. Nests in large, old-growth, or dominant live tree with open branches, especially ponderosa pine. Roosts communally in winter.	May occur. Nesting habitat potentially suitable for bald eagle is present within forest habitat in the treatment areas.

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Black swift *Cypseloides niger*	–	SSC	Coastal belt of Santa Cruz and Monterey Co; central and southern Sierra Nevada; San Bernardino and San Jacinto Mountains. Breeds in small colonies on cliffs behind or adjacent to waterfalls in deep canyons and sea-bluffs above the surf; forages widely	Not expected to occur. Treatment areas do not contain coastal canyon or sea bluff habitat suitable for colonial nesting of this species.
Burrowing owl *Athene cunicularia*	–	SSC	Open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	Not expected to occur. Treatment areas do not contain grassland habitat and burrowing owls have not been detected within the treatment areas.
Golden eagle *Aquila chrysaetos*	–	FP	Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.	May occur. Golden eagles may forage within the treatment areas; however, nesting habitat suitable for the species is not present.
Grasshopper sparrow *Ammodramus savannarum*	–	SSC	Dense grasslands on rolling hills, lowland plains, in valleys and on hillsides on lower mountain slopes. Favors native grasslands with a mix of grasses, forbs and scattered shrubs. Loosely colonial when nesting.	Not expected to occur. Treatment areas do not contain grassland habitat suitable for this species.
Least Bell's vireo *Vireo bellii pusillus*	FE	SE	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2,000 feet. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, *Baccharis*, mesquite.	Not expected to occur. Treatment areas do not contain riparian forest habitat and are not within the current range of least Bell's vireo does is not within the
Loggerhead shrike *Lanius ludovicianus*	–	SSC	Prefers open country for hunting, with perches for scanning, and fairly dense shrubs and brush for nesting.	May occur. Treatment areas contain habitat potentially suitable for this species within brushy areas.
Long-eared owl *Asio otus*	–	SSC	Riparian bottomlands grown to tall willows and cottonwoods; also, belts of live oak paralleling stream courses. Require adjacent open land productive of mice and the presence of old nests of crows, hawks, or magpies for breeding.	May occur. Treatment areas contain habitat potentially suitable for this species within forested portions of the treatment areas.
Marbled murrelet *Brachyramphus marmoratus*	FT	SE	Feeds near-shore; nests inland along coast from Eureka to Oregon border and from Half Moon Bay to Santa Cruz. Nests in old-growth redwood-dominated forests, up to six miles inland, often in Douglas-fir.	Not expected to occur. The nearest known marbled murrelet occurrence is approximately 8 miles southwest of the treatment areas within Henry Cowell Redwoods State Park (CNDDB 2020). Treatment areas are outside of the known range of this species and this species.

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Northern harrier *Circus hudsonius*	–	SSC	Coastal salt and fresh-water marsh. Nest and forage in grasslands, from salt grass in desert sink to mountain cienagas. Nests on ground in shrubby vegetation, usually at marsh edge; nest built of a large mound of sticks in wet areas.	May occur. Habitat potentially suitable for this species is present adjacent to the treatment areas near freshwater marsh or pond habitat.
Olive-sided flycatcher *Contopus cooperi*	–	SSC	Nesting habitats are mixed conifer, montane hardwood-conifer, Douglas-fir, redwood, red fir and lodgepole pine. Most numerous in montane conifer forests where tall trees overlook canyons, meadows, lakes, or other open terrain.	May occur. Treatment areas contain habitat potentially suitable for olive-sided flycatcher in forest habitat and there are several recent observations of the species in the vicinity of the treatment areas (eBird 2020).
Purple martin *Progne subis*	–	SSC	Inhabits woodlands, low elevation coniferous forest of Douglas-fir, ponderosa pine, and Monterey pine. Nests in old woodpecker cavities mostly, also in human-made structures. Nest often located in tall, isolated tree/snag.	May occur. Treatment areas contain habitat potentially suitable for purple martin within large conifer trees.
Saltmarsh common yellowthroat *Geothlypis trichas sinuosa*	–	SSC	Resident of the San Francisco Bay region, in fresh and salt marshes. Requires thick, continuous cover down to water surface for foraging; tall grasses, tule patches, willows for nesting.	Not expected to occur. Treatment areas do not contain marsh habitat.
Swainson's hawk *Buteo swainsoni*	–	ST	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, and agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.	Not expected to occur. Treatment areas are outside of the known range of this species.
Tricolored blackbird *Agelaius tricolor*	–	ST SSC	Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few kilometers of the colony.	Not expected to occur. Treatment areas do not contain nesting habitat adjacent to open water suitable for this species.
Vaux's swift *Chaetura vauxi*	–	SSC	Redwood, Douglas-fir, and other coniferous forests. Nests in large hollow trees and snags. Often nests in flocks. Forages over most terrains and habitats but shows a preference for foraging over rivers and lakes.	May occur. Treatment areas contain forest habitat potentially suitable for this species and there have been several recent observations of the species in the vicinity of the treatment areas (eBird 2020).

