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-Public Draft-

# Monterey County Forest Health and Fire Resilience Public Works Plan (PWP)

*Project Proponent: Resource Conservation District of Monterey County*

*Date of Public Review Draft PWP: November 3, 2022*
*Date of RCD Public Hearing: December 15, 2022*

# Introduction

This Public Works Plan (PWP) has been designed in consultation with staff from the California Coastal Commission (CCC) and County of Monterey Housing and Community Development. This PWP is based on in the requirements of Section 30605 of the Public Resources Code, which enables the CCC to "promote greater efficiency for the planning of any public works or state university or college or private university development projects and as an alternative to project-by-project review." PWPs are meant to provide a single document that establishes a framework for comprehensive planning, reviewing, and permitting, allowing a suite of related activities that would otherwise trigger the need for individual Coastal Development Permits (CDPs) to instead be analyzed as an integrated and coordinated system, thus expediting the permitting process and saving money through use of a comprehensive permit vehicle. This PWP has also been developed to function as a companion to CalFire's statewide Vegetation Treatment Program (CalVTP) and its associated Programmatic Environmental Impact Report (PEIR). In addition to the CalVTP, the collaborators developed the Coastal Vegetation Treatment Standards (Coastal VTS) to provide additional guidance and clarity for projects to be implemented within the Coastal Zone and within and/or in proximity to Environmentally Sensitive Habitat Areas (ESHA). As such, this PWP provides a planning framework to review and authorize individual vegetation management projects in Monterey County over the next ten years using principles, strategies, and best management practices that align fire resilience planning with the protection of coastal resources.

The Resource Conservation District of Monterey County's (RCD) proposed Forest Health and Fire Resilience PWP focuses explicitly on developing a cost-effective and programmatic approach to compliance with the California Coastal Act in order to increase the pace and scale of implementation of critical projects that will improve both ecological conditions and the resilience of our landscapes to future climate change-induced wildfire. Projects that fit within and are consistent with the PWP and are designed with RCD oversight will be able to utilize the compliance procedures articulated in this document and will not be required to obtain individual CDPs from the County or pay CDP fees to the County.

This PWP is intended to serve as an optional compliance pathway for those Forest Health and Fire Prevention projects that otherwise would have required a CDP within a portion of Monterey County's Local Coastal Program (LCP) area. Local landowners will continue to be able to determine if their projects require CDPs, and if so will continue to be able to obtain a traditional CDP through the County, if they so choose, or if a project cannot be designed to meet the standards and guidance provided in this PWP. Projects that are currently exempt from the Coastal Act will continue to be exempt. Projects on federal land or with a federal lead agency can continue to comply with the Coastal Zone Management Act through coordination with the CCC's Federal Consistency Office in San Francisco. This PWP will not affect exemptions or replace existing permit pathways (individual Coastal Development Permits or Timber Harvest Plans). This PWP does not create new exemptions from the Coastal Act or Local Coastal Program. The PWP will not restrict any organization from doing work in the proposed PWP Program Area.

Additionally, the PWP does not preclude the coordinated development of long-term solutions at the state level that could further streamline permitting consistently across the state.

This PWP is divided into the following 7 Sections:

- Section I: Purpose and Need
- Section II: Program Description
- Section III: CalVTP Protection Measures and the Coastal VTS
- Section IV: Local Planning Context
- Section V: Administration, Approval Process & Program Review
- Section VI: Glossary of Terms

# Section I: Purpose and Need

## Purpose

The 2020 California wildfire season was a record-setting year of wildfires that burned across the state of California. *"As of the end of the year, nearly 10,000 fires had burned over 4.2 million acres, more than 4% of the state's roughly 100 million acres of land, making 2020 the largest wildfire season recorded in California's modern history. California's August Complex fire has been described as the first "gigafire" as the area burned exceeded 1 million acres. The fire crossed seven counties and has been described as being larger than the state of Rhode Island."*[1] The 2020 wildfire season arrived on the heels of the 2018 wildfire season, which at the time was the largest and most destructive on record. The mass destruction in the 2018 wildfire season ushered in a series of Executive Orders, Legislation, and reports focused on identifying (a) the factors driving the level of catastrophic fire affecting the state, (b) the barriers to implementing fuel load reduction and forest resilience work at an appropriate pace and scale, and (c) the key tools and mechanisms necessary to turn the tide on this crisis and set the state on a trajectory that reduces the risk, severity, and impact of catastrophic wildfires. The California Forest Management Task Force's January 2021 *Wildfire and Forest Resilience Action Plan* is a clear call for increasing the pace and scale of fuel reduction and forest health actions, and the Plan places the essential work described in this Public Works Plan within the critical context of state, regional, and local fire resilience efforts.

Like many areas of the state, forest, woodland, chaparral and grassland landscapes throughout Monterey County are undergoing significant change. The climate is becoming warmer and drier, endemic species are at risk, invasive species are on the move, and sudden oak death has taken an immeasurable toll on regional ecosystems and overall forest health. Altered fire regimes and increased fuel loads are driving larger and more catastrophic wildfire. The result has been damaging

[1] https://www.fire.ca.gov/incidents/2020

changes to ecosystems that require environmentally sensitive landscape-level treatments to help reduce the impact of changing climates and ecological conditions impacting Monterey County. The 2016 Soberanes fire and the 2020 Carmel, Dolan and River Fires are evident examples of the level of risk posed by these wildfires, and their impacts to our human and biological communities in this landscape. The latter three wildfires combined burned approximately 312,044 acres in Monterey County, destroyed 185 structures, and exhibited extreme fire behavior. Impacts of this extreme fire behavior was especially evident in areas where fires burned larger areas at high severity, destroying soil structure, resulting in damaging debris flows. Post-fire mapping data suggest the majority of forested areas in the Big Sur region burned at high fire severities as a result of dense understory growth.

In addition to the direct human and ecological toll of these catastrophic wildfires is the global toll of greenhouse gas emissions. The California Air Resources Board, in their draft December 2020 report titled, "Greenhouse Gas Emissions of Contemporary Wildfire, Prescribed Fire, and Forest Management Activities", estimates that California's 2020 wildfire season resulted in the release of approximately 112 million metric tons of carbon dioxide into the atmosphere.[2] This is equivalent to approximately 24.2 million passenger vehicles driven for an entire year.[3]

Local agencies of Monterey County are joining efforts to design, permit, and implement critical, high-priority vegetation treatment activities that will reduce future risk of catastrophic, severe intensity fire and create a mosaic of climate and fire resilient native ecosystems. The Resource Conservation District of Monterey County, in partnership with County of Monterey Housing & Community Development, CalFire, the Coastal Conservancy, public and private landowners, technical advisors, the Coastal Commission, Fire Safe Council for Monterey County and other partners are leading a regional prioritization effort to identify, design, permit and implement multiple mission critical forest health and fuel load reduction projects within the Coastal Zone over the proposed 10-year timeframe of this PWP. This effort will use Fire Hazard Severity Zone (FHSZ) maps, high-resolution vegetation mapping funded by CDFW's Vegetation Classification and Mapping Program (VegCAMP) expected Spring 2026, and CALFIRE fire susceptibility maps, and input from public and private sector experts in ecosystem science and wildfire science to create an on-going docket of high priority projects for implementation. The RCD currently has grants from CalFire, the Coastal Conservancy, and others where funds can be applied to planning and implementation of forest health and fire resilience projects within the Coastal Zone. The RCD intends to seek additional public and private grant funding over the next decade for design, permitting, and implementation of these priority projects

[2] https://ww3.arb.ca.gov/cc/inventory/pubs/ca_ghg_wildfire_forestmanagement.pdf
[3] https://news.bloomberglaw.com/environment-and-energy/californias-2020-wildfire-emissions-akin-to-24- million-cars

due to the high fire risk within the region and especially within the Coastal Zone.

This PWP provides a planning framework to review and authorize individual vegetation management projects in Monterey County's Coastal Zone over the next ten years using principles, strategies, and best management practices that align fire resilience planning with the protection of coastal resources. Over the proposed 10-year period of the PWP, the RCD and its partners plan to conduct high priority forest health and fire resilience projects with voluntary collaborating landowners within the PWP Program Area in moderate to very high wildfire hazard areas of the Coastal Zone of Monterey County. However, activities will not occur across the entirety of this region.

## Need

The coast is particularly vulnerable to catastrophic wildfires due to historic development patterns and resource management patterns. High priority forest health and fire prevention projects must be carried out on a routine basis to promote fire resiliency in these coastal areas. Efficient implementation requires programmatic streamlining of California Environmental Quality Act (CEQA) compliance and Coastal Act authorizations. The California Board of Forestry has created a tool to address CEQA compliance for large and complex fuel management and forest health projects through adoption of the Programmatic Environmental Impact Report for the California Vegetation Treatment Program (CalVTP) in January of 2020 (https://bof.fire.ca.gov/projects-and-programs/calvtp/calvtp-programmatic-eir/). This proposed PWP, will be the fourth of its kind: a programmatic companion to the CalVTP to enable streamlined compliance with the California Coastal Act.

To reduce risk of catastrophic wildfire and improve ecological conditions and trajectories for our forests, woodlands, and grasslands, this PWP provides a programmatic authorization tool that utilizes the CalVTP along with targeted strategies for projects within the coastal zone (as directly incorporated into this PWP and articulated in the Coastal Vegetation Treatment Standards for Monterey County) as the critical framework for project analysis. This PWP enables the RCD and project partners to design and implement multiple mission-critical forest health, ecosystem restoration and fire resilience projects throughout the PWP Program Area over a 10-year period. This PWP also creates a clear and agreed upon process for approval of individual projects submitted under the PWP (Section VI) that includes:

- Early consultation among Commission staff, RCD staff, registered foresters or qualified professionals, CalFire, local landowners and tribal entities;
- Inclusion of the Coastal Vegetation Treatment Standards (CVTS) for Monterey County developed by Coastal Commission and RCD staff and technical advisors into the CalVTP Project Specific Analyses (PSAs);
- Timelines for review and approval of PSAs under the PWP process, including through the preparation of Notices of Impending Developments

(NOIDs);

- A process for projects that are of the same type and meet the same goals and standards as articulated in the CalVTP and Coastal VTS for Monterey County, but do not fit under the VTP due to either their location being outside the Treatable Landscape (for example, defensible space work on private property) or their scale being too small to warrant use of the extensive CalVTP PEIR process; and
- A process for monitoring, enforcement, and programmatic review.

This effort leverages significant collaboration between Commission staff and the RCD over the past 11 months to develop a set of agreed upon vegetation treatment standards that are referred to as the Coastal VTS for Monterey County (Exhibit A). This, coupled with the CalVTP PEIR, provides clear guidance on special requirements for Forest Health and Fire Prevention projects within the Coastal Zone of Monterey County. In developing this PWP, the RCD and County of Monterey Housing and Development worked with Coastal Commission staff on an iterative and focused review of all relevant Land Use Plans (LUP) and Coastal Implementation Plans (CIP) to ensure that policies specific to local sensitive resources were adequately addressed.

# Section II: Program Description

## Overarching Goal of Forest Health and Fire Resilience Program

This PWP and the projects that will be approved under it directly support the intent of the RCD of Monterey County's Forest Health and Wildfire Resilience Program goals, California's climate goals, the goals of the 2021 California Wildfire and Forest Resilience Action Plan, and the goals of the California Coastal Commission and the Monterey County Local Coastal Program for the protection of Environmentally Sensitive Habitat Areas (ESHA).

Approved projects are likely to be implemented within or adjacent to ESHA and will be designed to:

- Proactively restore forest health, improve ecosystem resiliency, and conserve working forests by conducting ecologically minded forest health treatments.
- Protect state water supply sources by strategically implementing ecological restoration projects across priority watersheds.
- Encourage the long-term storage of carbon in forest and woodland trees and soils through the reduction of dense understory thus promoting healthier stands of mature trees.
- Minimize the loss of forest carbon from large, intense wildfires, through reduction of ladder fuels and brush resulting from decades of fire

suppression.

- Promote public safety, health, and welfare and protect public and private property through the implementation of ecologically restorative fuel reduction treatments in the wildland urban interface.

## Project Design Approach

Vegetation communities and their associated faunal assemblages have evolved with specific disturbance regimes. These regimes result in a mosaic of habitats, and along with energy inputs and stability over time, are important drivers of diversity. In Mediterranean climates, such as those found in much of California, fire is the most important, large-scale natural disturbance regime driving the distribution and composition of vegetative communities.

An expanding population, increased development into the wildland-urban interface, and the cumulative impacts of historic fire suppression policy, which concentrates the state's resources on fire reduction, has resulted in significantly altered vegetation communities and increased fire risk to lives and property. These facts have been widely recognized and significant resources are now being directed towards fuels treatments and forest management. While these fuel treatments are largely motivated by an increase in catastrophic wildfire, they present an opportunity to provide ecological benefits on the lands where they are implemented and to the broader landscape they are designed to protect.

When developing forestry and other vegetation management projects, the terms forest health, ecosystem restoration, and fuel reduction are often used interchangeably; however, they can either refer to markedly different treatments or end states, or ideally to very similar ones. In the broadest sense, a healthy forest or ecosystem is one that possesses the ability to naturally sustain the unique species composition and processes that exist within it. This encompasses a system's biodiversity, including the plant, animal and fungal assemblages that occur there, as well as the ecosystem processes and services that the forest provides, such as carbon sequestration, erosion control, and nutrient cycling. Managing for ecosystem restoration or forest health means managing to sustain and support these assemblages and processes.

Fuel reduction, while often supporting forest or other ecosystem health, is focused on the type, arrangement and quantity of flammable materials found in the landscape. By modifying any of the attributes mentioned above, fuel reduction projects seek to alter fire behavior, typically reducing intensity, rate of spread, or flame length, to assist in control of wildfires or prescribed fires. The ultimate goal is to design and implement fuel reduction projects that help protect life and property from wildfire, while simultaneously furthering forest health and ecosystem benefit goal.

Considerate, knowledge-driven fuel reduction projects seek to emulate the effects

of evolutionary fire regimes, create a system that is equipped to respond to natural disturbance events in the future, or provide strategic safety measures for fire personnel and the general public, with minimum adverse impacts to the natural environment. With vegetation serving as the primary source of fuel in wildland fires, manipulation of vegetation to create fire-resistant, ecologically-resilient, and healthy ecosystems is paramount to ensuring the safety of human life and property as well.

As such, while forest health projects are explicitly designed to directly improve both ecosystem health and the provisioning of other essential ecosystem services, fuel reduction projects should, when practicable, also be designed to directly improve ecosystem conditions (e.g., removal of exotic invasive plant species, management that mimics natural disturbance regime, etc.). Fuel reduction projects that cannot be designed to directly improve or restore ecosystems or ecosystem processes are expected to provide indirect ecosystem benefits by reducing the intensity, rate of spread, and extent of catastrophic wildfire on adjacent habitats and ecosystems.

If appropriately designed and implemented, forest health and fuel reduction projects should achieve as many of the following goals as feasible:

- Promote a mosaic of native vegetation types that support diverse native floral, faunal, and fungal assemblages and are resilient to climate change;
- Improve habitat for rare, threatened and endangered plant and animal species where they are present;
- Increase the ability to manage wildfire and implement prescribed fire;
- Reduce impacts to natural and cultural resources from fire suppression activities;
- Maintain important cultural landscapes;
- Significantly reduce loss of life and property from catastrophic wildfire; and,
- Educate the public about the role of fire in California's landscapes and their role in living with it.

These goals acknowledge that complete re-establishment of fire regimes that existed during the evolutionary history of the plants and animals found within the Coastal Zone of Monterey County cannot be replicated under current conditions. It is also understood that even if historic fire regimes were re-established, some of these natural communities have been so altered that the effects of these regimes would not result in a restoration to a pre-contact state.

Given these constraints, where possible, evolutionarily appropriate fire regimes or surrogates (e.g., mechanical, manual, herbivory) for those regimes should be enacted or maintained. The following literature provides peer-reviewed support

for the design approach described in this PWP: Keeley 2002[4], Stephens et al. 2012[5], and Vaillant et al. 2009[6].

To accomplish this vision of ecological restoration and resilience, improved forest health, and reduced risk and severity of wildfire, this PWP will guide development, approval, and implementation of high priority forest health and fire prevention projects within the PWP Program Area of Monterey County's Coastal Zone over the next 10 years. The PWP Program Area depicts the eligible area where activities under the PWP could occur. However, activities will not occur across the entirety of this region.

