San Mateo County Parks
Huddart and Wunderlich
California Vegetation Treatment Program
Project-Specific Analysis

An Addendum to the CalVTP PEIR

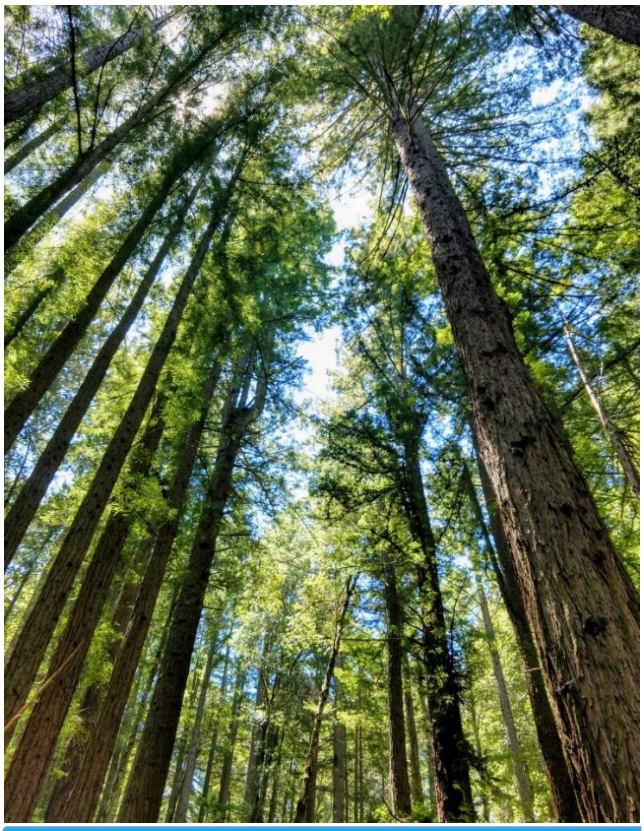

Photo of Huddart County Park

Prepared for:

San Mateo County Parks

and the San Mateo Resource Conservation District

April 1st, 2021

Huddart and Wunderlich County Park Project-Specific Analysis

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Appendix PD-3

Project-Specific Analysis

PD-3: PROJECT-SPECIFIC ANALYSIS

PD-3.1: INTRODUCTION

The California Vegetation Treatment Program (CalVTP) directs implementation of vegetation treatments within the California Department of Forestry and Fire Protection's (CAL FIRE's) State Responsibility Area (SRA) to serve as one component of the state's range of actions to reduce wildfire risk, reduce fire suppression efforts and costs, and protect natural resources as well as other assets from wildfire. The Program Environmental Impact Report (PEIR) for the CalVTP evaluates the environmental impacts of the CalVTP. The CalVTP is described in Chapter 2, "Program Description" of the PEIR. The PEIR has been prepared under the direction of CEQA lead agency, California Board of Forestry and Fire Protection (Board), in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines. The document functions as a Program EIR in accordance with State CEQA Guidelines Section 15168 for streamlining of CEQA review of later activities consistent with the CalVTP.

Using the Project-specific Analysis (PSA) in reliance on the PEIR, CAL FIRE or other project proponents will evaluate each vegetation treatment project intended to implement the CalVTP as a later activity addressed by the PEIR to determine whether the later activity qualifies as within the scope of this PEIR or requires additional environmental documentation or its own independent environmental review. Such evaluations will ascertain whether a later vegetation treatment project is consistent with the description of activities contained in the CalVTP and whether the effects on the environment were covered in the PEIR. Also, a project proponent will evaluate whether the later vegetation treatment project would (1) cause any new impact, (2) cause any substantially more severe significant impact than was addressed in the PEIR, or (3) reveal 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. If none of those outcomes are determined, and the effects on the environment were covered in the PEIR, the impacts of the later vegetation treatment project can be found to be within the scope of this PEIR, and no additional environmental documentation would be required (State CEQA Guidelines Section 15168[c][1], [2] and [4]). The determination that a project is within the scope of the PEIR is a factual determination that should be supported by substantial evidence. The substantial evidence underpinning the finding is developed using the PSA checklist provided in this section. If a project is within the scope of this PEIR, the project proponent may act on the project using the PSA and PEIR without public circulation of any additional environmental document. If the project is approved, the project proponent would file a Notice of Determination.

Under this CEQA compliance approach, a project proponent must incorporate from the PEIR into the later vegetation treatment project all standard project requirements (SPRs) relevant to the proposed project and all feasible mitigation measures in response to significant impacts caused by the later project. A "within the scope" finding for later vegetation treatment projects would facilitate an increase in the pace and scale of project approvals in a manner that includes environmental protections.

If a later vegetation treatment project would have impacts that were not covered by the PEIR (and therefore would not qualify for a within the scope finding), then additional documentation may need to be prepared that accompanies the PEIR to demonstrate the project's CEQA compliance (State CEQA Guidelines Section 15168(c)(1)). If additional documentation is needed, it may be a Negative Declaration, Mitigated Negative Declaration, or an EIR, depending on the environmental impact differences encountered. In this situation, the PSA serves the same function as an initial study to identify which impacts were not covered by (and are therefore not within the scope of) the PEIR and, therefore, must be addressed in a Negative Declaration, Mitigated Negative Declaration, or an EIR, as well as documenting those impacts that are within the scope of the PEIR. Refer to Section PD-3.2.4 (under Checklist Answers) for additional explanation regarding the function of the PSA checklist.

PD-3.1.1: Project Proponents – Lead and Responsible Agency Roles

CAL FIRE is in charge of preventing and extinguishing wildfires within the SRA (PRC Sections 4113 and 4125). The treatable landscape within the SRA primarily encompasses private land (approximately 92 percent) on which CAL FIRE or counties under contract with CAL FIRE would implement vegetation treatments in coordination with the landowner. Additionally, there are many local, regional, and state agencies with land ownership or land management roles in the remainder of the treatable landscape (i.e., on public land) that will seek to implement vegetation treatments consistent with the CalVTP to reduce wildfire risks.

For the purposes of this PEIR and PSA, a project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. 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 later vegetation treatment project is not within the scope of the CalVTP PEIR, then the project proponent may serve as a lead agency in the preparation of additional environmental documentation that accompanies the PEIR for CEQA compliance.

PD-3.1.2: Treatments Addressed in the PEIR

Proposed treatment projects qualifying as within the scope of the PEIR must be consistent with the treatments covered in the CalVTP, which are summarized in this section, and the geographic extent of the CalVTP, which is encompassed in the boundaries of the treatable landscape. Refer to PEIR Chapter 2, "Program Description" for a detailed description of the CalVTP.

TREATMENT TYPES

The CalVTP treatment types are:

- Wildland-Urban Interface Fuel Reduction: Located in WUI-designated areas, fuel reduction would generally consist of strategic removal of vegetation to prevent or slow the spread of non-wind driven wildfire between structures and wildlands, and vice versa.
- Fuel Breaks: In strategic locations, fuel breaks create zones of vegetation removal and ongoing maintenance, often in a linear layout, that support fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. While fuel breaks can passively interrupt the path of a fire or halt or slow its progress, this is not the primary goal of constructing fuel breaks.
- Ecological Restoration: Generally, outside of the WUI in areas that have departed from the natural fire regime as a result of fire exclusion, ecological restoration would focus on restoring ecosystem processes, conditions, and resiliency by moderating uncharacteristic wildland fuel conditions to reflect historic vegetative composition, structure, and habitat values.

TREATMENT ACTIVITIES

The WUI fuel reduction, fuel break, and ecological restoration treatment types would be implemented using various treatment "activities" that may be applied singularly or in combination. The CalVTP treatment activities are:

- Prescribed Burning: Includes pile burning (prescribed burning of piles of vegetative material to reduce fuel and/or remove biomass following treatment) and broadcast burning (prescribed burning to reduce fuels over a larger area or restore fire resiliency in target fire-adapted plant communities; would be conducted under specific conditions related to fuels, weather, and other variables).

- Mechanical Treatment: Use of motorized equipment to cut, uproot, crush/compact, or chop existing vegetation.
- Manual Treatment: Use of hand tools and hand-operated power tools to cut, clear, or prune herbaceous or woody species.
- Prescribed Herbivory: Use of domestic livestock to reduce a target plant population thereby reducing fire fuels or competition of desired plant species.
- Herbicides: Chemical application designed to inhibit growth of target plant species.

TREATABLE LANDSCAPE

Approximately 20.3 million acres within the 31 million-acre SRA were identified that may be appropriate for vegetation treatments. This area is called the "treatable landscape." CAL FIRE's Fire and Resource Assessment Program (FRAP) modeled the areas where each of the three proposed treatment types could be implemented within the treatable landscape. Multiple treatment types can be implemented where modeled treatment areas for treatment types overlap. Qualifying treatments under the CalVTP would occur within the 20.3 million acres of treatable landscape. The boundaries of the treatable landscape are available on the Board's website.

PD-3.2: EVALUATION OF ENVIRONMENTAL IMPACTS

The PSA provided herein is to be used to determine whether later vegetation treatment projects in the treatable landscape have been covered in the PEIR to allow for approval without further environmental review and documentation (beyond what is needed to complete the PSA), or whether additional CEQA documentation is required (i.e., a Negative Declaration, Mitigated Negative Declaration or EIR). Environmental effects are not necessarily limited to those identified in the PSA checklist, which encompass all effects disclosed in the PEIR. For this reason, the checklist includes a row for "Other Impacts" under each resource area.

The determination as to whether an ND, MND, or EIR is required for impacts that are not within the scope of the PEIR is subject to the "fair argument" standard, which requires preparation of an EIR when there is a fair argument, based on substantial evidence in the record, that the proposed treatment project may have a significant effect on the environment.

PD-3.2.1: Determining Whether a Proposed Treatment is Within the Scope of the PEIR

The purpose of the PSA is to guide CAL FIRE and other project proponents in their determination of whether a proposed vegetation treatment project is within the scope of the CalVTP PEIR. A proposed vegetation treatment project is within the scope of the PEIR when it meets all of the following qualifications:

- Treatment Methods. The proposed treatment methods are consistent with the treatment types and activities described in Chapter 2, "Program Description" of the PEIR.
- Geographic Area. The proposed treatment site is within the geographic limits of the CalVTP's treatable landscape.
- Environmental Impacts. The environmental effects of the proposed treatment have been covered in the PEIR and none of the criteria for preparation of subsequent CEQA documentation are met (State CEQA Guidelines Sections 15168(c)(2), 15162).

PD-3.2.2: Documenting Whether Impacts of a Proposed Treatment Projects are Within the Scope of the PEIR

For the PSA to adequately document the impacts that are within the scope of this PEIR and do not require additional CEQA review and documentation, the PSA must identify the following:

- Relevant PEIR analysis. Identify the specific sections, impact numbers, and page numbers from this PEIR that contain information relevant to the proposed treatment project.
- Additional Studies Prepared and References Cited. Attach to the PSA site-specific studies, reports, and survey results used in support of the within-the-scope finding or impact significance determination, if less severe than that identified in the PEIR. Include copies of references cited in the PSA, which will be made available to the public by the project proponent upon request.
- Standard Project Requirements. Identify each standard project requirement (SPR) that is relevant to the treatment, which will demonstrate that the SPR will be integrated into treatment design. Some SPRs allow for deviation from requirements (e.g., minimum buffer distances), identification of parameters (e.g., tree size for retention), and determinations of feasibility with the provision of a site- and/or treatment activity-specific explanation for the planned deviation, identified parameter, or feasibility determination in the PSA.
- Environmental Impacts. Identify which impacts in the PEIR would occur from implementation of the proposed vegetation treatment project. Because the intent of the PEIR is to disclose potentially significant impacts that are reasonably foreseeable to occur from any of the treatments within the extent of the treatable landscape, it is expected that, due to site-specific conditions, proposed vegetation treatment projects may result in impacts less severe than those identified in the PEIR. A project proponent may rely on the impact significance determination in the PEIR, and for significant impacts, apply the relevant mitigation measures. Alternatively, if an impact identified as significant in the PEIR would be less than significant for the later treatment project, the project proponent may demonstrate with substantial evidence in the PSA that the project impact is less than significant and mitigation measure(s) are not needed. Similarly, potentially significant environmental effects identified in the PEIR may be minimized or found to be less than significant without mitigation in the future due to technological advances, further research, or industry response (e.g., air quality, greenhouse gas emissions, utilities and service systems); these effects and the reasons they are less severe than those identified in the PEIR will be documented in the PSA.
- Mitigation Measures. Identify each mitigation measure from the PEIR that is relevant to the proposed treatment project. In the PSA, explain any components of the mitigation measures that are not applicable to the treatment, and for any significance determination that is different than the PEIR, describe how each measure will address site-specific conditions and reduce the impact of the proposed vegetation treatment project. Some mitigation measures allow for deviation from requirements (e.g., minimum buffer distances), identification of parameters (e.g., tree size for retention), and determinations of feasibility with the provision of a site- and/or treatment activity-specific explanation for the planned deviation, identified parameter, or feasibility determination in the PSA.

PD-3.2.3: Providing Substantial Evidence

The impact determinations and within-the-scope findings in the PSA, as well as any explanation for planned deviations, identified parameters, or feasibility determinations associated with SPR and mitigation measures, must be based on substantial evidence (defined in the CEQA Guidelines as "facts, reasonable assumptions predicted upon facts, and expert opinion supported by facts"). Therefore, the PSA will include analytical discussions of the conclusions reached. Portions of the PEIR relied on for conclusions should be identified by section number and page number. Ancillary information (e.g., site-specific surveys) not included in the PEIR but relied on for conclusions or required by

PEIR measures will be attached to the PSA. A list of references cited in the PSA will be included with the PSA and copies of such references made available to the public by the proponent agency upon request.

PD-3.2.4: Project-Specific Analysis

STANDARD PROJECT REQUIREMENTS, MITIGATION MEASURES, AND MONITORING AND REPORTING

The analysis must consider the measures identified in the PEIR that will avoid, reduce, or otherwise mitigate potential impacts of the project. These measures take the form of SPRs and mitigation measures. Some SPRs and mitigation measures apply to all projects, while others only apply to projects that include specific treatment types, treatment activities, or locations. Attachment A to this checklist provides a comprehensive list of SPRs and mitigation measures applicable to each project type. The project proponent should complete Attachment A and verify that all applicable SPRs and mitigation measures will be implemented, the timing of implementation, and identify the entity responsible for implementing and verifying or enforcing each measure. In effect, a completed Attachment A to the PSA will function as the Mitigation Monitoring and Reporting Program for the vegetation treatment project.

RESOURCE AREAS

The environmental resource areas in the PSA checklist are the same as those analyzed in Chapter 3, "Environmental Setting, Impacts, and Mitigation Measures", of the PEIR. The project proponent will review the environmental analysis in the PEIR for each corresponding resource area in the PSA checklist. The project proponent will consider whether required SPRs and mitigation measures would be effective in avoiding, reducing, or mitigating environmental impacts of the project considering the proposed activities and site-specific characteristics. SPRs are intended to be integrated into treatment design and implementation; therefore, project proponents should determine if it is necessary to implement the SPR during preparation of the PSA, prior to treatment, or during treatment implementation. For example, implementation of SPR BIO-1 is intended to be carried out during PSA preparation; it will identify potentially affected biological resources and assess whether they can be avoided, which will determine whether other SPRs and mitigation measures must be implemented prior to or during treatments.

Written explanations supporting all conclusions should be provided in the discussion following the checklist questions for each resource area.

CHECKLIST ANSWERS

After verifying that the proposed treatment activities, treatment types, and geographic location of the treatment project are consistent with the PEIR, the primary functions of the checklist are to determine:

- whether any of the significant impacts of the later treatment project would be substantially more severe than those covered in the PEIR;
- whether the later treatment project would result in any new impacts that were not covered in the PEIR; and
- the type of CEQA document, if any, that is appropriate to examine impacts that are not within the scope of the PEIR.

Accordingly, the checklist questions presented for each resource area identify, for each impact addressed in the PEIR, whether the impact applies to the treatment project and if so, identify the SPRs and mitigation measures that are applicable to the treatment project. The checklist is also intended to identify whether the impact significance determination for the treatment project is different than the impact significance determination in the PEIR; if it is different, the checklist will identify whether the difference constitutes a substantially more severe significant impact and is therefore not within the scope of the PEIR. If it is determined that a substantially more severe significant impact

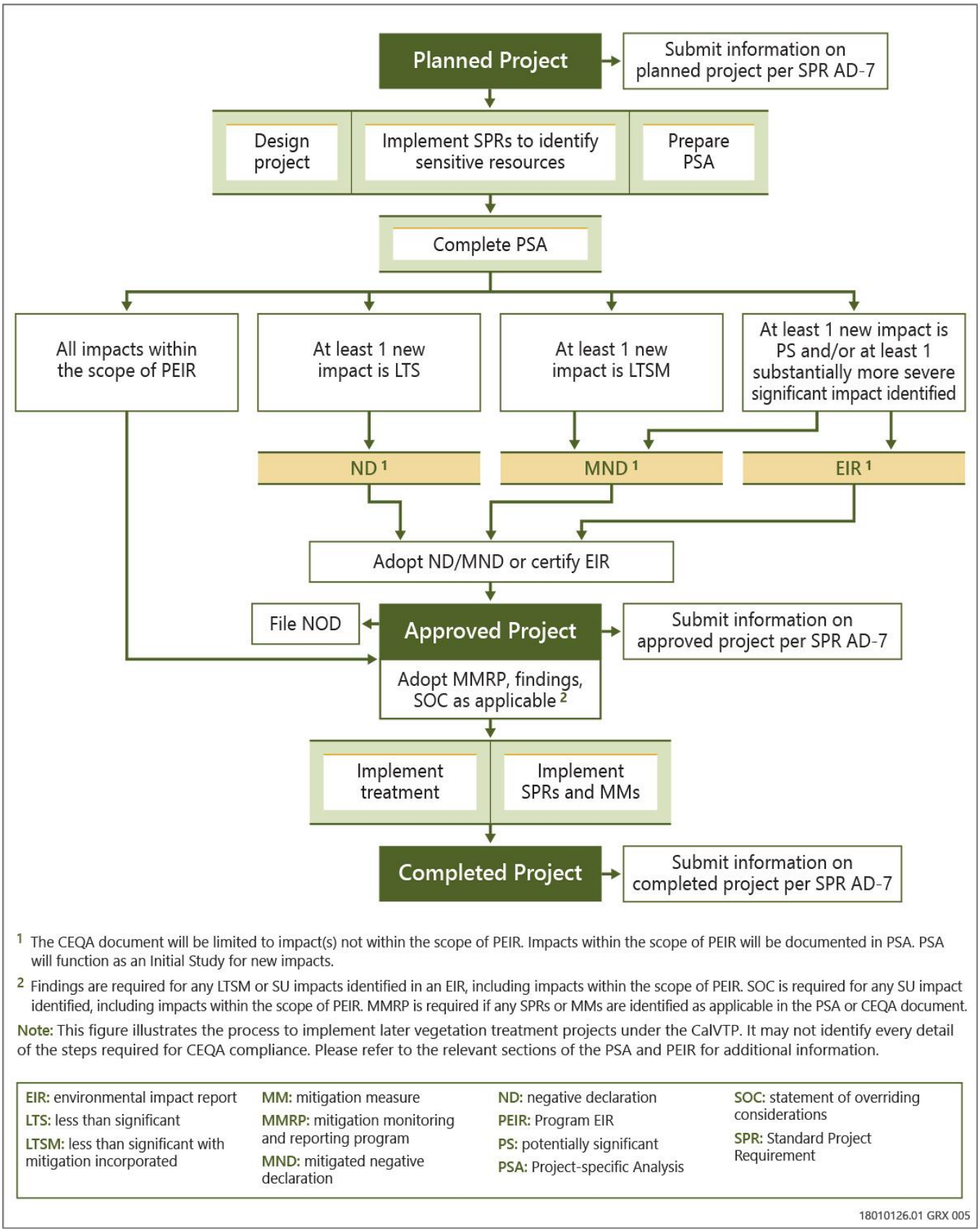
that cannot be mitigated down to the same level as, or lower level than, identified in the PEIR would result from a later treatment project, an EIR must be prepared, unless one or more mitigation measures incorporated into the project would mitigate the effects to a point where clearly no significant effect on the environment would occur, in which case an MND would be appropriate The MND or EIR may be limited to examining the impacts that are not within the scope of the PEIR.

"New" impacts are effects on the environment that were not addressed in the CalVTP PEIR.

For each new impact listed in the checklist, the project proponent should indicate whether the impact would be one of the following:

- New Impact that is Less Than Significant: The project would result in a new adverse impact that is not analyzed in the CalVTP PEIR; however, the impact would not be significant. In this case, the impact is not "within the scope" of the CalVTP PEIR and preparation of a Negative Declaration could be prepared. Pursuant to CEQA Guidelines Section 15168(d), a subsequent negative declaration could be prepared to document the new impact and substantial evidence supporting the less-than-significant conclusion, along with the PSA checklist documenting the rest of the "within-the-scope" impacts.
- New Impact that is Less Than Significant with Mitigation Incorporated: The project would result in a new significant impact that is not analyzed in the CalVTP PEIR, but due to the project proponent's willingness to incorporate new mitigation into the proposed project, the impact is clearly less than significant with feasible mitigation. In this case, the impact is not "within the scope" of the CalVTP PEIR and a Mitigated Negative Declaration could be prepared, consistent with CEQA Guidelines Section 15168(d), which allows for use of a subsequent negative declaration to document the new impact and substantial evidence supporting the less-than-significant conclusion, along with the PSA checklist documenting the rest of the "within-the-scope" impacts.
- New Impact that is Potentially Significant: The project would result in a new significant impact that is not analyzed in the CalVTP PEIR (which would be subject to the "fair argument" standard as a new impact), the impact cannot be clearly mitigated to less than significant. In this circumstance, the impact is not "within the scope" of the CalVTP PEIR and preparation of an Environmental Impact Report (EIR) is required. The EIR will cover the new potentially significant or significant impact(s) and need not further evaluate significant impacts already covered in the PEIR, which are documented in the PSA.

In summary, when additional environmental documentation is needed to augment the PEIR for CEQA compliance, the PSA checklist and accompanying analysis would serve the same function as an initial study that defines the topics to be addressed in the EIR, MND, or ND to cover the impacts that are not within the scope of the PEIR, as directed by State CEQA Guidelines Section 15168(d)(1). Pursuant to State CEQA Guidelines Section 15168(d), a later ND could be prepared, if the new impact would be less than significant, or MND, if the new impact or substantially more severe significant impact could be clearly mitigated to less than significant. The analysis of any new impact to support adoption of an ND or MND, along with the analysis of impacts that are within the scope, would be documented in the PSA checklist. If a later EIR is prepared, it could be limited in its scope to the new significant impact(s) or substantially more severe significant impact(s), with the remainder of the impacts that are within the scope of the PEIR being documented in the PSA checklist. Refer to the CalVTP PSA Process flowchart presented in Figure 1.



1 The CEQA document will be limited to impact(s) not within the scope of PEIR. Impacts within the scope of PEIR will be documented in PSA. PSA will function as an Initial Study for new impacts.

2 Findings are required for any LTSM or SU impacts identified in an EIR, including impacts within the scope of PEIR. SOC is required for any SU impact identified, including impacts within the scope of PEIR. MMRP is required if any SPRs or MMs are identified as applicable in the PSA or CEQA document.

Note: This figure illustrates the process to implement later vegetation treatment projects under the CalVTP. It may not identify every detail of the steps required for CEQA compliance. Please refer to the relevant sections of the PSA and PEIR for additional information.

EIR: environmental impact report
LTS: less than significant
LTSM: less than significant with mitigation incorporated
MM: mitigation measure
MMRP: mitigation monitoring and reporting program
MND: mitigated negative declaration
ND: negative declaration
PEIR: Program EIR
PS: potentially significant
PSA: Project-specific Analysis
SOC: statement of overriding considerations
SPR: Standard Project Requirement

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Source: Ascent Environmental Inc. 2019

Figure 1 CalVTP PSA Process

AGENCY-SPECIFIC CEQA IMPLEMENTATION PROCEDURES

This PSA may be used by CAL FIRE, another public agency funded by grants from CAL FIRE or other state agencies, or a public agency with land ownership, land management, or other regulatory responsibilities in the treatable landscape that is proposing to implement, fund, or issue any approval for vegetation treatments consistent with the CalVTP PEIR. Each project proponent should follow their agency's CEQA implementation procedures, including filing of a Notice of Determination through the State Clearinghouse and/or applicable County Clerk's office.

PROJECT-SPECIFIC CEQA FINDINGS AND OVERRIDING CONSIDERATIONS

When a responsible agency approves a vegetation treatment project using a within the scope finding for all environmental impacts, it must still adopt 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. Although each responsible agency must adopt its own findings (see CEQA Guidelines section 15096(h)), such agencies have the option of reusing, incorporating, or adapting all or part of the findings adopted by the Board for the CalVTP PEIR to meet the agency's own requirements to the extent the findings are applicable to the proposed vegetation treatment project. A findings template intended to assist responsible agencies to formulate their own findings is attached to this PSA as Attachment B.

REPORTING REQUIREMENTS

Planned Projects

To assist with tracking actions under the CalVTP, project proponents will submit information to CAL FIRE on planned projects when beginning preparation of this PSA. The submittal will include the following:

- 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.

Approved Projects

To assist with tracking, reporting, and adaptively managing actions under the CalVTP, project proponents 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:

- 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)

Completed Projects

To assist with tracking, reporting, and adaptively managing actions under the CalVTP, project proponents 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 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).

ENVIRONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

1.	Project Title:	Cal VTP – San Mateo County Parks, Huddart and Wunderlich
2.	Project Proponent Name and Address:	County of San Mateo – Parks Department, 455 County Center, 4th Floor, Redwood City, CA 94063-1646
3.	Contact Person Information and Phone Number:	Dan Krug, (650)599-1371, dkrug@smcgov.org
4.	Project Location:	Click or tap here to enter text. Huddart: 1100 Kings Mountain Rd., Woodside, CA 94062, San Mateo County USGS – Woodside Quadrangle, California – San Mateo Co., T6S, R4W, and portions of Canada De Raymundo Latitude (Y): 37.4349393 N Longitude (X): -122.2958021 W The main park entrance is located approximately two miles onto Kings Mountain Road off of Highway 84. See project map (Attachment #1, Map 1) Wunderlich: 4040 Woodside Rd., Woodside, CA 94062, San Mateo County USGS -Woodside Quadrangle, California – San Mateo Co., T6S, R4W, and portions of Canada De Raymundo Latitude (Y): 37.402162 Longitude (X): -122.2780236 The main park entrance is located on the west side of Highway 84, approximately a half mile northwest of Portola Road. See Project Map (Attachment #1, Map 2)
5.	Total Area to be Treated (acres)	402.1 Acres

6. Description of Project: Click or tap here to enter text.

a. Initial Treatment

Project Goals:

The San Mateo County Parks, Huddart and Wunderlich Cal VTP builds upon work completed by the San Mateo Resources Conservation District and San Mateo County Parks collaboratively with partners, stakeholders, and local communities on forest health fuel reduction projects to create shaded fuel breaks, reduce ladder fuels, lower fire severity, and reduce invasive species. Reducing competition in the understory and treating hazard or diseased trees where feasible creates a healthier and more vigorous forest, increasing forest resiliency and reducing wildfire risk.

Project Description:

Mechanical mastication would be utilized to remove understory vegetation, dead or downed material, remove hazard trees, dead, dying, and diseased trees, and live trees up to 8 inches diameter at breast height (DBH). All debris and materials left by the masticator will be lopped and scattered throughout the treatment area. The manual treatment crew may utilize chainsaws and/or other various hand mechanized or hand tools to prune trees and woody vegetation, buck downed debris and materials, and to remove dead, dying, and diseased trees of any diameter, and live trees up to 8 inches DBH. Herbicide application may be utilized to eliminate the spread and re-sprouting of invasive species in the treatment areas predominately along roads and trails. The treatment activities will reduce potential ignition sources, improve the forest's health and vigor, and promote a more resilient fuel break (see Initial and Maintenance Treatment Descriptions).

Project Site:

Huddart and Wunderlich County Parks are recreational properties containing hiking and equestrian trails and scenic picnic areas utilized by the public. Proposed treatment areas are located within the park boundaries on slopes less than approximately 40% off of roadways and trails, however, some trail closures may be required for public safety.

Project Location:

The project treatment area encompasses a total of 402.1 acres on San Mateo County Park lands, specifically Huddart County Park (217.6 acres) and Wunderlich County Park (184.5 acres). The project properties are located to the west of Woodside and south of the Crystal Springs Reservoir in San Mateo County, see attached maps (Attachment #1, Map 1 and Map 2).

Initial Treatment Description:

Treatment Types

WUI Fuels Reduction

Proposed project areas are natural areas that are adjacent to homes and structures, indicating that the project areas make up a WUI as defined in the PEIR (CalVTP Final PEIR Volume II Section 2.5.1 page 7 and page 8-10). Fuel reductions in the WUI will directly impact communities and assets at risk, serving as emergency access points along or near evacuation routes for the nearby communities and as an opportunity to slow or stop wildfires. WUI treatments would remove understory vegetation including dead, dying, hazard, and diseased trees of any diameter, ladder fuels, and live trees up to 8 inches DBH to promote a healthier residual stand following treatments. Habitat quality will be enhanced through WUI fuel reductions where existing habitat has been degraded due to invasive species encroachment or the accumulation of fuels.

Fuel Break

This project also proposes fuel break treatment types in areas that would prevent or slow the spread of wildfire to structures or other natural resources. As defined in the PEIR, fuel breaks remove zones of vegetation to support fire suppression efforts and passively interrupt the path of a fire (CalVTP Final PEIR Volume II Section 2.5.1 page 7 and page 11-14). Treatments would predominately consist of shaded fuel breaks, however, non-

shaded fuel breaks may occur in shrub fuel types. The fuel breaks would provide emergency responders opportunity to control or contain wildfires through the modification of flammable vegetation. Shaded fuel breaks support a healthy and fire resilient residual forest stand through retaining the majority of the overstory canopy to maintain shade that will reduce the potential for rapid re-growth of understory vegetation.

Ecological Restoration

In addition, this project proposes ecological restoration treatment types to restore ecosystem processes, conditions, and resiliency through the removal of dense understory fuels and invasive species in areas generally outside of the WUI, or areas integrated into WUI fuel reductions, as defined in the PEIR (CalVTP Final PEIR Volume II Section 2.5.1 page 7 and page15-17). Implementing the treatment activities will result in a modification of the existing fuels that will ultimately support native vegetative species and restore habitat conditions including, but not limited to habitat quality and natural fire processes. The removal of understory vegetation would mimic a natural disturbance that encourages natural forest succession to occur and influences the amount of carbon stored in the forest (Dale et al. 2000). Thinning the stand through the removal of small diameter live trees and understory vegetation will result increase the site's carrying capacity for stand volume, which would increase the growth of the residual trees (Skovsgaard, 2008). The build-up of fuels and vegetation creates competition for the available water, nutrients, and sunlight plants need to grow, therefore, the reduction of vegetative competition in the understory would increase the growth and carbon storage capacity in the residual stand.

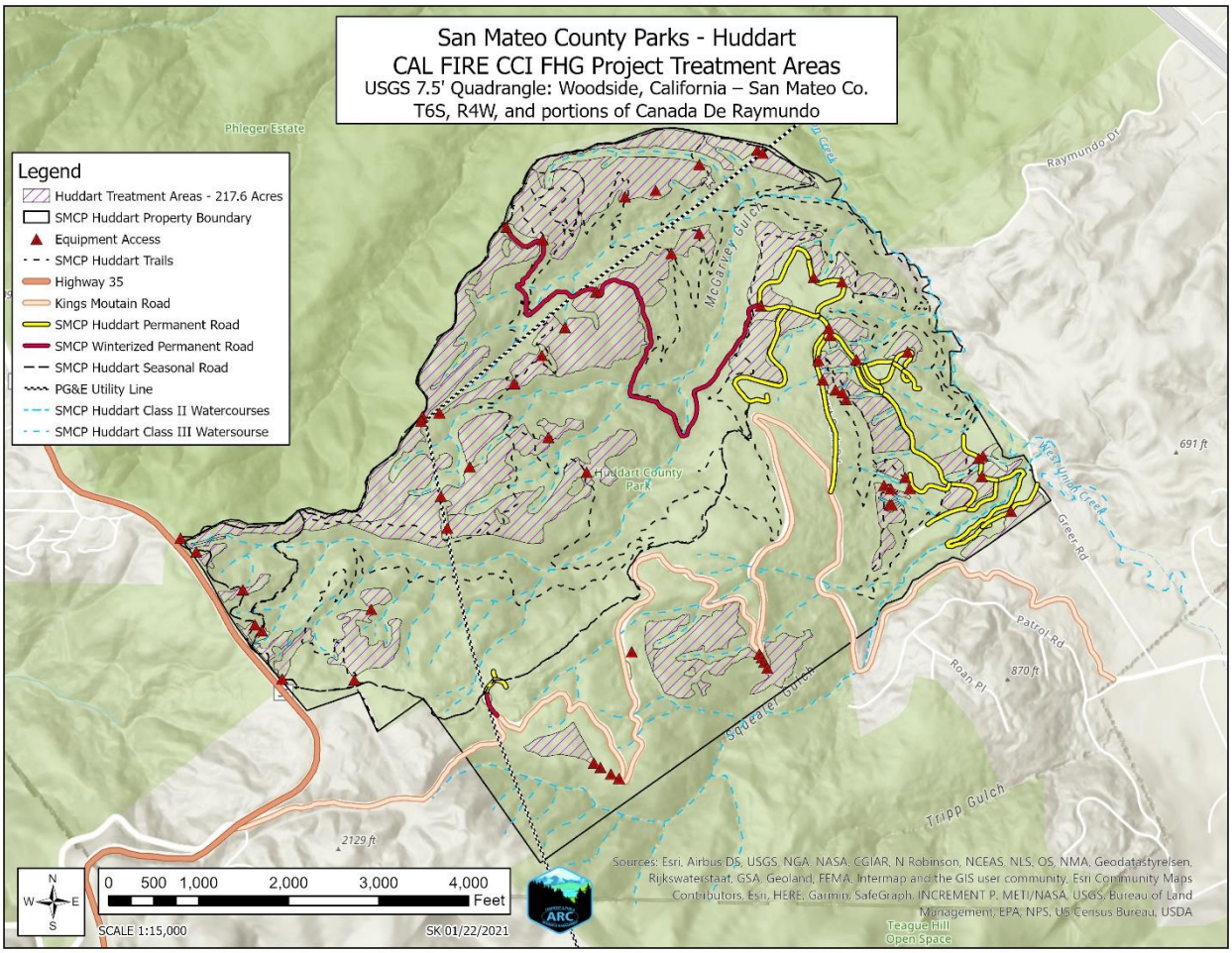


Figure 1: Huddart County Park Project Map (map not to scale, see Attachment #1, Map 1).

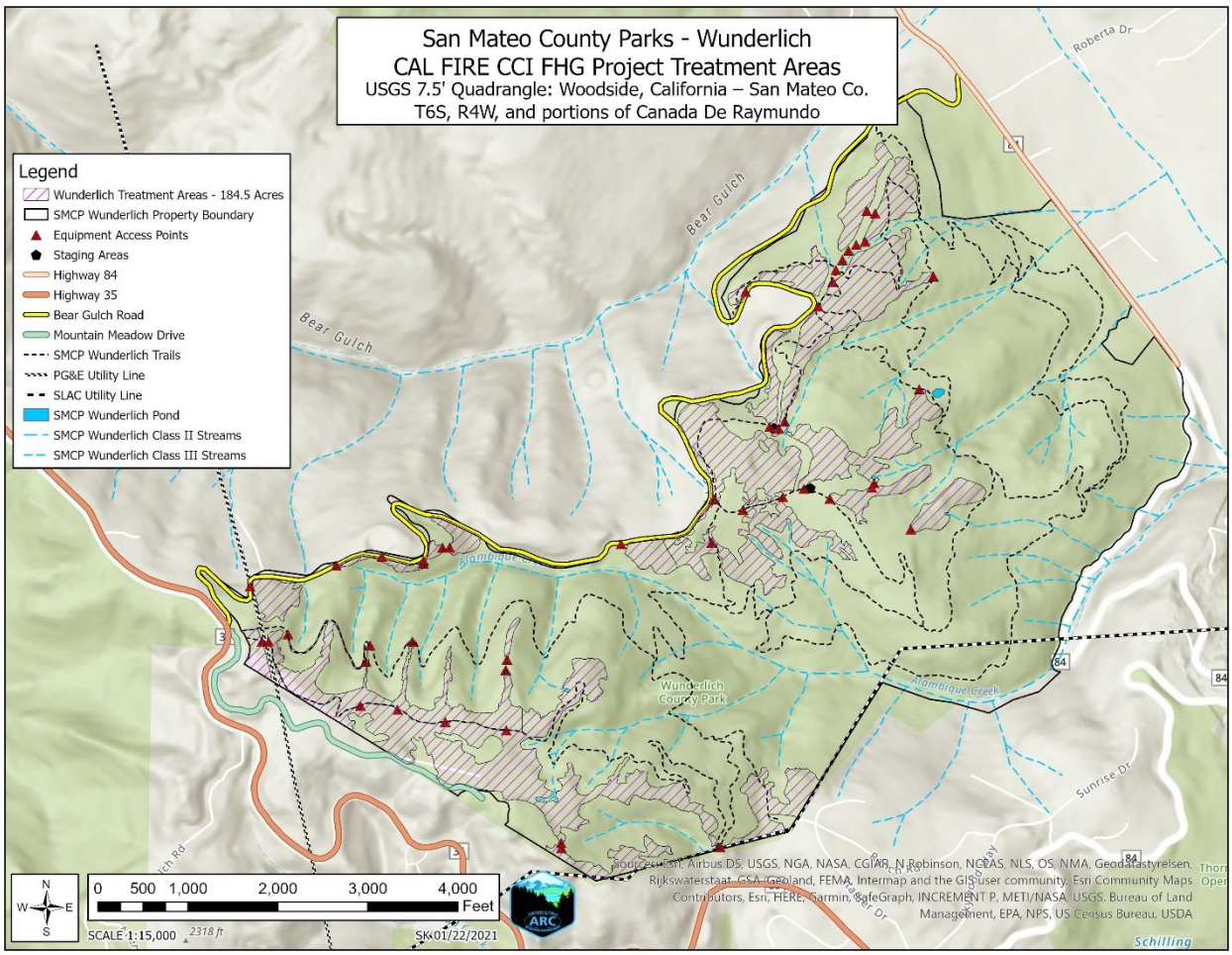


Figure 2: Wunderlich County Park Project Map (map not to scale, see Attachment #1, Map 2).