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Western snowy plover *Charadrius alexandrinus nivosus*	FT	SSC	Great Basin standing waters, sand shore, wetland. Sandy beaches, salt pond levees and shores of large alkali lakes. Needs sandy, gravelly, or friable soils for nesting.	Not expected to occur. Treatment areas do not contain wetland or beach habitat suitable for this species.
White-tailed kite *Elanus leucurus*	–	FP	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	May occur. Treatment areas contain nesting habitat potentially suitable within woodlands and there have been several recent observations of the species in the vicinity of the treatment areas (eBird 2020).
Willow flycatcher *Empidonax traillii*	–	SE	Inhabits extensive thickets of low, dense willows on edge of wet meadows, ponds, or backwaters; 2,000-8,000 feet elevation Requires dense willow thickets for nesting/roosting. Low, exposed branches are used for singing posts/hunting perches.	Not expected to occur. Treatment areas do not contain riparian forest habitat suitable for this species.
Yellow rail *Coturnicops noveboracensis*	–	SSC	Summer resident in eastern Sierra Nevada in Mono County. Fresh-water marshlands.	Not expected to occur. Treatment areas do not contain marshland habitat suitable for this species.
Yellow warbler *Setophaga petechia*	–	SSC	Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada. Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods, sycamores, ash, and alders.	Not expected to occur. Treatment areas do not contain riparian forest habitat suitable for this species.
Yellow-breasted chat *Icteria virens*	–	SSC	Summer resident; inhabits riparian thickets of willow and other brushy tangles near watercourses. Nests in low, dense riparian, consisting of willow, blackberry, wild grape; forages and nests within 10 feet of ground.	Not expected to occur. Treatment areas do not contain riparian forest habitat suitable for this species.
Fish				
Chinook salmon - Central Valley fall / late fall-run ESU *Oncorhynchus tshawytscha* pop. 13	–	SSC	Populations spawning in the Sacramento and San Joaquin rivers and their tributaries.	Not expected to occur. Treatment areas do not contain aquatic habitat suitable for this species.
Coho salmon - central California coast ESU *Oncorhynchus kisutch* pop. 4	FE	SE	Federal listing includes populations between Punta Gorda and San Lorenzo River. State listing includes populations south of Punta Gorda. Require beds of loose, silt-free, coarse gravel for spawning. Also need cover, cool water, and sufficient dissolved oxygen.	Not expected to occur. Treatment areas do not contain aquatic habitat suitable for this species.
Monterey roach *Lavinia symmetricus subditus*	–	SSC	Tributaries to Monterey Bay, specifically the Salinas, Pajaro, and San Lorenzo drainages.	Not expected to occur. Treatment areas do not contain aquatic habitat suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Pacific lamprey *Entosphenus tridentatus*	–	SSC	Found in Pacific Coast streams north of San Luis Obispo County, however regular runs in Santa Clara River. Size of runs is declining. Swift-current gravel-bottomed areas for spawning with water temperatures between 12-18 degrees C. Ammocoetes need soft sand or mud.	Not expected to occur. Treatment areas do not contain aquatic habitat suitable for this species.
Riffle sculpin *Cottus gulosus*	–	SSC	Found in headwater streams with cold water and rocky or gravelly substrate. They prefer permanent streams where the water does not exceed 25-26°C, and where ample flow keeps the dissolved oxygen level near saturation. Riffle sculpins may occupy riffles or pools, though they tend to favor areas that have adequate cover in the form of rocks, logs, or overhanging banks.	Not expected to occur. Treatment areas do not contain aquatic habitat suitable for this species.
Sacramento hitch *Lavinia exilicauda exilicauda*	–	SSC	Inhabits warm, lowland, waters including clear streams, turbid sloughs, lakes, and reservoirs. In streams they are generally found in pools or runs among aquatic vegetation, although small individuals will also use riffles. Sacramento hitch prefer shallow stream habitats with smaller gravel to mud substrates.	Not expected to occur. Treatment areas do not contain aquatic habitat suitable for this species.
San Joaquin roach *Lavinia symmetricus* ssp. 1	–	SSC	Tributaries to the San Joaquin River from the Cosumnes River south.	Not expected to occur. Treatment areas do not contain aquatic habitat suitable for this species.
Steelhead - central California coast DPS *Oncorhynchus mykiss irideus* pop. 8	FT	–	From Russian River, south to Soquel Creek and to, but not including Pajaro River. Also San Francisco and San Pablo Bay basins.	Not expected to occur. Treatment areas do not contain aquatic habitat suitable for this species.
Tidewater goby *Eucyclogobius newberryi*	FE	SSC	Brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego County to the mouth of the Smith River. Found in shallow lagoons and lower stream reaches, they need fairly still but not stagnant water and high oxygen levels.	Not expected to occur. Treatment areas do not contain aquatic habitat suitable for this species.
Invertebrates				
Bay checkerspot butterfly *Euphydryas editha bayensis*	FT	–	Restricted to native grasslands on outcrops of serpentine soil in the vicinity of San Francisco Bay. *Plantago erecta* is the primary host plant; *Orthocarpus densiflorus* and *Orthocarpus purpurscens* are the secondary host plants.	Not expected to occur. Treatment areas do not contain serpentine soils and are outside of the known range of this species.
Black abalone *Haliotis cracherodii*	FE	–	Marine intertidal and splash zone communities. Mid to low rocky intertidal areas.	Not expected to occur. Treatment areas do not contain aquatic habitat suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Callippe silverspot butterfly *Speyeria callippe callippe*	FE	–	Restricted to the northern coastal scrub of the San Francisco peninsula. Hostplant is *Viola pedunculata*. Most adults found on east-facing slopes; males congregate on hilltops in search of females.	Not expected to occur. Treatment areas are outside of the known range of this species.
Crotch bumble bee *Bombus crotchii*	–	SC	Coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera include *Antirrhinum*, *Phacelia*, *Clarkia*, *Dendromecon*, *Eschscholzia*, and *Eriogonum*.	Not expected to occur. There is one known historic (1903) occurrence of crotch bumble bee in the vicinity of the treatment areas (exact location unknown, mapped to San Jose; CNDDB 2020). The treatment areas are within the historic range of crotch bumble bee; however, the current range of the species is limited to the Sacramento Valley and coastal and inland areas in southern California (Xerces Society 2018). It is unlikely that the range of crotch bumble bee would expand into the Santa Cruz Mountains region during the life of the project. Treatment activities may, however, result in improved habitat conditions for this species by treating invasive plant infestations, restoring native vegetation, and creating openings in dense forest habitat that may promote the growth of native floral resources.
Monarch - California overwintering population *Danaus plexippus* pop. 1	–	–	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (Eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	Not expected to occur. Winter roost habitat for this species is largely limited to coastal areas, and there are no documented roosts in the vicinity of the treatment areas.
Mount Hermon (=barbate) June beetle *Polyphylla barbata*	FE	–	Interior dunes. Known only from Zayante sand hills in vicinity of Mt. Hermon, Santa Cruz County.	Not expected to occur. Treatment areas do not contain Zayante soils.
Ohlone tiger beetle *Cicindela ohlone*	FE	–	Coastal prairie. Remnant native grasslands with California oatgrass and purple needlegrass in Santa Cruz County. Substrate is poorly-drained clay or sandy clay soil over bedrock of Santa Cruz mudstone.	Not expected to occur. Treatment areas do not contain coastal prairie habitat.
Smith's blue butterfly *Euphilotes enoptes smithi*	FE	–	Most commonly associated with coastal dunes and coastal sage scrub plant communities in Monterey and Santa Cruz counties. Hostplant: *Eriogonum latifolium* and *Eriogonum parvifolium* are utilized as both larval and adult foodplants.	Not expected to occur. Treatment areas do not contain coastal dune or coastal scrub habitat.