In addition, RCD Board members and staff are personally committed to equitable and just treatment of all people and are compelled to be attentive to and concerned with the welfare of the entire community with whom we share food and land. We acknowledge that People of Color have experienced bias and institutional racism, including discriminatory land use policies, desecration of sacred lands and cultural resources, and concentration of environmental pollution, which has resulted in inequitable distribution of environmental benefits and burdens that still disproportionately burden these communities today. To address this, one goal of the Public Works Plan is to ensure selection and prioritization of projects that benefit California Native American Tribes and Environmental Justice communities (identified using CalEnviroScreen 4.0), including through early and meaningful coordination, planning, design, and implementation of forest health and fire prevention projects authorized under the PWP.

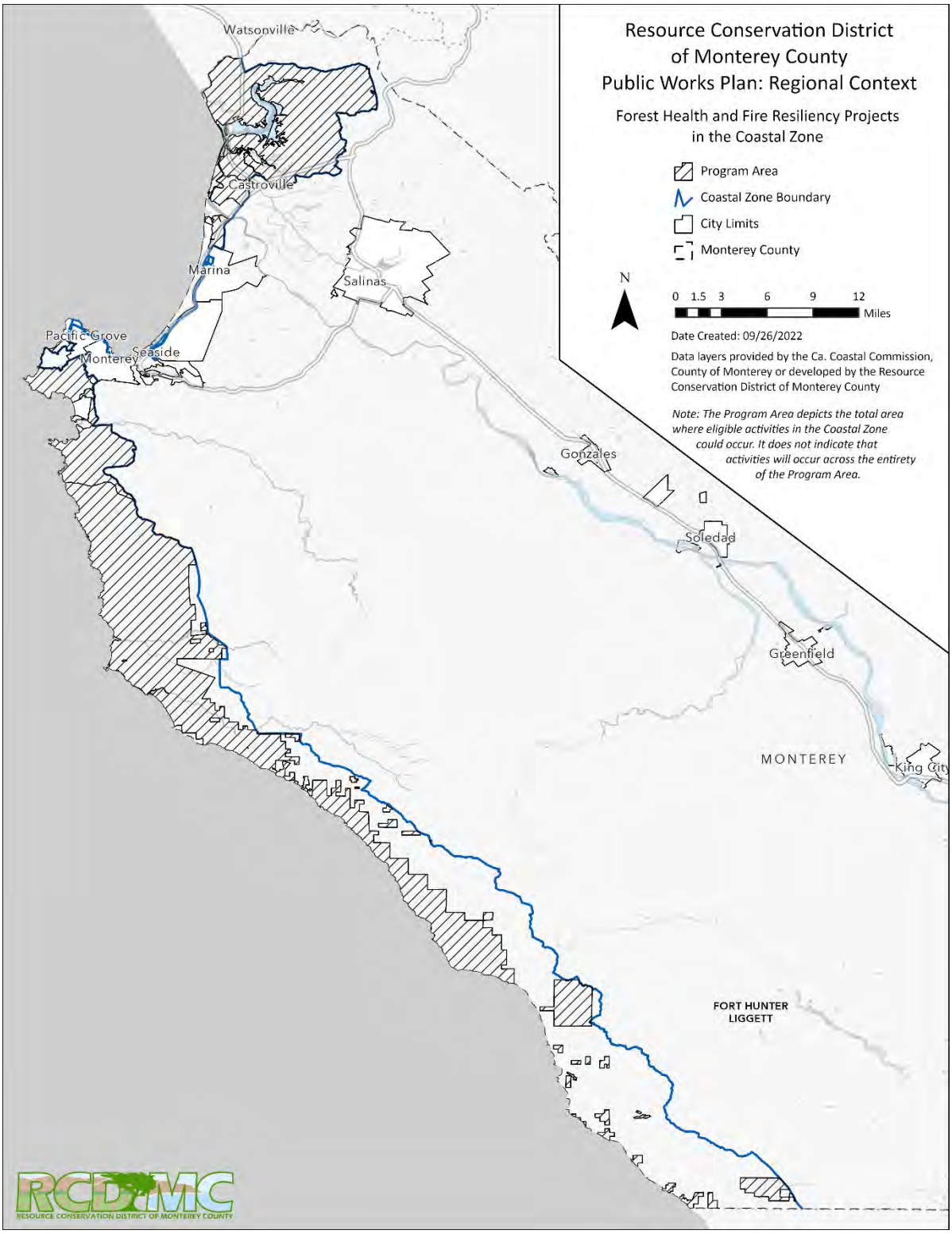
## Program Area

The Resource Conservation District of Monterey County's Forest Health and Fire Resilience PWP covers an area within the County's LCP jurisdiction that stretches from just north of Elkhorn Slough to the southern Big Sur Coast, the northern and southern boundaries of Monterey County. Map #1 shows the geographic context within which the PWP fits, as well as the relationship between the PWP Program Area and the LCPs for cities within Monterey County, which are not included as part of the PWP Program Area. Areas in south county within the Coastal Zone but excluded from the PWP Program Area are federal lands.

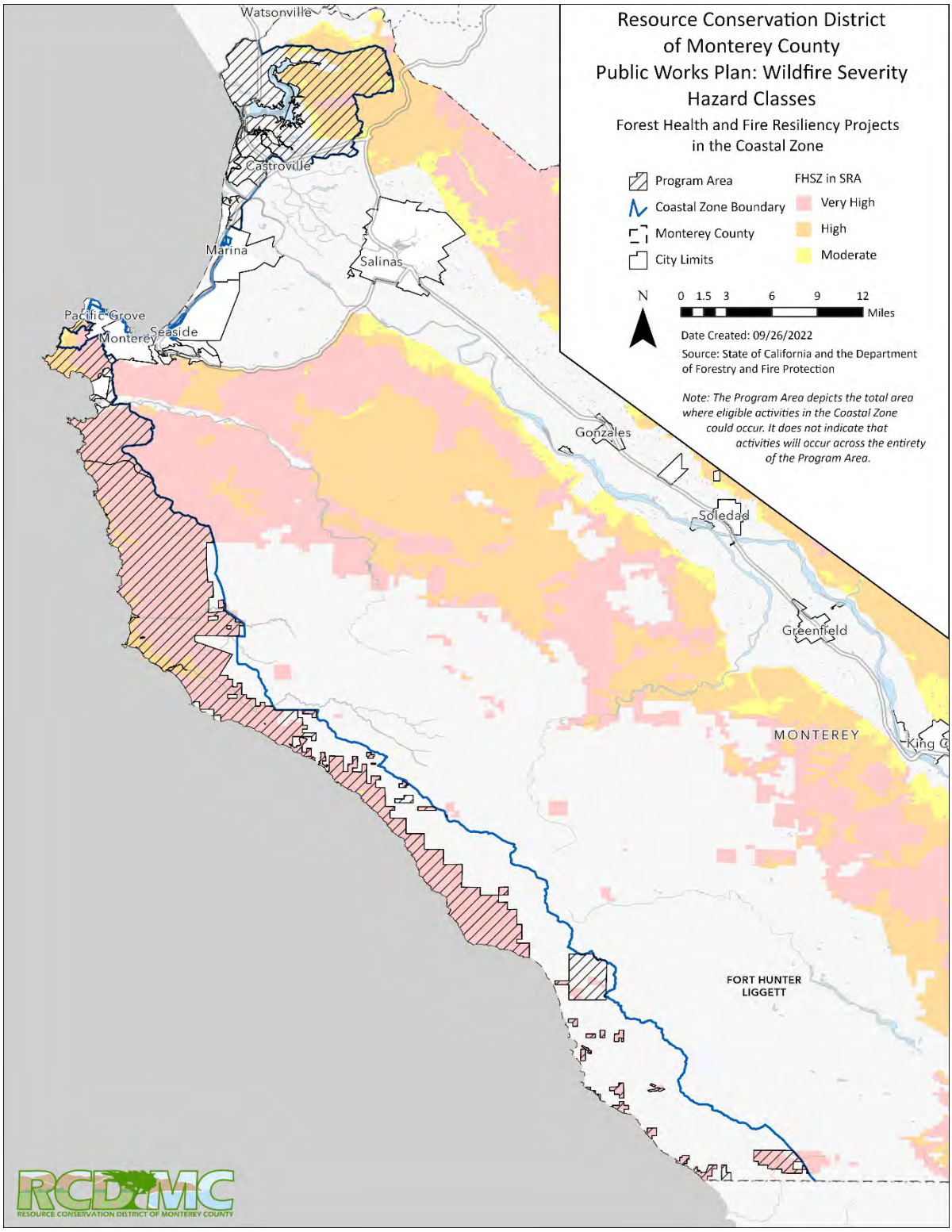
Map #2 displays the PWP Program Area overlayed on CalFire's Fire Hazard Severity Zone Maps to provide context for future planning efforts within the PWP Program Area. Map #3 shows the CalVTP Treatable Landscapes map and how that program and its associated PEIR overlap with the PWP Program Area. While the PWP has been developed as a companion to the CalVTP, it is expected that some high

[4] https://onlinelibrary.wiley.com/doi/abs/10.1046/j.1365-2699.2002.00676.x
[5] https://www.firescience.gov/projects/99-S-01/project/99-S-01_bio201262606_Article_Stephens.pdf
[6] https://fireecology.springeropen.com/articles/10.4996/fireecology.0502014

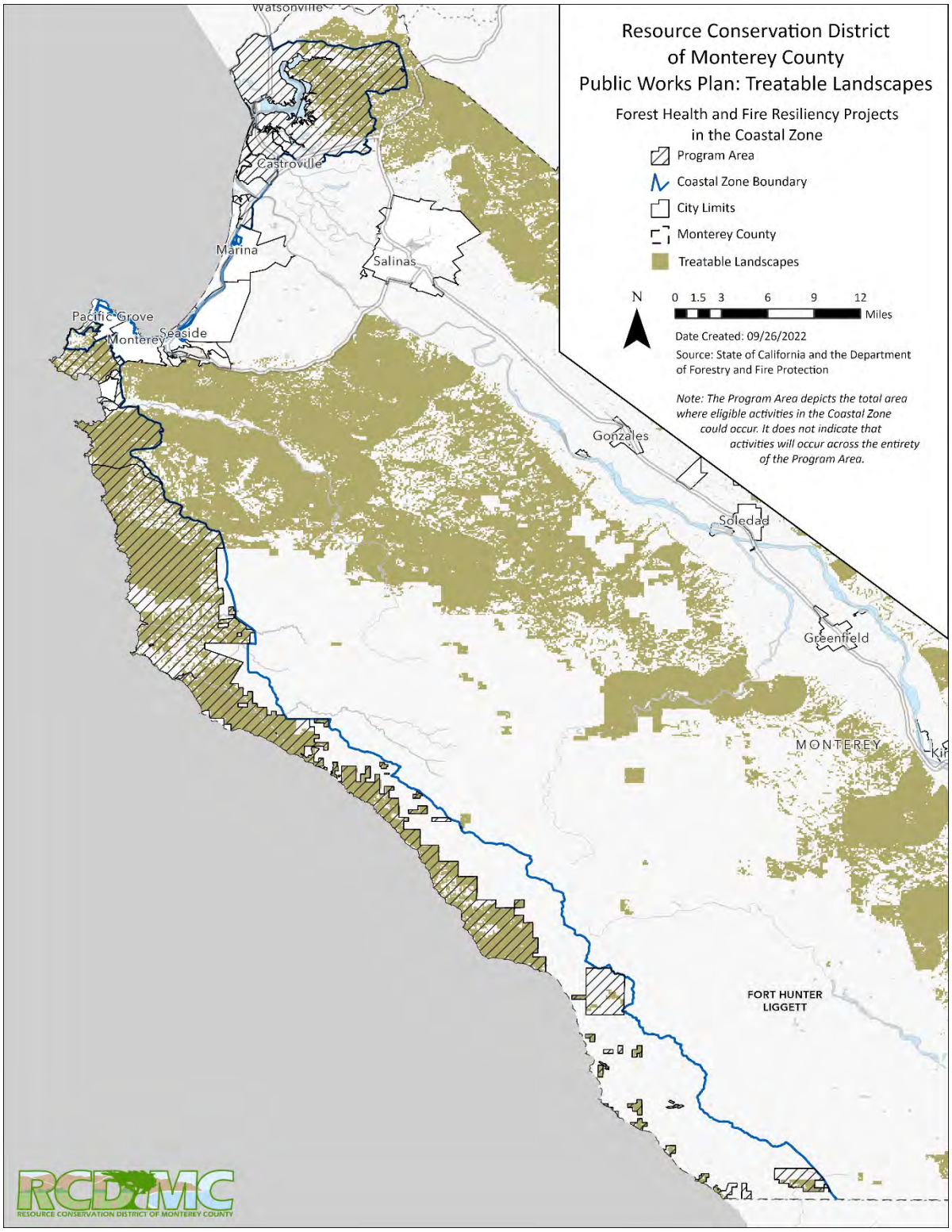
priority projects outside of the modeled treatable landscape will be developed and authorized through the PWP, as explained in more detail below. Maps #4 and #5 provide additional context by illustrating both the LCP land-use designations and vegetation types mapped within the PWP Program Area. More detailed maps for each LCP can be found in Exhibit D.