Treatment Activities

Treatment activities consist of 402.1 acres of mechanical treatment. Masticators will be used to remove dense stands of understory vegetation and ladder fuels and maintain a healthy overstory, which is within the scope of the PEIR. As stated in the CalVTP PEIR Section 2.5.2, mechanical treatments may cut, uproot, crush/compact, or chop existing vegetation through the use of masticators and other methods of application. Understory debris would be lopped and scattered on-site within the treated areas. The mechanical treatment crew may utilize a chainsaw and/or various other mechanized tools or hand tools to buck downed debris and prune ladder fuels and vegetation. Herbicide application may be implemented where invasive species are present within the treatment areas to promote regeneration of native species throughout the treatment areas through the removal of invasive species. The CalVTP PEIR Section 2.5.2 indicates that herbicide application may only be implemented at ground-level from equipment on vehicles or by manual application devices and must comply with the U.S. Environmental Protection Agency directions, as well as California Environmental Protection Agency and Department of Pesticide Regulation label standards. Based on San Mateo County Park practices, manual herbicide application methods are expected to be used for this project. It is estimated that herbicide treatments could occur over approximately 93 acres of the treatment areas predominately near roads, trail systems, and pockets of invasive species. Herbicide acreage was determined in ArcGIS Pro by establishing a 50-foot buffer from all roads and trails in proximity to treatment areas.

Fuel Types

Proposed treatments would occur in tree and shrub fuel types as described in the CalVTP PEIR Section 2.4.1, although, there are grass fuel types located within the project properties. Tree fuel types are dominated by coastal redwood forests mixed with Douglas-fir and mixed hardwood stands. These forests have generally closed

canopies with moderate to dense understory fuels. The removal of understory vegetation and ladder fuels in the tree fuel types would reduce the risk of ground or surface fires spreading into the canopy. The shrub fuel types consist predominately of native shrub and chaparral species, such as coyote brush, poison oak, and manzanita. However, invasive species, such as French broom, acacia, and eucalyptus, have been documented in treatment areas. The reduction of fuels within all fuel types can prevent stand replacement that may occur in the event of a wildfire that spreads continuously through the flammable foliage and woody materials.

Equipment:
This project proposes the use of the following equipment:
Masticator
Chainsaws and/ or other mechanized tools or hand tools
Haul vehicles for equipment transport
Vehicles for contractor transport
Manual herbicide applicators

Duration of Treatments:
Initial treatments are estimated to occur within both project properties over approximately 397 days within a 2-3 year period, however, the timeframe may change in the event of delays, such as weather or production rates.

Pests and Disease:
The pathogen, *Phytophthora ramorum,* commonly referred to as Sudden Oak Death (SOD), infects coastal forests throughout California and Oregon and kills susceptible species including: tanoak, coast live oak, California black oak, Shreve's oak, canyon live oak, and madrone saplings. Host species that are in the project area include, but are not limited to California bay laurel, coast redwood, and Douglas-fir. Along with the mitigation measures under project activities and treatment prescription, to avoid the spread of this pathogen, all hand equipment, including boots, will be sanitized and heavy equipment hosed off prior to operations in areas where the spread of SOD is possible. The California Oak Mortality Task Force website contains additional information regarding treatment and disposal measures for plants infected with SOD. See the attached link for additional information and to monitor changes in SOD treatment recommendations: http://www.suddenoakdeath.org/

Invasive Species:

Acacia

Black acacia trees were first introduced to the project areas in the early 1900's as ornamental species. The seeds of this species disperse readily and are commonly spread by water movement and human activities (California Invasive Plant Council, Cal IPC, 2020). The Cal IPC and University of California Weed Research Information Center (UCWRIC) recommends removing entire roots and root fragments or applying herbicides to prevent re-sprouting and reduce clonal populations through root sucker development. The University of California Weed Research Information Center recommends the following chemical treatments that may be applied under the CalVTP (CalVTP Final PEIR Volume II Table 3.10-1): Glyphosate (isopropylamine salt, potassium salt, dimethylamine salt, and diammonium salt formulations), Hexazinone, and Triclopyr (butoxyethyl ester and triethylamine salt formulations). Chemical application methods vary, however, cut stump, basal bark, and foliar applications are most common (DiTomaso, et al., 2013). Some species of Acacia are capable of changing soil chemistry through nitrogen fixation of fallen leaves that have an allelopathic impact preventing the growth of native understory species. See the attached links for additional information and to monitor changes in black acacia treatment recommendations: https://wric.ucdavis.edu/information/natural%20areas/wr_A/Acacia.pdf and https://www.cal-ipc.org/plants/profile/acacia-melanoxylon-profile/

Eucalyptus

Blue gum eucalyptus was planted throughout the Wunderlich property historically as an ornamental species and as windbreaks. The plantings have spread beyond their original locations and are to be avoided due to the historical significance. This species reproduces readily in moist coastal climates, where it displaces native plant communities due to allelopathic chemicals that are released by debris, including bark, limbs, and leaves (Cal IPC,

2020). Blue gum eucalyptus creates highly flammable fuel complexes from the accumulation of debris and can be hazardous due to common limb failure. See the attached link for additional information and to monitor changes in blue gum eucalyptus treatment recommendations: https://www.cal-ipc.org/resources/library/publications/ipcw/report48/

French broom

French broom is a problematic invasive species due to its ignitability, ability to carry fire into tree canopies, shading out seedlings, and replacing the native plants and forage species. This species has a large seed bank and re-sprouts readily from the root after cutting, freezing, and fire (California Invasive Plant Council, Cal IPC, 2020). Cal IPC recommends pulling French broom to remove the entire plant including its roots to eliminate re-sprouting. The UCWRIC recommends the following chemical treatments that may be applied under the CalVTP (CalVTP Final PEIR Volume II Table 3.10-1): Glyphosate (Roundup and Roundup Pro Max), Imazapyr (Arsenal, Chopper, Habitat, Stalker, and Polaris), and Triclopyr (Garlon 3A and Garlon 4) (DiTomaso, et al., 2013). Application methods may vary between chemicals, however, the UCWRIC recommends cut stump and basal bark application immediately following the cut. The removal of this species is a priority due to its increased fire hazard and adverse impacts to habitat and aesthetics. Additional information about French broom control and treatments are located on the Cal IPC website. See the attached link for additional information and to monitor changes in French broom treatment recommendations: https://www.cal-ipc.org/plants/profile/genista-monspessulana-profile/ and https://wric.ucdavis.edu/information/natural%20areas/wr_G/Genista.pdf

Treatment Types Click or tap here to enter text.

☒ Wildland-Urban Interface Fuel Reduction

☒ Fuel Break

☒ Ecological Restoration

Treatment Activities Click or tap here to enter text.

☐ Prescribed Burning (Broadcast), _____ acres

☐ Prescribed Burning (Pile Burning)

☒ Mechanical Treatment, ___402.1 ___ acres

☐ Manual Treatment, _____ acres

☐ Prescribed Herbivory, _____ acres

☒ Herbicide Application, ___93____ acres

Fuel Type Click or tap here to enter text.

☐ Grass Fuel Type

☒ Shrub Fuel Type

☒ Tree Fuel Type

b. Treatment Maintenance

Maintenance Treatment Description:

Maintenance treatments are estimated to occur approximately every 3-5 years but may occur as needed over the lifetime of the CalVTP. Following initial treatment, site conditions are expected to resemble a park-like setting with a clear, open understory that would promote a healthier, more vigorous forest. Open understories will create a mosaic of fuel continuity that would support wildlife habitats and the regeneration of native species. Maintenance intervals will be dependent on the re-establishment rate of the understory species and would be triggered by dense, continuous understory and ladder fuels. Maintenance treatments would be conducted through the implementation of mechanical treatments and may include herbicide application to remove hazard trees, understory vegetation and ladder fuels, and reduce the re-establishment of invasive species.

Treatment Types Click or tap here to enter text.

☒ Wildland-Urban Interface Fuel Reduction

☒ Fuel Break

☒ Ecological Restoration

Treatment Activities Click or tap here to enter text.

☐ Prescribed Burning (Broadcast), _____ acres

☐ Prescribed Burning (Pile Burning)

☒ Mechanical Treatment, __402.1 ____ acres

☐ Manual Treatment, _____ acres

☐ Prescribed Herbivory, _____ acres

☒ Herbicide Application, ___93____ acres

Fuel Type Click or tap here to enter text.

☐ Grass Fuel Type

☒ Shrub Fuel Type

☒ Tree Fuel Type

Use of the PSA for Treatment Maintenance

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

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

7. Regional Setting and Surrounding Land Uses: (Briefly describe the project's surroundings)

Surroundings:

Physical

Huddart and Wunderlich County Parks are located in San Mateo County Park land on the eastern side of the Santa Cruz Mountains. The project sites are bound by rural homes as well as the larger community of Woodside, creating the wildland-urban interface (WUI). The project areas range from approximately 390 feet to 2275 feet elevation within the Bear Gulch Watershed. The north boundary line of Wunderlich County park is encompassed by a private, gated residential road, called Bear Gulch Road, and various other private properties are surround the park. While there are no flowing streams in the project area, Huddart contains a central Class II watercourse called McGarvey Gulch Creek and Class III watercourses are common throughout the property. Similarly, Wunderlich has one main Class II watercourse, Alambique Creek, as well as various Class III watercourses located throughout the property. Surrounding land uses include recreational land to the north, west, and south of both parks and WUI predominately to the east of both parks, and also prominent near the north and south property boundaries of Wunderlich County Park. See attached maps (Attachment #1, Map 1 and Map 2).

Vegetation

The vegetation within Huddart and Wunderlich County park is comprised of forests dominated by coastal redwood, Douglas-fir, and mixed hardwood forests, oak woodlands, and shrub vegetation types. The understory is comprised of native brush species and grasslands. Acacia, French broom, and eucalyptus are common invasive species located within the project areas.

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

No other public agency approval is required for this project. During the development of the project the California Department of Fish and Wildlife (CDFW) was consulted. If necessary, the County of San Mateo will obtain all applicable permitting and licensing through the San Mateo County Agricultural Commissioner office prior to the implementation of herbicide application in compliance to SPR HAZ-6.

Coastal Act Compliance

☒ The proposed project is NOT within the Coastal Zone

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

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

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

CAL FIRE Associate State Archaeologist, Ben Harris, was consulted during the planning phase of the proposed project on January 20, 2021. A records check through the Northwest Information Center (NWIC) was completed on July 27, 2020. Due to the confidentiality of the records check, results may be available to qualified personnel upon request, see the archaeological, historical, and tribal cultural resources discussion below. In addition, a letter was written to the geographically affiliated tribes on April 1, 2021, and a full Confidential Archaeological Addendum (CAA) has been completed and submitted to the NWIC upon submittal of the CalVTP PSA.

DETERMINATION (To be completed by the project proponent)

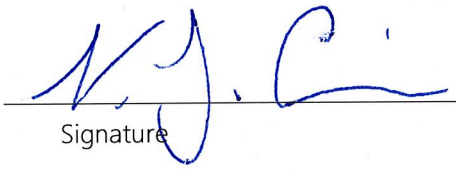
On the basis of this PSA and the substantial evidence supporting it:

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

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

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

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



Signature

March 31, 2021

Date

Nicholas Calderon

Printed Name

Director of Parks and Recreation

Title

San Mateo County Parks

Agency
455 County Center, 4th Floor
Redwood City, CA 94087

EVALUATION OF ENVIRONMENTAL IMPACTS

1. Refer to the applicable resource analysis section in the CalVTP PEIR for relevant information on each environmental topic.
2. A brief explanation is required for each impact, including impacts that have been identified in the PEIR as well as any "new impacts".
3. The discussion of each impact identified in the PEIR that is also applicable to the proposed treatment project should generally include the following information:
   - Briefly describe the impact of the proposed vegetation treatment project.
   - Summarize the impact as it was presented in the PEIR, including a statement that the impact is covered in PEIR.
   - Provide evidence that (explain why) the project impact is covered in PEIR, considering whether the proposed treatment is consistent with the treatment types and activities addressed in the PEIR as well as the associated intensity (i.e., duration).
   - Identify SPRs and MMs applicable to the treatment project.
   - (If applicable) Explain which components of the MM or SPR would be applied. This circumstance exists if the MM or SPR allows for deviation from requirements (e.g., minimum buffer distances), identification of parameters (e.g., tree size for retention), and determinations of feasibility. A site- and/or treatment activity-specific explanation for the planned deviation, identified parameter, or feasibility determination must be provided in the PSA.
   - (If applicable) Explain why the impact significance in the PSA is different than that found in the PEIR; substantiate the different (new) significance conclusion.
   - (If applicable) Explain why MM or SPRs identified for this impact in PEIR do not apply to this project. This circumstance may exist where a PS impact was identified in the PEIR, but the impact severity would be less for the treatment project or the MM does not otherwise apply.
4. If the project proponent has determined that a new impact would occur, then the checklist answers for the new impact must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant without the need for mitigation.
5. "Potentially Significant" is appropriate if there is substantial evidence that a new impact may be significant. If there are one or more "Potentially Significant" new impacts identified, or if any impact would constitute a substantially more severe significant impact than was covered in the PEIR, an EIR is required unless one or more mitigation measures incorporated into the project would mitigate the effects to a point where clearly no significant effect on the environment would occur, in which case an MND would be appropriate. A ND could be prepared, if the new impact would be less than significant, or MND, if the new impact could be clearly mitigated to less than significant. The analysis of any new impact to support adoption of an ND or MND, along with the analysis of impacts that are within the scope, would be documented in the PSA checklist. If a later EIR is prepared, it could be limited in its scope to the new significant impact(s) or substantially more severe significant impact(s), with the remainder of the impacts that are within the scope of the PEIR being documented in the PSA checklist and attached to the EIR as an appendix. When preparing any environmental document, the environmental analysis should incorporate by reference pertinent portions of the analysis from the CalVTP PEIR and focus the environmental analysis solely on issues that were not addressed in the CalVTP PEIR.
6. Project proponents should incorporate into the PSA checklist references to information sources for potential impacts. Include a list of references cited in the PSA and make copies of such references available to the public upon request.

PD-3.3: AESTHETICS AND VISUAL RESOURCES

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

Click or tap here to enter text.

Impact AES-1

Initial and maintenance treatments would include mechanical treatments. The potential for these treatments to result in short-term degradation of the visual character of the land was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.2.3, page 16-19). The treatment activities and potential impacts are within the scope of the PEIR because they are consistent with the activities and impacts addressed in the PEIR. The project area spans over a recreational property, where many hiking trails intersect with the project sites, and some treatment areas are in close proximity to and may be visible from Highway 35, or Skyline Boulevard, a designated State Scenic Highway, and King's Mountain Road, a County Scenic Corridor (CalVTP Final PEIR Volume II Section3.2.3, Figure 3.2-10, page 24). With the implementation of SPR AD-3, AES-1, AES-2, AES-3, and REC-1, the treatments will be consistent with local plans and ordinances, vegetation adjacent to trails will be thinned and feathered to screen views from the trails and sufficient vegetation will be retained beyond, all treatment related equipment will be stored outside of the public viewshed and will not block views where feasible, and recreational users will be notified of any temporary recreation area closures at least two weeks prior to the commencement of the treatment activities. The proposed project will promote a healthy residual stand and will resemble open, park-like conditions after treatments. Therefore, the potential for the project to result in short-term substantial degradation of a scenic vista, visual character, or damage to scenic resources would be less than significant.

Impact AES-2

Initial and maintenance treatments would include WUI fuel reduction, ecological restoration, and fuel break treatment types. The potential for these treatments to result in long-term substantial degradation of the visual character was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.2.3, page 20-22). The property is used for recreational activities and some treatment areas are in close proximity to and may be visible from Highway 35, or Skyline Boulevard, a designated State Scenic Highway, and King's Mountain Road, a County Scenic Corridor (CalVTP Final PEIR Volume II Section 3.2.3, Figure 3.2-10, page 24). Treatment areas along trail systems will be feathered to screen views into treated areas (SPR AES-1 and SPR AES-3). In addition, all treatment related equipment will be stored outside of the public viewshed and will not block views where feasible per SPR AES-2. As analyzed in Impact AES-1, the aesthetic impacts will be temporary and short-term because understory plants will regenerate and sprout shortly after the treatments are implemented and will resemble park-like conditions.

Based on the implementation of the applicable SPR's and the nature of the treatment types, the potential for this project to result in long-term substantial degradation of the visual character of the project site or damage to scenic resources would be less than significant.

Impact AES-3

The proposed initial and maintenance treatments would include fuel break treatment types that will predominately implement shaded fuel breaks; however, non-shaded fuel breaks will be implemented in shrub fuel types. The potential for the non-shaded fuel break treatments to result in long-term substantial degradation of the visual character was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.2.3, page 25-27). Potential impacts as a result of the non-shaded fuel break treatment type is within the scope of the PEIR because the treatment activities are consistent with those analyzed in the PEIR. The proposed treatment areas are located within a recreational area where non-shaded fuel break treatments may be visible from public trails. Mitigation Measure AES-3 will be implemented and requires that the project proponent conduct a visual reconnaissance of the non-shaded fuel break treatment areas to determine if public viewing areas, such as public trails or scenic vistas, have a view of the treatment areas. Under MM AES-3, if public view points are identified to have views of the non-shaded fuel break treatment areas, then the treatment area will be moved if feasible or it will be thinned and feathered at the edge of the fuel break to strategically preserve vegetation that will screen public views of the non-shaded fuel break treatment area to achieve wildfire risk reduction objectives.

The treatment areas located in proximity to Highway 35, or Skyline Boulevard, and King's Mountain Road are forested areas where shaded fuel breaks will be implemented to minimize the potential to impact public views from the State Scenic Highway and County Scenic Corridor. However, following the implementation of the applicable Mitigation Measure, the potential for the non-shaded fuel break treatments to result in a substantial long-term degradation of a scenic vista or visual character or quality of public views would remain significant and unavoidable, because MM AES-3 cannot be implemented in a way that would feasibly reduce the visual impact below significance, as stated in the PEIR (CalVTP Final PEIR Volume II Section 3.2.3, page 27).

New Aesthetic and Visual Resource Impacts

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has evaluated and considered site specific characteristics to determine that the project treatments are consistent with the CalVTP PEIR's environmental and regulatory settings (CalVTP Final PEIR Volume II Sections 3.2.1 and 3.2.2). No changed circumstances would lead to new significant impacts not addressed in the CalVTP PEIR. Therefore, no new impact related to aesthetics and visual resources would occur that is not covered in the PEIR.

PD-3.4: AGRICULTURE AND FORESTRY RESOURCES

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

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

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

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

Discussion

Click or tap here to enter text.

Impact AG-1

The initial and maintenance treatments would include mechanical treatment. The project areas are comprised of forests dominated by coastal redwood, Douglas-fir, and mixed hardwood forests, oak woodlands, and shrub vegetation types. There is no farmland within the project area. The potential for the proposed treatment to result in the loss of forest land was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.3.3, page 7-8). Potential impacts resulting in the conversion of forest land are within the scope of the PEIR because the treatment activities are consistent with those addressed in the PEIR. As stated in the PEIR, "treatment activities under the CalVTP would not result in the loss of forest land or conversion of forest land to non-forest use," (CalVTP Final PEIR Volume II Section 3.3.3, page 7). The project treatment does not remove trees for commercial purposes and does not remove live trees established in the overstory canopy due to the 8-inch diameter at breast height (DBH) limitation in the treatment prescription. Although this project proposes the removal of understory vegetation and ladder fuels, treatments would improve the health and vigor of the forest and develop a shaded fuel break more resilient to changing climates in the future. The conversion of forest land to non-forest land is not a potential impact because the dominant vegetation types will be retained due to treatment occurring primarily in the understory.

Based on the treatment activities and beneficial results of the proposed project, no forestland, timberland, or farmland will be converted, any impact would be less than significant.

New Agriculture and Forestry Resource Impacts

The proposed project treatment is consistent with the treatments and activities that are considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed project and determined that they are consistent with the environmental and regulatory settings stated in the CalVTP PEIR (CalVTP Final PEIR, Volume II, 3.3.1 and 3.3.2). No changed circumstances would lead 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.

PD-3.5: 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	PSU	No	Yes
Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk	LTS	Table 3.4-6; Impact AQ-2 pp. 3.4-33 – 3.4-34; Appendix AQ-1	Yes	AQ – 1 HAZ – 1 NOI – 4 NOI – 5	NA	LTS	No	Yes
Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	LTS	Section 3.4.2; Impact AQ-3, pp. 3.4-34 – 3.4-35	No	None	NA	No impact	No	Yes
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	SU	Section 3.4.2; Impact AQ-4, pp. 3.4-35 – 3.4-37	No	None	None	No impact	No	Yes
Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust	LTS	Impact AQ-5, pp. 3.4-37 – 3.4-38	Yes	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	None	None	No impact	No	Yes

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

New 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

Click or tap here to enter text.

Impact AQ-1

This project would require the use of vehicles, mechanical equipment, mechanized hand tools, and may include herbicide application during initial and maintenance treatments, which would result in emissions of criteria pollutants that could exceed California ambient air quality standards (CAAQS) or the national ambient air quality standards (NAAQS) thresholds. The potential for emissions of criteria to exceed CAAQS or NAAQS thresholds was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, page 26-33). The proposed treatments, treatment equipment, and equipment use duration are consistent with the scope of the PEIR. The following SPR's will be implemented during this project: compliance with applicable local air quality requirements (SPR AQ-1) and minimize dust during treatment activities (SPR AQ-4). SPR's AD-4, AQ-2, AQ-3 and AQ- 6 do not apply to this project because prescribed burns are not proposed for this project. Per maps published by the California Geologic Survey, no naturally occurring asbestos is located within the project area, therefore, SPR AQ-5 is not applicable to this project (ArcGIS Online, 2020). The Bay Area Air Quality District guidelines for dust abatement and other air quality concerns was reviewed for this project in compliance to SPR AQ-1. The proposed treatment types, mechanical treatment and herbicide application, produce much less emissions of criteria air pollutants and precursors per acre than the prescribed burning treatment type (CalVTP Final PEIR Volume II Section 3.4.3 Table 3.4-6).

Mitigation Measure AQ-1 is applicable to this project and would reduce the mass emissions of criteria air pollutants by implementing vehicle and equipment exhaust emission reduction techniques. However, the impact would remain potentially significant and unavoidable due to the infeasibility of implementing specific emission reduction techniques, as stated in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3 page 33). The project proponent has determined the following components of mitigation measure AQ-1 to be feasible for reducing emissions: encouraging contractors to carpool, substituting gasoline-powered equipment or renewable diesel fuel equipment where feasible, and utilizing equipment with Best Available Control Technology. Equipment that meets the EPA's Tier 4 emission standards will be utilized if available. There are no changes in circumstances that would occur in the proposed project that were not evaluated in the PEIR. Ultimately, the implementation of this project will reduce long-term impacts to air quality by reducing the amount of vegetative fuels available to burn in the case of a wildfire, indicating air quality impacts would be less than significant. Therefore, any substantial increase in the severity of this significant impact associated with changed circumstances would not occur.

Following the implementation of applicable SPR's and Mitigation Measures, this project's potential to generate emissions of criteria air pollutants and precursors during treatment activities that would exceed CAAQS or NAAQS and conflict with Regional Air Quality Plans would remain potentially significant and unavoidable, because, as stated in the PEIR, the amount of emission reduction as a result of implementing MM AQ-1 cannot be determined due to various variables assessed in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, page 33).

Impact AQ-2

The use of vehicles and mechanical equipment during initial and maintenance treatments could expose people to diesel particulate matter emissions. The potential to expose people to diesel particulate matter was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, page 33-34). The proposed treatments will occur over a short duration and would not occur next to the same people for an extended period of time. The proposed treatments comply with SPR AQ-1, HAZ-1, NOI-4, and NOI-5, which requires compliance with all applicable air quality regulations, equipment to be maintained, activities and staging areas to be located away from human receptors, and restricts equipment idling time. Diesel particulate matter emissions from the proposed project and its impacts are within the scope of the PEIR and treatment activities are consistent with those addressed in the PEIR. There are no changes in circumstances that would occur in the proposed project that were not evaluated in the PEIR, therefore, the impacts of this project would remain less than significant.

Impact AQ-3
This impact does not apply to this proposed treatment because no naturally occurring asbestos appears to be located in the treatment areas per maps created by the California Geologic Survey (ArcGIS Online, 2020). Therefore, no impact will occur in relation to fugitive dust emissions containing naturally occurring asbestos.

Impact AQ-4
This impact does not apply to this project because the proposed project does not include prescribed burning. Burning treatments will not be considered for the initial or maintenance treatments. Therefore, there will be no impact related to toxic air contaminants released by smoke.

Impact AQ-5
The use of vehicles and mechanical equipment during initial and maintenance treatments may expose human receptors to the objectional odors from diesel exhaust. The potential to expose human receptors to diesel exhaust was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, page 37-38). The release of objectional odors from diesel exhaust during proposed treatments is within the scope of the impacts stated in the PEIR because the treatment activities are consistent with those analyzed in the PEIR. Trails located within or adjacent to treatment areas will be temporarily closed, which would minimize the amount of diesel exhaust exposure to human receptors. This project will comply with the following applicable SPR's to minimize the potential for impacts on diesel exhaust exposure: properly maintain all diesel and gasoline-powered equipment (HAZ-1), stage all equipment as far as possible from noise-sensitive receptors (NOI-4), and restrict equipment idle time (NOI-5). The implementation of these SPR's will reduce the amount of exhaust emissions produced by equipment by restricting idle time.

Based on the staging area location requirements and potential trail closures, operation limitations, and equipment maintenance, it is likely that the impacts of this project will remain less than significant.

Impact AQ-6
This impact does not apply to this project because prescribed burns are not included in the proposed treatments. Burning treatments will not be considered for the initial or maintenance treatments. Therefore, no impact related to exposure to odors released from smoke will occur.

New Air Quality Impacts
The proposed treatment is consistent with the treatment types and activities evaluated in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the regulatory and environmental settings as stated in the PEIR (CalVTP Final PEIR, Volume II, 3.4.1 and 3.4.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to air quality would occur that is not analyzed in the PEIR.

PD-3.6: 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 – 1-5 CUL – 8	CUL - 2	SU	No	Yes
Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	LTS	Impact CUL-3, p. 3.5-17	Yes	CUL – 1-6 CUL – 8	NA	LTS	No	Yes
Impact CUL-4: Disturb Human Remains	LTS	Impact CUL-4, p. 3.5-18	Yes	NA	NA	LTS	No	Yes

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

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

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

Discussion

According to a records check completed by the Northwest Information Center (NWIC), there are two known historic-period resources with archaeological components within the project site on the Wunderlich property and six more adjacent to, or outside of, the project sites primarily on the Wunderlich property. Also, there are three historic-period resources with built components located adjacent to, or outside of, the project site. There are no known or previously recorded Native American archaeological resources within or adjacent to the project sites. Due to confidentiality requirements, the archaeological survey report is available upon request to qualified personnel.

In addition, CAL FIRE Associate State Archaeologist, Ben Harris, was consulted during the planning phase of this project on January 20, 2021, a letter was written to the geographically affiliated tribes on April 1, 2021, and a full

Confidential Archaeological Addendum (CAA) was completed and submitted to the NWIC upon submittal of the CalVTP PSA.

Impact CUL-1

Initial and maintenance treatments would include the use of mechanical equipment. The potential for these treatments to cause a substantial adverse change in significance to built historical resources was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, page 14-15). The potential to change the significance of built historical resources during project operations is within the scope of the PEIR because the treatment activities and level of disturbance are consistent with those addressed in the PEIR. Applicable SPR's will be implemented and require the following: an archaeological and historical resource records search will be conducted (SPR CUL-1), identified built historic resources will be avoided through the implementation of a 100 foot buffer for mechanical treatment activities (SPR CUL-7), and all crew members and contractors will be trained on the protection of sensitive archaeological, historical, or tribal cultural resources and avoidance measures for encountered or discovered archaeological resources (SPR CUL-8). The records search did not return any recorded or known built historical resources within the project areas.

Based on the implementation of the applicable SPR's and archaeological protocols for this project, it is likely that any impact that may cause a substantial adverse change in the significance of a built historical resource would be less than significant.

Impact CUL-2

Initial and maintenance treatments would include the use of heavy equipment that may disturb the soil. The potential for these treatment activities to result in inadvertent discovery of unique archaeological resources or subsurface historical resources was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, page 15-16). The potential for there to be an inadvertent discovery of unique archaeological resources or subsurface historical resources is within the scope of the activities and impacts discussed in the PEIR because the treatment activities and the extent of ground disturbance of the treatment project are consistent with those analyzed in the PEIR. The project proponent will implement SPR CUL-1 through CUL-5 and CUL-8 to minimize the risk of inadvertently damaging or discovering unknown resources during treatment activities. The applicable SPR's require the following: an archaeological and historical resource records search will be conducted (SPR CUL-1), all geographically affiliated California Native American Tribes will be notified of the treatment activities (SPR CUL-2), pre-field research will be conducted (SPR CUL-3), a site-specific archaeological survey will be conducted and survey reports will be completed (SPR CUL-4), consultation with culturally affiliated tribes will occur if cultural resources are identified and cannot be avoided to develop protection measures for the resource(s) (SPR CUL-5), and all crew members and contractors will be trained on the protection of sensitive archaeological, historical, or tribal cultural resources and avoidance measures for encountered or discovered archaeological resources (SPR CUL-8). Mitigation Measure CUL-2 will also be implemented to further minimize impacts on unknown unique archaeological or subsurface historical resources by ceasing all activities within 100 feet of the discovered resource(s) until a qualified archaeologist is contacted and determines the significance of the find.

Although the implementation of the protocol and avoidance measures, SPRs, and mitigation measure will reduce the risks of this impact, unknown resources could be inadvertently damaged. Therefore, this impact would remain significant and unavoidable, as stated in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, page 16).

Impact CUL-3

Initial and maintenance treatments would include mechanical treatment, which would result in ground disturbing activities. The potential for treatment activities to cause a substantial adverse change in the significance of a tribal cultural resources was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, page 16-17). The potential for adverse effects to tribal cultural resources during implementation of the treatment project is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and level of ground disturbance are consistent with those analyzed in the PEIR. The implementation of SPR CUL-1 through CUL-6 and CUL-8 would minimize the potential for impacting tribal cultural resources. The applicable SPR's require the following: an archaeological and historical resource records search will be conducted (SPR CUL-1), all geographically affiliated California Native American Tribes will be notified of the treatment activities (SPR CUL-2), pre-field research will be conducted (SPR CUL-3), a site-specific archaeological survey will be conducted and survey reports will be completed (SPR CUL-4), consultation with culturally affiliated tribes will occur if cultural resources are identified and cannot be avoided to develop protection measures for the resource(s) (SPR CUL-5), consultation with

geographically affiliated tribes will occur if cultural resources are identified in the treatment areas to develop protection measures for the resource(s) (SPR CUL-6), and all crew members and contractors will be trained on the protection of sensitive archaeological, historical, or tribal cultural resources and avoidance measures for encountered or discovered archaeological resources (SPR CUL-8).

An information request letter was sent out to the geographically affiliated tribes on April 1, 2021 and no responses were received as of May 1, 2021. There are currently no known tribal cultural resources in the project area.

Based on the implementation of the applicable SPR's and the results from consulting with geographically affiliated tribes, it is likely that this project's potential to create an adverse change in the significance of tribal cultural resources is less than significant.

Impact CUL-4

Initial and maintenance treatments would include mechanical treatments utilizing heavy equipment, which would result in ground disturbing activities. The potential for treatment activities to uncover human remains was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.5.3, page 17). The potential for human remains to be uncovered during the implementation of the treatment project is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and the level of ground disturbance are consistent with those analyzed in the PEIR. As stated in the PEIR, this project would comply with the California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097, which indicate that if human remains are discovered, there shall be no further disturbance or excavation of the site and the human remains shall be left undisturbed. There are no SPR's or MM's for this impact.

Based on this project's compliance with the California Health and Safety Code Sections 7050.5 and 7052 in addition to PRC Section 5097, any impact to discovered human remains is expected to be less than significant.

New Archaeological, Historical, and Tribal Cultural Resource Impacts

The proposed treatment is consistent with the treatment types and activities considered in the PEIR. The project proponent has considered the site-specific characteristics of the treatment project and determined they are consistent with the environmental and regulatory setting conditions discussed in the PEIR (CalVTP Final PEIR, Volume II, 3.5.1 and 3.5.2). No changed circumstances would lead 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 addressed in the PEIR.

PD-3.7: 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	LTS	Impact BIO-1, pp 3.6-131–3.6.138	Yes	BIO – 1 BIO – 2 BIO – 9 GEO – 1 GEO – 3-5 GEO - 7	None	LTS	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTS (all wildlife species except bumble bees) S&U (bumble bees)	Impact BIO-2, pp 3.6-138–3.6-184	Yes	BIO – 1-5 BIO – 9 BIO – 12 GEO – 1 HAZ – 5 HAZ – 6 HYD – 1 HYD – 4 HYD – 5	BIO – 2a BIO – 2b BIO – 2c BIO – 2g BIO – 3a BIO – 3b BIO – 3c	LTS (all wildlife except bumble bees) PSU (western bumble bee)	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function	LTS	Impact BIO-3, pp 3.6-186–3.6-191	Yes	BIO – 1-6 BIO – 9 HYD – 4	BIO – 3a BIO – 3b BIO – 3c	LTS	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTS	Impact BIO-4, pp 3.6-191–3.6-192	No	None	None	No impact	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTS	Impact BIO-5, pp 3.6-192–3.6-196	Yes	BIO – 1 BIO – 4 BIO – 5 BIO – 10 HYD – 1 HYD – 4	BIO - 5	LTS	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197–3.6-198	Yes	BIO – 1-5 BIO – 12	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	No Impact	Impact BIO-7, pp 3.6-198–3.6-199	Yes	AD – 3	NA	No impact	No	Yes

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	No Impact	Impact BIO-8, pp 3.6-199–3.6-200	No	NA	NA	No impact	No	Yes

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

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

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

Discussion

Per SPR BIO-1, a data review of project-specific biological resources and reconnaissance survey of the project area were conducted. The CalVTP Final PEIR Appendix BIO-3 Tables 1a and 1b were used to identify species known or with potential to occur within the Central California Coast ecoregion and their associated California Wildlife Habitat Relationship (CWHR) types that may be present within or in proximity to treatment areas. The CNDDB BIOS 5 and the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California database were used to identify the state and federally listed species that may be present within 5 miles of the Huddart County Park and Wunderlich County Park property boundaries. The search yielded 48 federal and state threatened, endangered, or candidate species, CDFW species of special concern and candidate species, and the CNPS's California Rare Plant Rank (CRPR) List 1 and 2. The species reviewed are listed and impacts to each species are analyzed within the "Biological Resources Species List" (Attachment #3). In a memorandum written on January 28, 2021, the San Mateo County Parks Natural Resources Manager concurs with the findings of biological resources likely to occur within the project areas (Attachment #4). From the complete list of species, eleven of the special-status plants and twelve of the special-status wildlife were determined to have potential to occur or are known to occur within the property boundaries (Table BIO-1). A biological resources survey will be conducted prior to operations and the appropriate agency will be notified if any rare, threatened, or endangered (RTE) species are discovered.

A map delineating vegetation types and potential sensitive habitats or natural communities within the treatment areas was developed using CAL FIRE's Fire and Resource Assessment Program (FRAP) vegetation layer in combination with aerial photos and field verification points per SPR BIO-3 (Attachment #1, Map 3 and Map 4). Huddart County Park treatment areas contain the following vegetation types according to CAL FIRE's FRAP data, aerial photos, and field verification points: redwood (48.6%), Douglas-fir (37.4%), coastal scrub (5.4%), coastal oak woodland (4.5%), and mixed chaparral (4.1%) (Attachment #1, Map 5). Wunderlich County Park treatment areas include the following vegetation types according to CAL FIRE's FRAP data, aerial photos, and field verification

points: Douglas-fir (67.3%), coastal oak woodland (22.8%), redwood (2.9%), coastal scrub (2.3%), montane hardwood (1.9%), eucalyptus (1%), valley oak woodland (0.8%), annual grassland (0.8%), and barren (0.2%) (Attachment #1, Map 6).

Table BIO-1: Special-Status Plant and Wildlife Species with Potential to Occur within the Property Boundaries

Species	Listing Status			Habitat	Potential for Occurrence
	Federal	State	CRPR		
Special-Status Plants					
Allium peninsulare var. franciscanum (Franciscan onion)	--	--	1B.2	This species grows in clay soils on dry hillsides within coastal communities, usually below 300 meters elevation.	May occur. The Wunderlich County Park property may contain potentially suitable habitat for this species.
Amsinckia lunaris (bent-flowered fiddleneck)	--	--	1B.2	This species grows in openings on gravelly slopes of serpentine soils and favors valley grassland and foothill woodland communities usually under 800 meters elevation.	May occur. The project properties may contain potentially suitable habitat for this species.
Arctostaphylos andersonii (Anderson's manzanita)	--	--	1B.2	This species grows in openings in redwood forests or near forest edges, usually below 700 meters elevation. Anderson's manzanita favors hot areas in broadleaved upland forests, chaparral communities, and North coast coniferous forests.	Known to occur within the Wunderlich County Park property boundary in two locations: below the west-most utility line and overlapping with one treatment area along the southern property line.
Arctostaphylos regismontana (King's mountain manzanita)	--	--	1B.2	This species grows in openings on granite or sandstone outcrops with fast-draining soils. The King's mountain manzanita favors full sun and low moisture habitats within chaparral, broadleaf, or coniferous forests.	Known to occur within the Huddart County Park property boundary along King's Mountain Road where CNDDB data shows potential occupied area overlap with treatment areas. There are several occurrences located within Wunderlich County Park, which are predominately located centrally within the property and near the northeastern property corner.
Cirsium fontinale var. fontinale (fountain thistle)	E	E	1B.1	This species grows in openings in serpentine wetlands or seeps. The fountain thistle favors elevations between 45 and 175 meters in chaparral, valley grassland, and wetland-riparian communities.	May occur. The Huddart County Park property may contain potentially suitable habitat for this species.