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Western bumble bee *Bombus occidentalis*	–	SC	Bumble bees have three basic habitat requirements: suitable nesting sites for the colonies, availability of nectar and pollen from floral resources throughout the duration of the colony period (spring, summer, and fall), and suitable overwintering sites for the queens.	Not expected to occur. Treatment areas are within the historic range of this species. However, western bumble bee has recently undergone a dramatic decline in abundance and distribution and is no longer present across much of its historic range. In California, western bumble bee populations are currently largely restricted to high elevation sites in the Sierra Nevada (Xerces Society 2018). It is unlikely that the range of western bumble bee would expand into the Santa Cruz Mountains region during the life of the project. Treatment activities may, however, result in improved habitat conditions for this species by treating invasive plant infestations, restoring native vegetation, and creating openings in dense forest habitat that may promote the growth of native floral resources.
Zayante band-winged grasshopper *Trimerotropis infantilis*	FE	–	Chaparral, interior dunes. Isolated sandstone deposits in the Santa Cruz Mountains (the Zayante Sand Hills ecosystem). Mostly on sand parkland habitat but also in areas with well-developed ground cover and in sparse chaparral with grass.	Not expected to occur. Treatment areas do not contain suitable Zayante Sand Hills habitat for this species.
Mammals				
American badger *Taxidea taxus*	–	SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils, and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	Not expected to occur. Treatment areas do not contain grassland habitat and are not contiguous with other grassland habitat in surrounding areas.
Mountain lion Puma concolor	–	SC	Mountain lions inhabit a wide range of ecosystems, including mountainous regions, forests, deserts, and wetlands. Mountain lions establish and defend large territories and can travel large distances in search of prey or mates. The Central Coast and Southern California Evolutionarily Significant Units (ESUs) were granted emergency listing status in April of 2020, and CDFW is currently reviewing a petition to list these ESUs as threatened under CESA.	Known to occur. Mountain lions have been documented traversing through the treatment areas, and it is likely that the treatment areas comprise a portion of the home range for many individual lions (Midpen 2020, Yovovich et. al., 2020). Potential den habitat (e.g., caves, cavities, thickets) may be present within treatment areas.
Pallid bat *Antrozous pallidus*	–	SSC	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	Known to occur. Pallid bats have been detected in the vicinity of the treatment areas during surveys conducted at Alma College (HT Harvey 2016). Habitat potentially suitable for pallid bat is present within large trees and rocky areas in treatment areas.

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Ringtail *Bassariscus astutus*	–	FP	Suitable habitat for ringtails consists of a mixture of forest and shrubland in close association with rocky areas or riparian habitats. Hollow trees, logs, snags, cavities in talus and other rocky areas, and other recesses are used for cover. Usually found within 0.6 mile of a permanent water source.	May occur. Habitat potentially suitable for ringtail is present within riparian areas and forested areas near streams and drainages in the treatment areas.
San Francisco dusky-footed woodrat *Neotoma fuscipes annectens*	–	SSC	Chaparral, redwood. Forest habitats of moderate canopy and moderate to dense understory. May prefer chaparral and redwood habitats. Constructs nests of shredded grass, leaves, and other material. May be limited by availability of nest-building materials.	Known to occur. San Francisco dusky-footed woodrat nests have been observed in the Preserve, and habitat suitable for this species is present throughout forest and brushy areas within the treatment areas (HT Harvey 2006).
Southern sea otter *Enhydra lutris nereis*	FT	FP	Nearshore marine environments from about Ano Nuevo, San Mateo County to Point Sal, Santa Barbara County. Needs canopies of giant kelp and bull kelp for rafting and feeding. Prefers rocky substrates with abundant invertebrates.	Not expected to occur. Treatment areas do not contain marine habitat suitable for this species.
Townsend's big-eared bat *Corynorhinus townsendii*	–	SSC	Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	Known to occur. Townsend's big-eared bats have been detected in the vicinity of the treatment areas during surveys conducted at Alma College (HT Harvey 2016). Habitat potentially suitable for Townsend's big-eared bat is present within large trees and human-made structures (e.g., buildings, bridges) in the treatment areas.
Western red bat *Lasiurus blossevillii*	–	SSC	Roosts primarily in trees, 2-40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	May occur. Western red bats have not been detected during previous surveys conducted in the vicinity of the treatment areas (HT Harvey 2016). Habitat potentially suitable for western red bat is present within trees in the treatment areas.