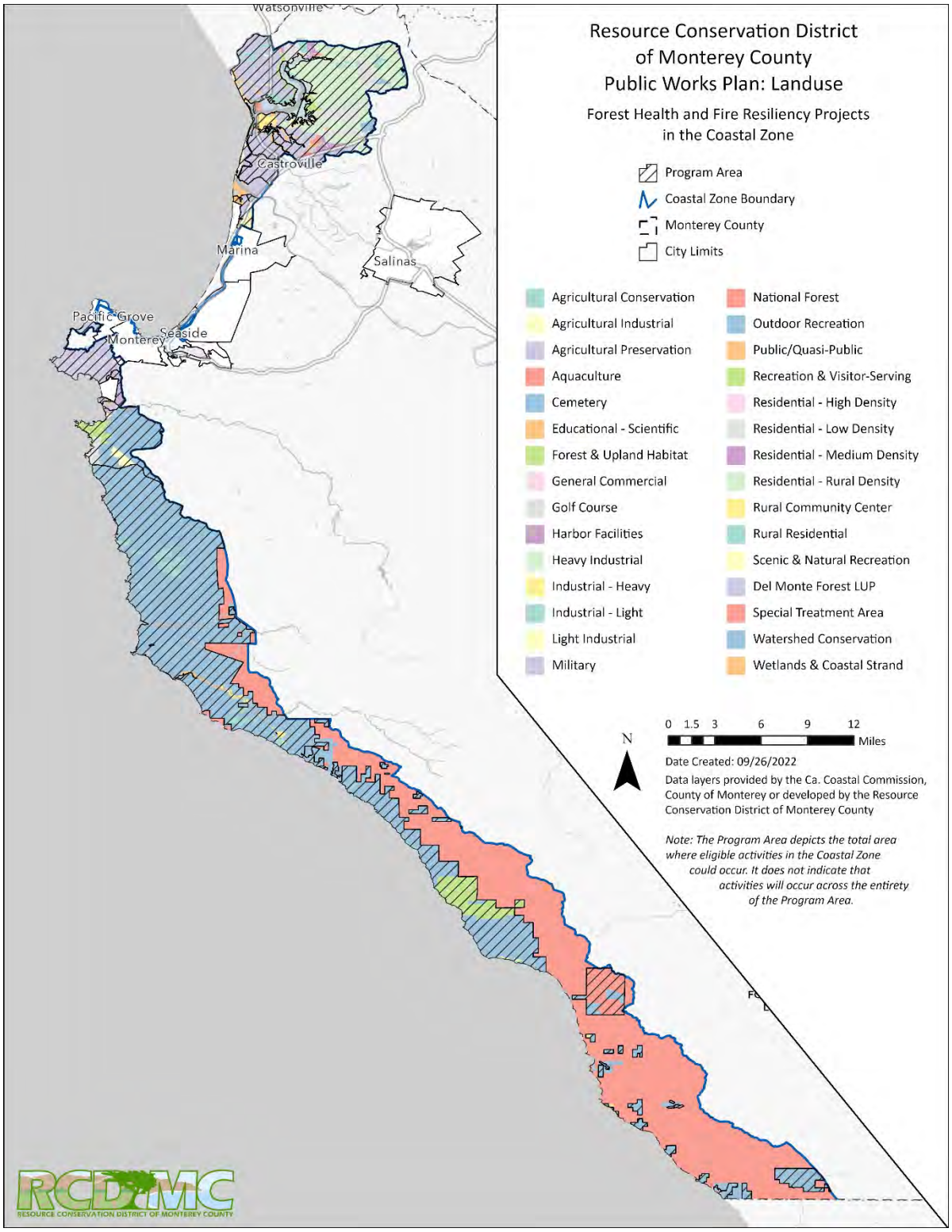

Map 1 – PWP Program Area



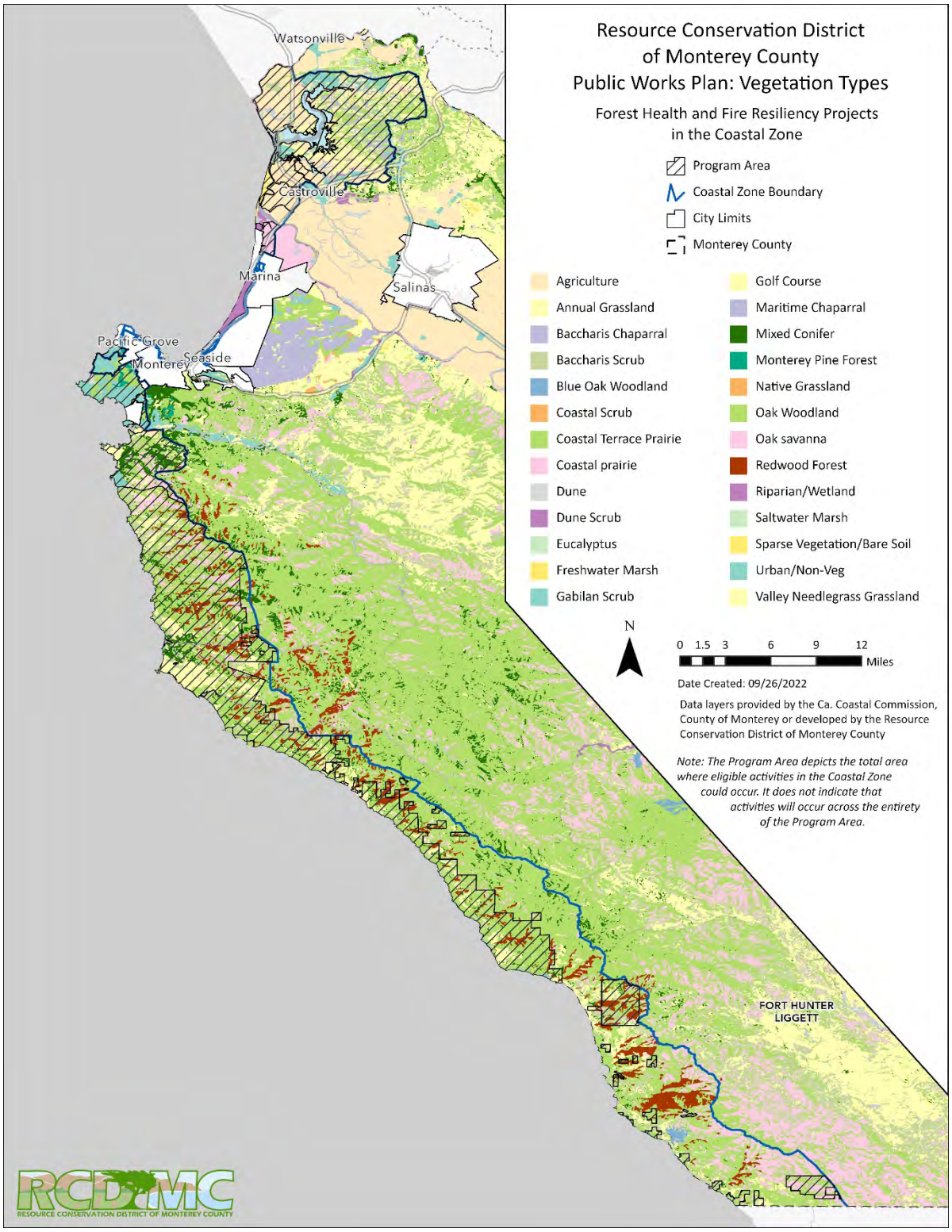

Map 2 – Fire Hazard Severity Classes in State Responsibility Areas




Map 3 – CalVTP Treatable Landscapes




Map 4 – Landuse Designations in the Monterey County Coastal Zone




Map 5 – Vegetation Types

## Types of Projects and Activities to be Covered

Except as noted below, the projects covered under this PWP will utilize the CalVTP for planning guidance, environmental review and analysis and will adhere to the mitigation and monitoring requirements as provided in that program. In addition, projects will be designed explicitly to meet the coastal zone-specific requirements contained in the Coastal VTS for Monterey County, designed collaboratively with Commission staff (Exhibit A). Projects occurring within the Coastal Zone, but outside of the CalVTP Treatable Landscape, and/or projects that are too small in scope to warrant utilizing the extensive CalVTP PEIR, must still be developed to meet all design, mitigation, monitoring, and other substantive requirements of the CalVTP as well as the requirements of the Coastal VTS in order to be approved under the PWP. CEQA compliance for projects outside of the CalVTP Treatable Landscape or for projects that are too small in scope to use the CalVTP PEIR will be accomplished through separate, appropriate environmental review—most likely a Categorical Exemption, or a Negative Declaration or a Mitigated Negative Declaration that tiers off the analyses and measures in the CalVTP PEIR.

All PWP activities will follow the definitions, guidance, and measures provided in the CalVTP PEIR. The CalVTP PEIR divides project activities into three categories based on the goals of each activity. These categories include Ecological Restoration, Wildland-Urban Interface (WUI) Fuel Reduction, and Fuel Breaks. It is important to note that while the CalVTP PEIR distinguishes between Ecological Restoration and both WUI Fuel Reduction and Fuel Breaks, for the purpose of this PWP, WUI Fuel Reduction and Fuel Break activities will be designed, when practicable, to provide direct ecosystem benefits. Direct ecosystem benefits that could accrue from WUI Fuel Reduction or Fuel Break projects include removal of non-native invasive vegetation, creation of ecologically-valuable edge habitat where appropriate, revegetation with native plant species, and modifications to vegetation structure that mimic the effects of natural disturbance regimes, etc. Based on geography, proximity to critical infrastructure, and/or specific fire prevention goals, integration of direct ecological restoration benefits may not be possible for all WUI and Fuel Break treatments. That said, all WUI and Fuel Break treatments will provide meaningful indirect ecosystem benefits through reduced severity, intensity, likelihood, and extent of catastrophic wildfire in the various forest, woodland, shrubland, and grassland habitats.

The Coastal VTS for Monterey County categorizes potential projects into two project types that differ from the three defined in the CalVTP PEIR. These two categories are Forest Health projects and Fire Prevention projects. Forest Health projects provide ecological benefits and improve the habitat's fire resiliency, including within ESHA. Fire Prevention projects, while designed to protect ecosystems as much as feasible, include a level of vegetation removal that may adversely impact ESHA in order to assure protection of existing structures or infrastructure. Pursuant to this PWP, Forest Health projects can include projects that are categorized through the CalVTP as Ecological Restoration, WUI Fuel Reduction and in some cases, Fuel Break activities (for shaded fuel breaks). Fire Prevention projects include CalVTP WUI Fuel Reduction and Fuel Break activities that could have adverse impacts on ESHA while

addressing human life and property safety concerns association with wildfire, but are designed to reduce the likelihood of significant and long-term impacts from catastrophic wildfire. These terms are defined below and are consistent with the definitions in the CalVTP and cross-walked with the terms used in the Coastal VTS for Monterey County.

Ecological Restoration:

This treatment includes all the projects referred to as Forest Health projects as well as other ecosystem health projects in woodlands, shrublands, and grasslands. 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 value. These activities will result in improved ecosystem health, improvement in native species composition and age structure, and mitigation of tree encroachment into coastal shrub and grassland ecosystems. It also includes the removal of weedy and invasive species and the removal of diseased vegetation, with an emphasis on moderating uncharacteristic fuel build-up due to the deprivation of natural fire regimes. This CalVTP project type includes the Forest Health projects in the Coastal VTS for Monterey County as well as limited Fire Prevention projects that are able to incorporate meaningful ecological restoration objectives into the design and implementation phases.

Wildland-Urban Interface (WUI) Fuel Reduction:

Located in WUI-designated areas, fuel reduction would generally consist of the strategic removal of vegetation to prevent or slow the spread of non-wind driven wildfire between structures and wildlands. WUI fuel reduction includes vegetation thinning, removing ladder fuels, and increasing defensible space. WUI Fuel Reduction projects can be designed to protect adjacent habitats and ESHA from extreme fire conditions. In some cases, WUI Fuel Reduction projects can also be designed to provide ecological benefits and improve the habitat's fire resiliency within the treatment area. WUI Fuel Reduction projects are described in the Coastal VTS under both Fire Prevention and Forest Health. A given project could fit under either Fire Prevention or Forest Health or both, depending on the specific situation and project objectives that can be implemented. Projects occurring in areas classified as chaparral habitat, whether determined by the project Registered Professional Forester (RPF) or vegetation mapping, pending availability and/or accuracy, will be limited to defensible space projects conducted as part of a larger WUI fuel reduction and Ecological Restoration project. Such projects will only treat chaparral within the minimum defensible space required by the County pursuant to local County Fire code (i.e., normally up to 100 ft. from the structure, or to the property line, whichever is less).

Fire Prevention/Fuel Breaks:

In strategic locations, fuel breaks remove flammable vegetation to slow the spread of wildfire, create a staging area for firefighting efforts, and provide ingress and egress during a wildfire incident. Fuel breaks result in zones of significantly less dense vegetation, often in a linear layout and often associated with an existing road or right of way. A shaded fuel break maintains a targeted level of tree cover while moderating surface fuels to limit a fire's ability to spread. Fuel Breaks can be designed to protect adjacent habitats and ESHA from extreme fire conditions. In some cases, shaded fuel breaks can also be designed to provide ecological benefits and improve the habitat's fire resiliency within the treatment area. Fuel breaks are described in the Coastal VTS under both Fire Prevention and Forest Health. A given project could fit under either Fire Prevention or Forest Health or both, depending on the opportunities and constraints for each project location.

The CalVTP PEIR was designed to provide coverage for Ecological Restoration and Fire Break/Fuel Reduction projects located in state-designated treatable landscapes. These treatable landscapes are a combination of State (Fire) Responsibility Area (SRA) lands that fall under the three categories listed above: identified WUI areas, existing fuel breaks along ridgelines and along roadways, and treatment areas for ecological restoration. As per Appendix PD-1 from the CalVTP PEIR, these treatable landscapes were developed using three Geographic Information System (GIS)-based analyses that compared SRA land, treatable categories, and vegetated landscapes dominated by tree, shrub, or grass communities. Any projects located outside of SRA land (e.g. within local responsibility areas or on federally owned land), as well as areas not pre-identified using the aforementioned treatable landscape categories, are omitted from coverage by the CalVTP PEIR, but not necessarily from the PWP. Because treatable landscapes were determined for the entirety of California utilizing GIS modeling, local, site-specific conditions were often unaccounted for. Map #3 shows areas within and outside of the CalVTP treatable landscape in the PWP Program Area. The PWP envisions four scenarios where projects would be approved under the PWP but may require additional CEQA compliance, potentially tiered off of the CalVTP PEIR. These include:

1. Fuel Breaks not included in the treatable landscape:

   During the Soberanes, Dolon and other recent wildfires, relic, poorly maintained rural fire roads, skid trails, and private access roads were utilized by fire suppression agencies as strategic suppression locations in Monterey County, particularly in the Santa Lucia Mountains. Roads of this type often are not included in the "treatable landscape" of the Cal VTP PEIR either because they have been decommissioned, poorly maintained, or have not followed prominent ridges. Nevertheless, these Fuel Breaks have provided and continue to provide strategic locations for fuel break/fuel reduction projects, and their maintenance is critical to local fire resilience and

firefighting efforts.

2. WUI Fuel Reduction projects outside of the treatable landscape:

   Critical Fuel Reduction projects may occur in residential and rural-residential settings within the Coastal Zone and outside of the SRA. Many of these areas were once dominated by low-growing coastal scrub and grassland and are now a matrix of homes and towering flammable fuels. These fuels include invasive tree species such as Eucalyptus spp. and fast growing non-native invasive woody shrubs like French broom (*Genista monspessulana*). WUI Fuel Reduction projects could include the strategic removal of these species for both fuel management and ecosystem restoration. Projects could occur on private or public lands in the WUI and would include the mechanical and manual removal of non-native invasive species. This treatment might include a targeted herbicide treatment to address resprouting of invasive species. Restoring these areas to low-growing native vegetation would meet the objectives of removing hazardous fire fuels in the community while restoring ecosystems and increasing biodiversity. Other projects might include thinning or removing a eucalyptus stand, removing ladder fuels to reduce the risk of a crown fire or returning a forest's understory to a more manageable level that encourages native recruitment.

3. Projects that are smaller than the scale of project envisioned for the CalVTP:

   While the CalVTP PEIR does not provide a minimum size limit for projects, the level of analysis for the full PEIR process is not easily scaled down for small projects, though these projects will still require CEQA and Coastal Act compliance. Projects in this category, under the PWP, could still be designed and analyzed to meet the parameters of the Coastal VTS and all applicable elements of the CalVTP, but would likely not be approved under the Cal VTP PEIR. For example, a neighborhood eucalyptus removal project along ½ acre of urban or suburban WUI land may be too small to warrant inclusion under the PEIR (e.g. may be Categorically Exempt from CEQA), but would prove extremely valuable in reducing flammable vegetative fuel loads in a neighborhood setting, could be designed to replace non-native vegetation with native species, and could require authorization under the LCP. The PWP anticipates these projects could be approved through the PWP process with creation of a project document and supporting studies that are similar to the PSA and include the relevant measures and standards from the CalVTP PEIR and Coastal VTS for Monterey County. (Exhibit A)

4. Defensible space vegetation treatments as a subset of a larger, contiguous WUI Fuel Reduction or Ecological Restoration project:

   The CalVTP PEIR intentionally did not analyze defensible space areas- areas up to 100 feet radius surrounding homes or structures, or to the property line, whichever is less- on private properties. State Public Resources Code 4291 requires that landowners be responsible for the maintenance of vegetation in this defensible space area. However, if defensible space areas

are included as part of a larger WUI Fuel Reduction or Ecological Restoration project, these relatively small areas of defensible space treatments can be classified as Fire Prevention activities under the Coastal VTS for Monterey County and may be considered for approval in a PSA as a subset of a larger project that is categorized as Ecological Restoration or WUI Fuel Reduction. This is to ensure that the relatively more intensive Fire Prevention work in defensible space areas is balanced with other work having restoration elements as their primary goals. Treatments in these areas pursuant to the PWP will be overseen by the RCD to ensure that design, initial implementation, and longer-term maintenance is consistent with the PWP, including all SPRs under the CalVTP and requirements of the Coastal VTS for Monterey County. In these cases, the NOID, PSA, or an appendix to the PSA, would need to address the consistency of the proposed defensible space work with CalVTP and Coastal VTS for Monterey County standards in order to provide sufficient information for Coastal Act purposes, even though the defensible space work would not otherwise be subject to the CalVTP PEIR and its requirement for a PSA.

## Maximum and minimum intensity of activities proposed to be undertaken

Both forest health and fire prevention project types will provide fire resiliency benefits in the coastal zone to protect against loss of life, property, and destruction of ecosystems from catastrophic wildfire. All projects under this PWP, specifically projects being conducted within ESHA, will provide ecological benefit, either directly or indirectly, to the greatest extent feasible. In addition, forest health projects are explicitly designed to provide direct ecological benefits to local landscapes. Given the nature of vegetation treatment activities, it is recognized that some projects (or portions of projects) cannot be designed to fully meet forest health or ecological restoration standards while also meeting the necessary fire resiliency objectives. For Fire Prevention projects that are not able to include forest health or ecosystem restoration as a primary objective, the project will be designed to minimize impacts to coastal resources, specifically ESHA, as required in Project Standards 2 and 3 (see Section III, below), in consideration of the necessary fire resiliency objectives. To ensure that benefits to the environment are maximized through forest health and ecological restoration planning in the PWP Program Area, the majority of RCD's project work area will be Forest Health as described in the Coastal VTS.

Within each of the project types described above, the CalVTP identifies 5 specific treatment types that a Project Proponent may utilize to implement projects and meet project goals and objectives. This PWP has been developed to be consistent with the CalVTP, and the maximum and minimum intensity of activity or activities proposed to be undertaken will comply with the analysis, evaluations, and limitations approved as part of the Programmatic Environmental Impact Report for the California Vegetation Treatment Program in January of 2020 (https://bof.fire.ca.gov/projects-and-programs/calvtp/calvtp-programmatic-eir/) except that projects under the PWP may be proposed outside of the geographic area covered by the PEIR. In addition to the CalVTP, all projects undertaken through this

PWP will adhere to the Coastal VTS for Monterey County for projects in the Coastal Zone (Exhibit A) and all other Project Standards in Section IV of this Plan. These standards were developed through extensive collaboration between the RCD, County planning staff, natural resource experts at State Parks, and Coastal Commission staff. In addition to this collaboration, CalFire regional staff were consulted on development of the Coastal VTS for Monterey County throughout the development process.