Collinsia multicolor (San Francisco collinsia)	--	--	1B.2	This species grows in shaded, moist habitats in northern coastal scrub, closed-cone pine forests, and coastal chaparral scrub communities between 30 and 180 meters elevation.	May occur. The treatment areas and project properties contain potentially suitable coastal chaparral scrub habitat for this species.
Dirca occidentalis (western leatherwood)	--	--	1B.2	This species grows in moist locations with partial shade. The western leatherwood can be found in riparian or wetland habitats within chaparral, cismontane woodlands, north coast coniferous forests and broadleaved upland forests	May occur. The treatment areas and project properties contain potentially suitable riparian, chaparral, and cismontane woodland habitats for this species.
Malacothamnus arcuatus (arcuate bush-mallow)	--	--	1B.2	This species favors habitats in early-successional or post-burn slopes within chaparral and cismontane woodland communities between 15-355 meters elevation.	May occur. The treatment areas and project properties contain potentially suitable chaparral and cismontane woodland habitats for this species.
Monolopia aracilens (woodland woollythreads)	--	--	1B.2	This species grows in openings of grasslands, chaparral, redwood forests, and oak woodland communities. The woodland woollythreads favors serpentine soils between 100 and 1200 meters elevation.	Known to occur within the Wunderlich County Park property boundary outside of the treatment areas along the Oak Trail. However, the November 2020 CNDDB data download shows potential occupancy for this species as the entire Wunderlich property boundary, ultimately overlapping with treatment areas.
Plagiobothrys chorisianus var. chorisianus (Choris' popcornflower)	--	--	1B.2	This species grows in moist, grassy areas in wetlands or ephemeral drainages. The Choris' popcornflower favors coastal prairie, chaparral, northern coastal scrub, and wetland-riparian communities below 240 meters elevation.	May occur. The Huddart County Park property may contain potentially suitable habitat for this species.
Trifolium amoenum (two-fork clover)	E	--	1B.1	The two-fork clover grows in moist, heavy soils in disturbed areas within valley grassland and wetland-riparian communities below 100 meters elevation.	May occur. The Wunderlich County Park property may contain potentially suitable habitat for this species.

Special-Status Wildlife					
Ambystoma californiense (California tiger salamander)	E	WL	--	This species favors habitats in grasslands and low foothills with vernal pools or ponds for breeding. The California tiger salamanders spend much of their time in burrows underground, where they enter a dormant stated called estivation during summer months.	May occur. The treatment areas and property boundaries contain potentially suitable grassland and pond habitat for this species.
Aneides niger (Santa Cruz black salamander)	--	SSC	--	This species occurs in mixed deciduous woodland, coniferous forests, and coastal grasslands in California. This species can be found in riparian areas near streams and under damp debris, but do not inhabit streams.	Known to occur within Huddart County Park property boundaries within McGarvey Gulch Creek where potential occupied habitat extends into treatment areas.
Antrozous pallidus (pallid bat)	--	SSC	--	This species favors rocky outcrops in semi-arid climates within grasslands, chaparral, oak woodlands, and coniferous forests. The pallid bat diet consists of ground-dwelling prey like small mammals or reptiles and large flying or ground-dwelling insects	May occur. The treatment areas and property boundaries contain potentially suitable rocky outcrops within chaparral, grassland, and coniferous forest habitat for this species.
Bombus occidentalis (western bumble bee)	--	CE	--	This is a pollinator species that associates with a wide range of flowering plants and crops within open coniferous, deciduous, and mixed-woodland forests, wet and dry meadows. The western bumble bee is capable of foraging in cold, rainy weather conditions and commonly nests underground.	May occur. The treatment areas and property boundaries contain potentially suitable coniferous and mixed-woodland forest, and meadow habitat for this species.
Corynohinus townsendii (Townsend's big eared bat)	--	SSC	--	This species favors dense coniferous forests, native prairies, and coastal communities usually below 3,300 meters elevation. This bat prefers dark, open caves or cliffs in cold areas for roosting and does not roost in rock crevices.	Known to occur within the Wunderlich County Park property boundary near the eastern park entrance where CNDDB data shows the potential occupied area that overlaps with treatment areas.
Danaus plexippus	--	CE	--	The monarch butterfly requires dense tree cover	May occur. The Wunderlich County Park treatment areas

(monarch butterfly)				for overwintering and often use eucalyptus trees, specifically *Eucalyptus globulus,* or blue gum eucalyptus. This species is intolerant to frost and feeds on milkweeds, which makes the monarchs poisonous to predators.	are in proximity to or contain an overwintering host species that may contain potentially suitable habitat for this species.
Dicamptodon ensatus (California giant salamander)	--	SSC	--	The California giant salamander requires habitat with cover for hiding, sun protection, and breeding and can be found under rocks, logs, or stones. This species' aquatic habitat consists of lakes, ponds, rivers, streams, or fast-moving water.	May occur. The treatment areas and property boundaries contain potentially suitable pond and stream habitat with coverage for this species.
Emys marmorata (western pond turtle)	--	SSC	--	The habitat for this species consists of aquatic and terrestrial environments, including lakes rivers, streams, ponds, wetlands, vernal pools, creeks, reservoirs, agricultural ditches, estuaries, and brackish waters. Adults favor deep waters while juveniles favor shallow waters, however, both prefer slow moving water. Terrestrial habitats consist of burrows in leaves or soil during the winter season. Nests are built away from water in flat areas with short vegetation and dry soils.	May occur. The treatment areas and property boundaries contain potentially suitable stream, pond, and terrestrial habitat for this species.
Neotoma fuscipes annectens (San Francisco ducky-footed woodrat)	--	SSC	--	This species prefers moderate canopy coverage in oak woodland, chaparral or shrubland, and coniferous forest communities.	May occur. The treatment areas and property boundaries contain potentially suitable oak woodland, chaparral or shrubland, and coniferous forest habitat for this species.
Puma concolor (mountain lion)	--	CE	--	This species prefers dense vegetative areas within mountain ranges of coniferous forests, scrub and oak woodlands, and arid communities.	May occur. The treatment areas and property boundaries contain potentially suitable coniferous forest and oak woodland habitat for this species.

Rana draytonii (California red-legged frog)	E	SSC	--	Common habitat consists of locations near ponds or along streams in humid forests, grasslands, and coastal scrub communities that contain plant cover. This species breeds in permanent water sources and requires moist refuges, like animal burrows, for cover in the dry season.	Known to occur within the Huddart property boundary near the northern half of the eastern property line where habitat expands from the West Union Creek. CNDDB data shows the potential occupied area overlapping treatments areas.
Thamnophis sirtalis tetrataenia (San Francisco garter snake)	E	E	--	This species favors openings in grasslands or wetland areas near ponds, marshes, or sloughs and is capable of swimming. During the dry season, the San Francisco gartersnake may become dormant in rodent burrows.	May occur. CNDDB data shows four unspecified occurrences for this species located in the Woodside Quadrangle that contains both project properties. However, the habitat is unfavorable within the treatment areas.

CE – Candidate Endangered

E – Endangered

SSC – CDFW Species of Special Concern

WL – Watch List

CRPR

1B - Plant species rare or endangered in California and elsewhere (Not protected under ESA or CESA)
0.1 - Seriously threatened in California (over 80% of occurrences are threatened; high degree and immediacy of threat)

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

Impact BIO-1

Initial treatment and maintenance treatments include the use of mechanical treatment and may include herbicide application, which could result in direct or indirect adverse effects to special-status plant species due to the project areas containing potentially suitable habitat for some species. The potential for adverse effects to special-status plants is within the scope of the activities and impacts addressed in the PEIR because the activities and level of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. Mechanical treatments and herbicide application may directly or indirectly impact special-status species; however, the removal of understory vegetation and invasive species will promote the regeneration of native species that supports a healthier residual forest. Applicable SPR's include the following requirements: biological resources will be reviewed and surveyed (SPR BIO-1), crew members and contractors will be trained on applicable biological resources (SPR BIO-2), invasive species spread will be prevented (SPR BIO-9), disturbance will be suspended during heavy precipitation (SPR GEO-1), disturbed soil areas exhibiting bare soil over 50% or more of the treatment area will be stabilized with mulch or organic matter produced from mastication (SPR GEO-3), erosion will be monitored by the project proponent through an inspection for proper implementation of applicable SPR's and mitigations prior to the rainy season and an inspection of the treated areas for evidence of erosion after the first large storm or rainfall event (SPR GEO-4), compacted treatment areas will be drained via water breaks (SPR GEO-5), erosion will be minimized through heavy equipment and slope limitations (SPR GEO-7), and herbicide application will not occur within protective buffers for special-status plants to prevent drift and non-target application (SPR HAZ-5).

Special-Status Plants
According to the CNDDB BIOS search, there are three special-status plant species that occur within the project properties (Anderson's manzanita, King's mountain manzanita, and woodland woollythreads) and three special-status plants that have potentially suitable habitat located within treatment areas (San Francisco collinsia, western leatherwood, and arcuate bush-mallow). However, there are no known special-status plant species occurrences within the treatment areas. An analysis for the potential for impact on each special-status plant species that may occur within 5 miles of the project property boundaries has been completed (Attachment #3).

Based on the implementation of the SPR's and MM's listed above, including survey protocols and pre-operational meetings, and the proximity of special-status plant species to the treatment areas, it is likely that any impacts to special-status plant species would be less than significant.

Impact BIO-2
Initial treatments and maintenance treatments include the use of mechanical treatment and may include herbicide application, which could result in direct or indirect adverse effects to special-status wildlife species or habitat due to the project areas containing potentially suitable habitat for some listed species. The potential for adverse effects to special-status wildlife species is within the scope of the activities and impacts addressed in the PEIR because the activities and level of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. Mechanical treatments and herbicide application will result in reduced understory vegetation that may modify preferred habitats for some species, however, it will promote a healthier, native residual forest habitat. SPR BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-9, GEO-1, HAZ-5, HAZ-6, HYD-1, HYD-4, and HYD-5 will be implemented to minimize impacts, however, the mitigation measures listed below would need to implemented to reduce impact significance. The applicable SPR's require the following: biological resources will be reviewed and surveyed (SPR BIO-1), crew members and contractors will be trained on applicable biological resources (SPR BIO-2), if sensitive natural communities or habitats cannot be avoided, then a protocol-level survey will be conducted to identify and map the limits of the potentially sensitive area (SPR BIO-3), treatments will be designed to avoid loss or degradation of riparian habitat function including retaining a minimum of 75% overstory and 50% understory canopy (SPR BIO-4), avoid type conversion and maintain habitat function in chaparral and coastal sage scrub communities through treatment design and a minimum of 35% relative cover of native chaparral and coastal sage scrub communities will be retained (SPR BIO-5), implement mitigations to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (SPR BIO-9), suspend mechanical and herbicide treatments during heavy precipitation (SPR GEO-1), develop a Spill Prevention and Response Plan (SPR HAZ-5), obtain all required licensing and permitting for herbicide application through the San Mateo County Agricultural Commissioner's office (SPR HAZ-6), comply with water quality regulations including vegetation and land disturbance related Waste Discharge Requirements (SPR HYD-1), identify and protect WLPZ's (SPR HYD-4), and protect non-target vegetation and special-status species from herbicides (SPR HYD-5).

Special-Status Wildlife
According to the CNDDB BIOS search, there are three special-status wildlife species that occur within the project properties (California red-legged frog, Santa Cruz black salamander, and Townsend's big eared bat) and seven special-status wildlife species that have potentially suitable habitat within the project areas or project properties (California tiger salamander, California giant salamander, pallid bat, western bumble bee, western pond turtle, San Francisco dusky-footed woodrat, and mountain lion). However, there are no known special-status wildlife species occurrences within the treatment areas. These species are categorized into the following life history groupings: Amphibians and Reptiles, Bats, Burrowing or Denning Wildlife, Insects and Other Terrestrial Invertebrates, and Ground-Nesting Wildlife. Mitigation Measures BIO-2a, BIO-2b, BIO-2c, BIO-2g, BIO-3a, BIO-3b, and BIO-3c will be applied based on the life history groupings to minimize residual impacts after the application of the SPR's. An analysis for the potential for impact on each special-status wildlife species that may occur within 5 miles of the project property boundaries has been completed (Attachment #3).

California Red-Legged Frog

The California red-legged (*Rana draytonii*) frog is listed as federally threatened and is a California Species of Special Concern. The California Natural Diversity Database (CNDDB) indicates that California red-legged frog occurs in West Union Creek touching the eastern property boundary of Huddart County Park. Project treatment areas are not within 300 feet of West Union Creek in Huddart County Park and are focused on ridges, and flat areas near ridges. This species was not discovered in the project area during preparation of this Project Specific Analysis (PSA), no additional suitable breeding habitat was found in the proposed treatment areas, and dispersal through the treatment areas are unlikely.

The Wunderlich THP, approved in 2019, indicates a red-legged frog occurrence for Wunderlich County Park, considered possibly extirpated, in San Francisquito Creek approximately .9 miles away. In addition, this occurrence currently shows as "Possibly Extirpated" in a 5-mile radius search of Wunderlich County Park on CNDDB. There is one cement lined, fenced pond (approximately 80' x 30') in Salamander Flat on Wunderlich County Park that is adjacent to project treatment areas that will receive a reconnaissance level survey prior to operations. Project treatment areas in Wunderlich County Park are focused on ridges, and flat areas near ridges, that are a significant distance away from any Watercourse and Lake Protection Zone. This species was not discovered in the project area during the preparation of this PSA, no additional suitable breeding habitat was found in the proposed treatment areas, and dispersal through the treatment areas are unlikely.

Reconnaissance level surveys will be conducted prior to operations at Huddart and Wunderlich County Park to determine occupancy of this species. Periodic reconnaissance level surveys will continue at both locations throughout the life of this PSA by San Mateo County Parks Staff.

This Project Specific Analysis occurs within the historic range of California red-legged-frog, so we assume presence unless protocol level surveys demonstrate absence. The following scenarios describe conditions for which take is not likely to occur when presence is known or assumed for timber harvesting plans; provided by "Information Needs and Guidelines for Timber Harvesting Plans (THPs) for US Fish and Wildlife Service Technical Assistance Analysis California Red-legged Frogs (CRF) (USFWS, March 2008). This Project Specific Analysis, although not a timber harvesting plan, utilizes the USFWS March 2008 guidelines scenarios to describe conditions for which take is not likely to occur when presence is known or assumed since some level of ground disturbing activities may occur through understory mastication:

I. Scenario I: No suitable habitat with harvest units and within 2 miles of harvest units
II. Scenario II: Suitable habitat within 2 miles of harvest units or in units, but no harvest activities within 300 feet of suitable habitat.
III. Scenario III: Suitable habitat within 2 miles of harvest units or in units and harvest activities planned within 300 feet of suitable habitat during the wet season. No take is estimated under the following conditions:
    i. For Class III watercourse, when dry, maintain a 30-foot buffer, trees felled away from watercourse.
    ii. For Class II watercourses and intermittent ponds/wetlands that meet the definition of suitable habitat, where water is present, 300 foot no cut buffer, where dry, 30-foot no cut buffer, no equipment within 75 feet of annual high water mark, trees felled away from suitable habitat.
    iii. Class I watercourse and permanent ponds/wetlands that mee the definition of suitable habitat – no cutting and no equipment with 300 feet of this suitable habitat.
IV. Scenario IV. Suitable habitat within 2 miles of harvest units or in units and harvest activities planned within 300 feet of suitable habitat during the dry season.
    i. All Suitable habitat must maintain a 30-foot no-cut buffer; no equipment within the no-cut buffer; trees felled away from suitable habitat

Scenario II described above shall be used. As stated, the nearest suitable habitat is located adjacent to San Francisquito Creek approximately 0.9 miles to the east of Wunderlich County Park and more than 300 feet away from treatment areas at Huddart County Park.

Based on the survey protocols and pre-operational meetings, the proximity of special-status wildlife species to treatment areas, and the implementation of the SPR's and Mitigation Measures it is likely that this project will result in a less than significant impact on all wildlife species, except for bumble bees, whose impact would remain potentially significant and unavoidable due to the difficulty in detecting overwintering and nesting bumble bees as addressed in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, page 171).

Impact BIO-3

Initial and maintenance treatments include mechanical treatments and may include herbicide application, which could result in direct or indirect adverse effects to sensitive habitats, including designated sensitive natural communities and oak woodlands. The potential for treatment activities to result in adverse effects to sensitive habitats was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, page 187-192). The potential for adverse effects to sensitive habitats is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and level of disturbance as a result of the treatment activities are consistent with those analyzed in the PEIR. The SPR's that apply to this impact are SPR BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-9, and HYD-4.

Table 3.6-3 in the PEIR (Volume II) for the Central California Coast ecoregion was reviewed and it was determined that the coastal oak woodland, mixed chaparral, redwood, Douglas-fir, and annual grassland California Wildlife Habitat Relationships (CWHR) classifications may be present within or in proximity to the treatment areas. Treatments are proposed within the mixed hardwood forests, redwood, Douglas-fir, and coastal oak woodland habitats. Therefore, SPR BIO-3 will be implemented and requires site-specific surveys and mapping sensitive natural communities within these habitat types (Attachment #1, Map 7 and Map 8).

Sensitive Natural Communities

Coastal Oak Woodlands

According to CAL FIRE FRAP vegetation data in combination with aerial photos and field verified vegetation points, which suggest that there is less acreage of oak woodland within the treatment areas than determined by the FRAP data, there is approximately 305.8 acres of coastal oak woodland present in Huddart and Wunderlich County Parks, or approximately 85.6 acres and 220.2 acres respectively. The treatment areas contain a total of approximately 51.4 acres of coastal oak woodland, or approximately 17% of the total acreage present on both project properties. Huddart County Park has approximately 11.2%, or 9.6 acres, of coastal oak woodland within the treatment areas, and Wunderlich County Park has approximately 19%, or 41.8 acres, of coastal oak woodland located within the treatment areas (Attachment #1, Maps 5, 6, 7, and 8).

Due to the treatment areas containing coastal oak woodlands, or the Coast Live Oak Alliance, as defined in the *Manual of California Vegetation,* Mitigation Measure BIO-3a applies to the proposed project (Sawyer et al., 2009 and CNPS, 2019). Mitigation Measure BIO-3a requires the following: the fire return interval for the specific natural community type or alliance must be determined, treatments must be designed to restore the natural fire return regime and return vegetation composition and structure to their natural condition, avoid creating fuel breaks in sensitive natural communities with rarity ranks S1 and S2 where feasible, and more than 20% of the native vegetation relative cover from a stand of sensitive natural communities with rarity rank S3 or in oak woodlands will not be removed by fuel breaks.

The proposed treatments will occur within coastal oak woodlands that are outside of their natural fire regime, defined as short-medium interval or approximately 30-100 years (Sugihara et al., 2006 and CNPS, 2019). The lack of fires within the project areas appears to have influenced some level of oak woodland habitat conversion that is at different levels of progression throughout the oak woodland areas evaluated during field verification. The

natural fire regime will not be immediately restored by this treatment, but characteristics of fire, predominantly regenerative action following vegetation treatments and ladder fuel alteration, will be conducted through mastication of understory vegetation, live trees up to 8 inches DBH, and dead, dying, and diseased trees to create a shaded fuel break that will promote the health and resiliency of the residual stand where approximately 80% of the native vegetation cover will be maintained. In treatment areas where multiple age classes are represented, the proposed treatment will promote heterogeneity, resiliency, and health in the residual stand by creating different influences of sunlight through the canopy to the forest floor adding to a mosaic of diversity in the understory. Treatments will not occur within S1 or S2 communities.

Redwood Forest

According to CAL FIRE FRAP vegetation data in combination with aerial photos and field verification points, there is approximately 595.9 acres total of redwood forest present within Huddart and Wunderlich County Parks, or approximately 428.8 acres and 167.1 acres respectively. The treatment areas contain a total of approximately 111.5 acres of redwood forest, or approximately 18.7% of the total redwood acreage present on both project properties. Huddart County Park has approximately 24.8%, or 106.2 acres, of redwood forest within the treatment areas, and Wunderlich County Park has approximately 3.2%, or 5.4 acres, of redwood forest located within the treatment areas (Attachment #1, Maps 3, 4, 5, and 6).

Due to the treatment areas containing redwood forest, or the Redwood Forest and Woodland Alliance with a rarity rank of S3.2, as defined in the *Manual of California Vegetation,* Mitigation Measure BIO-3a would apply to the proposed project; however, this project falls under the exception of Mitigation Measure BIO-3a due to the determination of a qualified registered professional forester (RPF) that this area would benefit from the proposed treatments (Sawyer et al., 2009 and CNPS, 2019). The exception to the Mitigation Measure BIO-3a approach states that is acceptable only 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 and it shall be demonstrated in the PSA that the treatment will be beneficial with substantial evidence that habitat function is expected to improve, as outlined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, pages 151 and 152).

The proposed treatments will occur in the redwood forest type that is defined to have a variable fire return interval that depends on the site conditions and has an average of approximately 50 years in redwood forests similar to those within Big Basin Redwoods State Park (Sugihara et al., 2006 and CNPS, 2019). Although redwoods are a fire adapted species, ecological restoration treatments often include fuel reductions to develop a forest stand more resistant to catastrophic fires (O'Hara et al., 2017). Redwood forests can be at a disadvantage if they experience too much or too little fire frequency or intensity (Thornburgh et al., 2000). Studies have shown that thinning treatments in second growth redwood forests exhibit an increase in growth up to approximately four times than un-thinned or treated areas, developing old growth characteristics more rapidly (Thornburgh, et al., 2000). The development of old growth characteristics, such as stimulated branch growth, as a result of thinning treatments may increase habitat quality and quantity for species that rely on old grow characteristics (Keyes, 2011). Similarly, studies utilizing local forest inventory and the Forest Vegetation Simulator in the Santa Cruz Mountains have suggested a benefit to most ecologically restorative treatments that focus on an understory thinning up to 12 inches in diameter (Cal Poly SPR, 2021 and FVS, 2021).

The natural fire regime will not be immediately restored by this treatment, but characteristics of fire, predominantly regenerative action following vegetation treatments and ladder fuel alteration, will be conducted through mastication of understory vegetation, live trees up to 8 inches DBH, and dead, dying, and diseased trees to create a shaded fuel break that will promote the health and resiliency of the residual stand where approximately 80% of the native vegetation cover will be maintained. In treatment areas where multiple age classes are represented, the proposed treatment will promote heterogeneity, resiliency, and health in the residual stand by creating different influences of sunlight through the canopy to the forest floor adding to a mosaic of diversity in the understory. Treatments will not occur within S1 or S2 communities.

Based on the research above and years of experience managing redwood forests, Steve Auten, RPF #2734, has determined that the redwood forests within the San Mateo County Parks Huddart and Wunderlich properties would benefit from ecological restoration and WUI fuel reduction treatment types implemented by this project.

Chaparral and Coastal Scrub Communities
The treatment areas contain chaparral and coastal scrub communities that are defined as the Lower Montane Mixed Chaparral Alliance in the *Manual of California Vegetation* (Sawyer et al., 2009 and CNPS, 2019). There is approximately 25.3 acres of chaparral and coastal scrub communities within the treatment areas.
SPR BIO-5 requires that under the ecological restoration treatment type, complete removal of the chaparral and coastal sage scrub vegetation types will not occur, ecological restoration treatments will not occur in vegetation types within their natural fire regime, and a minimum of 35% relative cover of existing shrubs and associated native vegetation will be retained in a mosaic pattern or shrub canopies will be thinned by no more than 20% from baseline density.

The proposed treatments will occur in approximately 25.3 acres of chaparral and coastal scrub vegetation that is outside of its natural fire regime, which is defined as truncated medium, or approximately 25-75 years (Sugihara et al., 2006) (Attachment #1, Map 7 and Map 8). Vegetation types with truncated medium fire return intervals often occur in fire adapted vegetation types, where fires that occur outside of the interval often result in vegetation type conversion (Sugihara et al., 2006). The lack of fires within the project areas appears to have influenced some level of chaparral and coastal sage scrub habitat conversion through the encroachment of Douglas-fir confirmed during field verification of treatment areas. The natural fire regime will not be immediately restored by this treatment, but characteristics of fire, predominantly the regenerative action following vegetation treatment and removal of small Douglas-fir trees, will be conducted through mastication of understory vegetation, dead, dying, and diseased trees, and live trees up to 8 inches DBH to create a shaded fuel break/fuel break that will promote the health and resiliency of the residual stand where approximately 35% of the native vegetation cover will be maintained. The proposed treatment will promote heterogeneity, resiliency, and health in the residual stand by creating different influences of sunlight to this vegetative type adding to a mosaic of diversity. The mosaic pattern of vegetation will retain suitable habitat for wildlife and minimize the potential for erosion following treatments.

This project proposes all operations to occur outside of the Watercourse and Lake Protection Zone (WLPZ), however, riparian vegetation may be present outside of the WLPZ. The treatment prescriptions propose the removal of most understory vegetation, dead, dying, and diseased trees, and live trees up to 8 inches. Any sensitive habitat or species will be flagged and avoided. The following MM's will be implemented to reduce potentially significant impacts on sensitive habitats and riparian vegetation and compensate for the loss of these habitats: MM BIO-3a, BIO-3b, BIO-3c.

Based on the treatment prescription, survey protocol and pre-operational meetings, and the implementation of the applicable SPR's and MM's, it is likely that any impact to riparian habitat or other sensitive natural communities would be less than significant

Impact BIO-4
Impacts to designated wetlands does not apply to the proposed project because initial and maintenance treatments will not occur in designated wetlands. Therefore, no impact is expected to occur to state or federally protected wetlands as a result of this project.

Impact BIO-5
Initial and maintenance treatments include the use of mechanical treatment that could result in direct or indirect adverse effects to wildlife movement corridors and nurseries because suitable habitat is present within the treatment areas. The potential for treatment activities to result in adverse effects to wildlife movement corridors and nurseries was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, page 193-197). The potential for adverse effects to wildlife movement corridors and nurseries is within the scope of the activities and impacts

addressed in the PEIR because the treatment activities and level of disturbance as a result of the treatment activities are consistent with those analyzed in the PEIR. The applicable SPR's for this proposed project impact include SPR BIO-1, BIO-4, BIO-5, HYD-1, and HYD-4.

The proposed treatment areas may contain essential connectivity areas for some ungulate species and mountain lions as well as habitat for breeding sites or cover. This project proposes the use of mechanical treatment outside of the WLPZ and will comply with overstory cover requirements in riparian areas (SPR BIO-4). MM BIO-5 will be implemented to retain and avoid nursery habitat through the establishment of buffers where necessary. Based on the implementation of SPR's and the MM, it is likely that any impact to wildlife movement corridors and nurseries would be less than significant.

Impact BIO-6

Initial and maintenance treatments include the use of mechanical treatment, which could result in direct or indirect effects resulting in the reduction of habitat or abundance of common wildlife, including nesting birds, because suitable habitat is present in the treatment area. The potential for treatment activities to result in adverse effects to habitat and abundance of wildlife was addressed in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, page 197-199). The potential for adverse effects to common wildlife, including nesting birds, is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and level of disturbance are consistent with those analyzed in the PEIR. The implementation of SPR BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and BIO-12 will reduce the risk of this project resulting in adverse effects to habitat and the abundance of common wildlife.

The CNDDB review for listed species did not return any special-status birds within the project property boundaries, however, it is likely that common native birds may be present within or in proximity to the treatment areas. If it is infeasible for operations to occur outside of the active nesting season of common native birds, including raptors, that may be present in the vicinity of the project site, then a survey will be conducted prior to operations (SPR BIO-12). Nesting bird surveys will be conducted in compliance to the California Forest Practice Rules 14 CCR 919.2 (b), (c), and (d) (paraphrased to fit this specific project and exceeding the standard) which states:

- (b): Nest tree(s), designated perch tree(s), screening tree(s), and replacement tree(s) shall be left standing and unharmed.
- (c): Operations shall be planned and operated to commence as far as possible from occupied nest trees.
- (d): When an occupied nest site of a listed bird species is discovered during operations, operations shall cease, and the nest tree shall be protected applying the provisions set forth in subsections (b) and (c) above and shall immediately notify CDFW and CAL FIRE.

The implementation of these Forest Practice Rules and survey protocols in Biological Resources indicate that any impact to nesting birds would be less than significant.

Based on the survey protocol, nesting survey protocol, and the implementation of the applicable SPR's, it is likely that any impact to the loss of habitat or abundance of wildlife, including nesting birds, would be less than significant.

Impact BIO-7

The potential for treatment activities to result in conflict with local policies or ordinances was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3 page 199). The potential for the proposed project to conflict with local policies or ordinances is within the scope of the activities and impacts addressed in the PEIR because the treatment projects implemented under the CalVTP are required to comply with any applicable county, city, or other local policies, ordinances, and permitting procedures (SPR AD-3) and are consistent with those analyzed in the PEIR.

Initial and maintenance treatments would include the removal of dead, dying, and diseased trees and live trees up to 8 inches DBH, which pertains to the San Mateo County (SMC) Significant Tree Ordinance and San Mateo

County Regulations for the Preservation, Protection, Removal and Trimming of Heritage Trees on Public and Private Property, however, the San Mateo County Parks Department is EXEMPT from permitting under these ordinances.

In addition, this project must comply with the regulations outlined in the SMC Grading and Land Clearing – Grading Regulations, although San Mateo County Parks Department is EXEMPT from these requirements, the CalVTP Standard Project Requirements and Mitigation Measures address environmental concerns that could occur due to mechanized removal of vegetation for forest health and climate resiliency.

The project design also considers the county of San Mateo Resource Management (RM) District Zoning Regulations. Incorporating the CalVTP Standard Project Requirements and Mitigation Measures, provides appropriate environmental relief with respect to the applicable section criteria listed in Chapter 20A.2, including: Environmental Quality Criteria, Site Design Criteria, Water Resources Criteria, Cultural Resources Criteria, Primary Scenic Resources Criteria, Primary Fish and Wildlife Habitat Areas Criteria, Primary Water Resources Area Criteria, and Primary Natural Vegetative Areas Criteria.

Due to the treatment prescription, including the 8 inch DBH limitation for live tree removal, the proposed project will not conflict, or provides appropriate mitigations, with regard to applicable local policies or ordinances as result of treatment activities. Therefore, no impact is expected to occur.

Impact BIO-8

The proposed project treatments are located outside of any habitat conservation plans (HCP) or natural community conservation plans (NCCP). Therefore, this project would not conflict with any HCP's or NCCP's and no impact is expected to occur.

New Biological Resource Impacts

The proposed project treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (CalVTP Final PEIR, Volume II Section 3.6.1 and 3.6.2). no changed circumstances would give rise to 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.

PD-3.8: 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 – 1-5 GEO – 7 GEO – 8 HYD – 4 AD – 3 AQ – 4	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	GEO – 3 GEO – 4 GEO – 7 GEO – 8 AQ – 4	NA	LTS	No	Yes

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

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

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

Discussion

The Department of Conservation Landslide Inventory map was reviewed to identify unstable areas within or in proximity to the treatment areas. In Huddart County Park, there are two dormant mature rockslides that overlap with treatment areas. One is located between two ridges near McGarvey Gulch and the other is on southern side of King's Mountain Road, which borders smaller dormant young and active historic rockslides outside of the property boundary. There are several dormant young rockslides located throughout the Huddart County Park boundaries. In Wunderlich County Park, there does not appear to be any landslide history within treatment areas. However, there are several dormant mature and dormant young rockslides and earth flows located throughout the property boundaries (DOC, 2015). All treatment areas have been field verified and no active unstable areas have been identified within the treatment areas. If a recent or active unstable area is identified during operations, all operations in proximity to the unstable area will cease and the area will be flagged and avoided.

Impact GEO-1

The initial and maintenance treatments include mechanical treatments and may include herbicide application that would disturb topsoil and reduce vegetative cover, which has the potential to increase rates of erosion and topsoil loss. The potential for these treatments to result in substantial erosion and loss of topsoil was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.7.3, page 26-29). The potential impacts are within the scope of the PEIR

because the treatment activities are consistent and will comply with SPR's GEO-1 through GEO-5, GEO-7, GEO-8, HYD-4, AD-3, and AQ-4, which will avoid and minimize the risk of substantial erosion and loss of topsoil. All equipment will be limited to operating on slopes less than 40%, but may utilize access routes that are 50% or less. The average slope of operation throughout the treatment areas ranges from approximately 20-30%. Operations will not occur while soils are saturated to avoid disturbances caused by the removal of vegetation.

Although treatments will remove vegetation and disturb topsoil, the implementations of the SPR's, slope limitations, and soil condition limitations indicate that the potential for this project impact to have substantial erosion and loss of top soil would be less than significant.

Impact GEO-2

The mechanical treatments included in the initial and maintenance treatments will result in the reduction of vegetative cover and affect root structure, decreasing the stability of slopes, which could increase the risk of landslide. The potential for these treatments to increase the risk of landslide was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.7.3, page 29-30). The prescription for these treatments limits mechanical operations to slope equal to or less than 40% and limits equipment access to slopes equal to or less than 50%. The average slope of operation throughout the treatment areas ranges from approximately 20-30%. Equipment will not operate on saturated soils to avoid disturbances caused by the removal of vegetation. This project will comply with SPR's GEO-3, GEO-4, GEO-7, GEO-8, and AQ-4 to avoid or minimize the risk of landslide resulting from these treatment activities.

Based on the equipment operation limitations and implementation of SPR's, the potential for this impact to increase the risk of landslide will be less than significant.

New Geology, Soils, Paleontology, and Mineral Resource Impacts

The proposed treatments are consistent with the treatment types and activities evaluated in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and has determined they are consistent with the environmental and regulatory settings discussed in the PEIR (CalVTP Final PEIR, Volume II, 3.7.1 and 3.7.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact to geology, soils, paleontology, or mineral resources would occur that is not covered in the PEIR.

PD-3.9: 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	GHG – 1	NA	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	PSU	Impact GHG-2, pp. 3.8-11 – 3.8-17	Yes	AD – 3	None	PSU	No	Yes

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

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

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

Discussion

Click or tap here to enter text.

Impact GHG-1

During initial and maintenance treatments, the use of vehicles and mechanical equipment would result in greenhouse gas (GHG) emissions. The potential for these treatments and treatment activities to result in a conflict with the applicable plans, policies, and regulations regarding GHG emissions was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.8.3, page 10-11). The proposed project is consistent with all applicable plans, policies, and regulations related to the purpose of reducing GHG emissions and treatment activities area consistent with those analyzed in the PEIR. The project proponent will comply with SPR GHG-1 to provide all necessary data required by the USFS and FRAP to fulfill AB 1504. The project impacts relating to the consistency of treatments with the applicable plans, policies, and regulations will remain less than significant.

Impact GHG-2

The use of vehicles and mechanical equipment during initial and maintenance treatments would result in GHG emissions. The potential for treatments to generate GHG emissions was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.8.3, page 11-17). In the long-term, the treatment activities are expected to have carbon sequestration benefits and are intended to reduce the risk of wildfire, which would decrease projected GHG emissions. Based on the mechanical treatment in tree fuel type listed in the CalVTP Table 3.8-3, this project is estimated to produce approximately 391 MTCO2e, or 0.92 MTCO2e/ acre. The estimated calculation derived from

the values in the CalVTP PEIR Table 3.8-3 does not include the GHG emissions from vehicle transport, including the transportation of equipment and contractors. CalVTP PEIR Table 3.8-2 indicates that in 2008, the largest fire year displayed in the table, 1.35 million acres burned producing approximately 45.7 MMTCO2. As of October 2020, approximately 4 million acres have burned, which is approximately three times more acres and MMTCO2 produced than in 2008. Implementing the treatment activities for this project would produce significantly less MTCO2 than an average wildfire year and would create an opportunity for wildfire to be stopped or slow the rate of spread. The GHG emissions produced from this treatment project are within the scope of the impacts evaluated in the PEIR because the proposed activities, equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions associated with wildfire are consistent with those analyzed in the PEIR.

Therefore, the potential for the project treatment activities to result in GHG emissions is considered potentially significant and unavoidable, as stated in the PEIR (CalVTP Final PEIR Volume II Section 3.8.3, page 17).

New Impacts Related to GHG Emissions

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined that they are consistent with the environmental and regulatory settings as stated in the PEIR (CalVTP Final PEIR, Volume II, 3.8.1 and 3.8.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact regarding GHG emissions would occur that is not covered in the PEIR.

PD-3.10: ENERGY RESOURCES

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

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

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

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

Discussion

Click or tap here to enter text.

Impact ENG-1

The use of vehicles, mechanical equipment, chainsaws, and other mechanized hand tools during initial and maintenance treatments will result in the consumption of energy. The potential for impacts to result in wasteful, inefficient, or unnecessary consumption of energy and the use of fossil fuels was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.9.3, page 7-8).The consumption of energy during the project treatment activities is within the scope of the impacts addressed in the PEIR because the treatment activities, the equipment and its duration of use, are consistent with those analyzed in the PEIR. There are no applicable SPR's or mitigation measures for this project impact, however, idle time for all equipment will be limited and crews will be encouraged to carpool to reduce the amount of energy consumed throughout the duration of this project. Therefore, the potential for this project to result in significant wasteful, inefficient, or unnecessary energy consumption remains less than significant.

New Energy Resource Impacts

The proposed treatment is consistent with the treatment types and activities discussed in the CalVTP PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined that they are consistent with the regulatory and environmental setting conditions developed in the PEIR (CalVTP Final PEIR, Volume II, 3.9.1 and 3.9.2). No changed circumstances would lead to significant impacts not addressed in the PEIR. Therefore, no new impact related to energy resources would occur that is not covered in the PEIR.

PD-3.11: 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 HAZ – 2	NA	LTS	No	Yes
Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	LTS	Impact HAZ-2, pp. 3.10-15 – 3.10-18	Yes	HAZ – 5-9	NA	LTS	No	Yes
Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites	PS	Impact HAZ-3, pp. 3.10-18 – 3.10-19	Yes	NA	HAZ – 3	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 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

Click or tap here to enter text.