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

1 Legal Status Definitions

Federal:

FE Federally Listed as Endangered (legally protected)
FT Federally Listed as Threatened (legally protected)
FD Federally Delisted

State:

FP Fully protected (legally protected)
SSC Species of special concern (no formal protection other than CEQA consideration)
SE State Listed as Endangered (legally protected)
ST State Listed as Threatened (legally protected)
SC State Candidate for listing (legally protected)
SD State Delisted

2 Potential for Occurrence Definitions

Not expected to occur: Species is unlikely to be present because of poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.
May occur: Suitable habitat is available; however, there are little to no other indicators that the species might be present.
Known to occur: Species has been documented within the treatment site.

Sources: Biosearch Environmental Consulting 2018; CNDDB 2020; eBird 2020; HT Harvey 2016; Xerces Society 2018

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Midpeninsula Regional Open Space District Findings and Statement of Overriding Considerations for CEQA Project-Specific Analysis Regarding the Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project

INTRODUCTION

The Midpeninsula Regional Open Space District ("Midpen"), also referred to as the "Project Proponent," in the exercise of its independent judgment, makes and adopts the following findings regarding its decision to approve the Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project, referred to herein as "vegetation treatment project" or "proposed project," within the scope of the California Vegetation Treatment Program (CalVTP). This document has been prepared in accordance with the California Environmental Quality Act (Pub. Resources Code, Sections 21000 et seq.) (CEQA) and the CEQA Guidelines (Cal. Code Regs., Tit. 14, Sections 15000 et seq.).

STATUTORY REQUIREMENTS FOR FINDINGS

Public Resources Code section 21002 provides that the procedures required by CEQA "assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." Further, "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in Public Resources Code section 21002 are implemented, in part, through the requirement that agencies adopt findings before approving projects for which EIRs are required. (See Pub. Resources Code, Section 21081, subd. (a); CEQA Guidelines, Section 15091, subd. (a).) For each significant environmental effect identified in an EIR for a project, the approving agency must issue a written finding reaching one or more of three permissible conclusions:

(1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

(3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

(CEQA Guidelines, Section 15091, subd. (a); Pub. Resources Code, Section 21081, subd. (a).) Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors." (See also *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 565.)

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a Statement of Overriding Considerations setting forth the specific reasons why the agency found that the project's "benefits"

rendered "acceptable" its "unavoidable adverse environmental effects." (CEQA Guidelines, Sections 15093, 15043, subd. (b); see also Pub. Resources Code, Section 21081, subd. (b).)

The California Board of Forestry and Fire Protection (Board of Forestry) adopted Findings and a Statement of Overriding Considerations for the California Vegetation Treatment Program (CalVTP) on December 30, 2019. As explained in the Board of Forestry's Findings and the Draft Program Environmental Impact Report (Draft PEIR) and the Final PEIR (collectively, the "PEIR"), the CalVTP would result in significant and unavoidable environmental effects to the following: Aesthetics; Air Quality; Archaeological, Historical, and Tribal Cultural Resources; Biological Resources; Greenhouse Gas Emissions; Transportation; and Public Services, Utilities, and Service Systems. However, for reasons set forth in the Statement of Overriding Considerations, the Board of Forestry determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the CalVTP.

Midpen (the "Project Proponent") adopts these findings to document its exercise of its independent judgment regarding the potential environmental effects analyzed in the PEIR and to document its reasoning for approving the Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project under the CalVTP in spite of the effects.

ROLE AS RESPONSIBLE AGENCY

The CalVTP PEIR defines a 'project proponent' as a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the CalVTP treatable landscape and seeks to fund, authorize, or implement vegetation treatments consistent with the CalVTP. Project proponents prepare a project-specific analysis (PSA) to determine if individual vegetation treatment projects qualify as within the scope of the CalVTP PEIR or require additional environmental review.

If through the PSA a project proponent determines that a proposed project is within the scope of the CalVTP PEIR, then the project proponent would act as a responsible agency pursuant to CEQA. A regulatory agency seeking to use the CalVTP PEIR to issue any secondary approval or permit for vegetation treatments would also be a responsible agency. If the PSA determines that one or more impacts of a proposed vegetation treatment project is not within the scope of the CalVTP PEIR, then the project proponent would serve as a lead agency in the preparation of additional environmental documentation that accompanies the PEIR for CEQA compliance.

When a responsible agency approves a vegetation treatment project using a within-the-scope finding for all environmental impacts, it must adopt its own CEQA findings pursuant to Section 15091 of the State CEQA Guidelines, and if needed, a statement of overriding considerations, pursuant to Section 15093 of the State CEQA Guidelines. (See CEQA Guidelines section 15096(h).) A responsible agency's findings need only address environmental impacts "within the scope of the responsible agency's jurisdiction." (*Riverwatch v. Olivenhain Municipal Water District* (2009) 170 Cal.App.4th 1186, 1202.) Although each responsible agency must adopt its own findings, such agencies have the option of reusing, incorporating, or adapting all or part of the findings adopted by the Board of Forestry for the CalVTP PEIR to meet the agency's own requirements to the extent the findings are applicable to the proposed vegetation treatment project. The following document sets forth the findings for Midpen's project-specific approval that relies on and implements the CalVTP PEIR.

BACKGROUND

BACKGROUND

In July 2020, the Project Proponent submitted information regarding proposed vegetation treatments at the Bear Creek Redwoods Open Space Preserve to be considered for use in the statewide CalVTP training. The Board of Forestry selected the Project Proponent's proposed vegetation treatment project to be used to prepare a PSA that will provide both CEQA compliance for the Project Proponent to approve and implement the project, as well as serve as an example PSA for other agencies seeking to use the CalVTP PEIR to accelerate approval of their own vegetation treatment projects.