Minimum and maximum intensity of a given treatment will be based on the project goals and objectives as well as the size and location of a given project. Projects approved under this PWP may include one or many different treatment types and intensities. The five CalVTP treatment types that are proposed for use in projects covered under this PWP include the following:

Prescribed burning:

The application of low-intensity fire onto target vegetation for purposes of ecological restoration and fuel reduction, including pile burning and broadcast burning. Prescribed burns are carried out with appropriate preparation, such as creating a fire line by removing fuels that will prevent the fire's spread outside of the target area, or by using existing abiotic features, such as fire roads. They are planned and conducted in close coordination with fire personnel and carried out only when weather, air quality and fuel conditions are optimal. Prescribed burning includes cultural burning, applying fire to coastal prairie to reduce thatch (fuels) and restore native vegetation, and to a low intensity forest understory burn aimed at reducing ground fuels, fire intolerant species, and control the occurrence and spread of Sudden Oak Death.

Mechanical Treatment:

This treatment type focuses on the use of motorized equipment to cut, uproot, crush/compact, or chop existing vegetation. Among a variety of uses, the most common and efficient manner is to utilize this equipment on slopes less than 50%, and in select habitats less than 30%, to increase the health and vigor of the forest by reducing resource competition among vegetation. This type of treatment will also utilize excavators to reach from existing roads, thus reducing competing vegetation adjacent to these roads.

Manual treatment:

This treatment focuses on the use of hand tools and hand-held power tools such as shovels, chainsaws, weedwhackers, or loppers to remove target vegetation. A crew limbing trees and removing ground fuels with chainsaws and loppers to create a shaded fuel break is a common form of manual treatment. The treatment, disposal or removal method for cut vegetation (i.e., lop and scatter, piling or complete removal), will depend on a project's objectives.

Prescribed herbivory:

This treatment utilizes domestic livestock such as goats, cattle, or sheep to reduce height and density of vegetation. This form of treatment is often deployed using goats to reduce the density and height of brush species, in woodlands and forests with dense understory growth or managed cattle grazing to promote ecosystem health and reduce risk of catastrophic or severe fire behavior in grasslands, oak woodlands, and coastal prairie habitats.

Herbicide application:

Herbicides are applied through ground application methods and used to target specific invasive species when other methods are not feasible due to their costs, effectiveness, or potential environmental impacts. Some applications are applied to new foliar growth of invasive species where uprooting may cause excessive soil disturbance. Other applications treat stumps immediately after the felling of invasive species, such as *Eucalyptus globulus*, to prevent resprouting.

## Maximum size of facilities proposed to be constructed pursuant to the PWP and the proposed timetable and any phasing of development activity contemplated

No new facilities are proposed for construction as part of this PWP.

The RCD will work with local landowners, CalFire, technical advisors, fire safe councils, tribal entities and environmental justice communities, Coastal Commission staff, Monterey County planners and other partners to prioritize and develop projects that will be implemented over the 10-year period of this PWP. The RCD will leverage existing forums for project identification, prioritization and coordination including, for example, local fire safe councils and the Los Padres Strategic Community Fuelbreak Collaborative Project. Potential PWP Projects will be phased over the course of the 10-year term and approved through NOIDs that will be submitted to the Commission for approval. NOIDs may include anywhere from 1 to many projects and NOIDs are expected to be submitted to the Commission between 1-3 times per year. If implementation of a specific activity/project is delayed due to unforeseen circumstances, the approved project will be automatically put into the queue for implementation the following year.

The RCD will manage the development and implementation of most projects permitted through the PWP. In other limited cases, partners can request permitting support from the RCD through the PWP on projects they themselves are implementing, in which case the RCD will oversee development of PWP supporting documentation and will provide some implementation oversight to ensure such projects comply with the PWP.

Projects/activities approved under the PWP will include both an initial

implementation phase and subsequent follow-up management at ecologically-appropriate intervals. These expected intervals will be clearly spelled out in each Project-Specific Analysis (PSA) submitted as part of the NOID process.

Project-Specific Analyses (PSAs) shall be submitted to the California Coastal Commission (CCC) as part of the NOID process for review and approval for the purpose of coastal development authorization prior to conducting projects. Coordination between the project proponent and CCC shall occur as early as feasible in the design process to streamline consistency review under the PWP (see Section VII, for more on administrative processes related to the PWP).

PSAs shall include clear problem and goal statements (e.g., overall project goals, fire prevention goals, ecological goals) associated with each project proposed pursuant to this PWP and will be submitted as part of the NOID process. These statements are intended to assist project proponents and CCC in developing mutual understanding of the potential impacts and benefits – both short and long term – for each project, and the structure for the problem and goal statements are articulated in the Coastal VTS for Monterey County. It is expected that this information will be incorporated into SPR BIO – 3 (Sensitive Natural Communities) and SPR – BIO – 8 (Identify and Minimize Impacts to Coastal Zone ESHA) of the CalVTP project PSA including the completed Coastal VTS for Monterey County document provided in the Attachments section of each project PSA.

# Section III: CalVTP Protective Measures and Coastal Vegetation Treatment Standards

## PWP Project Requirements

Please refer to the CalVTP PEIR Program-Level Standard Project Requirements (SPRs) and Mitigation Monitoring and Reporting Program (MMRP) tables for a full accounting of relevant protective measures that will be implemented for all projects under this PWP. The SPRs can be found in Appendix PD-3 of the CalVTP Final PEIR at (https://bof.fire.ca.gov/projects-and-programs/calvtp-homepage/calvtp-program-eir/) and the MMRP is located in Appendix B of the Final PEIR, Volume I at (https://bof.fire.ca.gov/projects-and-programs/calvtp-homepage/how-to-use-the-calvtp/). Exhibit B of this proposed PWP provides a summary of SPRs that are expected to be commonly applied to PWP projects. Due to the fact that most, if not all, projects approved under this PWP will take place in or near ESHA, project specific PSAs will also provide detailed information that addresses items in the Coastal VTS for Monterey County provided in Exhibit A of this proposed PWP:

- Protect Ecosystem
- Protect Gowen Cypress
- Protect Wetlands

- Protect Landmark Trees
- Protect Areas of Special Biological Significance (ASBS)
- Use Vegetation Removal Hierarchy
- Determine Suitable Use of Prescribed Fire
- Determine Suitable Use of Prescribed Herbivory
- Control Invasive Species
- Limit Herbicide Use
- Protect Coastal Viewshed
- Limit Fencing
- Limit Accelerants
- Limit the Need for Soil Stabilization
- Protect Coastal Public Access and Recreation

## PWP Project Standards

### Project Standard 1. Qualifying PWP Projects

Projects covered through this PWP shall be limited to forest health and fire prevention projects, as those terms are defined in the Coastal VTS for Monterey County, undertaken within the PWP Project Area (Map #1, above) over the next ten years from the date of PWP certification.

### Project Standard 2. Consistency with the CalVTP PEIR:

PWP projects shall be fully consistent with the requirements of the CalVTP PEIR, including the standard project requirements (SPRs) and mitigation measures of the CalVTP PEIR, except where more specifically addressed in Project Standard 3. These CalVTP PEIR measures include, but are not limited to:

- Administrative Standard Project Requirements, SPRs AD-1 through AD-9
- Aesthetic and Visual Resource Standard Project Requirements, SPRs AES-1 through AES-3 and Mitigation Measure AES-3
- Air Quality Standard Project Requirements, SPRs AQ-1 through AQ-6 and Mitigation Measure AQ-1
- Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements SPRs CUL-1 through CUL-8 and Mitigation Measure CUL-2
- Biological Resources Standard Project Requirements, including Special Status Plants, ESHA, Invasive species, & Wildlife SPRs BIO-1 through BIO-12 and Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-2a, BIO-2b, BIO-2c, BIO 2d, BIO- 2e, BIO-2f, BIO-2g, BIO-3a, BIO-3b, BIO-3c, BIO-4, & BIO-5
- Geology, Soils, and Mineral Resource Standard Project Requirements, SPRs GEO- 1 through GEO-8

- Greenhouse Gas Emissions Standard Project Requirements, SPR GHG-1 and Mitigation Measure GHG-2
- Hazardous Material and Public Health and Safety Standard Project Requirements, SPRs HAZ-1 through HAZ-9 and Mitigation Measure HAZ-3
- Hydrology and Water Quality Standard Project Requirements, SPRs HYD-1 through HYD-6
- Noise Standard Project Requirements, SPRs NOI-1 through NOI-6
- Recreation Standard Project Requirements, SPR REC-1
- Transportation Standard Project Requirements, SPR TRAN-1
- Public Service and Utilities Standard Project Requirements, SPR UTIL-1
- A Summary of key SPRs from the CalVTP are attached to this PWP as Exhibit B

Project Standard 3: Coastal Vegetation Treatment Standards for Monterey County

Projects shall be fully consistent with the Coastal Vegetation Treatment Standards for Monterey County attached as Exhibit A of this proposed PWP.

Project Standard 4: Monterey County Coastal Resource Protection

Projects covered under this PWP shall be structured to ensure protection of all LCP identified habitats and coastal resources consistent with the standards of the Monterey County LCP, including the North County, Del Monte Forest Area, Carmel Area and Big Sur Coast Land Use Plans and their Coastal Implementation Plans, including:

- North County – Chapter 20.144 2,
- Del Monte Forest Area – Chapter 20.147
- Carmel Area – Chapter 20.146
- Big Sur Coast – Chapter 20.145

Project Standard 5: Defensible Space as a component of Fire Prevention

Qualifying projects under this PWP may include treatment activities (as defined under the CalVTP) within 100 feet (or to the property line, whichever is closer), unless accompanied by a clear rationale, provided by a qualified professional, as to why additional defensible space is required to protect existing structures and infrastructure subject to County defensible space requirements. [7] Such projects shall comply with all of the following conditions:

[7] Building: Any structure used or intended for supporting or sheltering any use or occupancy that is defined in the California Building Code, 1989 Amendments, Chapter 11, except group M, Division 1, Occupancy. For the purposes of this Chapter, building includes mobile homes and manufactured homes, churches, and day care facilities. The word "building" includes "structure." (Monterey County Municipal Code Chapter 18.56.030).

Housing and Community Development, Monterey County (February 2019). Basic Defensible Space & Vegetation Management Guidelines for Property Owners.
https://www.co.monterey.ca.us/home/showpublisheddocument/38229/637678195975500000

- Treatment activities within the applicable defensible space zone shall be limited to fuel modification of existing vegetation necessary for establishing and/or maintaining the minimum defensible space required pursuant to Chapter 18.56 and Chapter 18.09 of the Monterey County Municipal Code, as applicable;
- Treatment activities within the applicable defensible space zone shall be undertaken as part of a larger, contiguous Ecological Restoration project and/or Wildland-Urban Interface Fuel Reduction project;
- To the maximum extent feasible, treatment activities within the applicable defensible space zone shall be designed to protect ESHA and other sensitive habitat, including through compliance with the Coastal Vegetation Treatment Standards for Monterey County provided under Exhibit A of this proposed PWP and the preparation of individual property-focused fuel modification plans, where necessary to address potential ESHA impacts and other coastal resource impacts;
- Where impacts to ESHA and other sensitive habitat is anticipated, treatment activities shall be designed in consultation with applicable resource protection agencies, including the Coastal Commission and relevant fire authority (e.g., County Fire District, and/or Cal Fire); and,
- Projects shall be implemented pursuant to contractual agreements with landowners specifying the terms and conditions of the defensible space project, including scope of work, location, duration (e.g., one-time or ongoing maintenance), responsibility, and liability, as well as other terms and conditions as necessary.

Project Standard 6: Project and Program Monitoring

Monitoring for each PWP project shall occur consistent with all specified CalVTP monitoring requirements. In addition, five years following certification of this PWP, RCD shall prepare a five-year programmatic review identifying at a minimum: the status of individual Projects implemented under the PWP, as well as Projects expected to be implemented under the PWP; level of program completion (e.g., number of acres treated, high priority areas for the subsequent five years; collective monitoring results; constraints and lessons learned, including potential opportunities for adaptive management; and program success). The programmatic review shall be submitted to the Coastal Commission and Monterey County. At the ten-year mark following certification of the PWP, a final programmatic review shall be prepared by the RCD and submitted to the County and Coastal Commission for review.

Project Standard 7: Prioritization of Projects

To the maximum extent feasible, and through early and meaningful engagement, RCD shall select, prioritize, design, and implement projects that benefit California Native American Tribes and Environmental Justice communities (as identified using CalEnviroScreen 4.0) within the PWP program area.

# Section IV: Local Planning Context

The Monterey County Local Coastal Program (LCP) comprises four area-specific Land Use Plan (LUP) segments and associated Coastal Implementing Program (CIP) segments. The LUPs were adopted by the County and certified by the California Coastal Commission in the years 1982 to 1986. The CIPs were later certified by the California Coastal Commission in 1988. The LCP incorporates the County's Growth Management Policy that includes natural and agricultural resource protection policies, policies to address urban sprawl, and policies to maintain the character of the rural portion of the County. To accomplish these goals, all development activities in the Coastal Zone are regulated by the LCP through the implementation of specific County land use policies.

In order to support implementation of projects under this PWP, the County of Monterey Housing and Community Development Department has reviewed the draft PWP and provided recommendations to ensure the PWP is consistent with County LCP Policies. With guidance from the County, the PWP has been designed to meet the requirements of the County LCP. As such, future Forest Health and Fire Prevention projects within the Coastal Zone that are approved under this PWP are not expected to require additional approvals from the County of Monterey Housing and Community Development Department. However, this PWP does not currently include treatment activities within the Marina, Seaside, Pacific Grove, or other incorporated jurisdictions subject to individually certified LCPs.

# Section V: Administration, Approval Process, & Program Review

The purpose of this section is to set forth procedures for reviewing and authorizing Projects contained in the Resource Conservation District of Monterey County's Forest Health and Fire Resilience PWP for vegetation treatment in the coastal zone that is carried out pursuant to the Board of Forestry's final Program Environmental Impact Report (PEIR) for the California Vegetation Treatment Program (CalVTP).

## Roles and Responsibilities

This PWP will help expedite implementation of a series of projects in a comprehensive and coordinated manner to help meet the State's vegetation treatment goals outlined in the CalVTP. As part of this effort, two primary actors will participate in the PWP process; their roles and responsibilities are as follows:

The California Coastal Commission shall be responsible for reviewing and acting on

the PWP and any amendments to it, as well as all PWP components, including reviewing and acting on the draft and final Project-Specific Analyses submitted as part of the Notice of Impending Development(s) (NOIDs), reviewing and acting on all related NOIDs, enforcing NOID (Project) conditions, and reviewing monitoring reports.

The RCD shall be responsible for drafting the PWP and any amendments, releasing them for public review, and approving them at the local level, as well as preparing all proposed NOID (Project) components, including drafting Project-Specific Analyses, public noticing of NOIDs, submitting NOIDs to the Commission, and preparing and submitting any other Project materials to the Commission. The RCD shall, through contractual agreements with other agencies, landowners, contractors and others, initiate individual Projects in coordination with Coastal Commission and County staff and in compliance with the PWP and CalVTP PEIR. RCD shall be responsible for monitoring of Project conditions. RCD will partner with other agencies, landowners, contractors and others to implement the responsibilities above and shall maintain oversight to confirm that all work is consistent with the PWP and NOID processes.

## Procedures for PWP Filing and Certification[8]

A PWP is a land use planning document that plans for and sets a framework for implementing a specific public works project or array of public works-related activities. A PWP provides a land use planning alternative to a LCP for obtaining approval of large or phased public works projects, as well as any development proposed by a special district, and remains under the authority of the Coastal Commission irrespective of coastal permit jurisdictional boundaries. A PWP is an alternative to project-by-project review for public works, which would otherwise require multiple coastal development permits for different components of the public works project. A PWP must be sufficiently detailed regarding the size, kind, intensity, and location of development to allow the Coastal Commission to determine its consistency with the policies in Chapter 3 of the Coastal Act (pre-LCP certification) or the certified LCP (post-LCP certification). Once the Coastal Commission certifies a PWP, no coastal development permit is required for development that is consistent with the PWP. Instead, the Project Proponent (in this case, the RCD) provides a Notice of Impending Development (NOID) to the Coastal Commission and other interested persons. The Coastal Commission then reviews the NOID for consistency with the approved PWP; if the Coastal Commission determines that the proposed development described in the NOID is consistent with the PWP, the development may proceed. If the proposed development is not consistent with the PWP, the Coastal Commission will apply conditions to that specific project to achieve consistency with the PWP.[9] If the

[8] For the sake of convenience and clarity, this section summarizes relevant statutory and regulatory requirements that apply to the adoption, amendment, and implementation of PWPs. However, it in no way modifies those requirements or locks the currently existing statutory and regulatory provisions in place.