Impact HAZ-1

The initial and maintenance treatments would include mechanical treatments and may include herbicide application, both of which would require the use of hazardous materials. The potential for treatment activities to create a significant health hazard from the use of hazardous materials was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.10.3, page 14-15). The potential impacts related to the use of fuels during treatment activities are within the scope of the activities and impacts discussed in the PEIR because the treatment types, equipment, and types of hazardous materials to be used are consistent with those analyzed in the PEIR. Any hazardous materials and emissions would result from the use of diesel fuel, chainsaw and mechanized hand tool fuel, and chainsaw bar oil; these materials will be transported and stored in appropriate containers. All personnel will wear personal protective equipment (PPE) and will be properly trained in the usage of equipment. All equipment associated with the proposed project will comply with SPR HAZ-1 to ensure proper maintenance and minimize

leaks. SPR HAZ-2 requires mechanized hand tools to have spark arrestors and will be implemented to minimize the risk of potential ignitions. Herbicide application impacts are discussed under Impact HAZ-2 below.

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

Impact HAZ-2

Initial and maintenance treatments may include herbicide application that would require the transportation, storage, and disposal of various herbicides. The potential for treatment activities to create a significant health hazard from the use of herbicides was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.10.3, page 15-18). The potential impacts related to the use of herbicides during treatment activities are within the scope of the activities and impacts discussed within the PEIR because the application methods and herbicides to be used are consistent with those analyzed in the PEIR. Herbicides may be applied to acacia, French broom, or other invasive species to minimize the spread and eliminate re-sprouting of invasive species within the treatment areas. Under the CalVTP, herbicide treatments will be limited to ground-level application and must comply with all Environmental Protection Agency (EPA) label directions. According to the PEIR Table 3.10-1, the herbicides proposed under the CalVTP pose low levels of toxicity to humans (CalVTP Final PEIR Volume II Section 3.10.3 Table 3.10-1, page 16-17). In addition, the proposed project treatments will comply with SPR HAZ-5 through HAZ-9, which requires the following: a Spill Prevention and Response Plan will be prepared prior to any herbicide treatment activities (SPR HAZ-5), compliance to herbicide application regulations including permitting and licensing through the San Mateo County Agricultural Commissioner's office prior to herbicide application (SPR HAZ-6), triple rinse herbicide containers and dispose of rinsed materials at an approved site (SPR HAZ-7), minimize herbicide drift into public areas through application parameters such as limitations for nozzle pressure and nozzle distance from vegetation (SPR HAZ-8), and notification of herbicide within 500 feet of public areas including posting signs on either side of herbicide treatment areas (SPR HAZ-9).

Based on compliance to regulatory requirements and SPR's in addition to utilizing low-level toxicity herbicides proposed under the PEIR, the potential for this project to result in significant health hazard from the use of herbicides is less than significant.

Impact HAZ-3

The initial and maintenance treatments of this proposed project include mechanical treatments that will disturb soils, which could expose workers, the public, or the environment to hazardous material if a contaminated site is present within the project area. The potential for the treatment activities to disturb or encounter contaminated sites that could expose workers, the public, or the environment to hazardous materials was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.10.3, page 18-19). Based on the Cortese List from the DTSC, there are no known hazardous waste sites identified within the proposed project area. In addition, the project area does not appear to contain any naturally occurring asbestos. There are no SPR's that apply to this project impact. The project proponent will implement and comply with mitigation measure HAZ-3 to identify and avoid any known hazardous waste sites.

Based on the absence of hazardous waste sites and naturally occurring asbestos and the implementation of mitigation measure HAZ-3, the potential for this project to result in public or environmental exposure to hazards from known hazardous waste sites would be less than significant.

New Hazardous Materials, Public Health and Safety Impacts

The proposed project is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined that they comply with the regulatory and environmental setting conditions as stated in the PEIR (CalVTP Final PEIR, Volume II, 3.10.1 and 3.10.2). No changed circumstances would give rise to new significant

impacts not addressed in the PEIR. Therefore, no new impact related to hazardous materials, public health, and safety would occur that are not covered in the PEIR.

PD-3.12: 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	None	NA	No impact	No	Yes
Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities	LTS	Impact HYD-2, pp. 3.11-27 – 3.11-29	Yes	BIO – 1 GEO – 1-4 GEO – 7 GEO – 8 HAZ – 1 HYD – 1 HYD – 4	NA	LTS	No	Yes
Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory	LTS	Impact HYD-3, p. 3.11-29	No	None	NA	No impact	No	Yes
Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides	LTS	Impact HYD-4, pp. 3.11-30 – 3.11-31	Yes	BIO – 4 HAZ – 5 HAZ – 7 HYD – 5	NA	LTS	No	Yes

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

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

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

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

Discussion

The proposed project area is located within the San Francisco Bay hydrologic region and watershed, as depicted in Figure 3.11-1 of the PEIR. The treatment areas are located outside of any Watercourse and Lake Protection Zones (WLPZ). Any WLPZ that is in proximity to the treatment areas will be flagged and avoided during operations. Any watercourse crossings utilized during operations will be existing and no new infrastructure will be constructed.

Impact HYD-1

This impact does not apply to the proposed treatment activities because prescribed burning is not a proposed treatment type for this project. Therefore, no impact will occur as a result of prescribed burning.

Impact HYD-2

Initial and maintenance treatments would include the use of mechanical treatments, which would result in ground disturbance. The potential for mechanical treatments to violate water quality regulations or degrade water quality was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.11.3, page 27-28). No Class I or Class II watercourses have been identified within the project sites; therefore, no Watercourse and Lake Protection Zones have been designated in the project area. Potential impacts are within the scope of the activities and impacts evaluated in the PEIR because the use of equipment and associated impacts to water quality are consistent with those analyzed in the PEIR. The centerline of Class III watercourses shall be flagged prior to operations where equipment could potentially cross a Class III due to project proximity and slope. Equipment exclusions zones of 25' for slopes less than 30% and 50' for slopes greater 30% shall be adhered too in this CalVTP. The project proponent will implement SPR GEO-1 through GEO-4, GEO-7, GEO-8, BIO-1, HAZ-1, and HYD-1 to avoid and minimize the risk of substantial degradation to surface or groundwater quality from mechanical treatment activities. The implemented SPR's include limitations to precipitation, soil saturation, and operable slopes, stabilizing disturbed soil and erosion monitoring, equipment maintenance, preliminary review of biological resources, and compliance with water quality regulations.

Based on avoidance measures and implementation of SPR's, the potential for this project to result in a violation of water quality standards or waste discharge requirements, degradation of surface and ground water quality, or conflict with or obstruct the Water Quality Control Plan would be less than significant.

Impact HYD-3

This impact does not apply to the initial or maintenance treatments because prescribed herbivory would not be used as a treatment activity for this project. Therefore, no impact would occur as a result of prescribed herbivory.

Impact HYD-4

Treatment activities may include herbicide application, which can affect water quality through runoff, leaching, drift, and misapplication or spills. The potential for herbicide treatment activities to violate water quality standards or waste discharge requirements, substantially degrade surface or ground water quality, or conflict with or obstruct the implementation of a water quality control plan through the ground application of herbicides was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.11.3, page 29-30). Potential impacts are within the scope of the activities and impacts addressed in the PEIR because the methods of herbicide application, transportation, storage, and disposal are consistent with those analyzed in the PEIR. Under the CalVTP, herbicide treatment activities are limited to ground-level application by hand (SPR BIO-4) and compliance to EPA labels is required. The proposed project treatment areas are located outside of any WLPZ's and SPR HYD-5 prohibits non-aquatic herbicide formulations from being applied within 50 feet of a waterbody or riparian area and prohibits application during precipitation or within 24 hours of forecasted precipitation. In addition, a Spill Prevention and Response Plan will be prepared prior to herbicide treatment activities (SPR HAZ-5) and all herbicide containers must be triple rinsed and hazardous waste materials must be disposed of at an approved site (SPR HAZ-7).

Based on the compliance to EPA labels and SPR limitations, the potential for this project to result in a violation of water quality standards or waste discharge requirements, substantially degrade surface or ground water quality, or conflict with or obstruct the implementation of a water quality control plan through the ground application of herbicides is less than significant.

Impact HYD-5

The initial and maintenance treatments include the use of mechanical treatment, which would result in ground disturbance. The potential for mechanical treatment to substantially alter existing drainage patterns of a project site was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.11.3, page 30-31). The potential impacts are within the scope of the activities and impacts addressed in the PEIR because the use of equipment and treatment activities are consistent with those analyzed in the PEIR. There are no Class I or Class II watercourses identified within the project area. All Class III drainages will be flagged prior to operations where equipment could potentially cross a Class III due to project proximity and slope. Chips should not be placed in watercourses or near culverts. The implementation of SPR HYD-1, HYD-2, HYD-4, and HYD-6 would avoid and minimize the risk of substantially altering the existing drainage pattern of the treatment area through compliance to water quality regulations, avoiding construction of new roads, identifying and protecting the WLPZ, and protecting existing drainage systems. Therefore, any impact would be less than significant.

New Hydrology and Water Quality Impacts

The proposed treatment is consistent with the treatment types and activities addressed in the PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined they are consistent with the regulatory and environmental settings discussed in the PEIR (CalVTP Final PEIR, Volume II, 3.11.1 and 3.11.2). No changed circumstances would lead to new significant impacts not analyzed in the PEIR. Therefore, no new impact related to hydrology and water quality would occur not covered in the PEIR.

PD-3.13: LAND USE AND PLANNING, POPULATION AND HOUSING

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

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

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

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

Discussion

Click or tap here to enter text.

Impact LU-1

The initial and maintenance treatments would occur on county property, so the project would comply with all applicable city and county general plans, policies, or ordinances. The potential for treatment activities to cause a significant environmental impact due to the conflict with a land use plan, policy, or regulation was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.12.3, page 13-14). The treatment types and activities are within the scope of those evaluated in the PEIR because the treatment activities and associated impacts are consistent with those analyzed in the PEIR. The implementation of SPR AD-3 will avoid and minimize the risk of significant environmental impact due to conflict with a land use plan, policy, or regulation. Therefore, the impact would be less than significant.

Impact LU-2

The initial and maintenance treatments would require approximately 10 crew members to implement. The potential for treatments to result in substantial population growth as a result of increases in demand for employees was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.12.3, page 14-15). Impacts associated with short-term increases in demand for employees during the implementation of the treatment project are within the scope of the activities and impacts addressed in the PEIR because the number of workers required for treatment implementation is consistent with the crew size analyzed in the PEIR for the types of treatments

proposed. Employing local contractors will be encouraged where feasible to minimize the risk of impacting population and housing resources. There are no applicable SPR's for this impact.

Based on the minimal crew size and attempting to hire local contractor, it is expected that any impact to population and housing as a result of this project would be less than significant.

New Land Use and Planning, Population and Housing Impacts

The proposed treatment is consistent with the treatment types and activities covered in the PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory setting conditions discussed in the PEIR (CalVTP Final PEIR, Volume II, 3.12.1 and 3.12.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to land use and planning, population and housing would occur that is not covered in the PEIR.

PD-3.14: 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 – 1-6	NA	LTS	No	Yes
Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities	LTS	Impact NOI-2, p. 3.13-12	Yes	NOI - 1	NA	LTS	No	Yes

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

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

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

Discussion

Click or tap here to enter text.

Impact NOI-1

The initial and maintenance treatments would include the use of mechanical treatment that requires heavy, noise-generating equipment. The potential for substantial short-term increase in ambient noise levels was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.13.3, page 9-12). Short-term increases in noise from the use of heavy equipment is within the scope of the activities and impacts addressed in the PEIR because the types and number of equipment proposed, and the duration of use of the equipment are consistent with those analyzed in the PEIR. The implementation of SPR AD-3 and NOI-1 through NOI-6 would minimize the risk of increasing exterior ambient noise levels during treatment implementation. The applicable SPR's require that heavy equipment use will be limited to daytime hours (SPR NOI-1), equipment will be maintained and equipped with exhaust mufflers and engine shrouds (SPR NOI-2), engine shrouds will be closed during operations (SPR NOI-3), staging areas will be located away from noise-sensitive land uses (SPR NOI-4), equipment idle time will be limited to 5 minutes (SPR NOI-5), and noise-sensitive receptors located within 1,500 feet of treatment activities will be notified (SPR NOI-6). Therefore, the impact would be less than significant.

Impact NOI-2

The initial and maintenance treatments would require large trucks to haul heavy equipment and crews to the project site. These haul trucks would pass by residential receptors, which could increase the single event noise levels (SENL). The potential for a substantial short-term increase in SENL was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.13.3, page 12). Short-term increases in noise from the use of heavy equipment during project implementation is within the scope of the treatment activities and impacts addressed in the PEIR because the number and types of equipment proposed are consistent with those analyzed in the PEIR. All haul trips and use of heavy equipment will be limited to daytime hours to avoid sleep disturbance of nearby residents. SPR NOI-1 restricts treatment activities to daytime hours, which San Mateo County defines as 7:00am to 6:00 pm Monday through Friday or 9:00 am to 5:00 pm on Saturdays under SMC PRC Sec. 4.88.360 (e). Therefore, the impact would be less than significant.

New Noise Impacts

The proposed treatment is consistent with the treatment types and activities discussed in the PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined they are consistent with the regulatory and environmental setting conditions addressed in the PEIR (CalVTP Final PEIR, Volume II, 3.13.1 and 3.13.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to noise would occur that is not analyzed in the PEIR.

PD-3.15: 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	AD – 3 REC – 1	NA	LTS	No	Yes

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

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

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

Discussion

Click or tap here to enter text.

Impact REC-1

The project areas are located on county property designated for recreational use. The initial and maintenance treatments may result in conflicts with recreationists due to potential restricted or limited park access, degradation of views, decreased air quality, or traffic during treatment implementation. The potential for treatment activities to disrupt recreational activities was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.14.3, page 6-7). The temporary disruption of recreational activities during project implementation is within the scope of the activities and impacts addressed in the PEIR because the treatments, associated equipment and duration of use is consistent with those analyzed in the PEIR. Maintaining consistency with local plans, policies, and ordinances (SPR AD-3) and posting notification of recreational area closure a minimum of 2 weeks prior to the commencement of treatment activities (SPR REC-1) would reduce the risk of disruption to recreational activities within the project area. Based on the implementation of SPR's and duration of the project, any impact to recreation as a result of this project would be less than significant.

New Recreation Impacts

The proposed treatment is consistent with the treatment types and activities addressed in the PEIR. The project proponent has considered all site-specific characteristics and determined they are consistent with the regulatory and environmental setting conditions presented in the PEIR (CalVTP Final PEIR, Volume II, 3.14.1 and 3.14.2). There are no changed circumstances that would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to recreation would occur that is not discussed in the PEIR.

PD-3.16: TRANSPORTATION

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures	LTS	Section 3.15.2; Impact TRAN-1 pp. 3.15-9 – 3.15-10	Yes	AD – 3 TRAN – 1	NA	LTS	No	Yes
Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses	LTS	Impact TRAN-2 pp. 3.15-10 – 3.15-11	No	None	NA	No impact	No	Yes
Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP	PSU	Impact TRAN-3 pp. 3.15-11 – 3.15-13	Yes	NA	AQ – 1	PSU	No	Yes

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

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

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

Discussion

Click or tap here to enter text.

Impact TRAN-1

The initial and maintenance treatments would temporarily increase vehicular traffic due to hauling equipment and crew transportation. No road closures would be necessary for the implementation of this project; however, park roads may be reduced to single lanes during operations. The potential for a temporary increase in traffic to conflict with a program, plan, or policy addressing roadway facilities or prolonged road closures was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.15.3, page 9-10). The proposed treatment project would be short-term and temporary increases in traffic related to the treatments are within the scope of the activities and impacts addressed in the PEIR because the treatment duration and number of vehicles is consistent with those analyzed in the PEIR. The implementation of SPR AD-3 and TRAN-1 will reduce the risk of conflicting with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures through the implementation of traffic control during operations. Vehicles and equipment would be staged within park boundaries, away from public viewsheds where feasible and not located on permanent roads.

Impact TRAN-2

The impact does not apply to the proposed project initial and maintenance treatments because they would not require the construction or alteration of any roadways and do not include prescribed burning. No impact would occur.

Impact TRAN-3

Initial and maintenance treatments could temporarily increase vehicle miles traveled (VMT) because the project site is in a remote location, which requires vehicle trips to access the sites. The potential for net increase in VMT to occur was analyzed in the PEIR and was identified as potentially significant and unavoidable (CalVTP Final PEIR Volume II Section 3.15.3, page 11-13). This individual project is expected to require only a small number (fewer than the 110 trips threshold) of trips per day, as discussed in the PEIR and the Technical Advisory on Evaluating Transportation Impacts (OPR 2018). The most VMT would occur at the beginning and end of the project to haul equipment in and out of the project area. Daily VMT would consist of crew transportation to and from the site. Hiring local contractors will be encouraged where feasible to reduce the amount of VMT. No SPR's apply to this impact. The project proponent will implement Mitigation Measure AQ-1 to encourage crew members to carpool and further reduce VMT.

Based on the implementation of Mitigation Measure AQ-1, measures to reduce VMT, and short-term duration of this project, the potential for this individual project to result in a net increase in VMT would remain potentially significant and unavoidable, as stated in the PEIR (CalVTP Final PEIR Volume II Section 3.15.3, page 12).

New Transportation Impacts

The proposed treatment is consistent with the treatment types and activities discussed in the PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined they are consistent with the regulatory and environmental setting conditions presented in the PEIR (CalVTP Final PEIR, Volume II, 3.15.1 and 3.15.2). 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.

PD-3.17: PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs	LTS	Section 3.16.1 pp. 3.16-2 – 3.16-3; Impact UTIL-1 p. 3.16-9	No	NA	NA	No impact	No	Yes
Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	PSU	Section 3.16.1 pp. 3.16-3 -3.16-5; Impact UTIL-2 pp. 3.16-10 – 3.16-12	No	NA	NA	No impact	No	Yes
Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste	LTS	Section 3.16.2 pp. 3.16-6 – 3.16-7; Impact UTIL-2 p. 3.16-12	Yes	None	NA	LTS	No	Yes

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

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

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

Discussion

Click or tap here to enter text.

Impact UTIL-1

This impact does not apply to the proposed treatments because it would not include prescribed burning and non-shaded fuel breaks that would require on-site water supplies for fire and dust suppression. No impact would occur.

Impact UTIL-2

The initial and maintenance treatments would generate biomass as a result of vegetation removal within the project site. Biomass generated would be chipped and scattered on-site because there is not a facility within an economically feasible distance to ship biomass off-site during this project, therefore, this impact does not apply to the project. This impact was evaluated in the PEIR and identified as potentially significant and unavoidable with no SPR's or Mitigation Measures because biomass hauled off-site could exceed the capacity of existing infrastructure

handling biomass (CalVTP Final PEIR Volume II Section 3.16.3, page 10-12). This proposed project does not include hauling any biomass off-site, therefore, there is no potential to exceed the capacity of existing infrastructure and there would be no impact.

Impact UTIL-3

Initial and maintenance treatments would generate biomass as a result of vegetation removal within the project site. The compliance with federal, state, and local management and reduction goals, statutes, and regulations related to solid waste was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.16.3, page 12). This project would not include hauling biomass off-site because all biomass generated would be chipped and scattered in the treatment areas. Compliance with all management and reduction goals, statutes, and regulations related to solid waste is within the scope of the activities and impacts addressed in the PEIR because the disposal of biomass on-site is consistent with those analyzed in the PEIR. SPR UTIL-1 does not apply to this project because no biomass will be hauled off-site.

Based on the compliance with all applicable management and reduction goals, statutes, and regulations, the potential for impact would be less than significant.

New Impacts to Public Services, Utilities and Service Systems

The proposed treatment is consistent with the treatment types and activities considered in the PEIR. The project proponent has considered the site-specific characteristics and determined that they are consistent with the regulatory and environmental setting conditions addressed in the PEIR (CalVTP Final PEIR, Volume II, 3.16.1 and 3.16.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to public services, utilities, or service systems would occur that is not covered in the PEIR.

PD-3.18: WILDFIRE

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

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

New 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

Click or tap here to enter text.

Impact WIL-1

Initial and maintenance treatments would include mechanical treatments using heavy equipment, which could exacerbate fire risk and expose people to uncontrolled spread of wildfire. The potential increase in exposure to wildfire during implementation of the proposed treatments was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.17.3, page 13-14). Increased wildfire risk associated with mechanical treatment in vegetated areas is within the scope of the activities and impacts addressed in the PEIR because the equipment types and duration of use are consistent with those analyzed in the PEIR. SPR HAZ-2, HAZ-3, and HAZ-4 will be implemented to reduce the risk of exposure to wildfire by requiring spark arrestors for all mechanical hand tools, a fire extinguisher to be carried with each chainsaw, and restricting smoking areas to non-vegetated areas. In addition, modeling fire behavior utilizing the Inter-agency Fuel Treatment Decision Support System (IFTDSS) based on the proposed treatments and Fuel Model 10 shows positive changes to fire behavior immediately following treatments similar to the proposed actions in this project. Fuel Model 10, or Mature/Overmature Timber and Understory, describes an excessively stocked forest environment similar to the conditions represented in the project area (Anderson, 1982). This project intends to predominately create shaded fuel breaks that could be used to slow a wildfire's rate of spread, providing an increased chance for nearby residents or recreationists to escape, and to potentially contain a fire. This project would have a positive impact to wildfire after treatments.

Based on the implementation of the SPR's and positive outcome of this project, the potential to substantially exacerbate fire risk and expose people to uncontrolled spread of wildfire would be less than significant.

Impact WIL-2

The initial and maintenance treatments would include mechanical treatments using heavy equipment, which could exacerbate fire risk as discussed above in WIL-1. The proposed project treatments are limited to slopes equal to or less than 40% and equipment access is limited to slopes equal to or less than 50% and the average slope of operation throughout the treatment areas ranges from approximately 20-30%, therefore, SPR GEO-8 does not apply to this project impact. The potential for post-fire landslides and flooding was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.17.3, page 14-15). The potential exposure of people or structures to post-fire landslides and flooding are within the scope of the activities and impacts covered in the PEIR because the equipment types and duration of use are consistent with those analyzed in the PEIR and prescribed fire would not be included as a treatment in this project. SPR GEO-3 through GEO-5 will be implemented to reduce the risk of erosion and mass wasting post-fire, in the event that a wildfire occurred as a result of the proposed treatments or an unrelated occurrence. The applicable SPR's require the following: disturbed soil areas exhibiting bare soil over 50% or more of the treatment area will be stabilized with mulch or organic matter produced from mastication (SPR GEO-3), erosion will be monitored by the project proponent through an inspection for proper implementation of applicable SPR's and mitigations prior to the rainy season and an inspection of the treated areas for evidence of erosion after the first large storm or rainfall event (SPR GEO-4), and compacted treatment areas will be drained via water breaks (SPR GEO-5). This project intends to create a fuel break that will serve as an opportunity for fire resources to stop or slow the spread of wildfire, which may lead to smaller burn scars, or less area susceptible to post-fire flooding or erosion.

Based on the implementation of the applicable SPR's, the potential for this project to result in post-fire flooding or landslides would be less than significant.

New Impacts to Wildfire

The proposed treatment is consistent with the treatment types and activities considered in the PEIR. The project proponent has considered all site-specific characteristics and determined they are consistent with the environmental and regulatory setting conditions discussed in the PEIR (CalVTP Final PEIR, Volume II, 3.17.1 and 3.7.2). No changed circumstances would lead 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.

ATTACHMENT A – STANDARD PROJECT REQUIREMENTS AND MITIGATION MEASURES CHECKLIST

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

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Administrative Standard Project Requirements				
SPR AD-1 Project Proponent Coordination: For treatments coordinated with CAL FIRE, CAL FIRE will meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable mitigation measures; identify any sensitive resources onsite; and discuss resource protection measures. For any prescribed burn treatments, CAL FIRE will also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	San Mateo Resource Conservation District	Project Proponent
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	San Mateo Resource Conservation District	Project Proponent
SPR AD-3 Consistency with Local Plans, Policies, and Ordinances: The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	San Mateo Resource Conservation District	Project Proponent
SPR AD-4 Public Notifications for Prescribed Burning: At least days prior to the commencement of prescribed burning operations, the project proponent will: 1) post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or smoke concerns; 2) publish a public interest notification in a local newspapers or other widely distributed media source describing the activity, timing, and contact information; 3) send the local county supervisor and county administrative officer (or equivalent official responsible for distribution of public information) a notification letter describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
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	Initial Treatment: Y	During	San Mateo Resource Conservation District	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Treatment Maintenance: Y Click or tap here to enter text.			
SPR AD-6 Public Notifications for Treatment Projects. One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.	Initial Treatment: Y Treatment Maintenance: Y	Prior	Project Proponent	Project Proponent
SPR AD-7 Provide Information on Proposed, Approved, and Completed Treatment Projects. For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. Information on proposed projects (PSA in progress): ▶ GIS data that include project location (as a point); ▶ project size (typically acres); ▶ treatment types and activities; and ▶ contact information for a representative of the project proponent. The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public no later than two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent's own website). Information on approved projects (PSA complete): ▶ A completed PSA Environmental Checklist; ▶ A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist);	Initial Treatment: Y Treatment Maintenance: Y	Prior, During, Post	San Mateo Resource Conservation District	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ GIS data that include a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction). Information on completed projects: ▶ GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction) ▶ A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes ■ Size of treated area (typically acres); ■ Treatment types and activities; ■ Dates of work; ■ A list of the SPRs and mitigation measures that were implemented ■ Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). This SPR applies to all treatment activities and all treatment types, including treatment maintenance.				
SPR AD-8 Request Access for Post-Treatment Assessment. For CAL FIRE projects, during contract development, CAL FIRE will include access to the treated area over a prescribed period (usually up to three years) to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance, as a contract term for consideration by the landowner. For public landowners, access to the treated area over a prescribed period will be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	Project Proponent	Project Proponent
SPR AD-9: Obtain a Coastal Development Permit for Proposed Treatment Within the Coastal Zone Where Required. When planning a treatment project within the Coastal Zone, the project proponent will contact the local Coastal Commission district office, or applicable local government to determine if the project area is within the jurisdiction of the Coastal Commission, a local government with a certified Local Coastal Program (LCP), or both. All treatment projects in the Coastal Zone will be reviewed by the local Coastal Commission district office or local government with a certified LCP (in consultation with the local Coastal Commission district office regarding whether a	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Coastal Development Permit (CDP) is required). If a CDP is required, the treatment project will be designed to meet the following conditions: i. The treatment project will be designed in compliance with applicable provisions of the Coastal Act that provide substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the original jurisdiction of the Commission or an area of a local coastal government without a certified LCP; and ii. The treatment project will be designed in compliance with the applicable provisions of the certified LCP, specifically the substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the jurisdiction of a local coastal government with a certified LCP. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.				
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	San Mateo Resource Conservation District	Project Proponent
SPR AES-2 Avoid Staging within Viewsheds: The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	San Mateo Resource Conservation District	Project Proponent
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	San Mateo Resource Conservation District	Project Proponent
Air Quality Standard Project Requirements				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR AQ-1 Comply with Air Quality Regulations: The project proponent will comply with the applicable air quality requirements of air districts within whose jurisdiction the project is located. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	San Mateo Resource Conservation District	Project Proponent
SPR AQ-2 Submit Smoke Management Plan: The project proponent will submit a smoke management plan for all prescribed burns to the applicable air district, in accordance with 17 CCR Section 80160. Pursuant to this regulation a smoke management plan will not be required for burns less than 10 acres that also will not be conducted near smoke sensitive areas, unless otherwise directed by the air district. Burning will only be conducted in compliance with the burn authorization program of the applicable air district(s) having jurisdiction over the treatment area. Example of a smoke management plan is in Appendix PD-2. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
SPR AQ-3 Create Burn Plan: The project proponent will create a burn plan using the CAL FIRE burn plan template for all prescribed burns. The burn plan will include a fire behavior model output of First Order Fire Effects Model and BEHAVE or other fire behavior modeling simulation and that is performed by a qualified fire behavior technical specialist that predicts fire behavior, calculates consumption of fuels, tree mortality, predicted emissions, greenhouse gas emissions, and soil heating. The project proponent will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. The burn plan will be created with input from a qualified technician or certified State burn boss. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
SPR AQ-4 Minimize Dust: To minimize dust during treatment activities, the project proponent will implement the following measures: ▶ Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol. ▶ If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by ARB, EPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the water results in runoff.	Initial Treatment: Y Treatment Maintenance: Y	During	San Mateo Resource Conservation District	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations. ▶ Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113. ▶ Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property," per Health and Safety Code Section 41700. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR AQ-5 Avoid Naturally Occurring Asbestos: The project proponent will avoid ground-disturbing treatment activities in areas identified as likely to contain naturally occurring asbestos (NOA) per maps and guidance published by the California Geological Survey, unless an Asbestos Dust Control Plan (17 CCR Section 93105) is prepared and approved by the air district(s) with jurisdiction over the treatment area. Any NOA-related guidance provided by the applicable air district will be followed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
SPR AQ-6: Prescribed Burn Safety Procedures. Prescribed burns planned and managed by non-CAL FIRE crews will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP). The IAP will include the burn dates; burn hours; weather limitations; the specific burn prescription; a communications plan; a medical plan; a traffic plan; and special instructions such as minimizing smoke impacts to specific local roadways. The IAP will also assign responsibilities for coordination with the appropriate air district, such as conducting onsite briefings, posting notifications, weather monitoring during burning, and other burn related preparations. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
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	Initial Treatment: Y Treatment Maintenance:	Prior	San Mateo Resource Conservation District	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Y			
SPR CUL-2 Contact Geographically Affiliated Native American Tribes: The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the project proponent will notify the California Native American Tribes in the counties where the treatment activity is located. The notification will contain the following: ▶ A written description of the treatment location and boundaries. ▶ Brief narrative of the treatment objectives. ▶ A description of the activities used (e.g., prescribed burning, mastication) and associated acreages. ▶ A map of the treatment area at a sufficient scale to indicate the spatial extent of activities. ▶ A request for information regarding potential impacts to cultural resources from the proposed treatment. ▶ A detailed description of the depth of excavation, if ground disturbance is expected. In addition, the project proponent will contact the NAHC for a review of their Sacred Lands File. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	San Mateo Resource Conservation District	Project Proponent
SPR-CUL-3 Pre-field Research: The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. The purpose of this research is to properly inform survey design, based on the types of resources likely to be encountered within the treatment area, and to be prepared to interpret, record, and evaluate these findings within the context of local history and prehistory. The qualified archaeologist and/or archaeologically-trained resource professional will review records, study maps, read pertinent ethnographic, archaeological, and historical literature specific to the area being studied, and conduct other tasks to maximize the effectiveness of the survey. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	San Mateo Resource Conservation District	Project Proponent
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	Initial Treatment: Y Treatment Maintenance: Y	Prior	San Mateo Resource Conservation District	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
survey completed. The specific requirements will comply with the applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR CUL-5 Treatment of Archaeological Resources: If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. The project proponent, in consultation with culturally affiliated tribe(s), will develop effective protection measures for important cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. These protection measures will be written in clear, enforceable language, and will be included in the survey report in accordance with applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent
SPR CUL-6 Treatment of Tribal Cultural Resources: The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity to submit comments and participate in consultation to resolve issues of concern. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent
SPR CUL-7 Avoid Built Historical Resources: If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. Within a buffer of 100 feet of the built historical resource, there will be no prescribed burning or mechanical treatment activities Buffers less than 100 feet for built historical resources will only be used after consultation with and receipt of written approval from a qualified archaeologist. If the records search does not identify known historical resources in the treatment area, but structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historic	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
significance are present in the treatment area, they will similarly be avoided. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR CUL-8 Cultural Resource Training: The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent
Biological Resources Standard Project Requirements				
SPR BIO-1: Review and Survey Project-Specific Biological Resources. The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this PEIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a 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:	Initial Treatment: Y Treatment Maintenance: Y	Prior	San Mateo Resource Conservation District	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
1. Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided. If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment: a. by physically avoiding the suitable habitat, or b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites). Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist. 2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided. Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-Protocols. Specific survey requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent
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	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
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	San Mateo Resource Conservation District	Project Proponent
SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions by implementing the following within riparian habitats: ▶ Retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within the limits of riparian habitat identified and mapped during surveys conducted pursuant to SPR BIO-3. Native riparian vegetation will be retained in a well distributed multi-storied stand composed of a diversity of species similar to that found before the start of treatment activities.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the riparian vegetation types characteristic of the region. This includes hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. ▶ Removal of large, native riparian hardwood trees (e.g., willow, ash, maple, oak, alder, sycamore, cottonwood) will be minimized to the extent feasible and 75 percent of the pretreatment native riparian hardwood tree canopy will be retained. Because tree size varies depending on vegetation type present and site conditions, the tree size retention parameter will be determined on a site-specific basis depending on vegetation type present and setting; however, live, healthy, native trees that are considered large for that type of tree and large relative to other trees in that location will be retained. A scientifically-based, project-specific explanation substantiating the retention size parameter for native riparian hardwood tree removal will be provided in the Biological Resources Discussion of the PSA. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, presence of sufficient seed trees, light availability, and changes in stream shading may inform the tree size retention requirements. ▶ Removed trees will be felled away from adjacent streams or waterbodies and piled outside of the riparian vegetation zone (unless there is an ecological reason to do otherwise that is approved by applicable regulatory agencies, such as adding large woody material to a stream to enhance fish habitat, e.g., see Accelerated Wood Recruitment and Timber Operations: Process Guidance from the California Timber Harvest Review Team Agencies and National Marine Fisheries Service). ▶ Vegetation removal that could reduce stream shading and increase stream temperatures will be avoided. ▶ Ground disturbance within riparian habitats will be limited to the minimum necessary to implement effective treatments. This will consist of the minimum disturbance area necessary to reduce hazardous fuels and return the riparian community to a natural fire regime (i.e., Condition Class 1) considering historic fire return intervals, climate change, and land use constraints. ▶ Only hand application of herbicides approved for use in aquatic environments will be allowed and only during low-flow periods or when seasonal streams are dry. ▶ The project proponent will notify CDFW when required by California Fish and Game Code Section 1602 prior to implementing any treatment activities in riparian habitats.				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Notification will identify the treatment activities, map the vegetation to be removed, identify the impact avoidance identification methods to be used (e.g., flagging), and appropriate protections for the retention of shaded riverine habitat, including buffers and other applicable measures to prevent erosion into the waterway. ▶ In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment goals objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, different protection measures and design standards will only be approved when the treatment plan incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub. The project proponent will design treatment activities to avoid type conversion where native coastal sage scrub and chaparral are present. An ecological definition of type conversion is used in the CalVTP PEIR for assessment of environmental effects: a change from a vegetation type dominated by native shrub species that are characteristic of chaparral and coastal sage scrub vegetation alliances to a vegetation type characterized predominantly by weedy herbaceous cover or annual grasslands. For the PEIR, type conversion is considered in terms of habitat function, which is defined here as the arrangement and capability of habitat features to provide refuge, food source, and reproduction habitat to plants and animals, and thereby contribute to the conservation of biological and genetic diversity and evolutionary processes (de Groot et al. 2002). Some modification of habitat characteristics may occur provided habitat function is maintained (i.e., the location, essential habitat features, and species supported are not substantially changed). During the reconnaissance-level survey required in SPR BIO-1, a qualified RPF or biologist will identify chaparral and coastal sage scrub vegetation to the alliance level and determine the condition class and fire return interval departure of the chaparral and/or coastal sage scrub present in each treatment area. For all treatment types in chaparral and coastal sage scrub, the project proponent, in consultation with a qualified RPF or qualified biologist will:	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Develop a treatment design that avoids environmental effects of type conversion in chaparral and coastal sage scrub vegetation alliances, which will include evaluating and determining the appropriate spatial scale at which the proponent would consider type conversion, and substantiating its appropriateness. The project proponent will demonstrate with substantial evidence that the habitat function of chaparral and coastal sage scrub would be at least maintained within the identified spatial scale at which type conversion is evaluated for the specific treatment project. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, spatial needs of sensitive species, presence of sufficient seed plants and nurse plants, light availability, and edge effects may inform the determination of an appropriate spatial scale. ▶ The treatment design will maintain a minimum percent cover of mature native shrubs within the treatment area to maintain habitat function; the appropriate percent cover will be identified by the project proponent in the development of treatment design and be specific to the vegetation alliances that are present in the identified spatial scale used to evaluate type conversion. Mature native shrubs that are retained will be distributed contiguously or in patches within the stand. If the stand consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity, to the extent needed to avoid type conversion. These SPR requirements apply to all treatment activities and all treatment types, including treatment maintenance. Additional measures will be applied to ecological restoration treatment types: ▶ For ecological restoration treatment types, complete removal of the mature shrub layer will not occur in native chaparral and coastal sage scrub vegetation types. ▶ Ecological restoration treatments will not be implemented in vegetation types that are within their natural fire return interval (i.e., time since last burn is less than the average time listed as the fire return interval range in Table 3.6-1) unless the project proponent demonstrates with substantial evidence that the habitat function of chaparral and coastal sage scrub would be improved. ▶ A minimum of 35 percent relative cover of existing shrubs and associated native vegetation will be retained at existing densities in patches distributed in a mosaic pattern within the treated area or the shrub canopy will be thinned by no more than 20 percent from baseline density (i.e., if baseline shrub canopy density is 60 percent, post treatment shrub canopy density will be no less than 40 percent). A different percent relative cover can be retained if the project proponent demonstrates with substantial evidence that alternative treatment design measures would result in effects on the habitat function of chaparral and coastal sage scrub that are equal or				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
more favorable than those expected to result from application of the above measures. Biological considerations that may inform a deviation from the minimum 35 percent relative cover retention include but are not limited to soil moisture requirements, increased soil temperatures, changes in light/shading, presence of sufficient seed plants and nurse plants, erosion potential, and site hydrology. ▶ If the stand within the treatment area consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity. These SPR requirements apply to all treatment activities and only the ecosystem restoration treatment type, including treatment maintenance. A determination of compliance with the SB 1260 prohibition of type conversion in chaparral and coastal sage scrub is a statutory issue separate from CEQA compliance that may involve factors additional to the ecological definition and habitat functions presented in the PEIR, such as geographic context. It is beyond the legal scope of the PEIR to define SB 1260 type conversion and statutory compliance. The project proponent, acting as lead agency for the proposed later treatment project, will be responsible for defining type conversion in the context of the project and making the finding that type conversion would not occur, as required by SB 1260. The project proponent will determine its criteria for defining and avoiding type conversion and, in making its findings, may draw upon information presented in this PEIR.				
SPR BIO-6: Prevent Spread of Plant Pathogens. When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., Ione chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (*Fusarium*), goldspotted oak borer, shot hole borer, bark beetle): ▶ clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk; ▶ include training on *Phytopthora* diseases and other plant pathogens in the worker awareness training; ▶ minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment; ▶ minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination;	Initial Treatment: Y Treatment Maintenance: Y	During	San Mateo Resource Conservation District	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ 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. ▶ 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.	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Environmentally Sensitive Habitat Areas				
SPR BIO-8: Identify and Avoid or Minimize Impacts in Coastal Zone ESHAs. When planning a treatment project within the Coastal Zone, the project proponent will, in consultation with the Coastal Commission or a local government with a certified Local Coastal Program (LCP) (as applicable), identify the habitat types and species present to determine if the area qualifies as an Environmentally Sensitive Habitat Area (ESHA). If the area is an ESHA, the treatment project may be allowed pursuant to this PEIR, if it meets the following conditions. If a project requires a CDP by the Coastal Commission or a local government with a certified LCP (as applicable), the CDP approval may require modification to these conditions to further avoid and minimize impacts: ▶ The treatment will be designed, in compliance with the Coastal Act or LCP if a site is within a certified LCP area, to protect the habitat function of the affected ESHA, protect habitat values, and prevent loss or type conversion of habitat and vegetation types that define the ESHA, or loss of special-status species that inhabit the ESHA. ▶ Treatment actions will be limited to eradication or control of invasive plants, removal of uncharacteristic fuel loads (e.g., removing dead, diseased, or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the vegetation types present in the ESHA. ▶ A qualified biologist or RPF familiar with the ecology of the treatment area will monitor all treatment activities in ESHAs. ▶ Appropriate no-disturbance buffers will be developed in compliance with the Coastal Act or relevant LCP policies for treatment activities in the vicinity of ESHAs to avoid adverse direct and indirect effects to ESHAs. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
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;	Initial Treatment: Y Treatment Maintenance: Y	During	San Mateo Resource Conservation District	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ for all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species; ▶ inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas; ▶ stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area; ▶ identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include herbicide application, manual or mechanical treatments, prescribed burning, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles; ▶ treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and ▶ implement Fire and Fuel Management BMPs outlined in the "Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers" (Cal-IPC 2012, or current version). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
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	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.				
SPR BIO-11. Install Wildlife-Friendly Fencing (Prescribed Herbivory). If temporary fencing is required for prescribed herbivory treatment, a wildlife-friendly fencing design will be used. The project proponent will require a qualified RPF or biologist to review and approve the design before installation to minimize the risk of wildlife entanglement. The fencing design will meet the following standards: ▶ Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale or snag a leaping animal; and, if feasible, keeping electric netting-type fencing electrified at all times or laid down while not in use. ▶ Charge temporary electric fencing with intermittent pulse energizers; continuous output fence chargers will not be permitted. ▶ Allow wildlife to jump over easily without injury by installing fencing that can flex as animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass. ▶ Be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers. This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
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	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent

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

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Geology, Soils, and Mineral Resource Standard Project Requirements				
SPR GEO-1 Suspend Disturbance during Heavy Precipitation: The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	San Mateo Resource Conservation District	Project Proponent
SPR GEO-2 Limit High Ground Pressure Vehicles: The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	San Mateo Resource Conservation District	Project Proponent
SPR GEO-3 Stabilize Disturbed Soil Areas: The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments, and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, prescribed herbivory, or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery, animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical, prescribed herbivory, and prescribed burns that result in exposure of	Initial Treatment: Y Treatment Maintenance: Y	During	San Mateo Resource Conservation District	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
bare soil over 50 percent of the project area treatment activities and all treatment types, including treatment maintenance.				
SPR GEO-4 Erosion Monitoring: The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During and Post	San Mateo Resource Conservation District	Project Proponent
SPR GEO-5 Drain Stormwater via Water Breaks: The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (February 2019 version). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During and Post	San Mateo Resource Conservation District	Project Proponent
SPR GEO-6 Minimize Burn Pile Size: The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15 percent of the total treatment area (Busse et al. 2014). The project proponent will not locate burn piles in a Watercourse and Lake Protection Zone as defined in SPR HYD-4. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
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	San Mateo Resource Conservation District	Project Proponent

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, including treatment maintenance.				
SPR GEO-8 Steep Slopes: The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). If unstable areas or soils are identified within the treatment area, are unavoidable, and will be potentially directly or indirectly affected by the treatment, a licensed geologist (P.G. or C.E.G.) will determine the potential for landslide, erosion, of other issue related to unstable soils and identity measures (e.g., those in SPR GEO-7) that will be implemented by the project proponent such that substantial erosion or loss of topsoil would not occur. This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent
Greenhouse Gas Emissions Standard Project Requirements				
SPR GHG-1 Contribute to the AB 1504 Carbon Inventory Process: The project proponent of treatment projects subject to the AB 1504 process will provide all necessary data about the treatment that is needed by the U.S. Forest Service and FRAP to fulfill requirements of the AB 1504 carbon inventory, and to aid in the ongoing research about the long-term net change in carbon sequestration resulting from treatment activity. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	San Mateo Resource Conservation District	Project Proponent
Hazardous Material and Public Health and Safety Standard Project Requirements				
SPR HAZ-1 Maintain All Equipment: The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR HAZ-2 Require Spark Arrestors: The project proponent will require mechanized hand tools to have federal- or state-approved spark arrestors. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	San Mateo Resource Conservation District	Project Proponent
SPR HAZ-3 Require Fire Extinguishers: The project proponent will require tree cutting crews to carry one fire extinguisher per chainsaw. Each vehicle would be equipped with one long-handled shovel and one axe or Pulaski consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	San Mateo Resource Conservation District	Project Proponent
SPR HAZ-4 Prohibit Smoking in Vegetated Areas: The project proponent will require that smoking is only permitted in designated smoking areas barren or cleared to mineral soil at least 3 feet in diameter (PRC Section 4423.4). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	San Mateo Resource Conservation District	Project Proponent
SPR HAZ-5 Spill Prevention and Response Plan: The project proponent or licensed Pest Control Advisor (PCA) will prepare a Spill Prevention and Response Plan (SPRP) prior to beginning any herbicide treatment activities to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. The SPRP will include (but not be limited to): ▶ a map that delineates staging areas, and storage, loading, and mixing areas for herbicides; ▶ a list of items required in an onsite spill kit that will be maintained throughout the life of the activity; ▶ procedures for the proper storage, use, and disposal of any herbicides, adjuvants, or other chemicals used in vegetation treatment. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	Project Proponent	Project Proponent
SPR HAZ-6 Comply with Herbicide Application Regulations: The project proponent will coordinate pesticide use with the applicable County Agricultural Commissioner(s), and all required licenses and permits will be obtained prior to herbicide application. The project proponent will prepare all herbicide applications to do the following: ▶ Be implemented consistent with recommendations prepared annually by a licensed PCA. ▶ Comply with all appropriate laws and regulations pertaining to the use of pesticides and safety standards for employees and the public, as governed by the EPA, DPR, and applicable local jurisdictions.	Initial Treatment: Y Treatment Maintenance: Y	During	Project Proponent	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Adhere to label directions for application rates and methods, storage, transportation, mixing, container disposal, and weather limitations to application such as wind speed, humidity, temperature, and precipitation. ▶ Be applied by an applicator appropriately licensed by the State. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.				
SPR HAZ-7 Triple Rinse Herbicide Containers: The project proponent will triple rinse all herbicide and adjuvant containers with clean water at an approved site, and dispose of rinsate by placing it in the batch tank for application per 3 CCR Section 6684. The project proponent will puncture used containers on the top and bottom to render them unusable, unless said containers are part of a manufacturer's container recycling program, in which case the manufacturer's instructions will be followed. Disposal of non-recyclable containers will be at legal dumpsites. Equipment will not be cleaned, and personnel will not be washed in a manner that would allow contaminated water to directly enter any body of water within the treatment area or adjacent watersheds. Disposal of all herbicides will follow label requirements and waste disposal regulations. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	Project Proponent	Project Proponent
SPR HAZ-8 Minimize Herbicide Drift to Public Areas: The project proponent will employ the following herbicide application parameters during herbicide application to minimize drift into public areas: ▶ application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ▶ spray nozzles will be configured to produce the largest appropriate droplet size to minimize drift; ▶ low nozzle pressures (30-70 pounds per square inch) will be utilized to minimize drift; and ▶ spray nozzles will be kept within 24 inches of vegetation during spraying. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	Project Proponent	Project Proponent
SPR HAZ-9 Notification of Herbicide Use in the Vicinity of Public Areas: For herbicide applications occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet, the project proponent will post signs at each end of herbicide treatment areas and any intersecting trails notifying the public of the use of herbicides. The signs will include the signal word (i.e., Danger, Warning or Caution), product name, and manufacturer; active ingredient; EPA registration number; target pest; treatment location; date and time of application; restricted entry interval, if	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	Project Proponent	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
applicable per the label requirements; date which notification sign may be removed; and a contact person with a telephone number. Signs will be posted prior to the start of treatment and notification will remain in place for at least 72 hours after treatment ceases. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.				
Hydrology and Water Quality Standard Project Requirements				
SPR HYD-1 Comply with Water Quality Regulations: Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or vegetation management activities. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent
SPR HYD-2 Avoid Construction of New Roads: The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior	San Mateo Resource Conservation District	Project Proponent
SPR HYD-3 Water Quality Protections for Prescribed Herbivory: The project proponent will include the following water quality protections for all prescribed herbivory treatments: ▶ Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified in the treatment prescription and excluded from prescribed herbivory project areas using temporary fencing or active herding. A buffer of approximately 50 feet will be maintained between sensitive and actively grazed areas.	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

<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>

Water will be provided for grazing animals in the form of an on-site stock pond or a portable water source located outside of environmentally sensitive areas.
Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed.

This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.
</td><td></td><td></td><td></td><td></td></tr>
<tr><td>
SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones: The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.
Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths
<table>
<tr><th>Water Class</th><th>Class I</th><th>Class II</th><th>Class III</th><th>Class IV</th></tr>
<tr><td>Water Class Characteristics or Key Indicator Beneficial Use</td><td>1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or
2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning.</td><td>1) Fish always or seasonally present offsite within 1000 feet downstream and/or
2) Aquatic habitat for nonfish aquatic species.
3) Excludes Class III waters that are tributary to Class I waters.</td><td>No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations.</td><td>Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.</td></tr>
<tr><td colspan="5">WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ</td></tr>
<tr><td>< 30 % Slope</td><td>75</td><td>50</td><td rowspan="2">Sufficient to prevent the</td><td></td></tr>
<tr><td>30-50 % Slope</td><td>100</td><td>75</td><td></td></tr>
</table>
</td><td>Initial Treatment: Y
Treatment Maintenance: Y</td><td>Prior and During</td><td>San Mateo Resource Conservation District</td><td>Project Proponent</td></tr>
</table>

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

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

The following WLPZ protections will be applied for all treatments:

- Treatment activities with WLPZs will retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced a qualified RPF will provide the project proponent with a site- and/or treatment activity-specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version).
- Equipment, including tractors and vehicles, must not be driven in wet areas or WLPZs, except over existing roads or watercourse crossings where vehicle tires or tracks remain dry.
- Equipment used in vegetation removal operations will not be serviced in WLPZs, within wet meadows or other wet areas, or in locations that would allow grease, oil, or fuel to pass into lakes, watercourses, or wet areas.
- WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately.
- Burn piles will be located outside of WLPZs.
- No fire ignition (nor use of associated accelerants) will occur within WLPZs however low intensity backing fires may be allowed to enter or spread into WLPZs.
- Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of soil into water

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
bodies and may include but are not limited to mulching, rip-rap, grass seeding, or chemical soil stabilizers. ▶ Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse. ▶ Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes. ▶ Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides: The project proponent will implement the following measures when applying herbicides: ▶ Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway. ▶ Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry. ▶ No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ provided that the project proponent notifies the applicable regional water quality control board no fewer than 15 days prior to herbicide application. The feasibility of avoiding herbicide application within WLPZ of Class I and II watercourses will be determined by the project proponent and may be based on whether doing so will preclude achieving CalVTP program objectives, including, but not limited to, protection of vulnerable communities. The reasons for infeasibility will be documented in the PSA. ▶ No herbicides will be applied within a 50-foot buffer of ESA or CESA listed plant species or within 50 feet of dry vernal pools.	Initial Treatment: Y Treatment Maintenance: Y	During	Project Proponent	Project Proponent

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray. ▶ Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ▶ No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities. This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.				
SPR HYD-6 Protect Existing Drainage Systems: If a treatment activity is adjacent to a roadway with stormwater drainage infrastructure, the existing stormwater drainage infrastructure will be marked prior to ground disturbing activities. If a drainage structure or infiltration system is inadvertently disturbed or modified during project activities, the project proponent will coordinate with owner of the system or feature to repair any damage and restore pre-project drainage conditions. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent
Noise Standard Project Requirements				
SPR NOI-1 Limit Heavy Equipment Use to Daytime Hours: The project proponent will require that operation of heavy equipment associated with treatment activities (heavy off-road equipment, tools, and delivery of equipment and materials) will occur during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship). Cities and counties in the treatable landscape typically restrict construction-noise (which would apply to vegetation treatment noise) to particular daytime hours. If the project proponent is subject to local noise ordinance, it will adhere to those to the extent the project is subject to them. If the applicable jurisdiction does not have a noise ordinance or policy restricting the time-of-day when noise-generating activity can occur noise-generating vegetation treatment activity will be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday and federal holidays. If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During	San Mateo Resource Conservation District	Project Proponent
SPR NOI-2 Equipment Maintenance: The project proponent will require that all powered treatment equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be	Initial Treatment: Y Treatment Maintenance:	During	San Mateo Resource Conservation District	Project Proponent

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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	Prior and During	Project Proponent	Project Proponent
Smoke generated during prescribed burn operations could potentially affect driver visibility and traffic operations along nearby roadways. Direct smoke impacts to roadway visibility and indirect impacts related to driver distraction will be considered during the planning phase of burning operations. Smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations will be identified and addressed within the TMP. The TMP will include measures to monitor smoke dispersion onto public roadways, and traffic control operations will be initiated in the event burning operations could affect traffic safety along any roadways. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Click or tap here to enter text. Treatment Maintenance: Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Public Services and Utilities Standard Project Requirements				
SPR UTIL-1: Solid Organic Waste Disposition Plan. For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. The Solid Organic Waste Disposition Plan will include the amount (e.g., tons) of solid organic waste to be managed onsite (i.e., scattering of wood materials, generating unburned piles, and pile burning) and	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
transported offsite for processing (i.e., biomass power plant, wood product processing facility, composting). If the project proponent intends to transport solid organic waste offsite, the Solid Organic Waste Disposition Plan will clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials. This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Aesthetics and Visual Resources				
Mitigation Measure AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks The project proponent will conduct a visual reconnaissance of the treatment area prior to implementing non-shaded fuel breaks to observe the surrounding landscape and determine if public viewing locations, including scenic vistas, public trails, and state scenic highways, have views of the proposed treatment area. If none are identified, the non-shaded fuel break may be implemented without additional visual mitigation. If the project proponent identifies public viewing points, including heavily used scenic vistas, public trails, recreation areas, and state scenic highways with lengthy views (i.e., longer than a few seconds) of a proposed non-shaded fuel break treatment area, the project proponent will, prior to implementation, attempt to identify any feasible change in location of the fuel break to reduce its visibility from public viewpoints. If no feasible location changes exist that would reduce impacts to public viewers and achieve the intended wildfire risk reduction objectives of the proposed non-shaded fuel break, the project proponent will implement, where feasible, a shaded fuel break rather than a non-shaded fuel break, if the shaded fuel break would achieve the intended wildfire risk reduction objectives. With the shaded fuel break, the project proponent will thin and feather adjacent vegetation to break up the linear edges of the fuel break and strategically preserve vegetation at the edge of the fuel break, as feasible, to help screen public views and minimize the contrast between the fuel break and surrounding vegetation.	Initial Treatment: Y Treatment Maintenance: Y	Prior	San Mateo Resource Conservation District	Project Proponent
Air Quality				
Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment. It is acknowledged that due to cost,	Initial Treatment: Y Treatment Maintenance: Y	During	San Mateo Resource Conservation District	Project Proponent

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

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

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape. ▶ Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank. ▶ Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the special-status plant itself, habitat function would be diminished and the treatment would need to be modified or precluded from implementation. ▶ No fire ignition (nor use of associated accelerants) will occur within the special-status plant buffer. A qualified RPF or botanist with knowledge of the special-status plant species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment would not maintain habitat function of the special-status plant habitat (i.e., the habitat would be rendered unsuitable) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If the project proponent determines the impact on special-status plants would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required.				
Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment. The first priority for compensatory mitigation will be preserving and enhancing existing populations outside of the treatment area in perpetuity, or if that is not an option because existing populations that can be preserved in perpetuity are not available, one of the following mitigation options will be implemented by the project proponent instead: ▶ creating populations on mitigation sites outside of the treatment area through seed collection and dispersal (annual species) or transplantation (perennial species); ▶ purchasing mitigation credits from a CDFW- or USFWS-approved conservation or mitigation bank in sufficient quantities to offset the loss of occupied habitat; and ▶ if the affected special-status plants are not listed under ESA or CESA, compensatory mitigation may include restoring or enhancing degraded habitats so that they are made suitable to support special-status plant species in the future. If relocation efforts are part of the Compensatory Mitigation Plan, the plan will include details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements. The following performance standards will be applied for relocation: ▶ the extent of occupied area will be substantially similar to the affected occupied habitat and will be suitable for self-producing populations. Re-located/re-established populations will be considered suitable for self-producing when: ▶ habitat conditions allow for plants to reestablish annually for a minimum of 5 years with no human intervention, such as supplemental seeding; and	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ reestablished habitats contain an occupied area comparable to existing occupied habitat areas in similar habitat types in the region. If preservation of existing populations or creation of new populations is part of the mitigation plan, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands and actions (e.g., the number and type of credits, location of mitigation bank or easement, restoration or enhancement actions), parties responsible for the long-term management of the land, and the legal and funding mechanisms (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. If mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, funding assurances, and success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations. If mitigation includes restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. If the loss of occupied habitat cannot be offset (e.g., if preservation of existing populations or creation of new populations through relocation efforts are not available for a certain species), and as a result treatment activities would substantially reduce the number or restrict the range of listed plant species, then the treatment will not qualify as within the scope of this PEIR. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above.				
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	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent

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

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

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

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding the determination that a non-listed special-status species would benefit from the treatment.				
Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities) If the provisions of Mitigation Measure BIO-2a, BIO-2b, BIO-2d, BIO-2e, BIO-2f, or BIO-2g cannot be implemented and the project proponent determines that additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or protecting land that provides (or will provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment. Compensation may include: 1. Preserving existing habitat outside of the treatment area in perpetuity; this may entail purchasing mitigation credits and/or lands from a CDFW- or USFWS-approved entity in sufficient quantity to offset the residual significant impacts, generally at a ratio of 1:1 for habitat; and 2. Restoring or enhancing existing habitat within the treatment area or outside of the treatment area (including decommissioning roads, adding perching structures, removing existing perching structures, or removing existing movement barriers or other existing features that are adversely affecting the species). The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanisms for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. 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	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent

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

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

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

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

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

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities) If treatment activities would occur within the limited range of any state or federally listed beetle, fly, grasshopper, or snail, and these species are identified as occurring or having potential to occur due to the presence of potentially suitable habitat during review and surveys for SPR BIO-1 and surveys for SPR BIO-10, then the following measures will be implemented: ▶ To avoid and minimize impacts to Mount Hermon June beetle and Zayante band-winged grasshopper, treatment activities will not occur within "Sandhills" habitat in Santa Cruz County, the only suitable habitat for these species. ▶ To avoid and minimize impacts to Casey's June beetle, Delhi Sands flower-loving fly (*Rhaphiomidas terminates abdominalis*), Delta green ground beetle (*Elaphrus virisis*), Morro shoulderband snail, Ohlone tiger beetle (*Cicindela ohlone*), and Trinity bristle snail, treatment activities will not occur within habitat in the range of these species that is deemed suitable by a qualified RPF or biologist with familiarity of the species. If the project proponent cannot implement the measures above to avoid mortality, injury or disturbance to listed beetles, flies, grasshoppers, and snails, or degradation of suitable habitat such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities) If special-status bumble bees are identified as occurring during review and surveys under SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, or if suitable habitat for special-status bumble bees is identified during review and surveys under SPR BIO-1 (e.g., wet meadow, forest meadow, riparian, grassland, or coastal scrub habitat containing sufficient floral resources within the range of the species), then the project proponent will implement the following measures, as feasible: ▶ Prescribed burning within occupied or suitable habitat for special-status bumble bees will occur from October through February to avoid the bumble bee flight season. ▶ Treatment areas in occupied or suitable habitat will be divided into a sufficient number of treatment units such that the entirety of the habitat is not treated within the same year; the objective of this measure is to provide refuge for special-status bumble bees during treatment activities and temporary retention of suitable floral resources proximate to the treatment area. ▶ Treatments will be conducted in a patchy pattern to the extent feasible in occupied or suitable habitat, such that the entirety of the habitat is not burned or removed and untreated portions of occupied or suitable habitat are retained (e.g., fire breaks will be aligned to allow for areas of unburned floral resources for special-status bumble bees within the treatment area).	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory) The project proponent will implement the following measure if treatment activities are planned within the range of desert bighorn sheep, peninsular bighorn sheep, Sierra Nevada bighorn sheep, or pronghorn: ▶ Prescribed herbivory activities will be prohibited within a 14-mile buffer around suitable habitat for any species of bighorn sheep within the range of these species consistent with the more stringent recommendations in the Recovery Plan for Sierra Nevada bighorn sheep (USFWS 2007). ▶ Prescribed herbivory activities will be avoided within the range of pronghorn where feasible (where this range does not overlap with the range of any species of bighorn sheep).	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3: ▶ Reference the *Manual of California Vegetation*, Appendix 2, Table A2, *Fire Characteristics* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class and fire return interval departure of the vegetation alliances present will also be determined. ▶ Design treatments in sensitive natural communities and oak woodlands to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function of the affected sensitive natural community. Treatments will be designed to replicate the fire regime attributes for the affected sensitive natural community or oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fireline intensity, severity, and fire type as described in *Fire in California's Ecosystems* (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval (i.e., time since last burn is less than the average time required for that vegetation type to recover from fire) or within Condition Class 1. ▶ To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled).	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ To the extent feasible, fuel breaks will not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in sensitive natural communities with a rarity rank of S3 (vulnerable) or in oak woodlands. In forest and woodland sensitive natural communities with a rarity rank of S3, and in oak woodlands, only shaded fuel breaks will be installed, and they will not be installed in more than 20 percent of the stand of sensitive natural community or oak woodland vegetation (i.e., if the sensitive natural community covers 100 acres, no more than 20 acres will be converted to create the fuel break). ▶ Use prescribed burning as the primary treatment activity in sensitive natural communities that are fire dependent (e.g., closed-cone forest and woodland alliances, chaparral alliances characterized by fire-stimulated, obligate seeders), to the extent feasible and appropriate based on the fire regime attributes as described in *Fire in California's Ecosystems* (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). ▶ Time prescribed herbivory to occur when non-target vegetation is not susceptible to damage (e.g. non-target vegetation is dormant or has completed its reproductive cycle for the year). For example, use herbivores to control invasive plants growing in sensitive habitats or sensitive natural communities when sensitive vegetation is dormant but invasive plants are growing. Timing of herbivory to avoid non-target vegetation will be determined by a qualified botanist, RPF, or biologist based on the specific vegetation alliance being treated, the life forms and life conditions of its characteristic plant species, and the sensitivity of the non-target vegetation to the effects of herbivory. The feasibility of implementing the avoidance measures will be determined by the project proponent based on whether implementation of this mitigation measure will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. If the avoidance measures are determined by the project proponent to be infeasible, the project proponent will document the reasons implementation of the avoidance strategies are infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). A qualified RPF or botanist with knowledge of the affected sensitive natural community will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat functions of the sensitive natural community or oak woodland. If the project proponent determines the impact on sensitive natural communities or oak woodlands would be less than significant, no further mitigation will be required. If the project proponent determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-3b will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the occupied habitat area even though some loss may occur during treatment activities. For a treatment to be considered beneficial to a sensitive natural community or oak woodland, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the community (or similar community) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.				
Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will implement the following actions: ▶ Compensate for unavoidable losses of sensitive natural community and oak woodland acreage and function by: ▪ restoring sensitive natural community or oak woodland functions and acreage within the treatment area; ▪ restoring degraded sensitive natural communities or oak woodlands outside of the treatment area at a sufficient ratio to offset the loss of acreage and habitat function; or ▪ preserving existing sensitive natural communities or oak woodlands of equal or better value to the sensitive natural community lost through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function. ▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that	Initial Treatment: Y Treatment Maintenance: Y	During	San Mateo Resource Conservation District	Project Proponent

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. 2. For restoring or enhancing riparian habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., Lake and Streambed Alteration Agreement), if these requirements are equally or more effective than the mitigation identified above.				
Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands Impacts to wetlands will be avoided using the following measures: ▶ The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented. ▶ The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures).	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
▶ A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified RPF or biologist and will depend on the type of wetland present (e.g., seasonal wetland, wet meadow, freshwater marsh, vernal pool), the timing of treatment (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the	Initial Treatment: Click or tap here to enter text. Treatment Maintenance: Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
species' vulnerability to the treatment activities, environmental conditions and terrain, and the treatment activity being implemented. ▶ A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. ▶ Within this buffer, herbicide application is prohibited. ▶ Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical treatments, prescribed herbivory, equipment and vehicle access or staging. ▶ Only prescribed (broadcast) burning may be implemented in wetland habitats if it is determined by a qualified RPF or biologist that: ▪ No special-status species are present in the wetland habitat ▪ The wetland habitat function would be maintained. ▪ The prescribed burn is within the normal fire return interval for the wetland vegetation types present ▪ Fire containment lines and pile burning are prohibited within the buffer ▪ No fire ignition (nor use of associated accelerants) will occur within the wetland buffer				
Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites The project proponent will implement the following measures while working in treatment areas that contain nursery sites identified in surveys conducted pursuant to SPR BIO-10: ▶ Retain Known Nursery Sites. A qualified RPF or biologist will identify the important habitat features of the wildlife nursery and, prior to treatment activities, will mark these features for avoidance and retention during treatment ▶ Establish Avoidance Buffers. The project proponent will establish a non-disturbance buffer around the nursery site if activities are required while the nursery site is active/occupied. The appropriate size and shape of the buffer will be determined by a qualified RPF or biologist, based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors. No treatment activity will commence within the buffer area until a qualified RPF or biologist confirms that the nursery site is no longer active/occupied. Monitoring of the effectiveness of the non-disturbance buffer around the nursery site by a qualified RPF, biologist, or biological technician during and after treatment activities will be required. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF,	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to special-status species.				
Greenhouse Gas Emissions				
Mitigation Measure GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns When planning for and conducting a prescribed burn, project proponents implementing a prescribed burn will incorporate feasible methods for reducing GHG emissions, including the following, which are identified in the National Wildfire Coordinating Group Smoke Management Guide for Prescribed Fire (NWCG 2018): ▶ reduce the total area burned by isolating and leaving large fuels (e.g., large logs, snags) unburned; ▶ reduce the total area burned through mosaic burning; ▶ burn when fuels have a higher fuel moisture content; ▶ reduce fuel loading by removing fuels before ignition. Methods to remove fuels include mechanical treatments, manual treatments, prescribed herbivory, and biomass utilization; and ▶ schedule burns before new fuels appear. As the science evolves, other feasible methods or technologies to sequester carbon could be incorporated, such as conservation burning, a technique for burning woody material that reduces the production of smoke particulates and carbon released into the atmosphere and generates more biochar. Biochar is produced from the material left over after the burn and spread with compost to increase soil organic matter and soil carbon sequestration. Technologies to reduce greenhouse gas emissions may also include portable units that perform gasification to produce electricity or pyrolysis that produces biooil that can be used as liquid fuel and/or syngas that can be used to generate electricity. The project proponent will document in the Burn Plan required pursuant to SPR AQ-3 which methods for reducing GHG emissions can feasibly be integrated into the treatment design.	Initial Treatment: N Treatment Maintenance: N	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
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	Initial Treatment: Y Treatment Maintenance: Y	Prior and During	San Mateo Resource Conservation District	Project Proponent

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

ATTACHMENT B – PROJECT-SPECIFIC CEQA FINDINGS AND STATEMENT OF OVERRIDING CONSIDERATIONS

Template Available for Use by Proponents of Vegetation Treatment Projects Within the Scope of the CalVTP Program EIR.

INTRODUCTION

The San Mateo County Parks Department, referred to herein as "Project Proponent," in the exercise of its independent judgment, makes and adopts the following findings regarding its decision to approve the San Mateo County Parks – Huddart and Wunderlich CalVTP PSA, referred to herein as "vegetation treatment 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 "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The same section provides that the procedures required by CEQA "are intended to 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." (Pub. Resources Code, Section 21002.) Section 21002 goes on to provide that "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 must 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 (the Board), adopted Findings and a Statement of Overriding Considerations on December 30, 2019.

Here, as explained in the Board'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. For reasons set forth in

the Board's Statement of Overriding Considerations, however, the Board determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the CalVTP.

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).) According to case law, 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 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 required findings for an agency's project-specific approval that relies on and implements the CalVTP PEIR.

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 vegetation treatment project under the CalVTP in spite of these effects.

BACKGROUND AND PROJECT DESCRIPTION

Project Goals:

The San Mateo County Parks, Huddart and Wunderlich Cal VTP builds upon work completed by the San Mateo Resources Conservation District and San Mateo County Parks collaboratively with partners, stakeholders, and local communities on forest health fuel reduction projects to create shaded fuel breaks, reduce ladder fuels, lower fire severity, and reduce invasive species. Reducing competition in the understory and treating hazard or diseased trees where feasible creates a healthier and more vigorous forest, increasing forest resiliency and reducing wildfire risk.

Project Description:

Mechanical mastication would be utilized to remove understory vegetation, dead or downed material, remove hazard trees, dead, dying, and diseased trees, and live trees up to 8 inches diameter at breast height (DBH). All debris and materials left by the masticator will be lopped and scattered throughout the treatment area. The manual treatment crew may utilize chainsaws and/or other various hand mechanized or hand tools to prune trees and woody vegetation, buck downed debris and materials, and to remove dead, dying, and diseased trees of any diameter, and live trees up to 8 inches DBH. Herbicide application may be utilized to eliminate the spread and re-sprouting of invasive species in the treatment areas predominately along roads and trails. The treatment activities will reduce potential ignition sources, improve the forest's health and vigor, and promote a more resilient fuel break (see "Project Activities and Treatment Prescriptions" under Initial and Maintenance Treatments).

Project Site:

Huddart and Wunderlich County Parks are recreational properties containing hiking and equestrian trails and scenic picnic areas utilized by the public. Proposed treatment areas are located within the park boundaries on slopes less than approximately 40% off of roadways and trails, however, some trail closures may be required for public safety.

Project Location:

The project treatment area encompasses a total of 402.1 acres on San Mateo County Park lands, specifically Huddart County Park (217.6 acres) and Wunderlich County Park (184.5 acres). The project properties are located to

the west of Woodside and south of the Crystal Springs Reservoir in San Mateo County, see attached maps (Attachment #1, Figure 1 and Figure 2).

Initial Treatment Description:

Treatment Types

WUI Fuels Reduction

Proposed project areas are natural areas that are adjacent to homes and structures, indicating that the project areas make up a WUI as defined in the PEIR (CalVTP Final PEIR Volume II Section 2.5.1 page 7 and page 8-10). Fuel reductions in the WUI will directly impact communities and assets at risk, serving as emergency access points along or near evacuation routes for the nearby communities and as an opportunity to slow or stop wildfires. WUI treatments would remove understory vegetation including dead, dying, hazard, and diseased trees of any diameter, ladder fuels, and live trees up to 8 inches DBH to promote a healthier residual stand following treatments. Habitat quality will be enhanced through WUI fuel reductions where existing habitat has been degraded due to invasive species encroachment or the accumulation of fuels.

Fuel Break

This project also proposes fuel break treatment types in areas that would prevent or slow the spread of wildfire to structures or other natural resources. As defined in the PEIR, fuel breaks remove zones of vegetation to support fire suppression efforts and passively interrupt the path of a fire (CalVTP Final PEIR Volume II Section 2.5.1 page 7 and page 11-14). Treatments would predominately consist of shaded fuel breaks, however, non-shaded fuel breaks may occur in shrub fuel types. The fuel breaks would provide emergency responders opportunity to control or contain wildfires through the modification of flammable vegetation. Shaded fuel breaks support a healthy and fire resilient residual forest stand through retaining the majority of the overstory canopy to maintain shade that will reduce the potential for rapid re-growth of understory vegetation.

Ecological Restoration

In addition, this project proposes ecological restoration treatment types to restore ecosystem processes, conditions, and resiliency through the removal of dense understory fuels and invasive species in areas generally outside of the WUI, or areas integrated into WUI fuel reductions, as defined in the PEIR (CalVTP Final PEIR Volume II Section 2.5.1 page 7 and page15-17). Implementing the treatment activities will result in a modification of the existing fuels that will ultimately support native vegetative species and restore habitat conditions including, but not limited to habitat quality and natural fire processes. The removal of understory vegetation would mimic a natural disturbance that encourages natural forest succession to occur and influences the amount of carbon stored in the forest (Dale et al. 2000). Thinning the stand through the removal of small diameter live trees and understory vegetation will result increase the site's carrying capacity for stand volume, which would increase the growth the residual trees (Skovsgaard, 2008). The build-up of fuels and vegetation creates competition for the available water, nutrients, and sunlight plants need to grow, therefore, the reduction of vegetative competition in the understory would increase the growth and carbon storage capacity in the residual stand.

Treatment Activities

Treatment activities consist of 402.1 acres of mechanical treatment. Masticators will be used to remove dense stands of understory vegetation and ladder fuels and maintain a healthy overstory, which is within the scope of the PEIR. As stated in the CalVTP PEIR Section 2.5.2, mechanical treatments may cut, uproot, crush/compact, or chop existing vegetation through the use of masticators and other methods of application. Understory debris would be lopped and scattered on-site within the treated areas. The mechanical treatment crew may utilize a chainsaw and/or various other mechanized tools or hand tools to buck downed debris and prune ladder fuels and vegetation. Herbicide application may be implemented where invasive species are present within the treatment areas to promote regeneration of native species throughout the treatment areas through the removal of invasive species. The CalVTP PEIR Section 2.5.2 indicates that herbicide application may only be implemented at ground-level from equipment on vehicles or by manual application devices and must comply with the U.S. Environmental Protection Agency directions, as well as California Environmental Protection Agency and Department of Pesticide Regulation label standards. Based on San Mateo County Park practices, manual herbicide application methods are expected to be used for this project. It is estimated that herbicide treatments could occur over approximately 93

acres of the treatment areas predominately near roads, trail systems, and pockets of invasive species. Herbicide acreage was determined in ArcGIS Pro by establishing a 50-foot buffer from all roads and trails in proximity to treatment areas.

Fuel Types
Proposed treatments would occur in tree and shrub fuel types as described in the CalVTP PEIR Section 2.4.1, although, there are grass fuel types located within the project properties. Tree fuel types are dominated by coastal redwood forests mixed with Douglas-fir and mixed hardwood stands. These forests have generally closed canopies with moderate to dense understory fuels. The removal of understory vegetation and ladder fuels in the tree fuel types would reduce the risk of ground or surface fires spreading into the canopy. The shrub fuel types consist predominately of native shrub and chaparral species, such as coyote brush, poison oak, and manzanita. However, invasive species, such as French broom, acacia, and eucalyptus, have been documented in treatment areas. The reduction of fuels within all fuel types can prevent stand replacement that may occur in the event of a wildfire that spreads continuously through the flammable foliage and woody materials.

Equipment:
This project proposes the use of the following equipment:
Masticator
Chainsaws and/ or other mechanized tools or hand tools
Haul vehicles for equipment transport
Vehicles for contractor transport
Manual herbicide applicators

Duration of Treatments:
Initial treatments are estimated to occur within both project properties over approximately 397 days within a 2-3 year period, however, the timeframe may change in the event of delays, such as weather or production rates.

ENVIRONMENTAL REVIEW PROCESS

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

On March 1, 2021, 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 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)

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 SPRs and mitigation measures that were implemented; and
  - 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.

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 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 County of San Mateo – Parks Department, 455 County Center, 4th Floor, Redwood City, CA 94063-1646. The custodian of these documents is the County of San Mateo, Parks Department.

MITIGATION MONITORING AND REPORTING PROGRAM

A Mitigation Monitoring and Reporting Program (MMRP) was adopted by the Board 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 Final PEIR and the treatment project PSA, which were presented to the County of San Mateo, Planning Department and reviewed and considered prior to any approvals, concurs with the conclusions of the Final PEIR and the treatment project PSA regarding the potential environmental effects of the CalVTP and the treatment 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-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos 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-6: Substantially Reduce Habitat or Abundance of Common Wildlife
- Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources
- Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan

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

HYDROLOGY AND WATER QUALITY

- 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
- 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-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
- 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
- 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

PUBLIC SERVICES, UTILITIES, AD SERVICE SYSTEMS

- Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs
- Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste

WILDFIRE

- Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire
- Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides

CUMULATIVE

- Agriculture and Forestry Resources
- Biological Resources
- Geology, Soils, Paleontology, and Mineral Resources
- Energy Resources
- Hazardous Materials, Public Health and Safety
- Hydrology and Water Quality
- Population and Housing
- Noise
- Recreation
- Wildfire

SIGNIFICANT EFFECTS AND MITIGATION MEASURES

The PEIR identified a number of significant and potentially significant environmental effects (or impacts) that the CalVTP will contribute to or cause. The Board 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. For reasons set forth in Section 10.2 of the Board's Findings and Statement of Overriding Considerations, however, the Board determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the CalVTP.