As a Project Proponent, Midpen proposes to implement vegetation treatments on 214.4 acres of land within the Bear Creek Redwoods Open Space Preserve in Santa Clara County. Midpen is seeking CEQA compliance for the proposed project as an activity covered by the CalVTP PEIR, using its PSA checklist. The proposed treatment type (i.e., ecological restoration) and the treatment activities (i.e., manual and mechanical treatments) are consistent with those evaluated in the CalVTP PEIR. In addition, the treatment areas are entirely within the CalVTP treatable landscape. Thus, Midpen is a responsible agency for the purposes of CEQA compliance.

ENVIRONMENTAL REVIEW PROCESS

The Project Proponent followed the evaluation and reporting process outlined in the PSA and required under the CalVTP.

On October 6, 2020, the Project Proponent submitted to CAL FIRE the required information regarding this project when it began preparing the PSA. The submittal included:

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

Upon adoption of these findings and approval of the project, Project Proponent will submit this completed PSA and associated geospatial data to CAL FIRE at the time a Notice of Determination is filed. The submittal will include the following:

- The completed PSA Environmental Checklist;
- The 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, WUI fuel reduction)

As required under the CalVTP, Project Proponent will submit the following information to CAL FIRE after implementation of the treatment:

- GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction)
- A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes
  - Size of treated area (typically acres);
  - Treatment types and activities;
  - Dates of work;
  - A list of the Standard Project Requirements ("SPRs") and mitigation measures from the PEIR that were implemented (SPRs are intended to avoid and minimize environmental impacts and comply with applicable laws and regulations, and to be implemented and enforced in the same way as mitigation measures consistent with Section 15126.4 of the State CEQA Guidelines); and
  - Any explanations regarding implementation if required by SPRs and mitigation measures

RECORD OF PROCEEDINGS

In accordance with Public Resources Code Section 21167, subdivision (e), the record of proceedings for the Project Proponent's decision to approve the vegetation treatment project under the CalVTP includes the following documents at a minimum:

- The certified Final PEIR for the CalVTP, including the Draft PEIR, responses to comments on the Draft PEIR, and appendices;
- All recommendations and findings adopted by the Board of Forestry in connection with the CalVTP and all documents cited or referred to therein;
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the treatment project prepared by the Project Proponent, consultants to the Project Proponent, or responsible or trustee agencies with respect to the Project Proponent's compliance with the requirements of CEQA and with respect to the Project Proponent's action on the CalVTP;
- Matters of common knowledge to the Project Proponent, including but not limited to federal, state, and local laws and regulations;
- Any documents expressly cited in these findings, in addition to those cited above; and
- Any other materials required for the record of proceedings by Public Resources Code section 21167.6, subdivision (e).

Pursuant to CEQA Guidelines section 15091, subdivision (e), the documents constituting the record of proceedings are available for review during normal business hours at 330 Distel Circle, Los Altos, CA. Midpen requests that the public call ahead of time to review the documents in person due to the ongoing pandemic. The custodian of these documents is Coty Sifuentes-Winter, Senior Resource Management Specialist; csifuentes@opensapce.org, (650) 691-1200 x560.

MITIGATION MONITORING AND REPORTING PROGRAM

A Mitigation Monitoring and Reporting Program (MMRP) was adopted by the Board of Forestry for the CalVTP, and the applicable mitigation measures for this treatment project have been identified in the PSA. The Project Proponent will use the MMRP to track compliance with the CalVTP mitigation measures. The MMRP will remain available for public review during the compliance period. The Final MMRP is attached to and is approved in conjunction with the approval of the treatment project and adoption of these Findings.

FINDINGS FOR DETERMINATIONS OF LESS THAN SIGNIFICANT

The Project Proponent has reviewed and considered the information in the Final PEIR for the CalVTP addressing potential environmental effects, proposed mitigation measures, and alternatives. The Project Proponent, relying on the facts and analysis in the PEIR and PSA, which were presented to the Midpen Board of Directors, and reviewed and considered prior to any approvals, concurs with the conclusions of the Final PEIR and the PSA regarding the potential environmental effects of the CalVTP and the project.

The Project Proponent concurs with the conclusions in the Final PEIR and treatment project PSA that all of the following impacts will be less than significant:

AESTHETICS AND VISUAL RESOURCES

☒ 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

☒ 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

AGRICULTURAL AND FORESTRY RESOURCES

☒ 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

AIR QUALITY

☒ Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk

☒ Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust

ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

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

☒ Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource

☒ Impact CUL-4: Disturb Human Remains

BIOLOGICAL RESOURCES

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

☒ Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries

☒ Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife

GEOLOGY, SOILS, AND MINERAL RESOURCES

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

☒ Impact GEO-2: Increase Risk of Landslide

GREENHOUSE GAS EMISSIONS

☒ Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs

ENERGY RESOURCES

☒ Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy

HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

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

HYDROLOGY AND WATER QUALITY

☒ 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

☒ Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area

LAND USE AND PLANNING, POPULATION AND HOUSING

☒ Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation

☒ Impact LU-2: Induce Substantial Unplanned Population Growth

NOISE

☒ Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation

☒ Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities

RECREATION

☒ Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas

TRANSPORTATION

☒ 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

☒ Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses

☒ Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP

PUBLIC SERVICES, UTILITIES, AND SERVICE SYSTEMS

☒ Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs

WILDFIRE

☒ Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire

SIGNIFICANT EFFECTS AND MITIGATION MEASURES

The PEIR identified significant and potentially significant effects on the environment that the CalVTP will contribute to or cause. The Board of Forestry determined that some of these significant effects can be fully avoided through the application of feasible mitigation measures. Other effects, however, cannot be avoided by the adoption of feasible mitigation measures or alternatives and thus will be significant and unavoidable. The Board of Forestry determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the CalVTP.

The Board of Forestry adopted the findings required by CEQA for all direct and indirect significant impacts. The findings provided a summary description of each impact, described the applicable mitigation measures identified in the PEIR and adopted by the Board of Forestry, and stated the Board of Forestry's findings on the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the Final PEIR; and the Board of Forestry incorporated by reference into its findings the discussion in those documents supporting the Final PEIR's determinations. In making those findings, the Board of Forestry ratified, adopted, and incorporated into the findings the analyses and explanations in the Draft PEIR and Final PEIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions were specifically and expressly modified by the findings.