[9] The Coastal Commission PWP review and approval process is not intended to supplant the review processes required of

NOID describes development that is not within the scope of the PWP, the Commission will not accept the NOID for filing, and the Project Proponent will need to obtain a PWP amendment before proceeding with it.

Prior to the filing of a PWP for certification by the Coastal Commission, and pursuant to Coastal Act Section 30503 and Sections 13353.5 and 13515 of the Commission's regulations, maximum opportunities for public participation must be afforded. A public review draft PWP must be made available to the public at least six weeks prior to local adoption of the PWP, including by posting the public draft PWP to the local government's or RCD's website and by transmitting it to: members of the public; each local government contiguous with the area subject to the PWP; local governments, special districts, or port or harbor districts that could be directly affected by or whose development plans should be considered in the PWP; relevant regional, state and federal agencies; and local libraries and media. Posting can be done through electronic means and does not need to be conducted via hardcopy. Further, pursuant to Section 13515(d) of the Commission's Regulations, the RCD must provide notice of the local hearing on the public draft PWP "not less than ten (10) working days before the hearing". The hearing should also be scheduled for a specific time and, when feasible, the hearing should be held in the coastal zone or in a place easily accessible to residents of the coastal zone.

The Public Draft of this PWP was being released on November 2, 2022, for public review and comment, which will continue throughout the Coastal Commission review and authorization process. The draft document will be distributed for public review and comment for six (6) weeks, during which time public comment is solicited.

Section 30605 of the Coastal Act allows PWPs to be submitted to the Coastal Commission for review in the same manner prescribed for the review of LCPs as set forth in Chapter 6 (commencing with Section 30500 of the Coastal Act). Sections 13371 and 13356(b)(2) of Commission's Regulations require that the Coastal Commission not approve or adopt a PWP unless it finds that there are no feasible alternatives or feasible mitigation measures available that would substantially lessen significant adverse impact that the development may have on the environment. Section 21080.5(a) of CEQA, Section 30605 of the Coastal Act, and Section 13355 of the Commission's Regulations also require the distribution of environmental information sufficient in detail to enable the Coastal Commission to determine the consistency of the plan with the policies of the Coastal Act or LCP, as applicable.

The Board of Forestry has prepared the California Vegetation Treatment Program

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RCD or agencies other than the Coastal Commission by the California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA) or other regulatory schemes; compliance with the CEQA, NEPA and/or other regulatory schemes are addressed at the project level, such as the CalVTP Program Environmental Impact Report.

(CalVTP) Final Program Environmental Impact Report (PEIR) (November 2019) to evaluate the potential environmental impacts of the proposed CalVTP treatment activities undertaken across the state. The Coastal Commission's environmental analysis for this PWP may draw on facts from the CalVTP PEIR. However, the Coastal Commission has the authority and duty to conduct its own review of the PWP, any amendments, and any Project-specific NOIDs under the Coastal Act, and such review will also satisfy any obligations to conduct CEQA review under its certified regulatory program.

This PWP provides for a ten (10) year period in which Projects may be carried out consistent with the provisions of the PWP. The Commission may grant an extension to this timeframe through a future PWP amendment if the Commission determines that additional time is warranted and that the amendment is consistent with Coastal Act and relevant LCP requirements at that time.

In the event that the PWP needs to be amended following its certification by the Commission, Sections 13365 – 13371 of the Commission's Regulations govern the process for such amendments. Section 13366 of the Regulations requires the RCD (or applicable local government) "to demonstrate that a public hearing at the local level has been held on the proposed amendment within a reasonable time prior to submission of the amendment application to the Commission" consistent with the standards of Section 13353.5 of the California Code of Regulations. Pursuant to Section 13367, a PWP amendment application shall be rejected if it would "lessen or avoid the intended effect, or any conditions, of a certified public works plan." If accepted, the PWP amendment application would be noticed and scheduled for hearing as either a minor amendment (pursuant to Section 13368) and heard at the next regularly scheduled Commission hearing, or as a regular amendment (pursuant to Section 13369) and processed in accordance with Sections 13370-71. The hearing requirements for review of the PWP amendment would be the same as provided for review of a PWP, as provided in Section 13356. Any amendments will need to be found consistent with Chapter 3 or the Coastal Act or any relevant LCPs, as they exist at that time.

Lastly, after certification of the PWP, the Coastal Commission continues to retain permit jurisdiction over development on tidelands, submerged lands, and public trust lands, whether filled or unfilled, within RCD's service area. Under the Federal Coastal Zone Management Act, the Commission also retains federal consistency review authority over federal agency activities and federally licensed or permitted activities on or adjacent to the Project sites. Projects neither covered by the PWP nor located in the Commission's retained permit jurisdiction shall be reviewed by the County of Monterey for consistency with its certified LCP.

## Project Review and Authorization under the PWP

Consistency determinations for individual Projects proposed as part of the PWP are made by the Coastal Commission and are subject to public review and comment

and a public hearing. Sections 30605 and 30606 of the Coastal Act and Title 14, Section 13359 of the California Code of Regulations govern the Coastal Commission's review process for development proposed pursuant to a certified PWP. Section 30606 of the Coastal Act requires the public agency (e.g., Special Districts, such as an RCD) proposing the public works Project to provide a NOID to the Coastal Commission (and other interested parties, organizations, and governmental agencies), along with data demonstrating the Project is consistent with the certified PWP. Once a NOID is deemed complete, it is scheduled for a public hearing within 30 working days, at which time the Coastal Commission determines whether conditions are required to bring the Project into conformance with the approved PWP.

For the purpose of submitting a NOID for an individual Project, the RCD shall comply with the following procedures and prepare the following documents:

i. Project Development: Prior to starting the Draft PSA, RCD shall initiate discussion of a proposed Project with Coastal Commission staff by providing the Project location and scope and detailing the anticipated benefits and impacts of the Project, including expected impacts to coastal resources and potential SPRs and mitigation measures.

ii. Site Visits: To the extent feasible, the RCD, local government(s), and relevant Commission Staff shall visit the areas proposed for vegetation treatment prior to the drafting of Project-Specific Analyses, as specified below. At a minimum, Coastal Commission staff shall provide preliminary comments on proposed Projects to identify potential issues of concern or suggest Project alternatives to explore.

iii. Draft Project-Specific Analysis (PSA): RCD shall oversee the drafting of a Project-Specific Analysis for each Project as required by the CalVTP PEIR. The Draft PSA shall be completed in accordance with the requirements of the CalVTP PEIR to determine whether the Project qualifies as within the scope of the PEIR, or that the Project will not result in any new or substantially more significant impacts than as described in the PEIR or CalVTP. For Projects that fall outside the treatable landscape or for projects that are too small in scope to warrant use of the PEIR for CEQA compliance[10], Project Proponents will still be required to develop all relevant sections of the PSA and a description of how the Project adheres to the Coastal Vegetation Treatment Standards in order to be included under this PWP. All PSAs will include the following:

[10] Projects that are deemed too small for inclusion in the CalVTP PEIR will still be required to comply with CEQA through project specific Categorical Exemptions, Negative Declarations, or other appropriate review.

i. A description of the proposed Project, including a narrative description of the size, kind, intensity and location of each proposed development and the supporting site plans and elevations thereof;
ii. Environmental documentation for the Project(s) including information and CEQA discretionary actions prepared pursuant to or in addition to the CalVTP PEIR, and an analysis of alternative locations for each proposed development activity, if warranted, due to significant impacts on ESHA or other coastal resources that could be avoided or minimized by implementing in a different location;
iii. All technical reports associated with the Project(s) (i.e., biological reports, geotechnical reports, traffic analyses, etc.), including all reports and plans required by the PEIR and PWP;
iv. The results of consultation with parties interested in, with jurisdiction over, and/or affected by the Project(s), including consultations with concerned public entities and agencies, and any additional consultation that might be required or needed;
v. All implementing mechanisms associated with the Project(s) (including but not limited to CEQA mitigation monitoring reports, legal documents, landowner authorization, etc.);
vi. The Monterey County CalVTS will be explicitly addressed for proposed projects as an exhibit to each PSA; and
vii. All public comments received regarding the Project(s);

iv. Final Project-Specific Analysis: Following review of the Draft Project-Specific Analysis by Commission staff and other interested parties, RCD shall prepare a Final PSA for each Project as required by the CalVTP PEIR that incorporates requested revisions and includes the components required under the Draft PSA (Section iii above). The Final PSA (or relevant sections, if a project will not be utilizing the PEIR for CEQA compliance) shall be completed in accordance with the requirements of the CalVTP PEIR to determine whether the Project qualifies as within the scope of the PEIR and shall additionally provide an analysis of consistency with the Coastal Vegetation Treatment Standards for Monterey County.

v. Preparation and Submittal of a Notice of Impending Development: Following development of the Final PSA, or in conjunction with preparation of the Final PSA, RCD shall prepare a Notice of Impending Development (NOID) for each Project or batch of Projects for Commission review and approval consistent with the PWP. RCD shall give advanced written notice to the Executive Director of its intent to submit a NOID prior to submitting the NOID. RCD shall coordinate with the Executive Director to ensure that a NOID is not submitted at a time when it would be legally infeasible for the Commission to bring the item

to hearing within 30 working days from being submitted and filed as complete (e.g., when the Commission is not holding a hearing in a particular month). The NOID shall adhere to and include the following procedures and materials:

i. Mailed/Emailed Notice. At least 30 working days prior to undertaking development activities, RCD shall give written notice of its intent to implement a Project by submitting a NOID. RCD shall send the NOID via first-class mail, e-mail, or other reasonable means, to the following persons, parties and agencies: the Coastal Commission's Executive Director; owners of record of each property within 100 feet (excluding road rights-of-way) of the proposed Project(s); persons residing on properties located within 100 feet (excluding road rights-of-way) of the proposed Project(s), as well as those persons residing in greater distances that may need to be noticed pursuant to the CalVTP SPRs and mitigation measures; all local governments and special districts that could be affected; all regional, state, and federal agencies that may have an interest in or be affected; all other persons, parties, and agencies who have requested to receive such notice, either for the Project(s) that is the subject of the notice or for all PWP Projects; and persons, parties, and agencies that are known by RCD to be interested in the specific Project(s) that is the subject of the notice (e.g., persons, parties, and agencies that submitted testimony or other comments during the CEQA/NEPA process for the PWP). The RCD should also post the NOID on its website in a downloadable format.

ii. Notice Content. The Notice of Impending Development (NOID) shall be clearly titled as such and shall, at a minimum, include the following information:
    - The description of the proposed Project(s), including a narrative description of the size, kind, intensity and location of each proposed development as well as an identification of the existence of the Final PSA, including the existence of supporting materials and documentation (e.g., maps, technical documents, etc.), and information regarding where and when the NOID and supporting material is available for public review (including where the Final PSA and supporting materials and documentation can be downloaded);
    - The RCD's approval of the Project(s), including any locally-adopted resolutions or identification numbers for filing purposes if available;
    - The anticipated date of commencement of development of the Project(s);
    - The appropriate RCD contact person(s) and their contact information;

- The process for Coastal Commission review of the Project(s) (including Coastal Commission contact information and proposed Commission date of action on the NOID).

iii. Posted Notice. The RCD shall post the NOID in conspicuous locations at the proposed Project(s) site(s) no later than the date that the Notice of Impending Development is sent pursuant to section, v., i. (i.e., at least 30 working days prior to commencement of development activities). The Notice shall comply with the following requirements:

- Notices that are posted shall be printed, clearly visible, and laminated or otherwise weatherproofed so as to be legible at all times.
- Notices shall be posted at locations on the perimeter (and/or within the perimeter as appropriate) of the proposed Project site where the site intersects public use areas (streets, paths, parking lots, etc.). Where Project sites do not contain intersections with public use areas, at least one notice shall be posted at the Project site entryway. Notices shall also be posted at the RCD office and sent to the Coastal Commission's Central Coast District office for posting.
- Notices shall indicate that a NOID has been submitted to the Coastal Commission for the proposed development and shall contain a general description of the nature of the proposed development, as well as Coastal Commission contact information and the date of proposed Commission action on the NOID.
- Notices that do not meet the criteria listed above, that otherwise become illegible, or that otherwise are not visible to pedestrians or disappear (for whatever reason) shall be replaced. All notices shall remain posted until the effective date of authorized commencement of development.

iv. Supporting Materials. Supporting information sufficient to allow the reviewer to determine whether the proposed Project is consistent with the certified PWP shall accompany the Notice of Impending Development sent to the Executive Director. At a minimum, the supporting information shall include:

- The Final PSA:
  - Any final authorization documents from the RCD (e.g., resolutions, minute orders, certifications, etc.) not included in the Final PSA;
  - Copies of all public comments received regarding the proposed PWP Project;
  - The proposed method of financing the activity, including any grants provided by a public entity; and

- For the Executive Director only: (a) A mailing list with names and addresses for each of the persons, parties, and agencies listed in Project Review and Authorization under the PWP, v., part 1 above, where the list is labeled and organized by each of the categories listed; (b) One set of plain (i.e., unadorned with no return address) regular business size (9½ inches by 4⅛ inches) envelopes stamped with first class postage (metered postage is not acceptable) addressed to each of the listed addressees from section v., i., above, for each Commission hearing (if applicable) on the matter (i.e., if there are multiple Commission hearings on the matter, then multiple envelope sets shall be provided as directed by the Executive Director); alternately, the RCD may provide a combination of valid email addresses, media, and envelopes in a manner acceptable to the Executive Director of the Coastal Commission to ensure transmittal of the Commission hearing notice to all parties in section v.,i. and, (c) Evidence that the Notice of Impending Development has been posted pursuant to the parameters of Section v., iii, above, (e.g., a site plan with the notice locations noted and/or photos of the notice locations attached).

Any proposed Development that is exempt from permitting requirements pursuant to Section 30610 of the Coastal Act and Sections 13250 – 13253 of the Commission's regulations is also exempt from needing to obtain any authorization through the NOID process. Likewise, consistent with Sections 13250 – 13253 of the Commission's regulations, Development that would be exempt except for its location in a sensitive area – such as repair and maintenance work taking place in environmentally sensitive habitat area – requires authorization through a NOID.

## Coastal Commission Review of PWP Components, Including NOIDs

The Coastal Commission shall review Project(s) for consistency with the PWP in accordance with the procedures of this Section.

i. Filing the Notice of Impending Development
Consistent with 14 CCR Sections 13357(a)(5), 13359(a), and 13353-13354, unless there are unusual circumstances, within five working days of receipt of the Notice of Impending Development and all applicable supporting information of the Project(s), the Executive Director shall review the submittal and shall determine whether additional information is necessary to determine if the proposed Project(s) is/are consistent with the PWP, and if additional information is deemed necessary, shall request such information from the RCD.

a. The Notice of Impending Development shall only be deemed filed if the Executive Director determines that the information supplied is consistent with the information requirements of Coastal Act Section 30606 and 14 CCR Sections 13357(a)(5), 13359(a), 13353, and 13354 and is sufficient to allow the Commission to determine whether the proposed Project is consistent with the certified PWP.
b. If the Executive Director has requested additional supporting information needed to determine consistency with the PWP, then the Notice shall be deemed filed when the Executive Director determines that all necessary supporting information has been received.

ii. Coastal Commission Hearing Deadline

Consistent with 14 CCR Sections 13357(a)(5) and 13359, the thirtieth working day following the day the Notice of Impending Development is deemed filed is the Hearing Deadline. The Hearing Deadline may be extended if, on or before the Hearing Deadline, the RCD waives its right to a hearing within thirty working days and agrees to an extension to a date certain, no more than three months from the Hearing Deadline, to allow for Commission review of the proposed Project(s) at a later hearing.

iii. Coastal Commission Review and Determination of Consistency with PWP

The Executive Director shall report in writing to the Commission regarding any pending proposed Project(s). The Coastal Commission shall review the proposed Project(s) at a scheduled public hearing prior to the Hearing Deadline.