The Board 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, and stated the Board'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 incorporated by reference into its findings the discussion in those documents supporting the Final PEIR's determinations. In making those findings, the Board 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 in Sections 8.1 and 8.2 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 decisionmaking 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 to be applicable to the treatment project, which have been required or incorporated into the project, will reduce these impacts to a less than significant level. The Project Proponent hereby directs that these mitigation measures be adopted.

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

☒ 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)
- ☒ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☒ 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
- ☒ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☒ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Shrub-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)
- ☒ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)
- ☒ 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
- ☒ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☒ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Ground-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)
- ☒ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☒ 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
- ☒ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

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

- ☒ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☒ 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
- ☒ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☒ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Insects and Other Terrestrial Invertebrates)

- ☒ 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)
- ☒ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)
- ☐ Mitigation Measure BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities)
- ☐ Mitigation Measure BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities)
- ☒ Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities)
- ☒ 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
- ☒ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

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

- ☒ 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)
- ☒ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☒ 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
- ☒ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

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

- ☒ 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)
- ☒ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory)
- ☒ 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
- ☒ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☒ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Fish and Aquatic Invertebrates (in wetlands, vernal pools))

- ☒ 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)
- ☒ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☒ 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
- ☒ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- ☐ Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands

☒ 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)
- ☒ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☒ 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
- ☒ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- ☐ Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands

☒ 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

☒ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

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

☐ Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands

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

☒ Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites

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 as indicated. Incorporating and implementing the following mitigation measures indicated to be applicable to the treatment project will reduce the severity of this impact, but not to a less-than-significant level. The Project Proponent hereby directs that these mitigation measures be adopted. 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 are not feasible; there are no feasible mitigation measures beyond the mitigation measures indicated below to reduce these impacts. [Alternative to preceding sentence: The Project Proponent has reviewed any suggested mitigation measures and finds these suggestions infeasible.] 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's Statement of Overriding Considerations the Project Proponent's own Statement of Overriding Considerations, if any].

AESTHETICS AND VISUAL RESOURCES

☒ Impact AES-3: Result in long-term substantial degradation of a scenic vista or visual character or quality of public views, or damage to scenic resources in a state scenic highway from the non-shaded fuel break treatment type

☒ Mitigation Measure AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks

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

☐ Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk

☐ No feasible mitigation is available.

☐ Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning

☐ No feasible mitigation is available.

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-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Insects and Other Terrestrial Invertebrates - Bumble Bees)

☒ Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities)

GREENHOUSE GAS EMISSIONS

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

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

TRANSPORTATION

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

☒ No feasible mitigation is available.

PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

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

☐ No feasible mitigation is available.

CUMULATIVE

Aesthetics

☒ Cumulative Aesthetics Impact related to Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway

☒ Mitigation Measure AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks

Air Quality

☒ Cumulative Air Quality Impact related to On-Road Vehicle and Off-Road Equipment Exhaust Emissions

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

Archaeological, Historical, and Tribal Cultural Resources

☒ Cumulative Archaeological, Historical, and Tribal Cultural Resources Impact related to Inadvertent Discoveries of Unique Archaeological Resources

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

Biological Resources

☒ Cumulative Biological Resources Impact related to Bumble Bees

☒ Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities)

Transportation

☒ Cumulative Transportation Impact related to Vehicle Miles Travelled

☒ No feasible mitigation is available.

Public Services, Utilities and Service Systems

☐ Cumulative Public Services, Utilities, and Service Systems Impact related to Disposal of Biomass

☐ No feasible mitigation is available.

STATEMENT OF OVERRIDING CONSIDERATIONS[1]

As set forth in the Board's adopted Findings, the Board 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, 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 the other benefits of the CalVTP, will render the significant effects acceptable.

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

[1] If the PSA indicates that the project proponent's treatment project will not contribute to or cause any of the significant and unavoidable impacts determined in the PEIR, the proponent need not adopt a statement of overriding considerations.

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

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 in Section 5, above.

- The CalVTP will reduce dire risks to life, property, and natural resources in California.
- The CalVTP reflects 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 reflects the Board's and CAL FIRE's goals. The CalVTP will help the Board 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 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 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 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 will bring the Board into compliance with these requirements.
- The Board is required by law to comply with SB 632, signed into law by Governor Newsom in October 2019, which requires the Board to certify a Final PEIR, pursuant to CEQA, for the vegetation treatment program filed with the State Clearinghouse under Number 2019012052 in January 2019. The CalVTP will bring the Board into compliance with this requirement.
- The CalVTP 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.

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ATTACHMENT C – PROJECT-SPECIFIC REVIEW AND SURVEY GUIDANCE FOR BIOLOGICAL RESOURCES

The following presets a stepwise guide for using the PEIR to determine the potentially affected resources in a project treatment area and the applicable SPRs and mitigation measures.

1) Pre-Treatment Review

a. Determine the ecoregion in which the treatment area is located.

i. Reference Figure 3.6-1

Special-Status Species

b. Determine which special-status plants, wildlife, and fish may be present within the ecoregion.

i. Refer to Appendix BIO-3

1. Central California Coast
    a. Table 1a: Special-Status Plants
    b. Table 1b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
2. Central California Coast Ranges
    a. Table 2a: Special Status Plants
    b. Table 2b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
3. Colorado Desert
    a. Table 3a: Special-Status Plants
    b. Table 3b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
4. Great Valley
    a. Table 4a: Special-Status Plants
    b. Table 4b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
5. Klamath Mountains
    a. Table 5a: Special-Status Plants
    b. Table 5b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
6. Modoc Plateau
    a. Table 6a: Special-Status Plants
    b. Table 6b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
7. Mojave Desert
    a. Table 7a: Special-Status Plants
    b. Table 7b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
8. Mono
    a. Table 8a: Special-Status Plants
    b. Table 8b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
9. Northern California Coast
    a. Table 9a: Special-Status Plants

b. Table 9b: Special-Status Wildlife
c. Table 19: Special-Status Fish

10. Northern California Coast Ranges
    a. Table 10a: Special-Status Plants
    b. Table 10b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
11. Northern California Interior Coast Ranges
    a. Table 11a: Special-Status Plants
    b. Table 11b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
12. Northwestern Basin and Range
    a. Table 12a: Special-Status Plants
    b. Table 12b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
13. Sierra Nevada
    a. Table 13a: Special-Status Plants
    b. Table 13b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
14. Sierra Nevada Foothills
    a. Table 14a: Special-Status Plants
    b. Table 14b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
15. Southeastern Great Basin
    a. Table 15a: Special-Status Plants
    b. Table 14b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
16. Southern California Coast
    a. Table 16a: Special-Status Plants
    b. Table 16b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
17. Southern California Mountains and Valleys
    a. Table 17a: Special-Status Plants
    b. Table 17b: Special-Status Wildlife
    c. Table 19: Special-Status Fish
18. Southern Cascades
    a. Table 18a: Special-Status Plants
    b. Table 18b: Special-Status Wildlife
    c. Table 19: Special-Status Fish

ii. Obtain an updated review of CNDDB and CNPS databases, relevant Biogeographic Information and Observation System (BIOS) queries, and relevant general and regional plans by a qualified RPF or biologist. Wetlands, Waters of the United States or State, Riparian Habitat, Sensitive Natural Communities

c. Determine whether there are wetlands or other aquatic resources within the ecoregion, and how many acres of each is present.
   i. All ecoregions - Table 3.6-2
d. Determine which habitat types and sensitive natural communities are present within the ecoregion, and how many acres of each is present.
   i. Central California Coast – Table 3.6-3

ii. Central California Coast Ranges – Table 3.6-5
iii. Colorado Desert – Table 3.6-7
iv. Great Valley – Table 3.6-9
v. Klamath Mountains – Table 3.6-11
vi. Modoc Plateau – Table 3.6-12
vii. Mojave Desert – Table 3.6-13
viii. Mono – Table 3.6-15
ix. Northern California Coast – Table 3.6-16
x. Northern California Coast Ranges – Table 3.6-18
xi. Northern California Interior and Coast Ranges – Table 3.6-20
xii. Northwestern Basin and Range – Table 3.6-21
xiii. Sierra Nevada – Table 3.6-22
xiv. Sierra Nevada Foothills – Table 3.6-24
xv. Southeastern Great Basin – Table 3.6-26
xvi. Southern California Coast – Table 3.6-27
xvii. Southern California Mountains and Valleys – Table 3.6-29
xviii. Southern Cascades- Table 3.6-31

e. Review descriptions of each CWHR habitat type.
   i. All ecoregions - Appendix BIO-1

Habitat Conservation Plans, Local Plans, and Policies

f. Identify Habitat Conservation Plans within the Ecoregion
   i. Central California Coast – Table 3.6-4
   ii. Central California Coast Ranges – Table 3.6-6
   iii. Colorado Desert – Table 3.6-8
   iv. Great Valley – Table 3.6-10
   v. Mojave Desert – Table 3.6-14
   vi. Northern California Coast – Table 3.6-17
   vii. Northern California Coast Ranges – Table 3.6-19
   viii. Sierra Nevada – Table 3.6-23
   ix. Sierra Nevada Foothills – Table 3.6-25
   x. Southern California Coast – Table 3.6-28
   xi. Southern California Mountains and Valleys – Table 3.6-30
g. Identify Local Plans and Policies Pertaining to Biological Resources within the Ecoregion
   i. The PEIR assumes that any vegetation treatments proposed by local agencies under the CalVTP would be consistent with local plans, policies, and ordinances as outlined in SPR-AD-3. The PEIR does not discuss specific local plans, policies, or ordinances; thus, determining relevant plans, policies, or ordinances would be the responsibility of the project proponent.

2) Reconnaissance-Level Survey of Treatment Area

A qualified RPF or biologist will conduct a reconnaissance-level survey for biological resources within the treatment area, focusing on the following resource areas:

a. Potential habitat for special-status wildlife and plants;
b. Riparian habitat or other sensitive natural communities;
c. State or federally protected wetlands; and
d. Potential wildlife nursery sites.

3) Focused or Protocol-level Surveys of Treatment Area (Where Protocol Exists)

If the qualified RPF or biologist determines that a special-status plant or wildlife species, riparian habitat, other sensitive natural community, or state or federally protected wetlands may be present based on the presence of suitable habitat, a focused or protocol-level survey for the resource will be conducted.

4) Determine Potential Impact Mechanisms and Relevant Mitigation Measures for Sensitive Biological Resources Determined to Be Present of Likely to Be Present

- a. Special-Status Plants
  - i. Refer to Impact BIO-1
    1. Refer to the relevant treatment activity(ies)
- b. Special-Status Wildlife
  - i. Group special-status wildlife determined to be present or likely to occur by life history characteristics.
    1. Refer to Impact BIO-2: Table 3.6-32
  - ii. Determine potential residual impact for each life history group after implementation of SPRs.
    1. Refer to Impact BIO-2: Table 3.6-33
  - iii. Refer to the relevant treatment activity(ies)
- c. Riparian Habitat and Other Sensitive Natural Communities
  - i. Refer to Impact BIO-3
    1. Refer to the relevant treatment activity(ies)
- d. State or Federally Protected Wetlands
  - i. Refer to Impact BIO-4
- e. Wildlife Movement Corridors or Wildlife Nurseries
  - i. Refer to Impact BIO-5

LIST OF ATTACHMENTS

Attachment #1: Project Maps

Attachment #2: Example Letter to Geographically Affiliated Tribes

Attachment #3: Biological Resources Species List

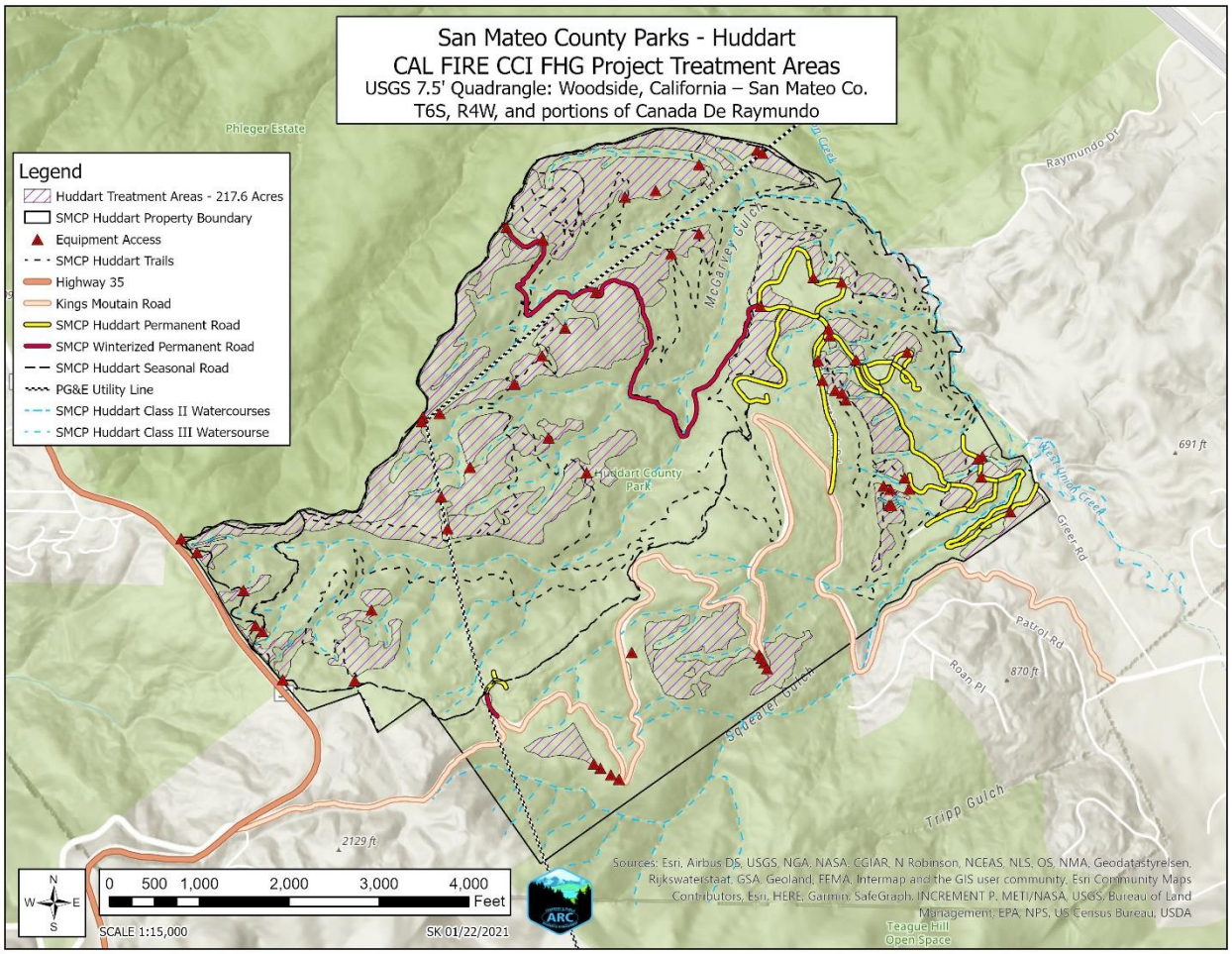
Attachment #4: Biological Resources Memorandum

Attachment #5: References

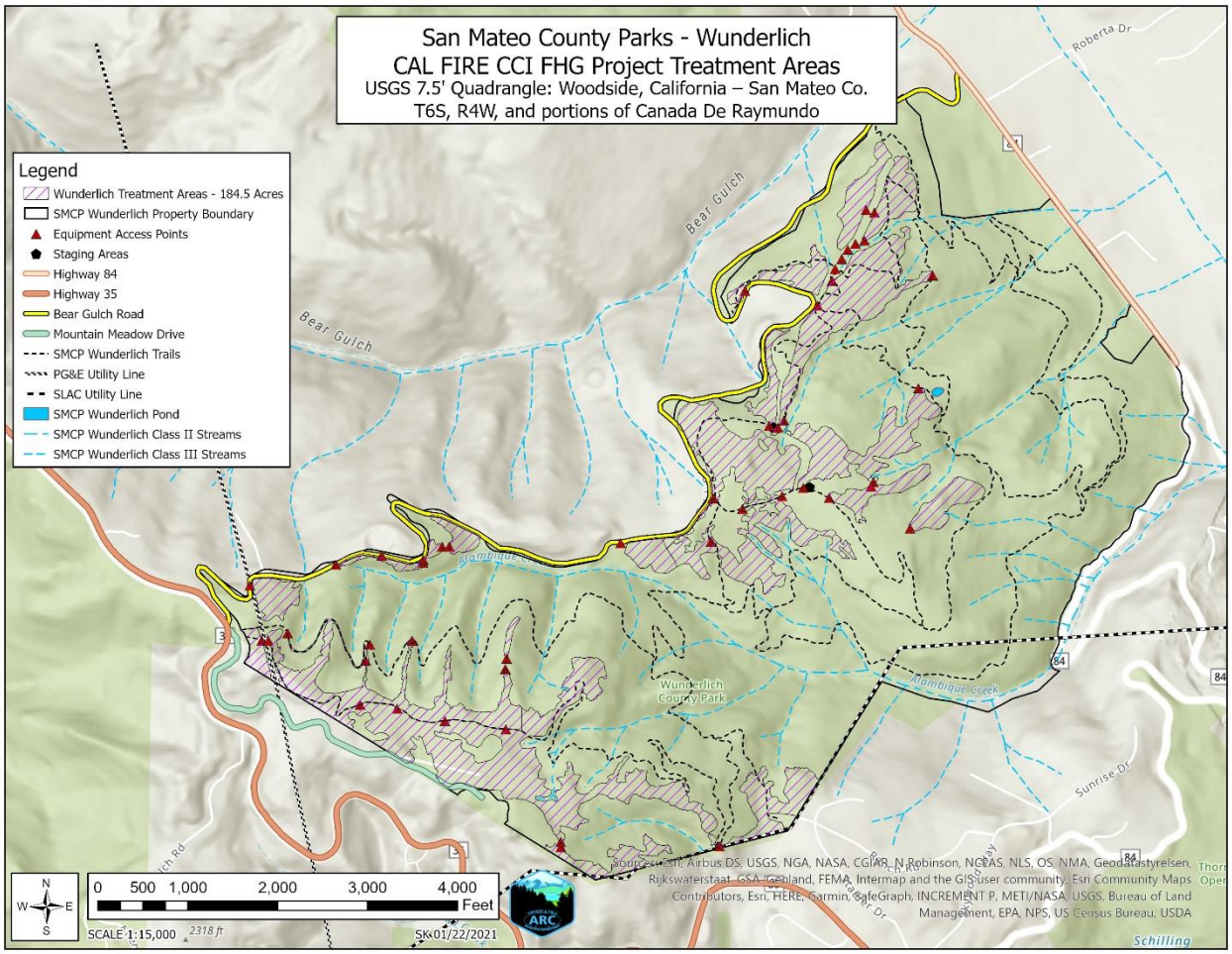
ATTACHMENT #1

San Mateo County Parks – Huddart and Wunderlich Project Maps

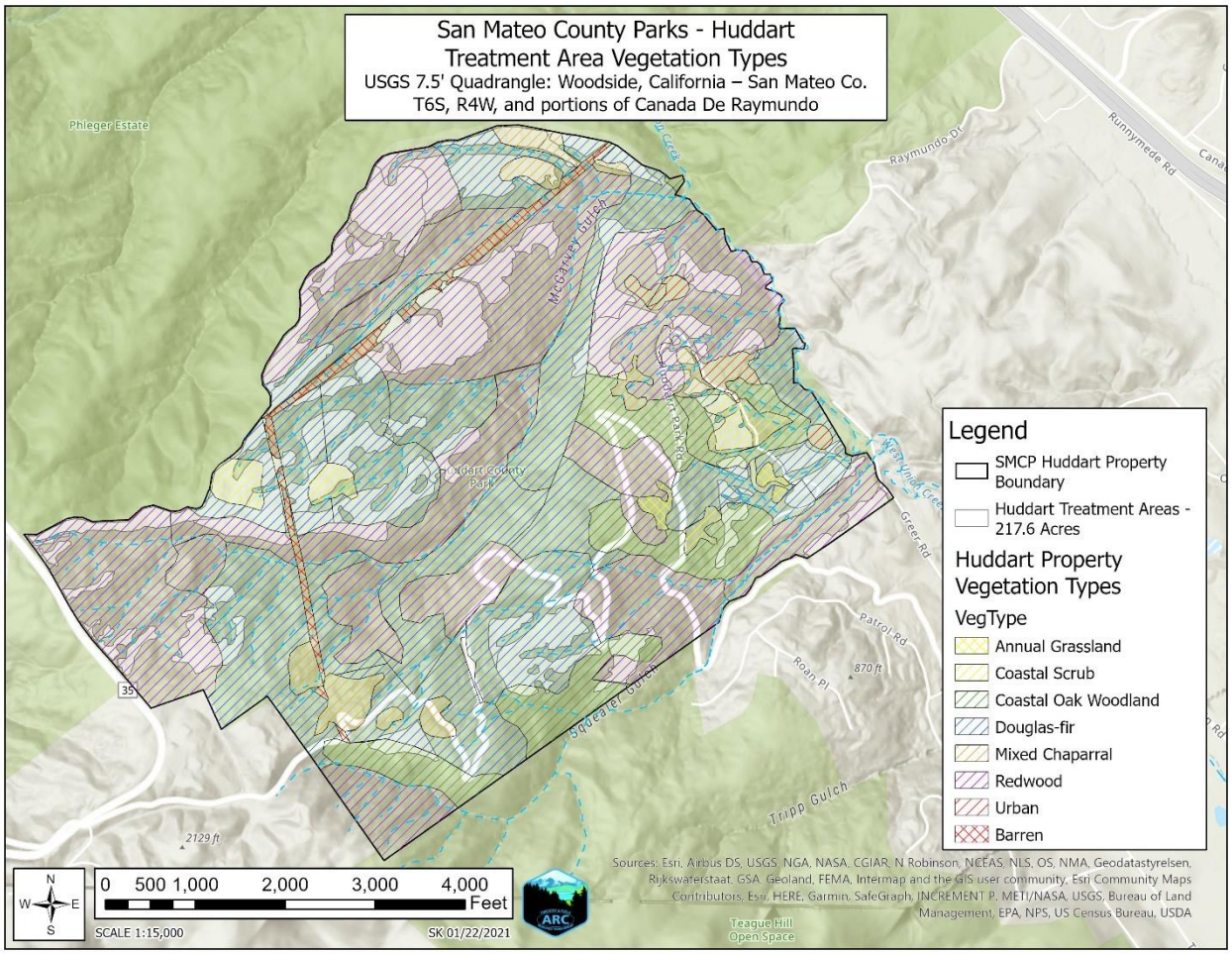
Attachment #1 Contents



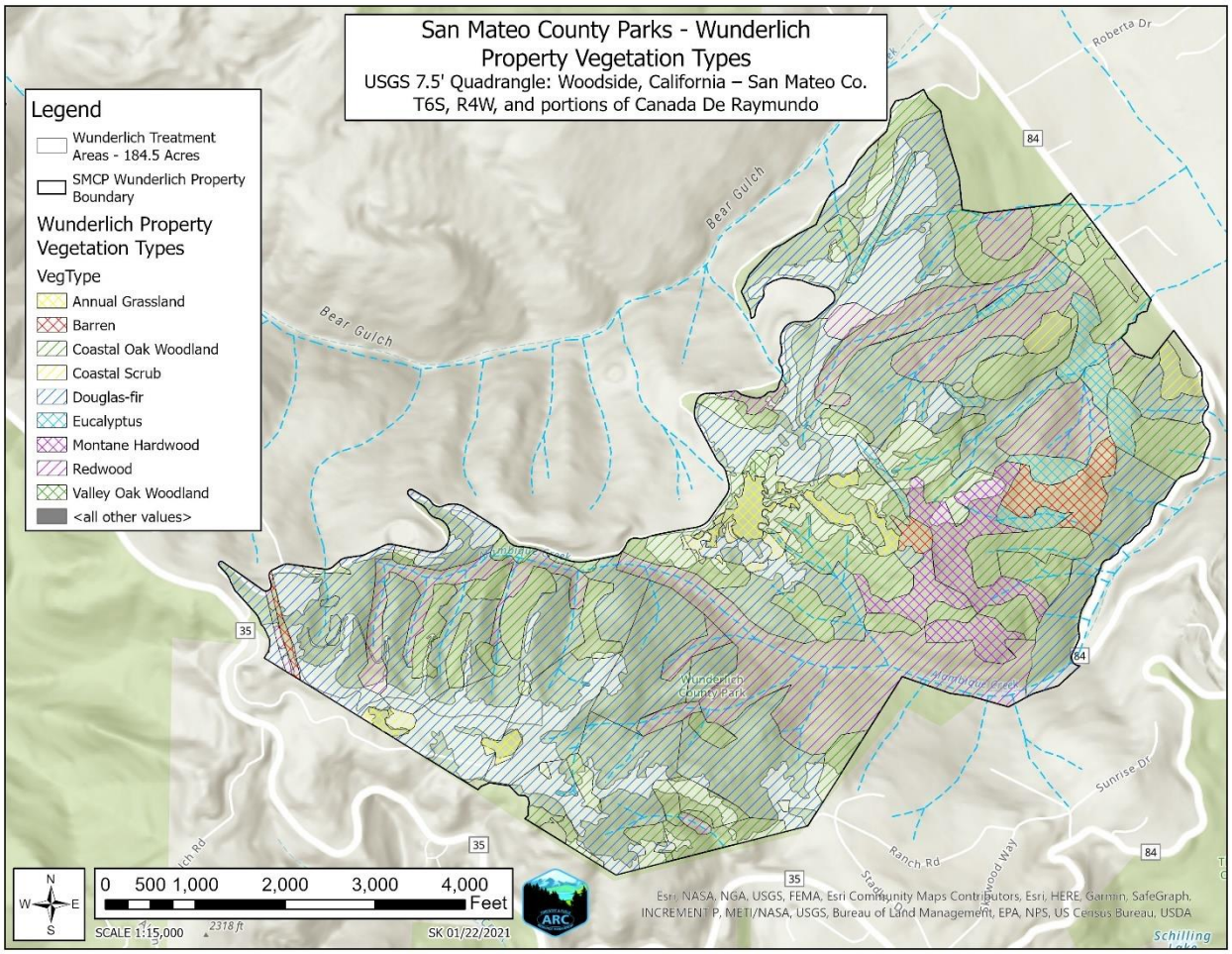
Map 1: Huddart County Park Project Map *Map not to scale. To-scale map to be inserted as PDF*



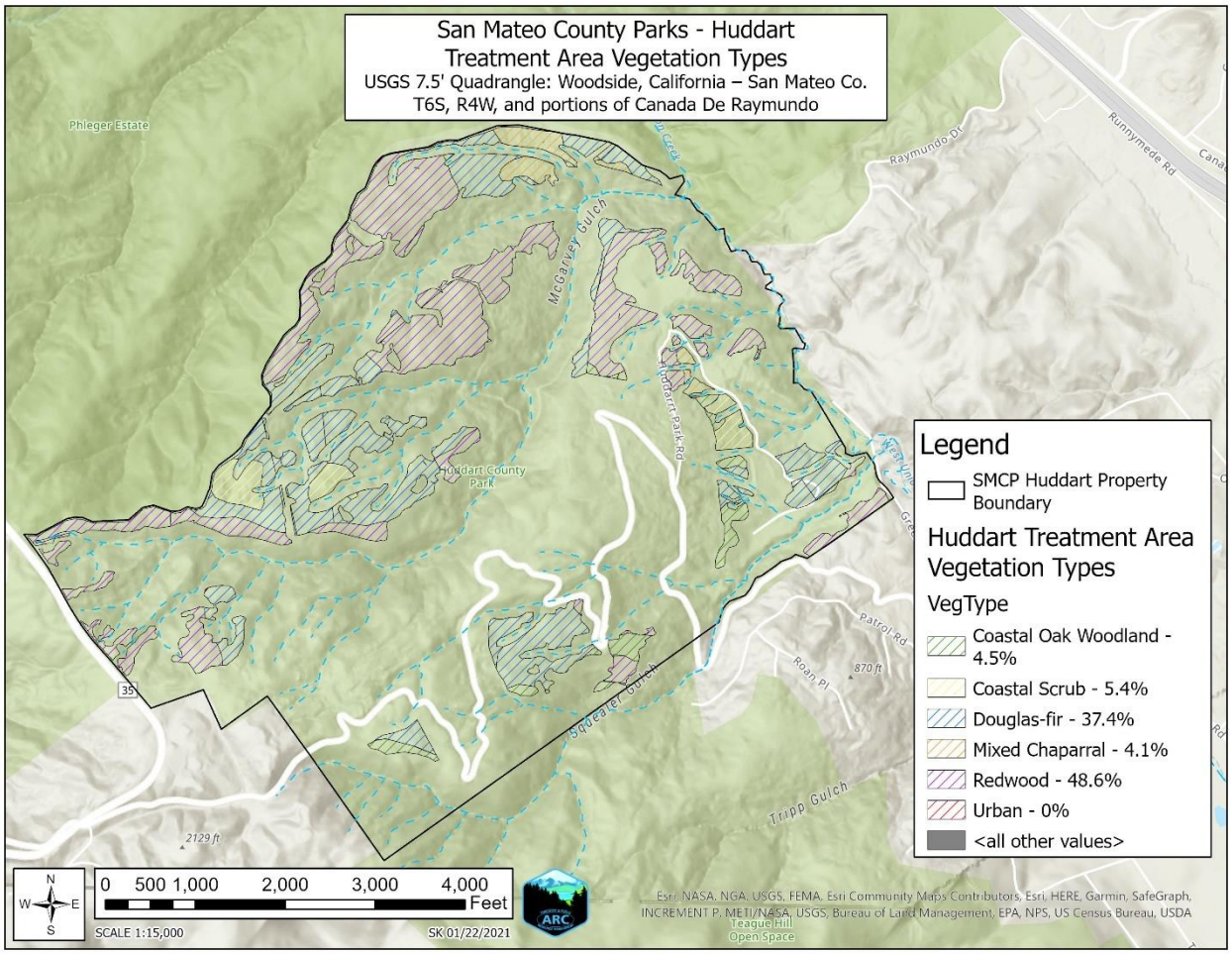
Map 2: Wunderlich County Park Project Map *Map not to scale. To-scale map to be inserted as PDF*



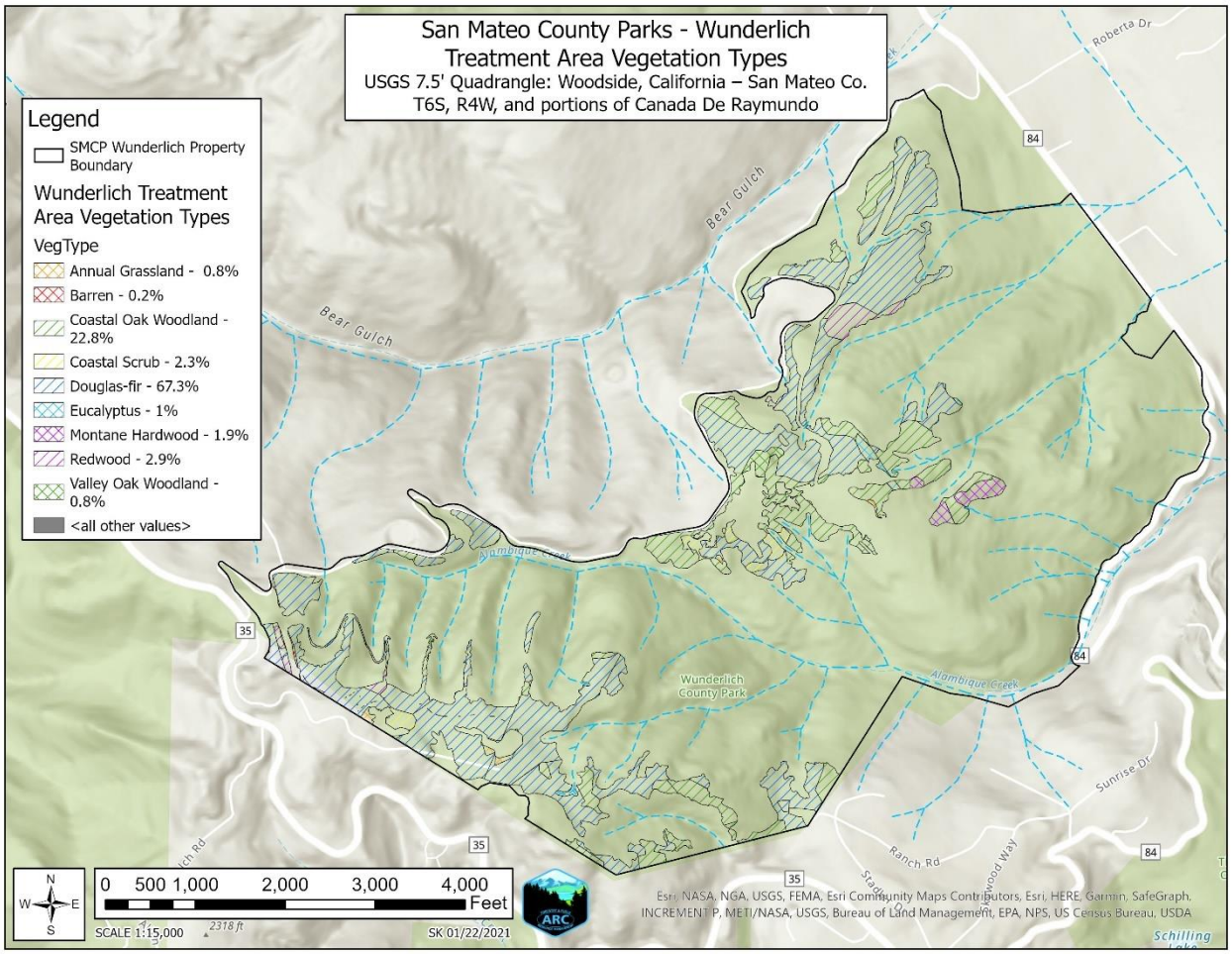
Map 3: Huddart County Park Property Vegetation Types *Map not to scale. To-scale map to be inserted as PDF*



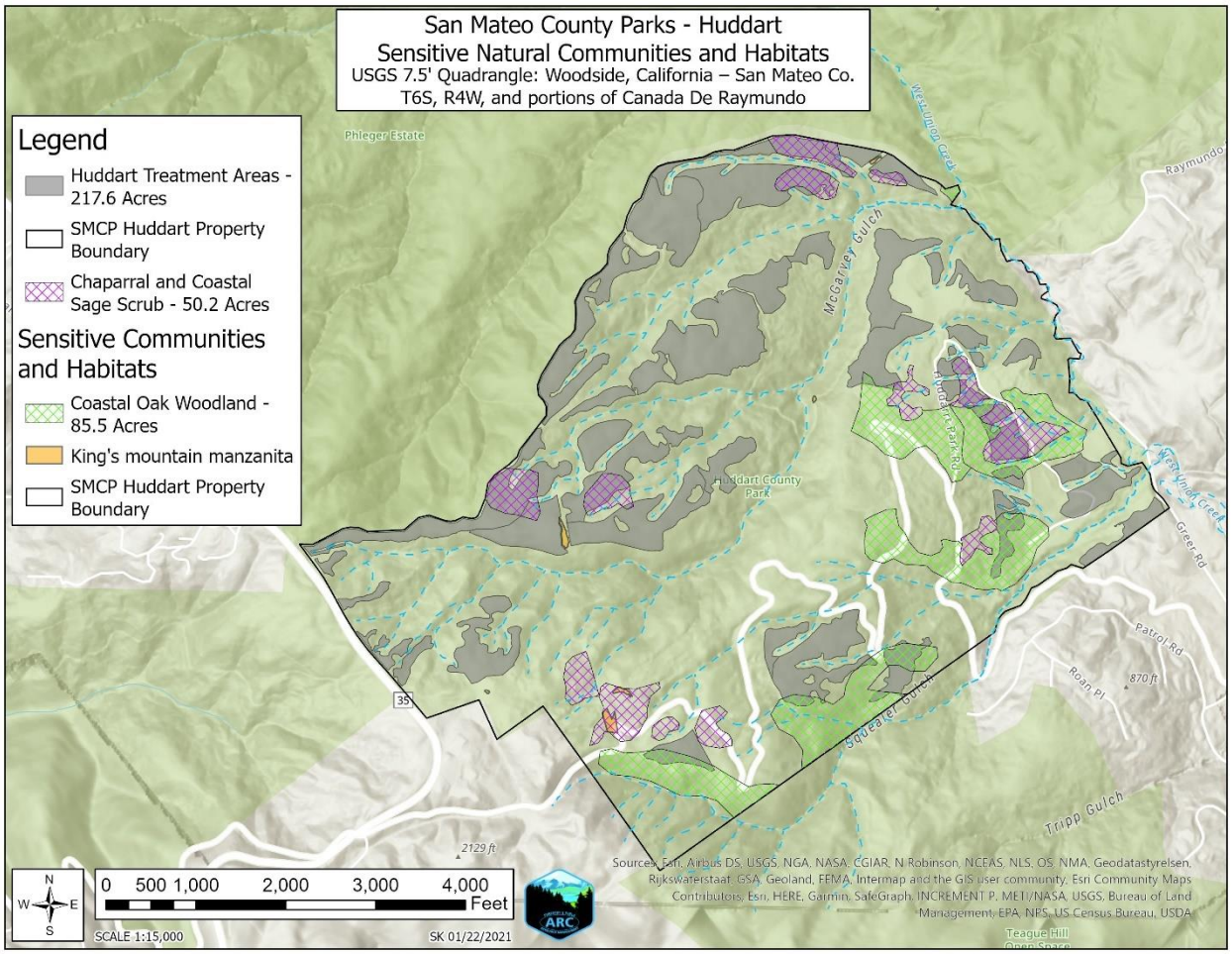
Map 4: Wunderlich County Park Property Vegetation Types *Map not to scale. To-scale map to be inserted as PDF*