Not every individual treatment project will have all of the significant environmental impacts that the CalVTP was determined to contribute to or cause. Additionally, some of the environmental impacts predicted by the CalVTP PEIR to be significant and unavoidable or less than significant after mitigation may be determined in a PSA to be less severe for an individual treatment project than determined in the statewide PEIR. The impacts and mitigation measures identified below reflect the conclusions of the PSA by indicating which of the CalVTP's impacts that this treatment project will contribute to or cause. By indicating the project-specific effects of this treatment project as follows, the Project Proponent's decisionmaker or decision-making body is hereby making the required findings under CEQA regarding the application or feasibility of mitigation measures to reduce those impacts.

FINDINGS FOR IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

The Project Proponent finds that changes or alterations have been required in, or incorporated into, the treatment project which avoid or substantially lessen the significant environmental effects indicated below, as identified in the Final PEIR and the PSA. Implementation of the mitigation measures indicated below will reduce these impacts to a less-than-significant level. The Project Proponent hereby directs that these mitigation measures be adopted.

ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

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

- ☒ Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources

BIOLOGICAL RESOURCES

☒ Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications

- ☒ Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA
- ☒ Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA

☒ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Tree-Nesting and Cavity-Nesting Wildlife)

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

☒ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Shrub-Nesting Wildlife)

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

☒ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Ground-Nesting Wildlife)

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

☒ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Burrowing and Denning Wildlife)

- ☒ 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)

☒ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Bats)

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

☒ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Amphibians and Reptiles (in wetlands, vernal pools, associated riparian))

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

☒ Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function

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

HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

☒ Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites

- ☒ Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites

FINDINGS FOR SIGNIFICANT AND UNAVOIDABLE IMPACTS

The CalVTP PEIR determined that some impacts of the program would be significant and unavoidable, even after implementation of all feasible mitigation. The Project Proponent finds that the treatment project would contribute to or cause the following significant and unavoidable impacts. Incorporating and implementing the following feasible

mitigation measures indicated to be applicable to the project will reduce the severity of this impact, but not to a less-than-significant level. The Project Proponent will adopt and implement these mitigation measures. The Project Proponent therefore finds that changes or alterations have been required in, or incorporated into, the treatment project that will substantially lessen, but not avoid, the significant environmental effect as identified in the PEIR and PSA.

The Project Proponent finds that fully mitigating these impacts to a less-than-significant level is not feasible; there are no feasible mitigation measures beyond those described below to reduce these impacts. These impacts will remain significant and unavoidable. The Project Proponent concludes, however, that the benefits of the CalVTP and the vegetation treatment project outweigh the significant unavoidable impacts of the Program and treatment project, as set forth in the Board of Forestry's Statement of Overriding Considerations.

AIR QUALITY

☒ Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that Would Exceed CAAQS Or NAAQS and Conflict with Regional Air Quality Plans

☐ Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques

☒ No feasible mitigation is available.

ADDITIONAL INFORMATION TO SUPPORT CalVTP FINDING FOR THE BEAR CREEK REDWOODS VEGETATION TREATMENT PROJECT:

Implementation of Mitigation Measure AQ-1 was required or incorporated into the CalVTP by the Board of Forestry to reduce the severity of this impact, but it was not feasible to attain a less-than-significant level. Emission reduction techniques included Mitigation Measure AQ-1 would be infeasible for the Project Proponent to implement and, for the same reasons explained in the PEIR, this impact would remain significant and unavoidable. Because the treatments would be implemented by Midpen (and hired contractors), a special district with variable funding, it would be cost prohibitive to use equipment meeting the latest efficiency standards including meeting U.S. Environmental Protection Agency's Tier 4 emission standards, using renewable diesel fuel, using electric- and gasoline-powered equipment, and using equipment with Best Available Control Technology. In addition, carpooling may not be feasible or recommended during and immediately following the coronavirus pandemic.

The Project Proponent incorporated all feasible and applicable measures to prevent and minimize this potential impact, pursuant to SPRs AQ-1 and AQ-4. The Project Proponent finds that mitigating this impact below a level of significance is not feasible. The Project Proponent concludes, however, that the benefits of the CalVTP and proposed project outweigh the significant unavoidable impacts of the Program and proposed vegetation treatment project, as set forth in the Statement of Overriding Considerations, below. The Project Proponent therefore finds that changes or alterations have been required in, or incorporated into, the proposed project that will substantially lessen, but not avoid, the significant environmental effect as identified in the PEIR.

GREENHOUSE GAS EMISSIONS

☒ Impact GHG-2: Generate GHG Emissions through Treatment Activities

☐ Mitigation Measure GHG-2: Implement GHG Emission Reduction Techniques During Prescribed Burns

☒ No feasible mitigation is available.

ADDITIONAL INFORMATION TO SUPPORT CalVTP FINDING FOR THE BEAR CREEK REDWOODS VEGETATION TREATMENT PROJECT:

Implementation of Mitigation Measure GHG-2 was incorporated into the CalVTP by the Board of Forestry to reduce the severity of this impact, but it was not feasible to attain a less-than-significant level. Mitigation Measure

GHG-2 is not applicable to the proposed project because it requires GHG emissions reduction techniques to be implemented specifically during prescribed burning, which is not included as a treatment activity in the proposed project. Although prescribed burning is the most emissions intensive CalVTP treatment activity, other elements of the CalVTP treatment activities would result in emissions of GHGs. Other mitigation measures could include the purchase and retirement of carbon credits to offset the one-time GHG emissions directly associated with the proposed project as a result of vehicle and equipment use; however, this approach would consume financial resources needed to achieve wildfire risk reduction objectives. No other feasible mitigation exists that would reduce this impact to a less-than-significant level without compromising the effectiveness of the proposed project and the achievement of basic project objectives.