The Executive Director's report to the Commission shall include a description sufficient to allow the Commission to understand the location, nature, and extent of the Project(s), and a recommendation regarding the consistency of the proposed Project(s) with the certified PWP. On or before the Hearing Deadline the Commission shall make one of the following determinations:

a. Determine that the proposed Project(s) is/are consistent with the certified PWP, or
b. Determine that conditions are required to render the proposed Project(s) consistent with the certified PWP, including identification and adoption of the required conditions.

Following the Commission's determination, the Executive Director shall inform the RCD of the Commission's determination and shall forward any conditions associated with it. If the Commission has identified conditions required to render the Project(s) consistent with the PWP, development shall not be undertaken until the conditions have been incorporated into the

Project(s).

Coastal Commission review of a proposed Project(s) shall be deemed complete on the date of a Commission determination that the Project(s) is/are consistent with the PWP with or without conditions.

Upon completion of Commission review, RCD may commence with Project activities provided that any conditions imposed by the Commission to render the Project(s) consistent with the PWP have been incorporated into the Project(s).

iv. Effective Date and Expiration Date of PWP Authorizations; Extension of Authorizations

Unless expressly stated otherwise in the approval documents, the effective date of a Project authorization shall be the date the Coastal Commission's review of the proposed Project is deemed complete pursuant to Section iii, above.

Unless expressly stated otherwise in the approval documents, the expiration date of a Project authorization pursuant to this PWP shall be three years following its effective date. Thereafter, implementation of the Project may not commence unless the authorization has been extended as provided herein, or a new authorization and review by the Commission has been completed in accordance with PWP provisions for initial review of a proposed Project.

## Monitoring Requirements

Following implementation of individual Projects under the PWP, the RCD shall provide monitoring reports in accordance with the requirements (i.e., SPRs and Mitigation Measures) of the CalVTP PEIR. The RCD shall maintain a record of monitoring reports in the RCD's office, which shall be made available for public review. The RCD shall submit a copy of each monitoring report to the Executive Director within ten days of its completion.

## Enforcement

In addition to all other available remedies, the provisions of the PWP, NOID authorizations, and the Coastal Act shall be enforceable pursuant to Chapter 9 of California Public Resources Code Division 20. Any person who performs or undertakes CalVTP-related activities inconsistent with the PWP, any NOID issued pursuant thereto, or the Coastal Act, or who fails to act as required by the PWP, a NOID or the Coastal Act, may, in addition to any other penalties or remedies, be subject to (i) an order pursuant to Public Resources Code Sections 30809, 30810, 30811, or 30812 or (ii) civil or administrative liability in accordance with the provisions of Public Resources Code Sections 30820, 30821, 30821.6 and 30822.

The RCD shall require that PWP-related activities are consistent with the PWP and with the terms and conditions of NOID authorizations issued pursuant to the PWP. The RCD shall investigate in a reasonable time allegations regarding PWP-related activities being undertaken inconsistent with the provisions of the PWP or NOID authorizations, and shall attempt to resolve any such inconsistencies discovered. In the event inconsistencies are not resolved, the RCD will report to the Executive Director or the Coastal Commission, who are authorized to enforce the terms of the PWP, NOIDs, and the Coastal Act.

### PWP Programmatic Review

Five years following certification of this PWP, RCD shall prepare a five-year programmatic review identifying at a minimum: the status of individual Projects implemented under the PWP, as well as Projects expected to be implemented under the PWP; level of program completion (e.g., number of acres treated, high priority areas for the subsequent five years; collective monitoring results; constraints and lessons learned; and program success). The programmatic review shall be submitted to Monterey County and the Coastal Commission. At the ten-year mark following certification of the PWP, a final programmatic review shall be prepared by the RCD and submitted to the County and Coastal Commission for review.

## Section VI: Glossary of Terms

**California Coastal Commission, Coastal Commission or Commission** - the California Coastal Commission.

**California Vegetation Treatment Program (CalVTP)** - Vegetation treatment activities and associated environmental protections developed by the Board of Forestry to reduce the risk of loss of lives and property, reduce fire suppression costs, restore ecosystems, and protect natural resources as well as other assets at risk from wildfire. The CalVTP supports the use of prescribed burning, mechanical treatments, hand crews, herbicides, and prescribed herbivory as tools to reduce hazardous vegetation around communities in the Wildland-Urban Interface (WUI), to construct fuel breaks, and to restore healthy ecological fire regimes.

**California Vegetation Treatment Program Environmental Impact Report and CalVTP PEIR and PEIR** - Final environmental impact report that evaluates the environmental impacts of the CalVTP in accordance with the California Environmental Quality Act (CEQA) and was certified by the Board of Forestry on December 30, 2019, which is available here.

**Coastal Vegetation Treatment Standards of Monterey County, Coastal Vegetation Treatment Standards and Coastal VTS** - Final forest health and fire prevention standards developed by the Coastal Commission, County of Monterey and Resource Conservation District of Monterey County, for the purpose of providing additional standards to or clarification of PEIR Standard Project Requirements (SPRs) for Projects in Monterey

County's coastal zone that fall within the scope of the PEIR.

"Development" means, on land, in or under water, the placement or erection of any solid material or structure; discharge or disposal of any dredged material or of any gaseous, liquid, solid, or thermal waste; grading, removing, dredging, mining, or extraction of any materials; change in the density or intensity of use of land, including, but not limited to, subdivision pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code), and any other division of land, including lot splits, except where the land division is brought about in connection with the purchase of such land by a public agency for public recreational use; change in the intensity of use of water, or of access thereto; construction, reconstruction, demolition, or alteration of the size of any structure, including any facility of any private, public, or municipal utility; and the removal or harvesting of major vegetation other than for agricultural purposes, kelp harvesting, and timber operations which are in accordance with a timber harvesting plan submitted pursuant to the provisions of the Z'berg-Nejedly Forest Practice Act of 1973 (commencing with Section 4511). As used in this section, "structure" includes, but is not limited to, any building, road, pipe, flume, conduit, siphon, aqueduct, telephone line, and electrical power transmission and distribution line.

Executive Director of the Commission and Executive Director - Executive Director of the California Coastal Commission or his/her designee.

Mitigation Measures - Measures certified in the CalVTP PEIR, or additional measures required by the Coastal Commission, to prevent, reduce, or offset adverse environmental effects of a Project.

Notice of Impending Development (NOID) - Notice of a Project Proponent's intention to implement one or more of the Projects contained in the PWP, which notice shall be provided by the RCD to the Coastal Commission and to others, as required by this chapter of the PWP.

Project - Development component included in the PWP, which requires submittal of a Project-Specific Analysis or relevant sections of the PSA for projects that do not fit within the CalVTP PEIR and Notice of Impending Development, as well as incorporation of CalVTP PEIR Standard Project Requirements and Mitigation Measures, as well as Coastal Vegetation Treatment Standards.

Project Proponent - A public agency providing funding for vegetation treatment or with land ownership, land management, or other responsibility in the treatable landscape and seeking to implement vegetation treatments (i.e., Projects) consistent with the PEIR for CEQA compliance, as defined by the CalVTP PEIR. Under this PWP, the Resource Conservation District of Monterey County is the Project Proponent, though RCD may partner with other public agencies acting as Project Proponents as well.

Project-Specific Analysis (PSA) - The process developed as part of the CalVTP PEIR for Project Proponents to evaluate each vegetation treatment project intended to implement the CalVTP PEIR to determine whether the activity qualifies as 'within the scope' of the PEIR or requires additional environmental documentation or its own independent environmental review.

Public works - (a) All production, storage, transmission, and recovery facilities for water, sewerage, telephone, and other similar utilities owned or operated by any public agency or by any utility subject to the jurisdiction of the Public Utilities Commission, except for energy

facilities; (b) all public transportation facilities, including streets, roads, highways, public parking lots and structures, ports, harbors, airports, railroads, and mass transit facilities and stations, bridges, trolley wires, and other related facilities and (c) all publicly financed recreational facilities, all projects of the State Coastal Conservancy, and any Development by a special district.

Resource Conservation District (RCD) - A special district established under Public Resources Code Division 9 to conserve resources such as soil and water and that are set up to be locally governed agencies with their own locally appointed or elected, independent boards of directors. RCDs implement Projects on public and private lands and educate landowners and the public about resource conservation.

Treatable Landscape - Appropriate CalVTP areas within which to implement proposed vegetation treatments (i.e., Projects) and which were identified by first dividing the State (Fire) Responsibility Area into vegetation types from the California Wildlife Habitat Relationship system and excluding those vegetation types with negligible wildfire risks (e.g., wet meadow, estuarine).

Standard Project Requirements (SPRs) - Measures required by the CalVTP PEIR that a proposed Project must implement to avoid and minimize environmental impacts and comply with applicable laws and regulations. SPRs are intended to be implemented and enforced in the same way as mitigation measures consistent with Section 15126.4 of the State CEQA Guidelines.

# Exhibit A

## Coastal Vegetation Treatment Standards (Coastal VTS) for Projects in the Coastal Zone of Monterey County

1. All projects shall comply with and carry out the requirements of the CalVTP PEIR, including use of approved treatment methods, treatment activities and all applicable standard project requirements (SPRs) and mitigation measures (MMs).
2. Project-Specific Analyses (PSAs) shall be submitted to the California Coastal Commission (CCC) for review and approval pursuant to the PWP prior to conducting projects. Coordination between the RCD and CCC shall occur as early as feasible in the design process in order to avoid delays.
3. PSAs shall include clear problem and goal statements (i.e., overall project goals, fire prevention goals, ecological goals, etc.) associated with each project proposed pursuant to this public works plan. These statements are intended to assist the RCD and CCC in developing mutual understanding of the potential impacts and benefits – both short and long term – for each project. It is expected that this information will be incorporated into item #7 of each PSA.
4. In the coastal zone, vegetation treatment projects fall into two categories: (1) Forest Health projects and (2) Fire Prevention projects. The purpose of Forest Health projects is to restore and enhance ecosystems, including to prevent fire behavior to which the ecosystem is not adapted. The ecosystems that can be treated under this category include forested ecosystems as well as other ecosystems such as woodland and scrub dominated systems. The purpose of Fire Prevention projects is to protect existing structures and infrastructure, including access roads. Fire Prevention projects shall be limited to the applicable defensible space requirement (which is typically 100 feet from habitable structures in the Wildland Urban Interface), unless accompanied by a clear rationale, provided by a qualified professional, as to why additional defensible space is required to protect existing structures and infrastructure.
5. In the coastal zone, environmentally sensitive [habitat] area (or ESHA) is defined as *any area in which plant or animal life, or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and that could be easily disturbed or degraded by human activities and developments* (see Coastal Act Section 30107.5). Rarity determinations for habitats and species are made by CDFW, USFWS, and CNPS, and are used to support a CCC ESA

determination.[11] In addition, an ESHA determination may be made on the basis of an area constituting 'especially valuable habitat' where it is of a special nature and/or serves a special role in the ecosystem, such as providing a pristine example of a habitat type or supporting important ecological linkages. The Coastal Act requires that environmentally sensitive habitat areas be protected against any significant disruption of habitat values and only allows uses dependent on the ESHA resources within those areas (see Coastal Act Section 30240). It is anticipated that many of the Forest Health and Fire Prevention activities pursued within the coastal zone of Monterey County will take place within natural communities that qualify as ESHA (e.g., Redwood forest, Monterey Pine forest, Monterey Cypress, Gowen Cypress, maritime chaparral, etc.). For habitats containing federally listed species such as Monterey and Gowen Cypress, USFWS will be consulted during the PSA to develop identify appropriate treatments.

6. In the coastal zone, wetlands are defined as where lands *may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens* (see Coastal Act Section 30121). Administrative Regulations (Section 13577(b)) further elaborate on this definition as *where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes*, and goes on to establish what is effectively a single-parameter rule, meaning that only one of the three parameters used by the US Army Corps of Engineers and various other agencies – hydric soils, hydrophytic vegetation, or hydrology – need be present to delineate a coastal wetland feature. Though it is not necessarily anticipated that Forest Health and Fire Prevention projects will occur around coastal wetlands, it is important to recognize that they can and do occur as part of the landscape mosaic. Wetlands as referenced in the CalVTP are more narrowly defined than as would be recognized under the Coastal Act. The Coastal Act generally protects wetlands and allows for impacts in only specific situations (see Coastal Act Section 30233).

7. In addition to the requirements of the CalVTP PEIR, the following standards shall also be met in the Monterey County coastal zone, not only in ESHA but in all habitats:

    a. Protect Ecosystems. Forest Health projects shall: (a) proactively restore and enhance ecosystems, protect watersheds, and promote long-term storage of carbon, including through the minimization of forest carbon loss from large and intense wildfires; (b) restore and

[11] CDFW defines natural communities, animals, and plants with a global or state ranking of 1, 2, or 3 as rare and the CCC typically finds these to be ESHA. CCC also typically considers plant and animal species listed by the federal and state endangered species acts (ESA and CESA, respectively) and/or identified under other special status categories (e.g., California Species of Special Concern) and/or identified by the California Native Plant Society (CNPS) as '1B' and '2' plant species as constituting ESHA.

maintain vegetation cover to a threshold that reflects appropriate fire frequencies (i.e., fire-return intervals) on the landscape, considering estimated pre-European settlement conditions as well as future climate change, and the maintenance or improvement of ecosystem health; (c) maintain vegetation cover and composition to comply with the standards (membership rules) set forth in the online edition of the Manual of California Vegetation (MCV) to avoid unintended habitat conversion; [12] and (d) provide for an appropriate mosaic of native plants by age, size, and class that support the specific habitat being treated. Fire Prevention projects shall meet all of the above requirements to the maximum extent feasible, while achieving overall project goals and necessary fire prevention goals, and any deviations shall be clearly explained and identified in the PSA.

b. Protect Gowen Cypress. Gowen Cypress habitat, as measured from the dripline of individual trees or the outermost periphery of a stand, whichever is greater, shall be delineated and protected from treatment activities with a 100-foot buffer. Treatment activities shall be limited to ecological restoration within the buffer and directly incorporate recommendations from a Registered Professional Forester and USFWS consultation.

c. Protect Wetlands. Coastal wetlands shall be delineated and protected from treatment activities with a 100-foot buffer. Only treatment activities that would restore ecological benefits to the wetland may be allowed within the buffer. Projects shall adhere to CalVTP SPR BIO-1 identifying and documenting the location of wetlands during project surveys and planning, and SPR HYD-3 protecting wetland water quality from prescribed herbivory treatments.

d. Protect Landmark Trees. Landmark Trees shall be protected from removal and other impacts in all coastal areas, regardless of species or size, if occurring within a riparian corridor or wetland habitat, critical habitat, scenic easement, critical viewshed, or on a ridgeline. Projects shall adhere to CalVTP SPRs BIO-1 and BIO-12.

e. Protect Areas of Special Biological Significance (ASBS). All treatment activities within the watershed boundaries of the Del Monte Forest and Carmel Areas of Special Biological Significance shall avoid work during periods of soil saturation, consistent with CalVTP SPR GEO-1.

f. Use Vegetation Removal Hierarchy. Except for prescribed fire project

[12] Membership rules are quantitative definitions used to assign field samples to vegetation types based on data analysis and can include species constancy, cover values, and the presence of indicator species.

components, a vegetation removal hierarchy shall be identified and implemented for each project to obtain the vegetation cover threshold identified by a Registered Professional Forester or qualified professional as necessary while ensuring that unintended habitat conversion does not occur and that vegetation cover is sufficient to support the project's ecological goals. In order of priority and application, the hierarchy shall be as follows: (1) thinning and removal of dead, dying and diseased foliage, shrubs (except that some snags should be retained to provide wildlife shelter, dens, etc.); (2) removal of invasive species; and (3) removal of native species that are not listed as endangered, threatened, rare, or otherwise especially valuable, with the end goal of having appropriate species composition in the plant community with a mix of vegetation age, height and density. In all cases, indicator species and diagnostic species appropriate to the vegetation community type shall be maintained in accordance with the standards (membership rules) set forth by the online edition of the Manual of California Vegetation (MCV), with the intention of maintaining cover and composition consistent with meeting project ecological goals. For Fire Prevention projects, additional vegetation removal may be allowed if maintaining such vegetation consistent with project ecological goals would result in an unacceptable fire risk to existing structures and infrastructure, and the removal is the minimum necessary to protect existing structures and infrastructure. Any such additional removal shall be clearly explained and identified in the PSA. Lastly, if vegetation cover threshold goals, as articulated in the online edition of the MCV, cannot be met, then removal of endangered, threatened, rare or otherwise especially valuable species and habitats shall be prohibited unless: such removal is critical to reduce the area's fire risk; removal is accompanied by restoration or enhancement such that the overall project provides net benefits to the habitat; and no other alternative exists that meets the project goals.