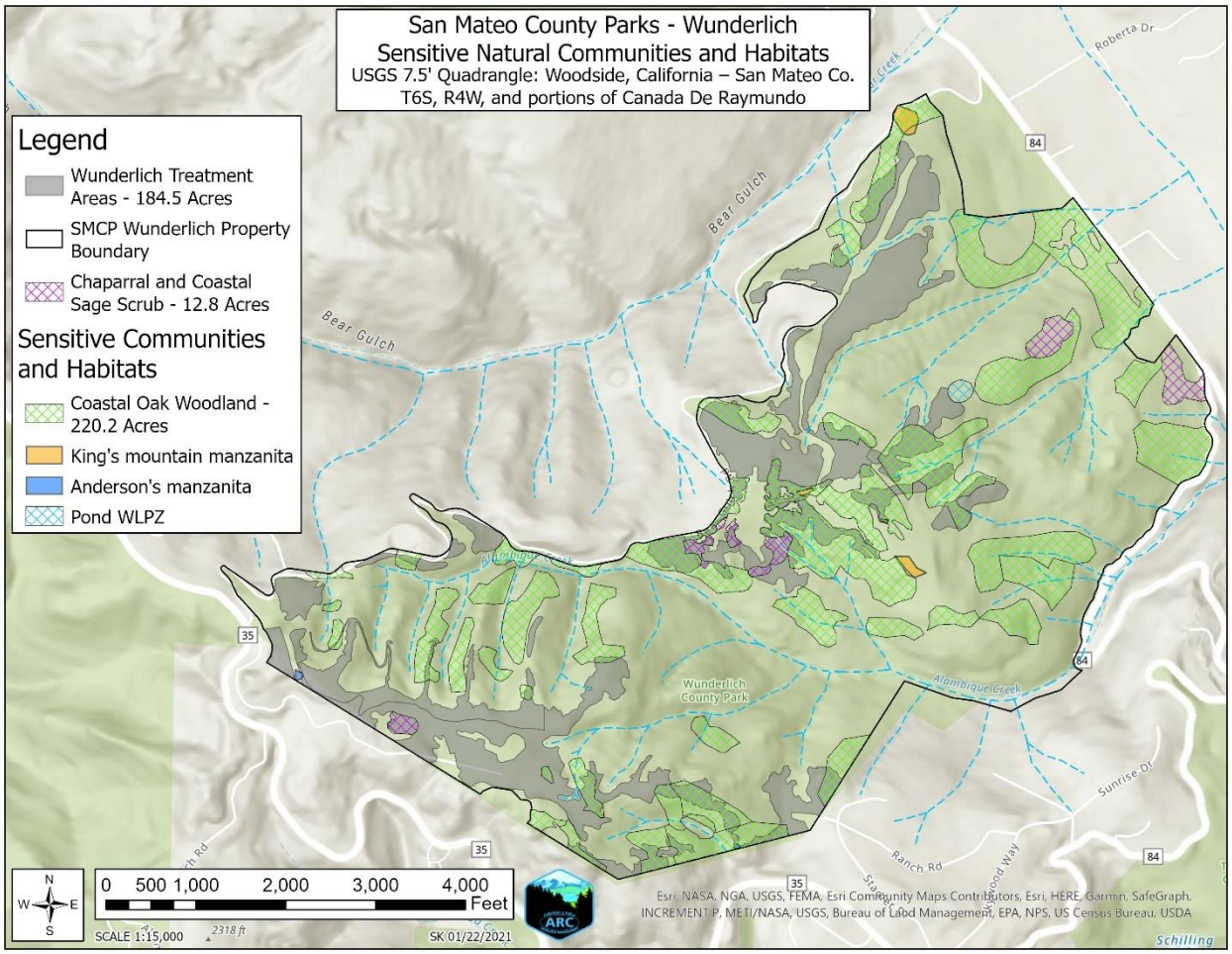
Map 5: Huddart County Park Treatment Area Vegetation Types *Map not to scale. To-scale map to be inserted as PDF*



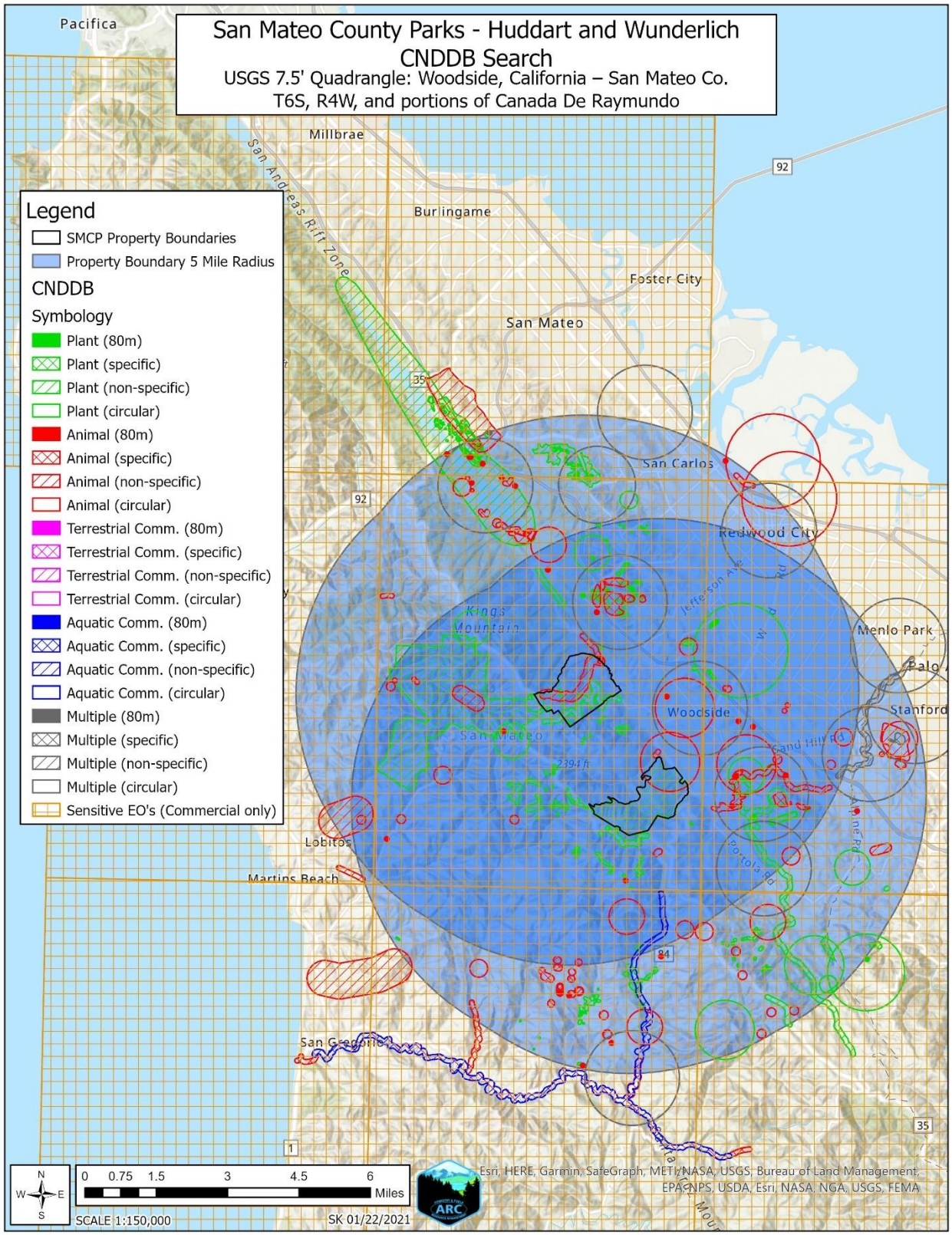
Map 6: Wunderlich County Park Treatment Area Vegetation Types *Map not to scale. To-scale map to be inserted as PDF*



Map 7: Huddart County Park Sensitive Natural Communities and Habitats *Map not to scale. To-scale map to be inserted as PDF*



Map 8: Wunderlich County Park Sensitive Natural Communities and Habitats *Map not to scale. To-scale map to be inserted as PDF*



Map 9: Huddart and Wunderlich County Parks CNDDB Search Results for a 5 Mile Radius from the Property Boundaries *Map not to scale. To-scale map to be inserted as PDF*

ATTACHMENT #2

Example Letter to Geographically Affiliated Tribes

(See the following pages)

Steve Auten, RPF #2734
116 Martinelli Street, Suite #8, Watsonville, CA 95076
(831)247-6697
Steve.Auten.ARC@gmail.com

Cultural Resources Representative
Name of Tribal Government or Individual
Mailing Address provided on the most current CAL FIRE Native American Contact List

March 1, 2021

RE: San Mateo County Parks – Huddart and Wunderlich CalVTP (Project #_____)

Dear Cultural Resources Representative:

A proposed CAL FIRE project is being planned in San Mateo County in the area shown on the enclosed maps. This project will include the removal of understory vegetation, including dead, dying, and diseased trees of any diameter, and live trees up to 8 inches diameter at breast height through mechanical mastication and herbicide application for invasive species to reduce potential ignition sources, reduce ladder fuels, and lower fire severity while creating a healthier, more vigorous forest, increasing forest resiliency and reducing wildfire risk. As part of the archaeological review for this project we respectfully request any information that you wish to share about cultural resources that exist near or within the project area. This notification provides you the opportunity to disclose the existence of Native American archaeological or cultural sites that could potentially be affected by the project and the opportunity to submit other comments regarding the project.

The project is located on two San Mateo County Park properties, Huddart County Park and Wunderlich County Park. Huddart County Park is located to the west of the community of Woodside, California approximately 2 miles west of the Highway 280 and Highway 84 junction and approximately 3 miles south of the Upper Crystal Springs Reservoir. Wunderlich County Park is also located to the west of the community of Woodside, California approximately 2 miles southwest of the Highway 280 and Highway 84 junction and approximately 1 mile west of Searsville Lake. The legal description of Huddart and Wunderlich County Parks is USGS 7.5' Quadrangle: Woodside, California – San Mateo County: T6S, R4W, Portions of Canada De Raymundo, Mount Diablo Base and Meridian. Three maps are enclosed to provide the precise location of the project properties. The first map is a general vicinity map that displays a travel route from the Highway 280 and Highway 84 junction to each project property. The second and

third maps provide a more detailed project location, including property boundaries and treatment areas, on a USGS 7.5' topographic quadrangle.

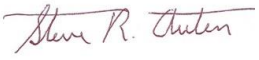
Please contact me if you wish to share information about archaeological or cultural sites in the project area. Locations of sites you disclose will be kept confidential. Disclosure to CAL FIRE, however, is an important step that betters our ability to identify and protect sites. A confidential archaeological survey report will soon be prepared under the direction of CAL FIRE Archaeologist Ben Harris. Feel free to contact our archaeologist at his office number, (707)576-2966, or mobile number, (707)529-7989, if you are more comfortable disclosing information to him.

If you have any questions or comments, please contact me at the telephone, mail, or email address listed above. The review process and comment period will end approximately 30 days from the date of this letter.

If during the field survey of this project, a Native American archaeological or cultural site is identified within the project area, you will receive a second written notification from me that includes both site description and protection information. This second notification will describe the proposed measures taken to protect the site during project operations and provide you with the opportunity to submit comments to CAL FIRE concerning the adequacy of those protection measures.

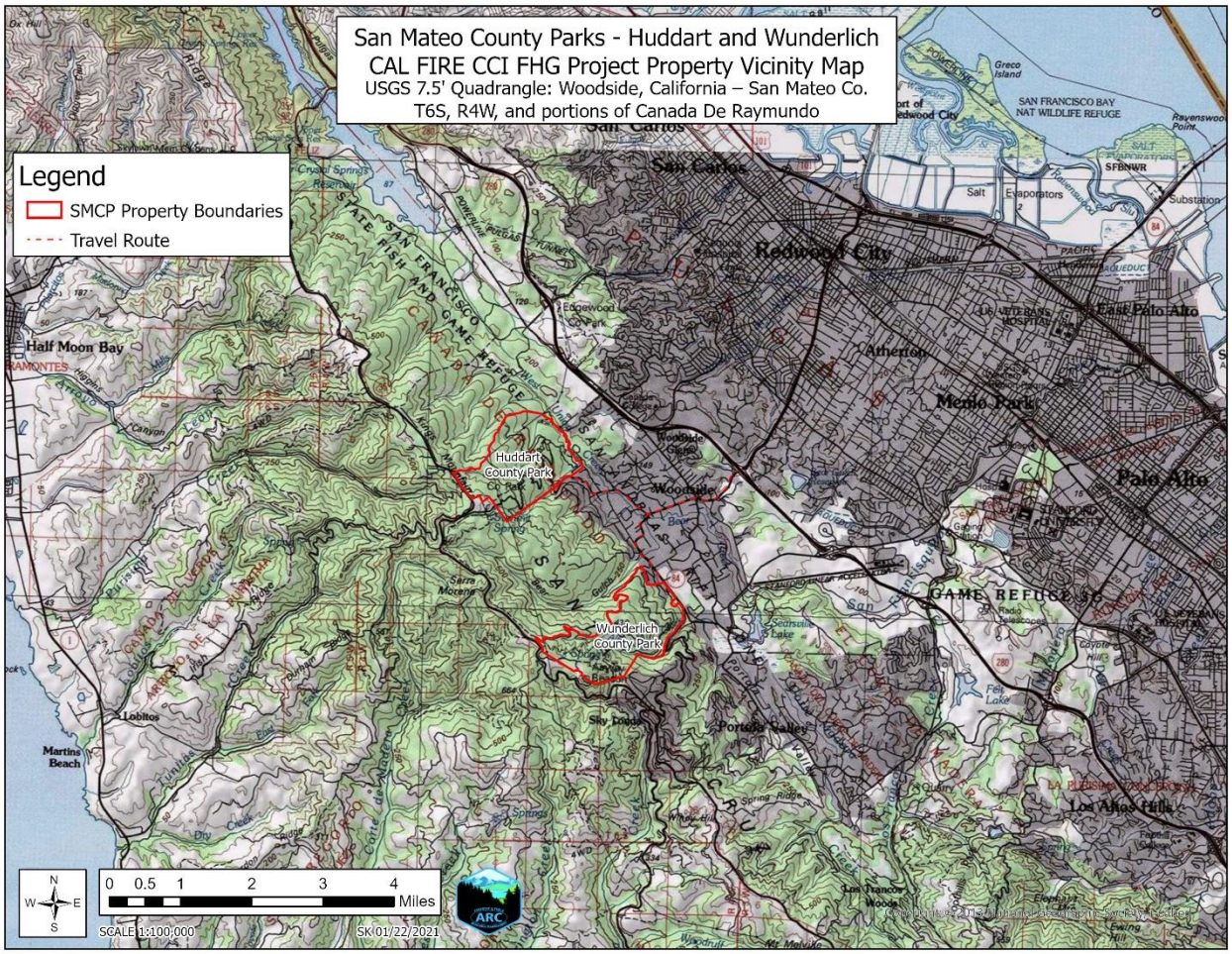
Please feel free to contact me if you have any questions concerning this proposed project or what is being requested in this letter.

Sincerely,



Steve R. Auten

Enclosures: Project Vicinity Map and Project Location Maps



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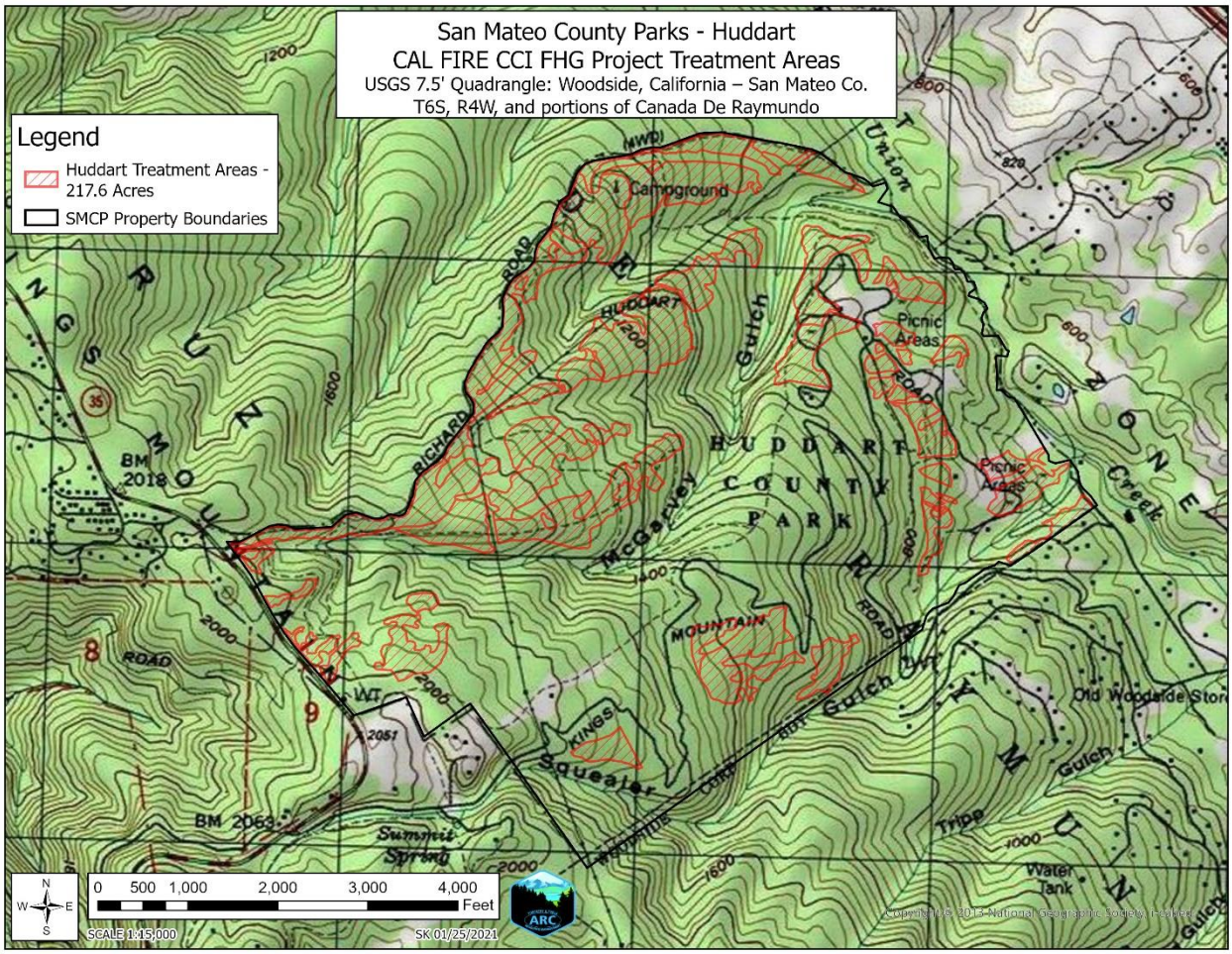

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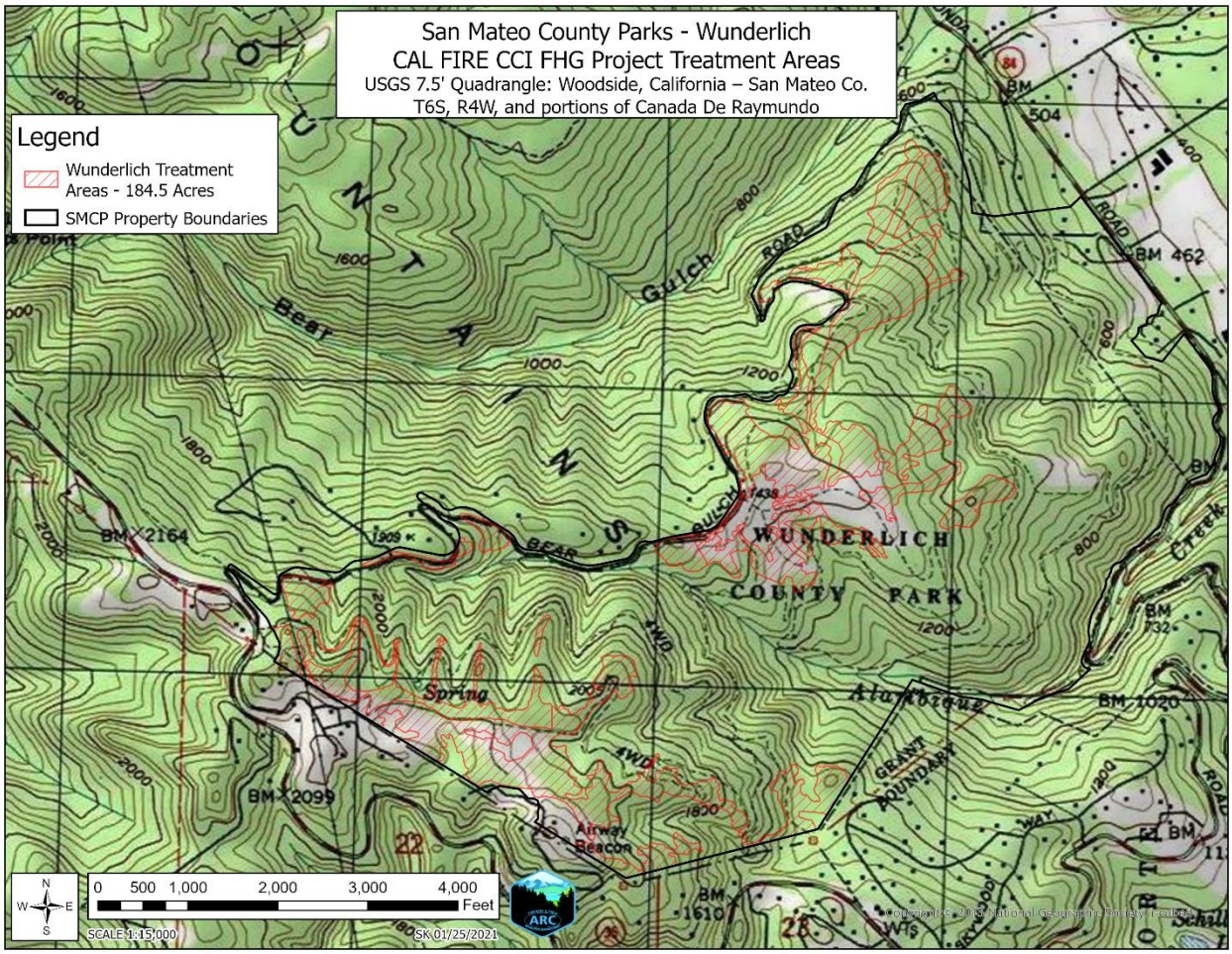

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ATTACHMENT #3

Biological Resources Species List

The California Natural Diversity Data Base (CNDDB), BIOS 5, was used to identify the state and federally listed species that may be present within the treatment areas. The search yielded 47 federal and state threatened, endangered, or candidate species, CDFW species of special concern and candidate species, and the California Native Plant Society's (CNPS) California Rare Plant Rank (CRPR) List 1 and 2.

Special-status plants that occur within the project properties and outside of the treatment areas include Anderson's manzanita (*Arctostaphylos andersonii*), King's mountain manzanita (*Arctostaphylos regismontana*), and woodland woollythreads (*Monolopia aracilens*). Eight special-status plants, including Franciscan onion (*Allium peninsulare var. franciscanum*), bent-flowered fiddleneck (*Amsinckia lunaris*), fountain thistle (*Cirsium fontinale var. fontinale*), San Francisco collinsia (*Collinsia multicolor*), western leatherwood (*Dirca occidentalis*), arcuate bush-mallow (*Malacothamnus arcuatus*), Choris' popcornflower (*Plagiobothrys chorisianus var. chorisianus*), and two-fork clover (*Trifolium amoenum*) have potentially suitable habitat located within treatment areas or the project properties, but are not known to occupy the project properties.

There are three special-status wildlife species, including the Santa Cruz black salamander (*Aneides niger*), Townsend's big eared bat (*Corynohinus townsendii*), and California red-legged frog (*Rana draytonii*) that occur within the project properties and are outside of the treatment areas. Special-status wildlife species that have potentially suitable habitat within the project properties or treatment area include the California tiger salamander (*Ambystoma californiense*), pallid bat (*Antrozous pallidus*), western bumble bee (*Bombus occidentalis*), monarch butterfly (*Danaus plexippus),* California giant salamander (*Dicamptodon ensatus*), western pond turtle (*Emys marmoratum*), San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*), mountain lion (*Puma concolor*), and the San Francisco garter snake (*Thamnophis sirtalis tetrataenia)*. However, there are no known special-status wildlife species occurrences within the treatment areas.

Botanical:

San Mateo thorn-mint (*Acanthomintha duttonii)*


2013 Lech Naumovich

Description/Status:

Acanthomintha duttonii, or the San Mateo thorn mint, is a California endemic herb that is a state and federal endangered species and is listed as 1B.1 under the CRPR. This is an erect species that can reach nearly 8 inches in height and has spiny leaf margins with defined veins. The inflorescence are made up of a cluster of flowers that range from cream to pink or purple in coloration.

Habitat:

The San Mateo thorn mint grows on serpentine soils along grassy slopes. This species favors habitat within chaparral and valley grassland communities, usually in elevations between 150-300 meters.

Proximity/ Potential for Occurrence:

This species is presumed to be present in multiple locations within 5 miles of Huddart and Wunderlich County Parks primarily to the north and northeast of both properties. The treatment areas would primarily occur in the understory of redwood and mixed hardwood forests and occasionally in chaparral, where serpentine soils are uncommon and is not considered suitable habitat for the San Mateo thorn-mint. It would be unlikely for this species to occur within the treatment areas.

Potential for Impact:

Based on this species' proximity to the project area, unsuitable habitat within treatment areas, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to San Mateo thorn-mint.

Franciscan onion (*Allium peninsulare var. franciscanum)*


2017 Dea Shea Himes

Description/Status:

The Franciscan onion, or *Allium peninsulare var. franciscanum,* is a California endemic species that is listed as 1B.2 under the CRPR. This flowering herb is a bulb species that has curved leaves and an umbel inflorescence of purple to pink flowers.

Habitat:

This species grows in clay soils on dry hillsides within coastal communities, usually below 300 meters elevation.

Proximity/ Potential for Occurrence:

The Franciscan onion is presumed to be present in multiple locations within 5 miles of Huddart County Park and/or Wunderlich County Park and is predominately located to the north and

northeast of both properties. It is unlikely for this species to occur within the treatment areas due a lack of coastal plant communities and unfavorable elevations for this species, however, it is possible that the Franciscan onion may occur within Wunderlich County Park.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to Franciscan onion.

bent-flowered fiddleneck (*Amsinckia lunaris*)


2020 Susan White

Status/Description:

The bent-flowered fiddleneck, or *Amsinckia lunaris,* is a flowering herb listed as a 1B.2 species under the CRPR. This species can reach approximately 4 feet in height and has an erect, slender stem that slightly coils near the flowers. The flowers are tubular with lobed edges and are yellow or orange in color with two dark spots.

Habitat:

This species grows in openings on gravelly slopes of serpentine soils and favors valley grassland and foothill woodland communities usually under 800 meters elevation.

Proximity/ Potential for Occurrence:

The bent-flowered fiddleneck is presumed to be present in one location within 5 miles northeast of Huddart County Park. It is possible for this species to occur within the project properties within foothill woodland or valley grassland communities.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to bent-flowered fiddleneck.

Anderson's manzanita (*Arctostaphylos andersonii*)


2004 Aaron Schusteff

Description/ Status:

Arctostaphylos andersonii, or Anderson's manzanita, is a shrub species endemic to the Santa Cruz Mountains of California listed as a 1B.2 species under the CRPR. This species is tree-like and can reach 2-5 m in height, is covered with bristles, and has pink, urn-shaped flowers that bloom in early to late spring. The bark is smooth and dark brown-red in coloration with alternate, oblong, heart-shaped leaves.

Habitat:

This species grows in openings in redwood forests or near forest edges, usually below 700 meters (2300 feet) elevation. The Anderson manzanita favors hot areas in broadleaved upland forests, chaparral communities, and North coast coniferous forests.

Proximity/ Potential for Occurrence:

This species is presumed to be present in two locations within Wunderlich County Park located below the west-most utility line and near the southern property line. Anderson's manzanita is presumed to present within 1 mile of Wunderlich County Park located to the southwest along Highway 35. The treatment areas within or near the redwood forests may have potentially suitable habitat for this species.

Potential for Impact:

Due to the project area containing potentially suitable habitat for this species, a survey will be conducted a minimum of one week prior to operations (see survey protocol above). Based on the biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the Anderson's manzanita.

King's mountain manzanita (*Arctostaphylos regismontana)*

Description/Status:

The King's mountain manzanita, or *Arctostaphylos regismontana,* is shrub endemic to California that is ranked as a 1B.2 species on the CRPR. This erect shrub can reach 2-4 meters tall and consists of dense foliage that is bristly and exudes sticky resins. The flowers are cone-shaped and make up a cluster of white or pink flowers.

Habitat:

This species grows in openings on granite or sandstone outcrops with fast-draining soils. The King's mountain manzanita favors full sun and low moisture habitats within chaparral, broadleaf, or coniferous forests.

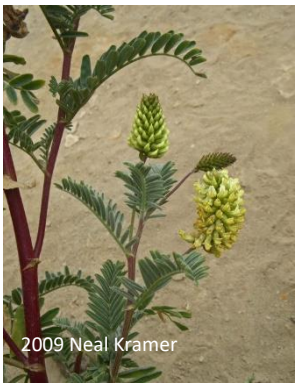
Proximity/ Potential for Occurrence:

This species is known to occur within the Huddart property boundary along King's Mountain Road outside of the treatment area; a 2017 survey located this occurrence at the following coordinates: 37.43226 N, -122.29831 W. Recent surveys conducted through San Mateo County Parks indicate that there are several occurrences located within Wunderlich County Park, which are predominately located centrally within the property and near the northeastern property corner. There are approximately 6 scattered occurrences within 1 mile of Wunderlich County Park and approximately 4 within 1 mile of Huddart County Park. This species is also presumed to be present in approximately 2 locations within 5 miles located to the north of both properties. The treatment areas may contain potentially suitable habitat for the King's mountain manzanita.

Potential for Impact:

Due to the project area containing potentially suitable habitat and the proximity of this species to treatment areas, a survey will be conducted a minimum of one week prior to operations (see survey protocol above). Based on the biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the King's mountain manzanita.

coastal marsh milk-vetch (*Astragalus pycnostachyus var. pycnostachyus)*


2009 Neal Kramer

Description/Status:

Astragalus pycnostachyus var. pycnostachyus, or the coastal marsh milk-vetch, is a herb species listed as 1B.2 under the CRPR that is endemic to the California coastline. This species can reach up to 1 meter tall with hairy, cupped leaflets. The inflorescence consists of many cone-shaped yellow flowers.

Habitat:

The coastal marsh milk-vetch favors cool areas in coastal dune or scrub communities and often favors moist areas in marshes and swamps along the coast, usually in elevations below 155 meters.

Proximity/ Potential for Occurrence:

This species is presumed present in one location within 5 miles north of Huddart County Park. Treatment areas do not contain any coastal dune or scrub communities, marshes, or swamps, so it is unlikely that this species would occur in the project area.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to coastal marsh milk-vetch.

fountain thistle (*Cirsium fontinale var. fontinale)*


2010 Neal Kramer

Description/Status:

Cirsium fontinale var. fontinale, or the fountain thistle, is a state and federally endangered species and a 1B.1 species under the CRPR that is endemic to California. This species has several reddish stems that can reach approximately 2 feet in length. The leaves are generally tipped with spines and purple-red curved bracts are located below a white to light-pink flower head.

Habitat:

This species grows in openings in serpentine wetlands or seeps. The fountain thistle favors elevations between 45 and 175 meters in chaparral, valley grassland, and wetland-riparian communities.

Proximity/ Potential for Occurrence:

Multiple occurrences of this species are presumed to be present within 5 miles of Huddart and Wunderlich County Parks. The known occurrences are primarily located to the north, northeast, and east of both properties. It is possible that there is potentially suitable habitat for the fountain thistle located within Huddart County Park.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to fountain thistle.

San Francisco collinsia *(Collinsia multicolor)*


2001 Margo Bors

Description/Status:

Collinsia multicolor, or the San Francisco collinsia, is a flowering herb endemic to the San Francisco Bay area of California and is listed as a 1B.2 species on the CRPR. This species can grow 1-2 feet and has a slender, sticky stem that is comprised of hairs. The leaves clasp the stems and are triangular with serrated margins. Individual flowers have petals that are approximately 1-2 centimeters in length and are white with pink, purple, or blue coloration.

Habitat:

This species grows in shaded, moist habitats in northern coastal scrub, closed-cone pine forests, and coastal chaparral scrub communities between 30 and 180 meters elevation.

Proximity/ Potential for Occurrence:

This species is presumed to be present in multiple locations within 5 miles of Huddart and Wunderlich County Parks. The known occurrences are located primarily to the north of Huddart and to the east of Wunderlich. The treatment areas may contain potentially suitable habitat for the San Francisco collinsia.

Potential for Impact:

Due to the project area containing potentially suitable habitat, a survey will be conducted a minimum of one week prior to operations (see survey protocol above). Based on the biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to San Francisco collinsia.

western leatherwood *(Dirca occidentalis)*

Description/Status:

Dirca occidentalis, or the western leatherwood, is a shrub endemic to the San Francisco Bay area of California and is listed as a 1B.2 species under the CRPR. This species can reach approximately 2 meters in height and has mottled grey bark with light green, oval leaves. The yellow flowers usually precede the leaves and dangle upside down with filament that exceed the length of the petals.

Habitat:

This species grows in moist locations with partial shade. The western leatherwood can be found in riparian or wetland habitats within chaparral, cismontane woodlands, north coast coniferous forests and broadleaved upland forests.

Proximity/ Potential for Occurrence:

This species is presumed to present in multiple locations within 5 miles of Huddart and Wunderlich County Park. The occurrences range north to south from both park properties. The treatment areas may contain potentially suitable habitat for the western leatherwood.

Potential for Impact:

Due to the project area containing potentially suitable habitat, a survey will be conducted a minimum of one week prior to operations (see survey protocol above). Based on the biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the western leatherwood.

San Mateo woolly sunflower (*Eriophyllum latilobum*)

Status/Description:

Eriophyllum latilobum, or the San Mateo woolly sunflower, is state and federally endangered and is listed as a 1B.1 species under the CRPR. This flowering herb can reach up to 3 feet tall and has triangularly lobed leaves. The inflorescence is comprised of ray and disc flowers that are yellow in coloration that is encompassed with acute phyllaries.

Habitat:

This species favors oak woodlands and grows in foothill woodland, cismontane woodland, coastal scrub, lower montane coniferous forest usually in elevations between 45 and 330 meters.

Proximity/ Potential for Occurrence:

This species is presumed to be present in one location within 5 miles south of Wunderlich County Park. It is unlikely that the treatment areas contain potentially suitable habitat for the San Mateo woolly sunflower.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the San Mateo woolly sunflower.

Hoover's button celery (*Eryngium aristulatum var. hooveri*)


2011 Aaron Arthur

Status/Description:

Eryngium aristulatum var. hooveri, or Hoover's button celery, is an herb endemic to California and listed as a 1B.1 species under the CRPR. This species is a stout, erect herb with a spiny, bract-like inflorescence with flowers covered in white, hairy phyllaries.

Habitat:

This species grows in wetlands and vernal-pools and favors freshwater wetland or wetland-riparian communities.

Proximity/ Potential for Occurrence:

Hoover's button celery is presumed to be present within 5 miles southeast of Wunderlich County Park. The treatment areas do not contain a potentially suitable habitat for this species.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to Hoover's button celery.

coyote thistle (*Eryngium jepsonii)*


2019 Ken Hickman

Status/Description:

The coyote thistle, or *eryngium jepsonii,* is a herb listed as a 1B.2 species under the CRPR. This species can reach approximately 1.5 feet tall and is heavily branched with light green to grey, oval shaped leaves. The inflorescences are spherical and comprised of white or purple flowers with pointy bracts at the base.

Habitat:

This species grows in clay soils within wetlands and favors wetland-riparian, valley grassland, and foothill grassland communities.

Proximity/ Potential for Occurrence:

This species is presumed to be present in one location within 5 miles of both project properties. The occurrence is located to the east of the project areas near Jasper Ridge. The treatment areas are unlikely to contain potentially suitable habitat for this species because treatments will predominately occur in tree and shrub vegetation types outside of wetlands.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to coyote thistle.

Hillsborough chocolate lily (*Fritillaria biflora var. ineziana*)


2012 Toni Corelli

Description/ Status:

Fritillaria biflora var. ineziana, or Hillsborough chocolate lily, is a perennial herb endemic to San Mateo County, California and is listed as a 1B.1 species under the CRPR. This species grows to approximately 10 inches tall with a stout, green stem that generally bends under the weight of the flower and has leaves that are linear to narrowly lanceolate and mottled with yellow coloration. The flowers are yellow-green, green-purple, or dark brown in coloration and have an ill odor.

Habitat:

This species grows in ultramafic serpentinite soils within valley grassland and foothill woodland communities usually around 150 feet in elevation.

Proximity/ Potential for Occurrence:

The Hillsborough chocolate lily is presumed to be present in one location within 5 miles of Huddart County Park. The occurrence is located in an unspecified area within the San Mateo Quadrangle. The treatment areas do not contain potentially suitable habitat for this species.

Potential for Impact:

Based on this species' proximity to the project areas, unfavorable habitat conditions within the treatment areas, biological surveys, and standard project requirements, no impact is expected to occur to the Hillsborough chocolate lily.

fragrant fritillary *(Fritillaria liliacea)*


2019 John Game

Description/Status:

Fritillaria liliacea, or the fragrant fritillary, is a herb endemic to California and listed as a 1B.2 species under the CRPR. This bulb wildflower can grows up to approximatley 1 foot tall and has an erect stem that bends at the flower. The flower is has 6 white petals with green stripes in the center.

Habitat:

This species favors full sun openings in coastal prairie, valley grasslands, northern coastal scrub, and wetland riparian communities usually below 230 meters elevation.

Proximity/ Potential for Occurrence:

This species is presumed to present in a few locations within 5 miles of Huddart and Wunderlich County Parks. The occurrences are primarily located to the east of both park properties. It is unlikely that the treatment areas will contain potentially suitable habitat for the fragrant fritillary because the park properties contain unfavorable elevations for this species.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to fragrant fritillary.

Marin western flax (*Hesperolinon congestum)*


2019 John Game

Description/Status:

The Marin western flax, or *Hesperolinon congestum,* is state and federally threatened and is listed as a 1B.1 species on the CRPR. This species has linear leaves with red secretion from stipule glands. The inflorescence is comprised of a congested cluster of flowers that are pink to rose with purple anthers and glandular margins.

Habitat:

This species favors serpentine soils within chaparral and valley grassland communities. The Marin western flax commonly grows with dry native bunch grasses below 200 meters elevation.