The Project Proponent finds that GHG emissions from off-road equipment, on-road vehicles, machine-powered hand tools, worker commute trips, and hauling of equipment and materials associated with manual and mechanical treatment activities cannot be avoided, because they are necessary for effective treatments. While routine management actions will reduce GHG emissions to the extent feasible, such as efficient project site travel (e.g., vanpools for field staff when feasible), ongoing maintenance of equipment including emission controls, and well-planned treatments that manage field time to the minimum needed, for CEQA compliance purposes the remaining GHG emissions need to be recognized as a significant and unavoidable impact, because reduction to less-than-significant levels cannot be assured. The Project Proponent finds that mitigating this impact below a level of significance is not feasible. The Project Proponent concludes, however, that the benefits of the CalVTP and the proposed project outweigh the significant unavoidable impacts of the Program and the proposed vegetation treatment project, as set forth in the Statement of Overriding Considerations, below.

STATEMENT OF OVERRIDING CONSIDERATIONS

As set forth in the Board of Forestry's adopted Findings, the Board of Forestry determined that the CalVTP will result in significant adverse environmental effects that cannot be avoided even with the adoption of all feasible mitigation measures, and there are no feasible project alternatives that would mitigate or substantially lessen the impacts. Despite these effects, however, the Board of Forestry, in accordance with CEQA Guidelines Section 15093, chose to approve the CalVTP because, in its view, the benefits to life, property, and other resources, and other benefits of the CalVTP will render the significant effects acceptable.

In the Board of Forestry's judgment, the CalVTP and its benefits outweigh its unavoidable significant effects. The Board of Forestry's Findings were based on substantial evidence in the record. The Board of Forestry's Statement of Overriding Considerations identified the specific reasons why, in the Board of Forestry's judgment, the benefits of the CalVTP as approved outweigh its unavoidable significant effects.

Exercising its independent judgment and review, the Project Proponent concurs that the benefits of the CalVTP and the proposed project outweigh the significant environmental effects and hereby incorporates by reference and adopts the Board of Forestry's Statement of Overriding Considerations for the CalVTP, as applicable to the proposed vegetation treatment project.

Any one of the reasons listed in the Statement of Overriding Considerations is sufficient to justify approval of the treatment project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the Project Proponent would stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section, and the documents found in the Record of Proceedings, which are described and defined under "Record of Proceedings," above.

- The CalVTP and the proposed vegetation treatment project will reduce dire risks to life, property, and natural resources in California.

- The CalVTP and the proposed vegetation treatment project reflect the most current and commonly accepted science and conditions in California and allows for adaptation in response to potential evolution and changes in science and conditions.
- The CalVTP and the proposed vegetation treatment project reflect the Board of Forestry's and CAL FIRE's goals. The CalVTP and the proposed vegetation treatment project will help the Board of Forestry and CAL FIRE achieve their central goals for reducing and preventing the impacts of fire in the state, as outlined in the *2018 Strategic Fire Plan for California*. The CalVTP and the proposed vegetation treatment project will help to establish a natural environment that is more resilient and built assets that are more resistant to the occurrence and effects of wildland fire.
- The CalVTP and the proposed vegetation treatment project will help implement Executive Orders, including:
  - EO B-42-17: Governor Brown's order issued to bolster the state's response to unprecedented tree die-off through further expediting removal of millions of dead and dying trees across the state;
  - EO B-52-18: Governor Brown's order to improve forest management and restoration, provide regulatory relief, and reduce barriers for prescribed fire; and
  - EO N-05-19: Governor Newsom's order directing CAL FIRE to recommend immediate-, medium-, and long-term actions to help prevent destructive wildfires.
- The Board of Forestry is required by law to comply with SB 1260, signed into law by Governor Brown in February 2018, which improves California forest management practices to reduce the risk of wildfire in light of the changing climate and includes provisions for the CalVTP PEIR to serve as the programmatic CEQA coverage for prescribed burns within the SRA. The CalVTP and the proposed vegetation treatment project brings the Board of Forestry into compliance with the requirements of SB1260.
- The CalVTP and the proposed vegetation treatment project will help to meet California's GHG emission goals consistent with the California Forest Carbon Plan, California's 2017 Climate Change Scoping Plan, Fire on the Mountain: Rethinking Forest Management in the Sierra Nevada, and California 2030 Natural and Working Lands Climate Change Implementation Plan.

The CalVTP and the proposed vegetation treatment project reflect Midpen's goals to manage pests in fuel management areas to reduce risk to human life and property, while also protecting natural resources, through implementing the state's Program. The Project Proponent's proposed vegetation treatment project would be implemented consistent with Midpen's ecologically sensitive vegetation management practices, which are focused on maintaining and improving high biodiversity and ecological health.

RESOLUTION NO. 21-___

RESOLUTION MAKING CERTAIN FINDINGS OF FACT, ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS AND A MITIGATION MONITORING AND REPORTING PLAN ASSOCIATED WITH THE PROJECT-SPECIFIC ANALYSIS FOR THE BEAR CREEK REDWOODS OPEN SPACE PRESERVE VEGETATION TREATMENT PROJECT, AND APPROVING THE BEAR CREEK REDWOODS OPEN SPACE PRESERVE VEGETATION TREATMENT PROJECT

WHEREAS, the California Board of Forestry and Fire Protection (Board of Forestry) prepared the California Vegetation Treatment Program (CalVTP) which directs implementation of vegetation treatments within the State Responsibility Area (SRA); and