g. Limit Treatment within Chaparral. Treatment activities (as defined under the CalVTP) shall not occur within chaparral habitat unless required to establish and/or maintain the minimum defensible space of a building or structure within the County's Wildland-Urban Interface. Such treatment shall be designed to protect chaparral habitat and its indicator species to the maximum extent feasible while meeting the minimum defensible space requirements pursuant to County Fire Code.

h. Determine Suitable Use of Prescribed Fire. Prescribed fire may be allowed if it is found to be the least environmentally damaging feasible alternative to achieving project goals, except in North County's Critical Erosion Areas, in redwood and chaparral habitats when slopes exceed

25% and/or a K-factor of 0.4, and in Carmel Area redwood and chaparral habitats when slopes exceed 30%.

i. Determine Suitable Use of Prescribed Herbivory. Prescribed herbivory may be allowed if it is found to be the least environmentally damaging feasible alternative to achieving project goals, except in North County's Critical Erosion Areas, in redwood and chaparral habitats when slopes exceed 25% and/or a K-factor of 0.4, and in Carmel Area redwood and chaparral habitats when slopes exceed 30%. Prescribed herbivory shall be conducted pursuant to an approved plan that ensures protection of habitat and other coastal resources, as documented in the PSA.

j. Control Invasive Species. Treatment activities and treatment types shall limit the spread of invasive species and prevent the spread of plant pathogens in all habitats, including those habitats that are not determined to be sensitive natural communities, riparian habitats, or oak woodlands, subject to CalVTP SPRs BIO-4 and 9.

k. Limit Equipment Types. All projects shall be carried out using the least invasive type of equipment feasible. Projects shall avoid the use of large masticators, track vehicles, and other heavy equipment, where feasible. When such heavy equipment is used, it shall remain on existing roads to the extent feasible. In riparian habitat, the use of heavy equipment shall be prohibited, except when authorized through a valid Stream and Lakebed Alteration Agreement and/or, if applicable, Clean Water Act 401 Certification, and when reviewed and approved by CCC. In North County's Critical Erosion Areas, in redwood and chaparral habitats when slopes exceed 25% and/or a K-factor greater than 0.4, and in Carmel Area redwood and chaparral habitats when slopes exceed 30%, mechanical treatments shall be prohibited. Projects shall adhere to CalVTP SPR GEO-2 limiting heavy equipment use and SPR HYD-4 prohibiting heavy equipment use in WLPZ except on existing roads.

l. Limit Herbicide Use. Herbicides shall be avoided to the maximum extent feasible and may be used only if such treatment activities are the least environmentally damaging feasible alternative and will not result in significant adverse impacts to sensitive ecological resources (e.g., when used to control of invasive species). Projects shall adhere to CalVTP SPRs HAZ-5, 6, 7, 8, and 9.

m. Protect Coastal Viewshed. All treatment-related materials shall be stored outside of major public viewing areas and may rely on existing vegetation to screen visibility. Treatments shall be planned and implemented to avoid significant breaks in the coastal viewshed, relying on techniques such as feathering and gradients along treatment area

peripheries to blend with the surrounding landscape.

n. Limit Fencing. The use of wildlife-friendly fencing for prescribed herbivory activities subject to CalVTP SPR BIO-11 shall require adequate ground clearance for smaller species to avoid entrapment and/or entanglement.

o. Limit Accelerants. Accelerants shall only be allowed for use in prescribed fire applications. The use of accelerants that could significantly disrupt or degrade ESHA is prohibited.

p. Limit the Need for Soil Stabilization. The use of riprap and/or chemical soil stabilizers that could significantly disrupt or degrade ESHA is prohibited.

q. Protect Coastal Public Access and Recreation. Coastal public access and recreational opportunities shall be preserved during project operations to the maximum extent feasible, including by, but not limited to, minimizing trail closures, limiting the use of public parking spaces for staging operations, posting accessway signage and using flaggers, and designing construction access corridors in a manner that has the least impact on coastal public access. Following the completion of Forest Health projects and Fire Prevention projects, all impacted coastal public access and recreational amenities shall be restored to existing conditions, in a manner that maximizes coastal public access and recreation.

# Exhibit B

| Summary of CalVTP Standard Project Requirements (SPR)[13] Description/Mitigation/Monitoring<br>The Project Proponent shall perform or cause to be performed the following: | | | |
|---|---|---|---|
| Administrative Standard Project Requirements | | SPR Description/Requirement/Mitigation/Monitoring | Additional Mitigation Measures (if applicable) |
| 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. | |
| 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. | |
| 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. | |
| SPR AD-4 | Public Notifications for Prescribed Burning | At least 3 days prior to the commencement of prescribed burning operations, the project proponent will post signs, publish, send county supervisor notification of prescribed burning operations. | |
| SPR AD-5 | Maintain Site Cleanliness | Project proponent will use fully covered trash receptacles and is required to remove all temporary non-biodegradable flagging. | |
| 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. | |
| 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 Project Specific Analysis, Mitigation and Monitoring Report Form, GIS data, and a post-project implementation report to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. | |
| SPR AD-8 | Request Access for Post-Treatment Assessment | For CAL FIRE projects and public landowners, 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. | |

[13] The list of CalVTP Standard Project Requirements (SPRs) presented in this table is an abridged version. The complete list of SPRs can be found in Appendix PD-3 of the CalVTP Final PEIR.

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|---|---|---|---|
| SPR AD-9 | Obtain a Coastal Development Permit for Proposed Treatment Within the Coastal Zone Where Required | All treatment projects in the Coastal Zone will be reviewed by the local Coastal Commission district office or local government with a certified LCP. | |
| | | | |
| Aesthetic and Visual Resource Standard Project Requirements | | SPR Description/Requirement/Mitigation/Monitoring | Additional Mitigation Measures (if applicable) |
| 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. | |
| 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. | |
| 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. | Mitigation Measure AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks: 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. |
| | | | |
| Air Quality Standard Project Requirements | | SPR Description/Requirement/Mitigation/Monitoring | Additional Mitigation Measures (if applicable) |
| 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. | 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. 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. Use renewable diesel fuel in diesel- powered construction equipment. 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 |

| | | | |
|---|---|---|---|
| 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. | |
| SPR AQ-3 | Create a Burn Plan | The project proponent will create a burn plan using the CAL FIRE burn plan template for all prescribed burns. | |
| SPR AQ-4 | Minimize Dust | Limit the speed of vehicles. If road use creates excessive dust, the project proponent will wet appurtenant roads or use a non-toxic chemical dust suppressant, remove any soil tracking onto public paved roads, suspend ground disturbing treatment activities outside the project area if particulate emissions cause issues per Health and Safety Code Section 41700. | |
| 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. | |
| 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). | |
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| Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements | | SPR Description/Requirement/Mitigation/Monitoring | Additional Mitigation Measures (if applicable) |
| SPR CUL-1 | Conduct Record Search | An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. | |
| SPR CUL-2 | Contact Geographically Affiliated Native American Tribes | 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. | Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources: If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil (“midden”), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist will assess the significance of the find. |
| SPR-CUL-3 | Pre-field Research | 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. | |
| 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. | |

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| 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. | |
| 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. | |
| 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. | |
| 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. | |
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| Biological Resources Standard Project Requirements | | SPR Description/Requirement/Mitigation/Monitoring | Additional Mitigation Measures (if applicable) |
| 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. | 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. |

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| SPR BIO-1 (cont.) | | | 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). 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. No fire ignition (nor use of associated accelerants) will occur within the special-status plant buffer. |
| SPR BIO-1 (cont.) | | | 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. |
| 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. | Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities): If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species by either the treatment will not being implemented within the occupied habitat or 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. |

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

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| | | | 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. |
| SPR BIO-2 (cont.) | | | Mitigation Measure BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities): Treatment areas within the range of these species will be surveyed for the host plant for each species (Table 3.6-34). Host plants for federally listed butterflies within the occupied habitat will be marked with high-visibility flagging, fencing, or stakes, and no treatment activities will occur within 10 feet of these plants. Because prescribed herbivory could result in the indiscriminate removal of the host plants for federally listed butterflies, this treatment type will not be used within occupied habitat of any federally listed butterfly species, unless it is known that the host plant is unpalatable to the herbivore. Treatment areas that are not occupied but are within the range of the federally listed butterfly will be divided into as many treatment units as feasible such that the entirety of the habitat is not treated within the same year. Treatments will be conducted in a patchy pattern to the extent feasible in areas that are not occupied but are within the range of the federally listed butterfly, such that the entirety of the habitat is not burned or removed and untreated portions of suitable habitat are retained. |
| SPR BIO-2 (cont.) | | | 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. |

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| SPR BIO-2 (cont.) | | | Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities): 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). 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). |
| SPR BIO-2 (cont.) | | | 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<br>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). |
| 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). | Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands: 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. To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity |

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| | | | ranks of S1 (critically imperiled) and S2 (imperiled). 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). |
| SPR BIO-3 (cont.) | | | Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands: If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will implement the following actions: Compensate for unavoidable losses of sensitive natural community and oak woodland acreage and function by: Restoring sensitive natural community or oak woodland functions and acreage within the treatment area; Restoring degraded sensitive natural communities or oak woodlands outside of the treatment area at a sufficient ratio to offset the loss of acreage and habitat function; or preserving existing sensitive natural communities or oak woodlands of equal or better value to the sensitive natural community lost through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function. The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects. |
| SPR BIO-3 (cont.) | | | 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. |

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| 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 will 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. 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. | Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands: Impacts to wetlands will be avoided using the following measures: The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented. The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures). A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high- visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. 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. |
| 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. 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). | 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. |
| 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: Clean and sanitize vehicles, equipment, footwear, and clothing, include training, minimize soil disturbance, minimize soil and plant material movement, and clean soil and debris from equipment and sanitize tools. | |
| 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. | |

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| 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). | |
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| Invasive Plants and Wildlife | | SPR Description/Requirement/Mitigation/Monitoring | Additional Mitigation Measures (if applicable) |
| 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, for all heavy equipment and vehicles traveling off road, pressure wash, if feasible, 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, stage equipment in areas free of invasive plant infestations, 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, treat invasive plant biomass onsite to eliminate seeds and propagules, and implement Fire and Fuel Management BMPs outlined in the "Preventing the Spread of Invasive Plants. | |
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| Wildlife | | SPR Description/Requirement/Mitigation/Monitoring | Additional Mitigation Measures (if applicable) |
| 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. | |
| 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. | |

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| 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. If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. If an active nest is observed, the project proponent may establish one of the following: Establish a temporary, species-appropriate buffer around the nest, modify the treatment in the vicinity of an active nest to avoid disturbance of active nests, or defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. Trees with visible raptor nests, whether occupied or not, will be retained. | |
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| Geology, Soils, and Mineral Resource Standard Project Requirements | | SPR Description/Requirement/Mitigation/Monitoring | Additional Mitigation Measures (if applicable) |
| 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). | |
| 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. | |
| 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. | |
| 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. 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. | |
| 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). | |

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| 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. | |
| SPR GEO-7 | Minimize Erosion | To minimize erosion, the project proponent will prohibit the use of heavy equipment on slopes steeper that 65%, steeper than 50% where erosion hazard rating is high or extreme. | |
| 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). | |
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| Greenhouse Gas Emissions Standard Project Requirements | | SPR Description/Requirement/Mitigation/Monitoring | Additional Mitigation Measures (if applicable) |
| 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. | 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. |
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| Hazardous Material and Public Health and Safety Standard Project Requirements | | SPR Description/Requirement/Mitigation/Monitoring | Additional Mitigation Measures (if applicable) |
| 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. | |
| SPR HAZ-2 | Require Spark Arrestors | The project proponent will require mechanized hand tools to have federal- or state-approved spark arrestors. | |

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| 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. | 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. |
| 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). | |
| 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. | |
| 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. | |
| 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. | |
| 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, 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. | |
| 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. | |
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| Hydrology and Water Quality Standard Project Requirements | | SPR Description/Requirement/Mitigation/Monitoring | Additional Mitigation Measures (if applicable) |

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| 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. | |
| 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). | |
| 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, 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, and treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed. | |
| SPR HYD-4 | Identify and Protect Watercourse and Lake Protection Zones (WLPZ) | 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). buffer distances vary from 50-150 feet depending on stream class and slope. 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. 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. WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. 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. 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. 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. | |

| | | | |
|---|---|---|---|
| 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, 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, no herbicides will be applied within a 50-foot buffer of ESA or CESA listed plant species or within 50 feet of dry vernal pools, for spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray, Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative), and no herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities. | |
| 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. | |
| | | | |
| Noise Standard Project Requirements | | SPR Description/Requirement/Mitigation/Monitoring | Additional Mitigation/Monitoring |
| 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). | |
| 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. | |
| SPR NOI-3 | Engine Shroud Closure | The project proponent will require that engine shrouds be closed during equipment operation. | |
| 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. | |
| SPR NOI-5 | Restrict Equipment Idle Time | The project proponent will require that all motorized equipment be shut down when not in use. | |

| | | | |
|---|---|---|---|
| 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. | |
| | | | |
| Recreation Standard Project Requirements | | SPR Description/Requirement/Mitigation/Monitoring | Additional Mitigation Measures (if applicable) |
| SPR REC-1 | Notify Recreational Users of Temporary Closures | If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent will coordinate with the owner/manager of that recreation area or facility. If temporary closure of a recreation area or facility is required, the project proponent will work with the owner/manager to post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. Additionally, notification of the treatment activity will be provided to the Administrative Officer (or equivalent official responsible for distribution of public information) of the county(is) in which the affected recreation area or facility is located. | |
| | | | |
| Transportation Standard Project Requirements | | SPR Description/Requirement/Mitigation/Monitoring | Additional Mitigation Measures (if applicable) |
| SPR TRAN-1 | Implement Traffic Control during Treatments | Prior to initiating vegetation treatment activities, the project proponent will work with the agency(is) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. | |
| | | | |
| Public Services and Utilities Standard Project Requirements | | SPR Description/Requirement/Mitigation/Monitoring | Additional Mitigation Measures (if applicable) |
| 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. | |