Proximity/ Potential for Occurrence:

This species is presumed to be present in multiple locations within 5 miles of Huddart and Wunderlich County Parks. The occurrences are predominately located to the north, northeast, and east of Huddart County Park boundaries. It is unlikely that the treatment areas contain potentially suitable habitat for the Marin western flax.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to Marin western flax.

legenere (*Legenere limosa)*


2000 John Game

Status/Description:

Legenere limosa, or legenere, is an herb species that is listed as a 1B.1 under the CRPR. This species has a slender, stiff, fleshy stem with erect lateral branches and narrowly triangular leaves. The inflorescence is an ovate raceme with triangular, white petals.

Habitat:

This species grows in wetlands and favors vernal-pools, valley grassland, freshwater wetland and wetland-riparian communities below 950 meters.

Proximity/ Potential for Occurrence:

This species is presumed to be present in one location within 5 miles south of Wunderlich County Park. The treatment areas do not contain any potentially suitable habitat for the legenere.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the legenere.

Crystal Springs lessingia *(Lessingia arachnoidea)*


2019 Joerg Lohse

Description/Status:

The Crystal Springs lessingia, or *Lessingia arachnoidea,* is a flowering herb endemic to the San Francisco Peninsula in California and is listed as a 1B.2 species under the CRPR. This herb has a slender, erect stem that can reach approximately 2-3 feet tall with narrow, toothed leaves. The inflorescence has a singular flower head that is lined with purple or lavender, funnel-shaped phyllaries. The top of the stem and the inflorescence head are commonly covered in woolly fibers.

Habitat:

This species favors disturbed, serpentine soils in valley grasslands, foothill woodland, and northern coastal scrub communities usually below 200 meters elevation.

Proximity/ Potential for Occurrence:

This species is presumed to be present in a few locations within 5 miles of Huddart and/or Wunderlich County Parks. The occurrences are primarily located to the north of Huddart boundaries. It is unlikely that treatment areas contain potentially suitable habitat for the Crystal Springs lessingia.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to Crystal Springs lessingia.

arcuate bush-mallow (*Malacothamnus arcuatus*)

Description/ Status:

Malacothamnus arcuatus, or the arcuate bush-mallow, is a perennial evergreen shrub endemic to California and is listed as a 1B.2 species by the CRPR. This woody, multi-stemmed shrub is erect reaching up to 5 meters in height with densely tomentose, or wooly stems, and leaves. This species has clusters of rose-like flowers that are pink and encompassed by wooly sepals and leaves.

Habitat:

This species favors habitats in early-successional or post-burn slopes within chaparral and cismontane woodland communities between 15-355 meters elevation.

Proximity/ Potential for Occurrence:

This species is presumed to be present in a few locations within 5 miles of Huddart and/or Wunderlich County Parks. The occurrences are located to the northeast of Huddart and to the south east of Wunderlich boundaries. The treatment areas located in lower elevations may contain potentially suitable habitat for the arcuate bush-mallow.

Potential for Impact:

Due to the project area containing potentially suitable habitat and the proximity of this species, a survey will be conducted a minimum of one week prior to operations (see survey protocol above). Based on the biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the arcuate bush-mallow.

woodland woollythreads (*Monolopia aracilens)*

Description/Status:


2015 Al Keuter

Monolopia aracilens, or the woodland woollythreads, is a flowering herb endemic to coastal areas near San Francisco Bay in California and is a 1B.2 species under the CRPR. This species has a woolly, branching stem that can reach approximately 2-3 feet tall. The slender stems branch into inflorescences with yellow, hemispheric flower heads comprised of ray florets and disc florets.

Habitat:

This species grows in openings of grasslands, chaparral, redwood forests, and oak woodland communities. The woodland woollythreads favors serpentine soils between 100 and 1200 meters elevation.

Proximity/ Potential for Occurrence:

This species is known to occur within the Wunderlich property boundary along Oak Trail outside of the treatment area; a 2007 survey located this occurrence at the following coordinates: 37.40146 N, -122.27132 W. However, the November 2020 data download shows potential occupancy for this species as the entire Wunderlich property boundary, ultimately overlapping with treatment areas. Woodland woollythreads are presumed to be present in multiple other locations scattered within 5 miles of both park properties. The treatment areas may contain potentially suitable habitat for the woodland woollythreads.

Potential for Impact:

Due to the project area containing potentially suitable habitat and the proximity of this species to treatment areas, a survey will be conducted a minimum of one week prior to operations (see survey protocol above). Based on the biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the woodland woollythreads.

white-rayed pentachaeta (*Pentachaeta bellidiflora)*

Description/Status:


2015 Neal Kramer

Pentachaeta bellidiflora, or the white-rayed pentachaeta, is a state and federally endangered species listed as 1B.1 under the CRPR. This species is an annual herb endemic to the San Francisco Bay area of California. The white-rayed pentachaeta has slightly hairy, green to purple stems and inflorescence heads. The leaves are wide and glabrous, and the inflorescence heads are comprised of white or pink, outer ray florets and yellow, inner disc florets.

Habitat:

This species grows in serpentine soils with rocky outcrops within valley grassland or bunchgrass communities usually in elevations below 620 meters.

Proximity/ Potential for Occurrence:

This species is presumed to be present in one location within 5 miles of Huddart and Wunderlich County Parks. The occurrence is located to the north of the Huddart property. It is unlikely that the treatment areas contain potentially suitable habitat for the white-rayed pentachaeta because treatments will not occur on rocky outcrops or within grassland communities.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to white-rayed pentachaeta.

Choris' popcornflower (*Plagiobothrys chorisianus var. chorisianus)*


2011 Dylan Neubauer

Description/Status:

The Choris' popcornflower, or *Plagiobothrys chorisianus var. chorisianus,* is a California endemic herb that is listed as a 1B.2 species under the CRPR. This species has a decumbent to erect, branching stem with spiny hairs and sheathing leaves. The inflorescence has bracts at the base and are comprised of a white, lobed corolla with yellow coloration from the center.

Habitat:

This species grows in moist, grassy areas in wetlands or ephemeral drainages. The Choris' popcornflower favors coastal prairie, chaparral, northern coastal scrub, and wetland-riparian communities below 240 meters elevation.

Proximity/ Potential for Occurrence:

This species is presumed to be present in a few locations within 5 miles of Huddart and/or Wunderlich County Parks. The occurrences are located to the north and northwest of Huddart and to the southwest of Wunderlich boundaries. It is unlikely that treatment areas will contain potentially suitable habitat for the Choris' popcornflower because treatments will not occur in drainages or wetlands. However, it is possible that there is potentially suitable habitat for this species within Huddart County Park property boundaries.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to Choris' popcornflower.

chaparral ragwort (*Senecio aphanactis)*

Description/Status:

Senecio aphanactis, or the chaparral ragwort, is a flowering herb species listed as 2B.2 under the CRPR. This species reaches approximately 8 inches in height and has linear, lobed leaves that occasionally clasp the stem at the base. The urn-shaped inflorescence are encompassed by woolly phyllaries and comprised of yellow ray or disc florets.

Habitat:

The chaparral ragwort grows in dry coastal areas with alkaline soils and favors foothill woodland, northern coast scrub, and coastal sage scrub communities between 130-660 meters elevation.

Proximity/ Potential for Occurrence:

This species is presumed to be present in one location within 5 miles north of Huddart County Park. It is unlikely that the treatment areas contain potentially suitable habitat for this species because there are no coastal plant communities present in these areas.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to chaparral ragwort.

San Francisco campion (*Silene verecunda ssp. verecunda)*

Description/Status:

Silene verecunda ssp. Verecunda, or the San Francisco campion, is a California native species listed as 1B.2 under the CRPR. This species has several erect, hairy stems that can reach approximately 1-2 feet tall. The leaves are lance-shaped and vary in size. The fused sepals encompass an inferior ovary and lobed petals that are white or pink in coloration.

Habitat:

This species grows in sandy, coastal areas within coastal prairie, chaparral, northern coastal scrub, and valley grassland communities usually under 1090 meters elevation.

Proximity/ Potential for Occurrence:

This species is presumed to be present in one location with 5 miles of both park boundaries. The occurrence is located to the northeast of Huddart County Park. It is unlikely that treatment areas will contain potentially suitable habitat for the San Francisco campion because sandy soils are not present in these areas.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to San Francisco campion.

two-fork clover (*Trifolium amoenum*)


2013 Neal Kramer

Status/Description:

Trifolium amoenum, or two-fork clover, is endemic to California and is federally endangered and listed as a 1B.1 species under the CRPR. This annual herb species can reach approximately 2.5 feet tall and has an erect stem with obovate leaflets. The inflorescence is spherical with petals that are purple or green with white tips.

Habitat:

The two-fork clover grows in moist, heavy soils in disturbed areas within valley grassland and wetland-riparian communities below 100 meters elevation.

Proximity/ Potential for Occurrence:

This species is presumed to be present in one location within 5 miles of both park properties. The occurrence is located to the east of Wunderlich County Park. The treatment areas are unlikely to contain suitable habitat for the two-fork clover. However, it is possible that Wunderlich County Park may contain potentially suitable habitat for this species.

Potential for Impact:

Based on this species' proximity to the project area, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the two-fork clover.

Santa Cruz clover (*Trifolium buckwestiorum*)


1997 Doreen L. Smith

Description/ Status:

Trifolium buckwestiorum, commonly known as the Santa Cruz clover, is endemic to California where it has very few occurrences in Monterey, Santa Cruz, and Sonoma counties. This Santa Cruz clover is listed under the CRPR as a 1B.1 species. The foliage is green or reddish, with finely toothed leaflets, and a head-like inflorescence with pale pink or white, tubed flowers.

Habitat:

This species favors habitat in disturbed grassy or gravelly coastal prairie or mixed evergreen forests in elevations below 710 meters. Feral pig rooting is a threat to this species.

Proximity:

This species is presumed to be present within 5 miles south of Wunderlich County Park. Treatment areas do not contain potentially suitable habitat for the Santa Cruz clover.

Potential for Impact:

Based on this species' proximity to the project area, biological surveys, unfavorable habitat conditions, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the Santa Cruz clover.

Wildlife

California tiger salamander (*Ambystoma californiense*)

Description/ Status:

Ambystoma californiense, also known as the California tiger salamander, is an amphibian that is listed as federally endangered in the distinct population segment (DPS) in Sonoma and Santa Barbara counties and the Central California DPS is listed as federally threatened. This is also a state threatened species and is on the CDFW's watch list. The California tiger salamander is large and stocky with a broad, rounded snout. Adult males can reach about 20 cm in length whereas the females measure up to 17 cm in length. The salamander is primarily black with white or yellow bars on its back and white or pale-yellow underbellies.

Habitat:

This species favors habitats in grasslands and low foothills with vernal pools or ponds for breeding. The California tiger salamanders spend much of their time in burrows underground, where they enter a dormant stated called estivation during summer months. This species' diet primarily consists of insects, tadpoles, and earthworms.

Proximity/ Potential for Occurrence:

This species is presumed to present within 1 mile to the south east of Huddart County Park and in a few locations within 5 miles to the east of Wunderlich County Park. It is unlikely that treatment areas will contain potentially suitable habitat for the California tiger salamander. However, treatment areas may be in proximity to potentially suitable habitat within the property boundaries.

Potential for Impact:

Due to the property boundaries containing potentially suitable habitat and the proximity of this species to property boundaries, a survey will be conducted a minimum of one week prior to operations (see survey protocol above). Based on the biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the California tiger salamander.

Santa Cruz black salamander (*Aneides niger)*

Description/ Status:

Aneides niger, or the Santa Cruz black salamander, is endemic to California and is listed as a CDFW species of special concern. Males have snouts that range from 68.8-85.7 mm and a head width of 10.5-16.3 mm, whereas female snouts range from 58.3 mm-73.7 mm and head widths range from 8.9-10.9 mm. Adults have uniform shiny, black coloration without spots. Juveniles have small white

spots that cover dorsal and ventral surfaces, that occasionally exhibit grey, green or black coloration beneath the spotting.

Habitat:

This species occurs in mixed deciduous woodland, coniferous forests, and coastal grasslands in California. This species can be found in riparian areas near streams and under damp debris, but do not inhabit streams.

Proximity/ Potential for Occurrence:

This species is known to occur within the Huddart property boundary along McGarvey Gulch Creek outside of the treatment area; a 1970's survey located this occurrence at the following coordinates: 37.43512 N, -122.29916 W. The Santa Cruz black salamander is presumed to be present in one location within 1 mile to the southeast of Wunderlich and in three locations within 5 miles of Huddart and/or Wunderlich County Parks, primarily to the south of the park boundaries. Treatment areas may contain or be in proximity to potentially suitable habitat for the Santa Cruz black salamander.

Potential for Impact:

Due to the project areas containing potentially suitable habitat and the proximity of this species to treatment areas, a survey will be conducted a minimum of one week prior to operations (see survey protocol above). Based on the biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the Santa Cruz black salamander.

pallid bat (*Antrozous pallidus)*


Tanya Dewey

Description/Status:

The pallid bat, or *Antrozous pallidus,* is a CDFW species of special concern. Adults can reach approximately 60 to 85 mm in length including its tail and has a wingspan of approximately 90 to 120 mm wide. This species is dorsally cream-yellow to light brown in color and pale to white on its underside with woolly fur. The pallid bat has wart-like glands near the nose that secrete an odor as a defense mechanism and have a U-shaped ridge above their nostrils. The ears are large and pointed with serrated edges.

Habitat:

This species favors rocky outcrops in semi-arid climates within grasslands, chaparral, oak woodlands, and coniferous forests. The pallid bat diet consists of ground-dwelling prey like small mammals or reptiles and large flying or ground-dwelling insects.

Proximity/ Potential for Occurrence:

This species is presumed to be present in two locations within 5 miles east of Huddart and/or Wunderlich County Parks. Treatment areas may contain potentially suitable habitat for the pallid bat.

Potential for Impact:

Due to the project area containing potentially suitable habitat, a survey will be conducted a minimum of one week prior to operations (see survey protocol above). Based on the biological surveys, the proximity to property boundaries, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the pallid bat.

burrowing owl (*Athene cunicularia)*

Description/ Status:

Athene cunicularia, or the burrowing owl, is a CDFW species of special concern. The burrowing owl is a small bird measuring 19-25 cm tall and have a wingspan of approximately 53-61 cm. This species has bright yellow eyes, white brows, and no ear tufts. Adults are brown with striped, white chests and white spots on the back. Young burrowing owls have no stripes on the chest and only few spots on the back.

Habitat:

Habitat commonly consists of prairies, farmland, airfields, and grazed, non-native grassland. Favorable habitats are primarily open, flat areas with short grass or bare soil. Nesting consists of building a 6-10 ft. long burrow that contains a nest chamber at the end. Evidence of burrows may include feathers and whitewash on the ground. In the west, the monogamous owls will lay 7-10 white eggs that get stained from the soils in the burrow. The burrowing owl diet consists of insects and small mammals or amphibians; hunting primarily occurs at night but will occur day and night during breeding season.

Proximity / Potential for Occurrence:

This species is presumed to be present in two locations within 5 miles west of Wunderlich and/or Huddart County Parks. Treatment areas are unlikely to contain potentially suitable habitat for the burrowing owl.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the burrowing owl.

Crotch's bumble bee (*Bombus crotchii*)


Robyn Judith Waayers

Status/Description:

Bombus crotchii, or the crotch bumble bee, is a state candidate endangered species. This nonmigratory species has a square-shaped face with 6 abdomen segments. Queens and worker bees, or the females, have a black head, face, and bottom thorax with segments that are black, yellow, or orange. Drones, or males, have yellow coloration on the face and a primarily black and red abdomen.

Habitat:

Crotch's bumble bee occurs in hot, dry environments within grassland and scrub communities. This species typically nests underground in abandoned rodent dens and overwinters under soft soils or leaf litter.

Proximity/ Potential for Occurrence:

This species is presumed to be present in one location within 5 miles east of Wunderlich County Park. The treatment areas are unlikely to contain potentially suitable habitat for Crotch's bumble bee.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the Crotch's bumble bee.

western bumble bee *(Bombus occidentalis)*


Rich Hatfield

Status/Description:

Bombus occidentalis, or western bumble bee, is a state candidate endangered species. The females, or worker and queens, have 12 antenna segments and six segments with a yellow thorax and yellow sides on the abdominal segment and a reddish-black fifth segment. Males have similar coloration, except they have 7 abdominal segments and 13 antenna segments. This species as six segmented legs with thin wings that are approximately the same size as the body.

Habitat:

This is a pollinator species that associates with a wide range of flowering plants and crops within open coniferous, deciduous, and mixed-woodland forests, wet and dry meadows. The western bumble bee is capable of foraging in cold, rainy weather conditions and commonly nests underground.

Proximity/ Potential for Occurrence:

This species is presumed to be present within 5 miles east of Huddart and Wunderlich County Park. The treatment areas contain potentially suitable habitat for the western bumble bee.

Potential for Impact:

Due to the project areas containing potentially suitable habitat, a survey will be conducted a minimum of one week prior to operations (see survey protocol above). Based on the biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the western bumble bee.

marbled murrelet (*Brachyramphus marmoratur)*


Brian Sullivan


2017 Ryan Shaw

Description/Status:

Brachyramphus marmoratur, or the marbled murrelet, is a state endangered and federally threatened seabird species. The marbled murrelet is a small seabird species that has an approximate wingspan of 10 inches wide. This species appears red-brown with mottled, white spots during the breeding season and appear to have dark grey backsides and white undersides with white patches on the face and shoulder areas during the nonbreeding season.

Habitat:

This species favors nesting sites in old-growth coniferous forests or rocky talus slopes near the Pacific Ocean, up to approximately 15 miles inland. The marbled murrelet nests on large branches approximately 4 inches in diameter or larger that create a platform that may be screened from predators or wind by branches of nearby trees, where the female will lay one yellow, olive, or blue-green egg with brown, black, and lavender specks. This seabird forages in coastal marine habitats, dieting on primarily fish and crustaceans.

Proximity/ Potential for Occurrence:

This species is presumed to be present within 5 miles west of Huddart and Wunderlich County Parks. It is unlikely that treatment areas will contain potentially suitable habitat for the marbled murrelet due to the project properties being located several miles inland.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the marbled murrelet.

western snowy plover (*Charadrius nivosus nivosus*)

Description/ Status:

Charadrius nivosus nivosus, or the western snowy plover, is a federally threatened seabird species. The western snowy plover is approximately 6 inches in length with a pale brown to grey, rounded body and white underside. Adults have dark patches on the head and shoulders. Juvenile plumage is similar to adult plumage, but the dark patches on the head and shoulders are absent. This species has long, dark or grey legs, large black eyes, and a short, dark bill.

Habitat:

The western snowy plover prefers habitat along the coast within sand spits, dunes, estuaries, and coastal beaches near river mouths. This species breeds and nests above the high tide lines where a female will lay approximately 3 camouflaged eggs in small depressions in the sand. The western snowy plover diet predominately consists of small invertebrates, crustaceans, and insects commonly found in beach sand, kelp, and dune vegetation.

Proximity/ Potential for Occurrence:

This species is presumed to be present in one location within 5 miles northeast of Huddart County Park. The occurrence is located near Smith Slough. The project areas do not contain potentially suitable habitat for the western snowy plover.

Potential for Impact:

Based on this species' proximity to the project areas and the unfavorable habitat conditions within the treatment areas, no impact is expected to occur to the western snowy plover.

Townsend's big eared bat (*Corynohinus townsendii)*

Description/Status:

The Townsend's big eared bat, or *Corynohinus townsendii,* is a CDFW species of special concern. This medium-sized bat can reach approximately 90 to 115mm long and has large ears that can reach approximately 38 mm in length and are curved when relaxed. The dorsal side of this species is brown or pale grey and the underside is generally buff or tan colored. The Townsend's big eared bat has two large glands beside the elongated nostrils and there are generally no visible differences between sexes.

Habitat:

This species favors dense coniferous forests, native prairies, and coastal communities usually below 3,300 meters elevation. This bat prefers dark, open caves or cliffs in cold areas for roosting and does not roost in rock crevices. The primary food source for this species is moths, however, beetles and other small insects are also common.

Proximity/ Potential for Occurrence:

This species is presumed to be present within the Wunderlich property boundary near the park entrance outside of the treatment area; a 1954 survey located this occurrence at the following coordinates: 37.414 N, -122.26369 W. Townsend's big eared bat is presumed to be present in one location within 1 mile and in multiple locations within 5 miles southwest of Wunderlich County Park. Treatment areas may contain potentially suitable habitat for Townsend's big eared bat.

Potential for Impact:

Due to the project area containing potentially suitable habitat, a survey will be conducted a minimum of one week prior to operations (see survey protocol above). Based on the biological surveys, the proximity to property boundaries, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the Townsend's big eared bat.

monarch butterfly (*Danaus plexippus)*

Description/ Status:


Glenn Firebaugh

Danaus plexippus, or the monarch butterfly, is listed as a CDFW candidate endangered or threatened species. Male and female monarchs are bright orange with black veins and borders with bilateral symmetry. The wings have white spots located within the black borders. Females have thicker black veins than males, which have swollen pouches on their hind wings. The monarch wingspan ranges from approximately 8.6 to 12.4 cm wide.

Habitat:

The monarch butterfly requires dense tree cover for overwintering and often use eucalyptus trees, specifically *Eucalyptus globulus,* or blue gum eucalyptus. This species is intolerant to frost and feeds on milkweeds, which makes the monarchs poisonous to predators. Monarchs mate prior to migrating from overwintering sites in the spring, then females lay their eggs on milkweed host plants, where the egg and larvae develop.

Proximity/ Potential for Occurrence:

The monarch butterfly is known to occur in several locations within 5 miles of the project areas. The occurrences are predominately located in the Montara Mountain and Half Moon Bay quadrangles. Wunderlich County Park contains several stands of *Eucalytpus globulus,* which may contain potentially suitable habitat for overwintering for this species.

Potential for Impact:

Due to the project properties containing *Eucalyptus globulus*, a overwintering host species, the eucalyptus stands in proximity to treatment areas will be evaluated for potentially suitable habitat. If it is determined that the eucalyptus trees in proximity to treatment areas contain potentially suitable habitat for this species, then an inspection for monarchs will occur prior to operations and

operations will be avoided in those areas during the overwintering period. Based on the avoidance measures and protocol to cease operations if this species were discovered during operations; no impact is expected to occur to the monarch butterfly.

California giant salamander (*Dicamptodon ensatus)*

Description/ Status:

Dicamptodon ensatus, or the California giant salamander, is a CDFW species of special concern. Adults are stout with a long tail reaching about 30 cm in total length. The bodies are light brown to brassy and have distinct dark patches. The front two feet have four toes and the hind feet have five toes.

Habitat:

The California giant salamander requires habitat with cover for hiding, sun protection, and breeding and can be found under rocks, logs, or stones. This species' aquatic habitat consists of lakes, ponds, rivers, streams, or fast-moving water. Females deposit 85-200 eggs underwater and protect the eggs until they hatch. This species has a relatively slow reproduction rate due to long gestation period and they do not reach sexual maturity until they are 5-6 years old.

Proximity/ Potential for Occurrence:

This species is presumed to be present in two locations within 1 mile of Wunderlich County Park. The occurrences are located to the north and southwest of Wunderlich boundaries in or near drainages. There are multiple locations within 5 miles west of Huddart and Wunderlich County Parks where the California giant salamander is presumed to be present. It is unlikely that the treatment areas may contain potentially suitable habitat for this species, however, treatment areas may be adjacent to potentially suitable habitat.

Potential for Impact:

Due to the property boundaries containing potentially suitable habitat and the proximity of this species to property boundaries, a survey will be conducted a minimum of one week prior to operations (see survey protocol above). Based on the biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the California giant salamander.

western pond turtle (*Emys marmorata*)

Description/ Status:

Emys marmorata, or the western pond turtle, is a CDFW species of special concern. The western pond turtles are yellow-ish with dark blotches on the dark brown to olive, smooth shell with webbed toes. Adult males have a large head, pointy snout, thick tail base, and wide neck with white

and yellow coloration. Adult females have blunt snouts, a thin tail base, and a dark throat and chin. Juveniles have long tails, soft shells, and are light brown.

Habitat:

The habitat for this species consists of aquatic and terrestrial environments, including lakes rivers, streams, ponds, wetlands, vernal pools, creeks, reservoirs, agricultural ditches, estuaries, and brackish waters. Adults favor deep waters while juveniles favor shallow waters, however, both prefer slow moving water. Terrestrial habitats consist of burrows in leaves or soil during the winter season. Nests are built away from water in flat areas with short vegetation and dry soils. The western pond turtle feeds on crustaceans, midges, fish, dragonflies, beetles, and other invertebrates and algae or plant material. Development is a threat to this species.

Proximity/ Potential for Occurrence:

This species is presumed to be present in a few locations within 5 miles to the north of Huddart County Park and to the southwest and east of Wunderlich County Park. It is unlikely that the treatment areas contain potentially suitable habitat for the western pond turtle, however, potentially suitable habitat may be present adjacent to treatment areas within property boundaries.

Potential for Impact:

Due to the property boundaries containing potentially suitable habitat and the proximity of this species to property boundaries, a survey will be conducted a minimum of one week prior to operations (see survey protocol above). Based on the biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the western pond turtle.

Bay checkerspot butterfly (*Euphydryas editha bayensis*)


Steve Martarano

Description/ Status:

The Bay checkerspot, or *Euphydryas editha bayensis*, is a butterfly endemic to the San Francisco Bay region of California and is a federally threatened species, as a subspecies of *Euphydryas editha*. This subspecies has a wingspan of approximately 2 inches with black bands along the veins with bright red, yellow, and white spots between the bands.

Habitat:

The habitat exists on shallow, serpentine soils along ridge tops, open woodlands, alpine tundra, grasslands, and rocky outcrops where host plants are present. The three primary host plants are *Plantago erecta* (California plantain), *Castilleja exserta* (owl's clover), and *Castilleja densiflora* (dense flower owl's clover). Adult diets consist of flower nectar whereas the larvae feed on the host plants.

Proximity/ Potential for Occurrence:

The Bay checkerspot butterfly is presumed to be present in one location within 1 mile northeast of the Huddart property near Emerald Lake Hills. In addition, this species is presumed to be present in multiple locations within 5 miles of Huddart and Wunderlich County Parks. The occurrences range from the north to the southeast of both project properties. The treatment areas do not contain potentially suitable habitat for the Bay checkerspot butterfly.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the Bay checkerspot butterfly.

American peregrine falcon (*Falco peregrinus anatum*)

Description/ Status:

Falco peregrinus anatum, or the American peregrine falcon, is a CDFW fully protected species and species of special concern. This species is approximately 36 to 49 cm in length and has a wingspan ranging from 100 to 110 cm wide. The wings and tail are long and pointed. Adults are dark grey to brown on their backs and head and have a pale white underside with dark markings. The yellow bill is strongly hooked and has a yellow ring around the eyes.

Habitat:

The peregrine falcon occurs primarily in coastal areas with open landscapes. This species nests in cliffs along rivers and the coastline. The nests are simply depressions in the ledges formed from the peregrine falcon scraping the sand, gravel, or substrate to approximately 2 inches deep. The peregrine falcon lays 2-5 pale brown eggs that are dotted with red, brown, or purple. The primary diet of this species is shorebirds and bats, but also prey on small rodents and fish.

Proximity/ Potential for Occurrence:

This species is presumed to be present in two unspecified locations within 5 miles of both property boundaries. The occurrences are located within the San Mateo and Mindego Hill Quadrangles. The treatment areas are unlikely to contain suitable habitat for the American peregrine falcon.

Potential for Impact:

Based on this species' proximity to the project area and unfavorable habitat conditions within the treatment areas, no impact is expected to occur to the American peregrine falcon.

saltmarsh common yellowthroat (*Geothlypis trichas sinuosa)*

Description/Status:

Geothlypis trichas sinuosa, or the saltmarsh common yellowthroat, is a CDFW species of special concern and is endemic to California. Adult males are brown to tan with a yellow throat and underside with a black mask around its eyes, whereas females are primarily brown, grey, or tan without a mask or changes in coloration. This species is small, reaching approximately 13 cm in length.

Habitat:

This species prefers herbaceous wetland and salt marsh communities usually below 450 meters elevation. Small, cup-shaped nests are usually well-hidden by tall vegetation less than approximately 1 meter above ground. Females will lay 3-6 white eggs with dark spots on one end of the egg. This species primarily consumes insects like spiders and caterpillars.

Proximity/ Potential for Occurrence:

This species is presumed to be present within 1 mile to the southeast of Wunderlich County Park and in multiple locations within 5 miles to the north of Huddart County Park. The treatment areas do not contain suitable habitat for the saltmarsh common yellowthroat.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the saltmarsh common yellowthroat.

bald eagle (*Haliaeetus leucocephalus*)

Status/Description:

Haliaeetus leucocephalus, or the bald eagle, is a large raptor listed as a state endangered species. This species has a wingspan of approximately 80 inches and length that ranges from approximately 27 to 38 inches. Adults have white, feathered heads with dark brown wings and bodies that are mottled with white. The underside of the tail is white and the legs and bills are bright yellow. Juvenile bald eagles are mostly uniformly brown and obtain the adult plumage in approximately 5 years.

Habitat:

This species nests in open country or mountains near lakes, reservoirs, rivers, marshes, and coasts. Nests are usually located in trees or large cliffs and are comprised of large sticks and lined with fine materials where 1-3 white eggs are laid. The bald eagle diet primarily consists of fish, birds, and mammals.

Proximity/ Potential for Occurrence:

This species is presumed to be present within 5 miles southeast of Wunderlich County Park. The project area does not contain any potentially suitable habitat for the bald eagle.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the bald eagle.

San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens)*

Description/Status:

The San Francisco dusky-footed woodrat, or *Neotoma fuscipes annectens,* is a CDFW species of special concern. This rodent species can reach approximately 9 inches in length and the tail adds approximately 6.5 to 8 inches to its length. The underside of this woodrat is white or grey and the dorsal side is primarily brown or grey in coloration. The San Francisco dusky-footed woodrat has large round ears and light colored, slightly hairy feet.

Habitat:

This species prefers moderate canopy coverage in oak woodland, chaparral or shrubland, and coniferous forest communities. The San Francisco dusky-footed woodrat builds complex nests from sticks and debris that can reach up to approximately 8 feet wide and 6 feet tall. Nests are typically occupied by a single adult, except for a period of time after the female gives birth to her pups. The diet for this species consists of woody plant species such as maple, coffeeberry, alder, live oak, and elderberry.

Proximity/ Potential for Occurrence:

This species is presumed to be present in multiple locations within 5 miles of Huddart and Wunderlich County Parks. The occurrences are primarily on the north of Huddart and to the east of Wunderlich boundaries. Treatment areas contain potentially suitable habitat for the San Francisco dusky-foot woodrat.

Potential for Impact:

Due to the treatment areas containing potentially suitable habitat, a survey will be conducted a minimum of one week prior to operations (see survey protocol above). Based on the biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the San Francisco dusky-footed woodrat.

Steelhead – central California coast (*Oncorhynchus mykiss irideus pop. 8)*

Description/Status:

The central California coast steelhead trout, or *Oncorhynchus mykiss irideus pop.8,* is a federally threatened species that occurs along the central coast of California. This anadromous trout species can range from approximately 35 to 65 cm in length and can weigh up to approximately 12 pounds. Adults appear primarily silver in coloration with pink cheeks and green backs and often have black spots along the tail and fins. Juveniles resemble adults in coloration, however, they have an additional dark oval mark located along the lateral line and between the head and dorsal fin.

Habitat:

This is an anadromous fish species that occurs in freshwater Pacific coast streams. This steelhead species will migrate to marine waters once it nears maturity, then returns to fresh water streams for spawning. Typically, this species requires a minimal of approximately 7 inches of water depth for migration and favors spawning habitat between 6 and 24 inches deep, usually in slow moving currents. High water velocities and low water depth can impede on this species' capability to migrate.

Proximity/ Potential for Occurrence:

This species is presumed to be present within 5 miles of Huddart County Park in Mills Creek to the northwest. The project area does not contain any potentially suitable habitat for the central California coast Steelhead.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the central California coast Steelhead.

mountain lion (*puma concolor)*

Description/ Status:

Puma concolor, formerly *Felis concolor,* or the mountain lion, is a CDFW candidate endangered species. Adult mountain lions have a tan coat and white to cream underside. Males and females appear the same in coloration, however, males can reach approximately 6 to 8 feet in total length whereas females are generally smaller reaching approximately 5-7 feet in length. Mountain lion cubs have dark spots on their bodies and rings around their tails that fade as they mature.

Habitat:

This species prefers dense vegetative areas within mountain ranges of coniferous forests, scrub and oak woodlands, and arid communities. Mountain lions are territorial and development has limited their available habitat. This species is an opportunistic hunter that primarily feeds on deer, farm animals, and small mammals such as coyotes, raccoons, and feral pigs.

Proximity/ Potential for Occurrence:

There are no survey results on the CNDDB for the mountain lion, however, mountain lions are common throughout the Santa Cruz Mountains and tracks have been identified on both park properties. The treatment areas contain potentially suitable habitat for mountain lions.

Potential for Impact:

During the biological survey, a field evaluation will be conducted to assess the potential for impact on this species due to the project area containing potentially suitable habitat. Based on the biological surveys and the pre-operational meeting; no impact is expected to occur to the mountain lion.

foothill yellow-legged frog (*Rana boylii*)

Description/ Status:

Rana boylii, or the foothill yellow-legged frog, is a frog from the genus Rana in the family Ranidae that is a state endangered species and a CDFW species of special concern. The foothill yellow-legged frog is a small-sized 3.72–8.2 cm (1.46–3.23 in) that ranges from gray, brown, olive, or reddish in coloration. This species often has dark molting or spots and yellow undersides on its hind legs.

Habitat:

Habitat is primarily foothill and mountain streams with rocky substrate in open, sunny banks within forests, chaparral, or woodland communities. Habitat located in the project area may be suitable habitat for this species.

Proximity/ Potential for Occurrence:

This species is presumed to be present in a few locations within 5 miles southeast, east, or north of Wunderlich and/or Huddart County Park. It is unlikely that the project areas contain potentially suitable habitat for the foothill yellow-legged frog.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species

were discovered during operations; no impact is expected to occur to the foothill yellow-legged frog.

California red-legged frog (*Rana draytonii*)

Description/ Status:

Rana draytonii, or the California red-legged frog, is a federally endangered species and CDFW species of special concern. This species ranges from 1.75-5.25 inches long with reddish-brown or brown, gray, or olive coloration. The skin is smooth with small black spots on the back and dark bands on the legs. The hind legs and belly are red on the underside and the chest region is creamy and marbled with gray.

Habitat:

Common habitat consists of locations near ponds or along streams in humid forests, grasslands, and coastal scrub communities that contain plant cover. This species breeds in permanent water sources and requires moist refuges, like animal burrows, for cover in the dry season. Habitat located in the project area may be suitable habitat for the California red-legged frog.

Proximity/ Potential for Occurrence:

The California red-legged frog is presumed to be present in one location within Huddart County Park located along the eastern property boundary where the habitat expands from West Union Creek. The treatment areas are at least 300 feet from West Union Creek, however, there is potential for upland movement. In addition, this species is presumed to be present in three locations within 1 mile southwest and northeast of Huddart County Park. There are many other occurrences scattered within 5 miles of Huddart and Wunderlich boundaries. Treatment areas are located more than 300 feet from potentially suitable habitat in Huddart County Park and more than 0.9 miles from Wunderlich County Park near San Francisquito Creek.

Potential for Impact:

Due to the project areas containing potentially suitable habitat and the proximity to treatment areas, presence will be assumed for California red-legged frog and take Scenario II will be implemented as described in the PSA (Impact BIO-2). Based on the biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the California red-legged frog.

American badger (*Taxidea taxus)*

Description/ Status:

Taxidea taxus, or the American badger, is a CDFW species of special concern. The American badger has thick brown or black fur with white stripes on its cheeks and an upturned nose. They have short and stout legs with a flat body that reaches approximately 1.5-2 ft in length, are muscular, and have long claws. The adult females will prepare a large burrow up to 10 ft below the surface for her offspring.

Habitat:

Habitat consists of open areas such as prairies, farmland, and plains as well as edges of woods. The American badger is a nocturnal carnivore and its diet primarily consists of small rodents, reptiles, birds, and insects.

Proximity/ Potential for Occurrence:

This species is presumed to be present in one location within 1 mile southeast of Wunderlich County Park and in multiple locations within 5 miles south of Wunderlich and/ or Huddart boundaries. It is unlikely that treatment areas contain potentially suitable habitat for the American badger.

Potential for impact:

Based on this species' proximity to the project area, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the American badger.

San Francisco gartersnake (*Thamnophis sirtalis tetrataenia)*

Description/Status:

The San Francisco gartersnake, or *Thamnophis sirtalis tetrataenia,* is a state and federally endangered species endemic to the San Francisco Bay area of California. Adults can reach 18 to 55 inches in length and have large eyes on the sides of their narrow head. This species has many dorsal stripes that are blue-green or greenish yellow to white, black, and red with a blue-green underside and red head.

Habitat:

This species favors openings in grasslands or wetland areas near ponds, marshes, or sloughs and is capable of swimming. During the dry season, the San Francisco gartersnake may become dormant in rodent burrows. The primary diet consists of amphibians, small mammals, reptiles, earthworms, slugs, slugs an leeches.

Proximity/ Potential for Occurrence:

The exact coordinates of known occurrences are not available for this species in the CNDDB. However, there are 4 known occurrences within the Woodside 7.5' Quadrangle, where both parks are located. There is a total of 39 other known occurrences in the 8 surrounding quadrangles. Many of the 39 occurrences are located in the Montara Mountain 7.5' Quadrangle to the Northwest of the properties and there are many occurrences scattered throughout the San Gregorio, La Honda, and Mindego Hill 7.5' Quadrangles to the south of the properties. The treatment areas are unlikely to contain suitable habitat for the San Francisco gartersnake.

Potential for Impact:

Based on this species' proximity to the project area, unfavorable habitat conditions, biological surveys, the pre-operational meeting, and mitigation measures to cease operations if this species were discovered during operations; no impact is expected to occur to the San Francisco gartersnake.

ATTACHMENT #4

Biological Resources Memorandum

(See the following pages)

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ATTACHMENT #5

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