WHEREAS, the Board of Forestry is the lead agency and California Department of Forestry and Fire Protection (CAL FIRE) is the responsible agency for implementing the CalVTP, in accordance with the requirements of the California Environmental Quality Act (CEQA) and CAL FIRE's primary responsibility for preventing and suppressing fires within the SRA (Public Resources Code [PRC] Sections 4113 and 4125); and

WHEREAS, the Board of Forestry, as the CEQA lead agency, prepared a Program Environmental Impact Report (PEIR) for the CalVTP, available at the following hyperlink: https://bof.fire.ca.gov/projects-and-programs/calvtp/peir-certification/ in cooperation with CAL FIRE, in accordance with CEQA (PRC Section 21000 et seq.) and the State CEQA Guidelines; and

WHEREAS, the Board of Forestry certified the PEIR and approved the CalVTP on December 30, 2019; and

WHEREAS, the Midpeninsula Regional Open Space District (District) is a project proponent using the Project-Specific Analysis (PSA) for the Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project (Project), which is incorporated herein by reference; and

WHEREAS, the District, as the responsible agency for the Project, relies upon the PEIR to evaluate the environmental effects of activities covered by the CalVTP, and prepared a PSA, attached hereto as Exhibit B, to determine whether the Project qualifies as within the scope of the CalVTP and PEIR; and

WHEREAS, the District's PSA determined that (1) treatment activities proposed by the Project are consistent with those evaluated in the PEIR, and (2) treatment activities proposed by the Project are entirely within the CalTVP treatable landscape; and

WHEREAS, the District's PSA determined all of the following: (1) the Project would not result in new impacts not disclosed in the PEIR, (2) the Project would not cause any substantially more severe significant impacts beyond those addressed in the PEIR, (3) the Project would not require a mitigation measure or alternative that is substantially different from those in the PEIR or found infeasible in the PEIR, but that is now is feasible, and that the project proponent declines to implement; and

WHEREAS, the Project does not require additional documentation to demonstrate CEQA compliance; and

WHEREAS, the District must incorporate all standard project requirements (SPR) from the PEIR relevant to the Project and all feasible mitigation measures in response to significant impacts caused by the Project; and

WHEREAS, the PSA identified certain impacts that have the potential for significant impacts, but are mitigated to less-than-significant levels through implementation of the mitigation measures included in the Mitigation Monitoring and Reporting Plan (MMRP); and

WHEREAS, the District's adoption of the MMRP, attached hereto as Exhibit D and incorporated herein by reference, will ensure that all mitigation measures relied on in the findings are fully implemented; and

WHEREAS, effects related to air quality and greenhouse gases would remain significant and unavoidable, even after the application of all feasible mitigation measures to lessen these impacts, due to the generation of criteria air pollutants and greenhouse gases during Project activities; and

WHEREAS, CEQA requires that the District determines whether specific economic, legal, social, technological, or other considerations may outweigh any significant, unavoidable environmental effects of the Project which cannot be fully mitigated; and

WHEREAS, staff analyzed the economic, legal, social, technological, and other considerations that outweigh the significant, unavoidable environmental effects of the Project that cannot be fully mitigated and summarized such benefits in the Statement of Overriding Considerations, attached hereto and incorporated herein as Exhibit C; and

WHEREAS, the District's Board of Directors ("Board") hereby finds and determines as follows:

1. The PSA, prepared in compliance with CEQA and in reliance on the PEIR, reflects the Board's independent judgment and analysis.

2. The Project activities described in the PSA are within the scope of the PEIR.

3. The PSA identifies all potentially significant environmental impacts of the Project; specifically, potentially significant impacts to archaeological, historical, and tribal cultural resources; biological resources; and hazardous materials, public health, and safety, which will be avoided or mitigated to less-than-significant levels through implementation of the mitigation measures included in the MMRP.

4. The PSA identifies Project impacts related to air quality and greenhouse gases that are determined to be significant and unavoidable, even after the application of all mitigation measures to lessen those impacts, as discussed in the Statement of Overriding Considerations.

5. The Project achieves CEQA compliance through the evaluation of environmental effects in the PSA and in reliance on the PEIR, and no additional environmental documentation is required.

6. The Project 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).

NOW, THEREFORE, BE IT RESOLVED AND CERTIFIED by the Board of Directors as follows:

A. The Clerk of the Board and the District are collectively designated as the location and custodian of the documents and other material constituting the record of proceedings upon which the Board's decision is based.

B. The Project qualifies as an activity within the scope of the CalVTP and PEIR.

C. The Project benefits described in the Statement of Overriding Considerations outweigh the unavoidable environmental impacts.

D. The Findings of Fact and Statement of Overriding Considerations are adopted.

E. The MMRP for the Project is adopted.

F. The Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project is approved.

* *

PASSED AND ADOPTED by the Board of Directors of the Midpeninsula Regional Open Space District on _____, 2021, at a regular meeting thereof, by the following vote:

AYES:
NOES:
ABSTAIN:
ABSENT:

ATTEST:

Secretary
Board of Directors

APPROVED:

President
Board of Directors

APPROVED AS TO FORM:

_____
General Counsel

I, the District Clerk of the Midpeninsula Regional Open Space District, hereby certify that the above is a true and correct copy of a resolution duly adopted by the Board of Directors of the Midpeninsula Regional Open Space District by the above vote at a meeting thereof duly held and called on the above day.

_____
District Clerk

EXHIBITS TO THIS RESOLUTION

Exhibit A:	California Vegetation Treatment Program Program Environmental Impact Report (available at the following hyperlink and not included as a standalone exhibit: https://bof.fire.ca.gov/projects-and-programs/calvtp/peir-certification/)
Exhibit B:	Project-Specific Analysis for the Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project
Exhibit C:	Findings and Statement of Overriding Considerations for CEQA Project-Specific Analysis Regarding the Bear Creek Redwoods Open Space Preserve Vegetation Treatment Project
Exhibit D:	Mitigation Monitoring and Reporting Plan