# Exhibit C

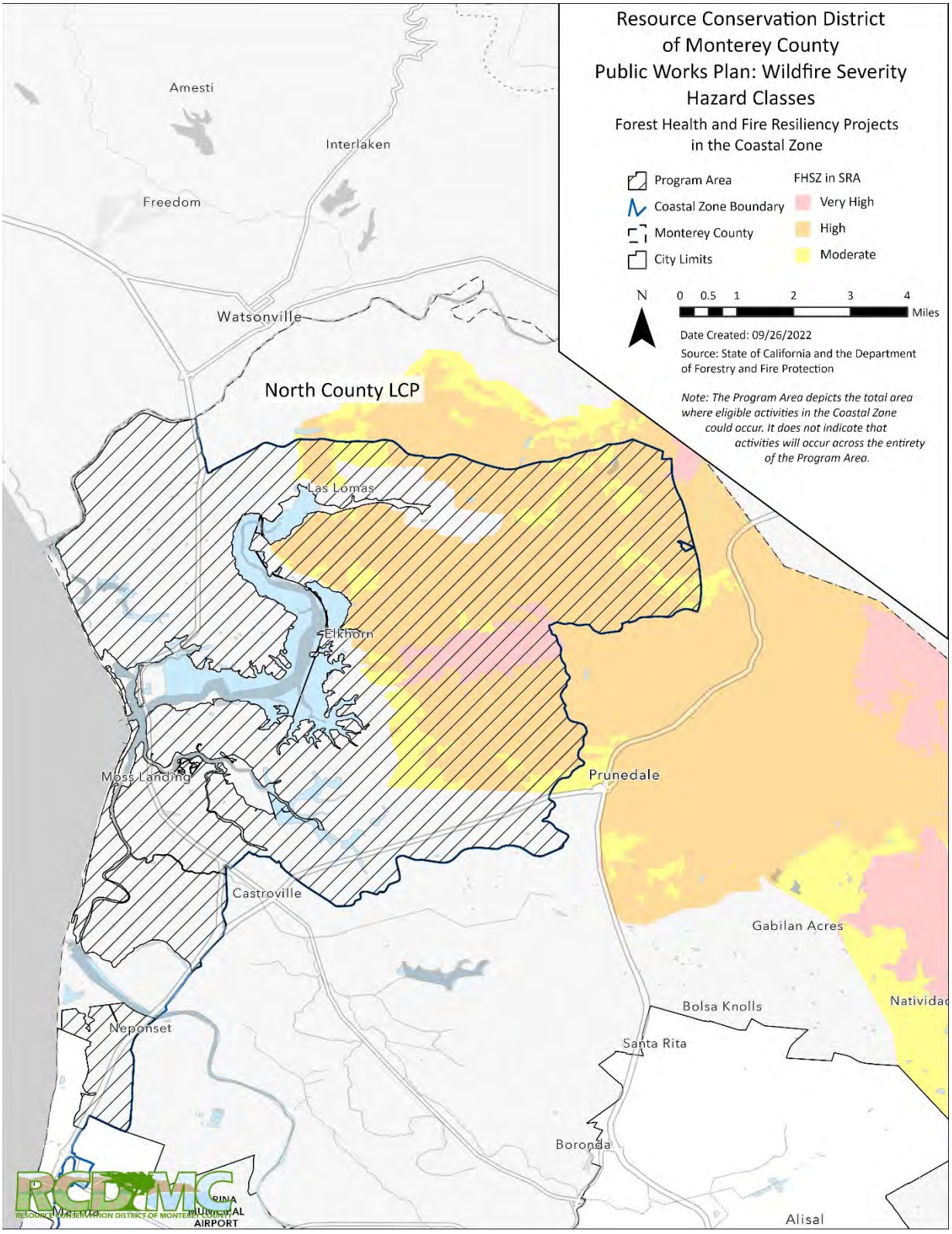
| **2022 California Natural Diversity Database with PWP Program Area**<br>*This is a species list created based on CNDDB data and the PWP Program Area. Project proponents will need to determine whether a species on this list could potentially occur within a given project site. If the species could occur on a given project site or be impacted by project activities the species will need to be analyzed during PSA development for potential impacts and associated avoidance and minimization measures.* | | Is Species Also Addressed in the CalVTP? |
|---|---|---|
| **Amphibians** | | |
| *Rana boylii* | foothill yellow-legged frog | YES |
| *Ambystoma californiense pop. 1* | California tiger salamander - central California DPS | YES |
| *Ambystoma macrodactylum croceum* | Santa Cruz long-toed salamander | YES |
| *Taricha torosa* | Coast Range newt | NO |
| *Rana draytonii* | California red-legged frog | YES |
| **Arachnids** | | |
| *Meta dolloff* | Dolloff Cave spider | NO |
| **Birds** | | |
| *Agelaius tricolor* | tricolored blackbird | YES |
| *Charadrius nivosus nivosus* | western snowy plover | YES |
| *Laterallus jamaicensis coturniculus* | California black rail | YES |
| *Cypseloides niger* | black swift | YES |
| *Riparia riparia* | bank swallow | YES |
| *Asio flammeus* | short-eared owl | YES |
| *Rallus obsoletus obsoletus* | California Ridgway's rail | YES |
| *Pelecanus occidentalis californicus* | California brown pelican | YES |
| *Falco mexicanus* | prairie falcon | NO |
| *Eremophila alpestris actia* | California horned lark | NO |
| *Athene cunicularia* | burrowing owl | YES |
| *Buteo regalis* | ferruginous hawk | NO |
| *Fratercula cirrhata* | tufted puffin | YES |
| *Nannopterum auritum* | double-crested cormorant | NO |
| *Falco peregrinus anatum* | American peregrine falcon | YES |
| *Elanus leucurus* | white-tailed kite | YES |
| **Bryophytes** | | |
| *Dacryophyllum falcifolium* | tear drop moss | NO |
| *Tortula californica* | California screw moss | NO |
| *Grimmia torenii* | Toren's grimmia | NO |
| **Dicots** | | |
| *Arctostaphylos pajaroensis* | Pajaro manzanita | YES |
| *Clarkia jolonensis* | Jolon clarkia | NO |
| *Cordylanthus rigidus ssp. littoralis* | seaside bird's-beak | NO |

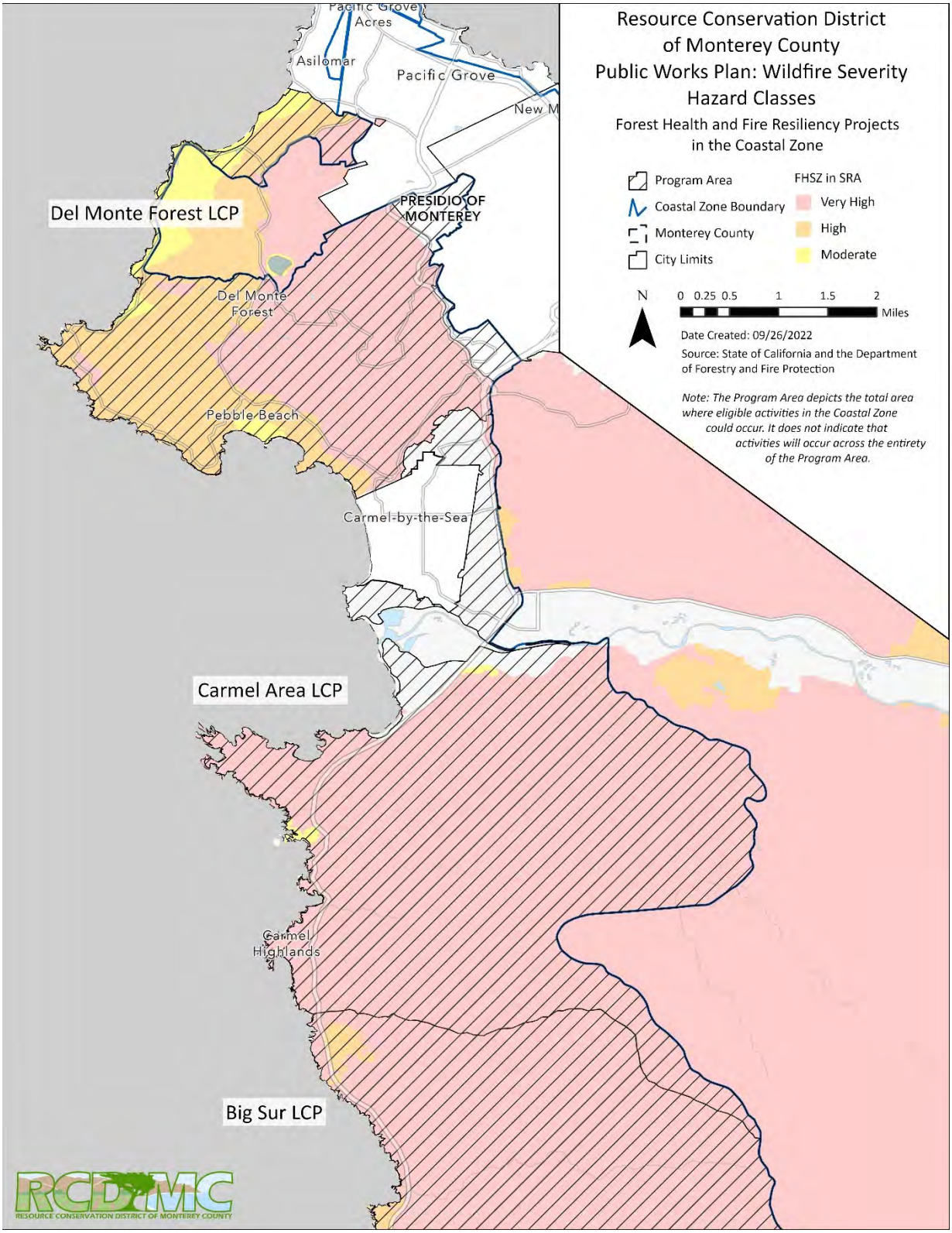
| | | |
|---|---|---|
| *Galium clementis* | Santa Lucia bedstraw | NO |
| *Centromadia parryi ssp. congdonii* | Congdon's tarplant | NO |
| *Sidalcea malachroides* | maple-leaved checkerbloom | NO |
| *Malacothamnus palmeri var. involucratus* | Carmel Valley bush-mallow | NO |
| *Delphinium hutchinsoniae* | Hutchinson's larkspur | NO |
| *Trifolium hydrophilum* | saline clover | NO |
| *Collinsia multicolor* | San Francisco collinsia | NO |
| *Castilleja ambigua var. insalutata* | pink Johnny-nip | NO |
| *Microseris paludosa* | marsh microseris | NO |
| *Horkelia cuneata var. sericea* | Kellogg's horkelia | NO |
| *Monardella sinuata ssp. nigrescens* | northern curly-leaved monardella | NO |
| *Chorizanthe pungens var. pungens* | Monterey spineflower | NO |
| *Arctostaphylos pumila* | sandmat manzanita | YES |
| *Ericameria fasciculata* | Eastwood's goldenbush | NO |
| *Arctostaphylos hookeri ssp. hookeri* | Hooker's manzanita | YES |
| *Monolopia gracilens* | woodland woollythreads | NO |
| *Eriogonum nortonii* | Pinnacles buckwheat | NO |
| *Rosa pinetorum* | pine rose | NO |
| *Delphinium umbraculorum* | umbrella larkspur | NO |
| *Streptanthus albidus ssp. peramoenus* | most beautiful jewelflower | NO |
| *Chorizanthe breweri* | Brewer's spineflower | NO |
| *Erysimum ammophilum* | sand-loving wallflower | NO |
| *Cirsium occidentale var. compactum* | compact cobwebby thistle | NO |
| *Arctostaphylos edmundsii* | Little Sur manzanita | NO |
| *Galium hardhamiae* | Hardham's bedstraw | NO |
| *Gilia tenuiflora ssp. arenaria* | Monterey gilia | NO |
| *Plagiobothrys chorisianus var. chorisianus* | Choris' popcornflower | NO |
| *Lupinus tidestromii* | Tidestrom's lupine | NO |
| *Erysimum menziesii* | Menzies' wallflower | NO |
| *Malacothamnus palmeri var. lucianus* | Arroyo Seco bush-mallow | NO |
| *Trifolium trichocalyx* | Monterey clover | NO |
| *Trifolium polyodon* | Pacific Grove clover | NO |
| *Pedicularis dudleyi* | Dudley's lousewort | NO |
| *Astragalus tener var. titi* | coastal dunes milk-vetch | NO |
| *Layia carnosa* | beach layia | NO |
| *Holocarpha macradenia* | Santa Cruz tarplant | YES |
| *Plagiobothrys uncinatus* | hooked popcornflower | NO |
| *Potentilla hickmanii* | Hickman's cinquefoil | NO |
| *Sanicula maritima* | adobe sanicle | NO |
| **Fish** | | |
| *Lavinia exilicauda harengus* | Monterey hitch | NO |
| *Spirinchus thaleichthys* | longfin smelt | YES |

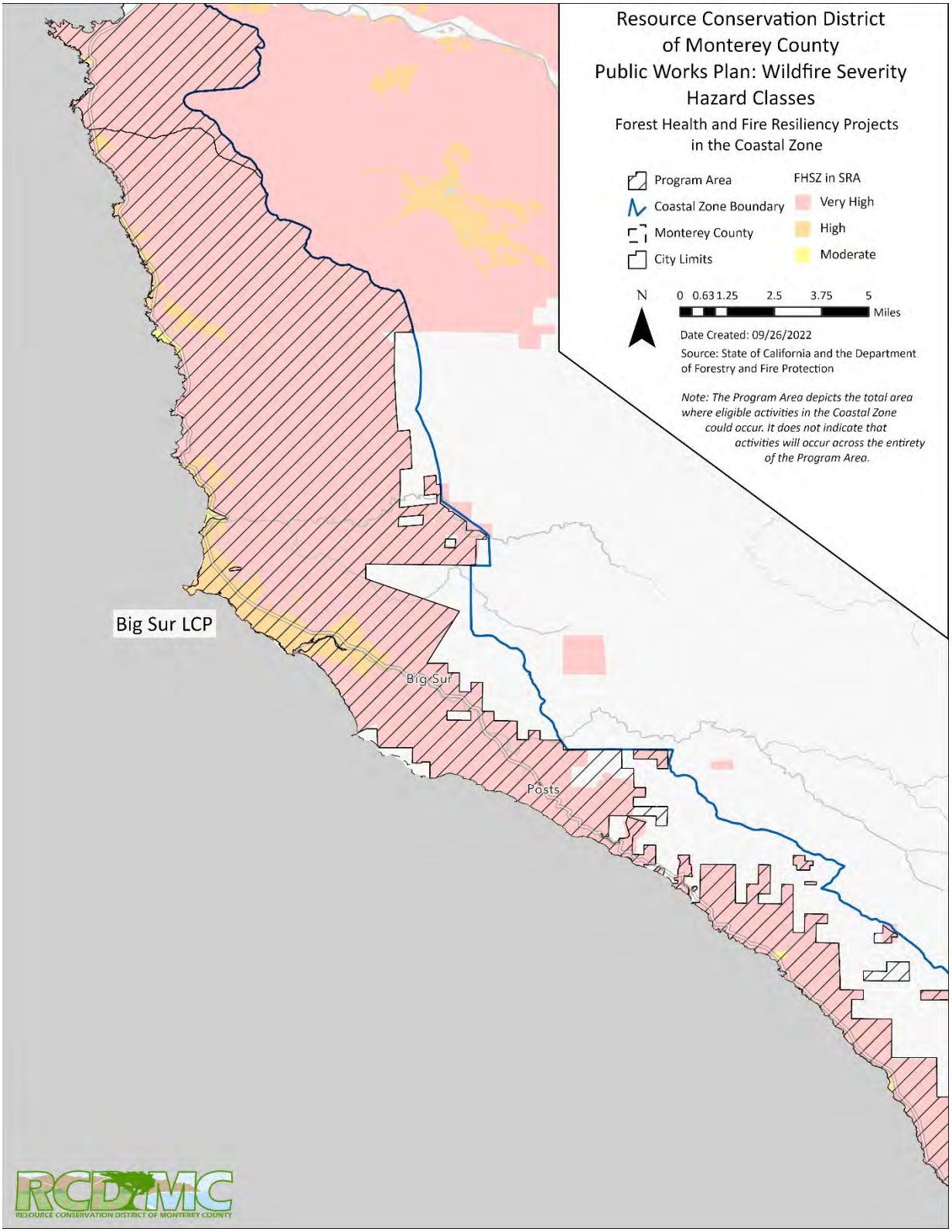
| | | |
|---|---|---|
| *Oncorhynchus mykiss irideus pop. 9* | steelhead - south-central California coast DPS | YES |
| *Eucyclogobius newberryi* | tidewater goby | YES |
| **Vegetation Communities** | | |
| *Monterey Pine Forest* | Monterey Pine Forest | YES |
| *Northern Bishop Pine Forest* | Northern Bishop Pine Forest | YES |
| *Monterey Cypress Forest* | Monterey Cypress Forest | YES |
| *Monterey Pygmy Cypress Forest* | Monterey Pygmy Cypress Forest | YES |
| *Central Maritime Chaparral* | Central Maritime Chaparral | YES |
| **Gymnosperms** | | |
| *Pinus radiata* | Monterey pine | YES |
| *Abies bracteata* | bristlecone fir | YES |
| *Hesperocyparis goveniana* | Gowen cypress | YES |
| *Hesperocyparis macrocarpa* | Monterey cypress | YES |
| **Insects** | | |
| *Bombus caliginosus* | obscure bumble bee | NO |
| *Bombus crotchii* | Crotch bumble bee | YES |
| *Optioservus canus* | Pinnacles optioservus riffle beetle | NO |
| *Euphilotes enoptes smithi* | Smith's blue butterfly | YES |
| *Bombus occidentalis* | western bumble bee | YES |
| *Danaus plexippus plexippus pop. 1* | monarch - California overwintering population | YES |
| *Coelus globosus* | globose dune beetle | |
| **Lichens** | | |
| *Sulcaria spiralifera* | twisted horsehair lichen | NO |
| *Ramalina thrausta* | angel's hair lichen | NO |
| **Mammals** | | |
| *Taxidea taxus* | American badger | YES |
| *Sorex ornatus salarius* | Monterey shrew | YES |
| *Lasiurus cinereus* | hoary bat | NO |
| *Reithrodontomys megalotis distichlis* | Salinas harvest mouse | NO |
| *Corynorhinus townsendii* | Townsend's big-eared bat | YES |
| **Monocots** | | |
| *Agrostis blasdalei* | Blasdale's bent grass | NO |
| *Fritillaria liliacea* | fragrant fritillary | NO |
| *Calochortus fimbriatus* | late-flowered mariposa-lily | NO |
| *Piperia yadonii* | Yadon's rein orchid | NO |
| *Carex obispoensis* | San Luis Obispo sedge | NO |
| *Allium hickmanii* | Hickman's onion | NO |
| **Reptiles** | | |
| *Anniella pulchra* | Northern California legless lizard | YES |
| *Phrynosoma blainvillii* | coast horned lizard | NO |
| *Emys marmorata* | western pond turtle | YES |

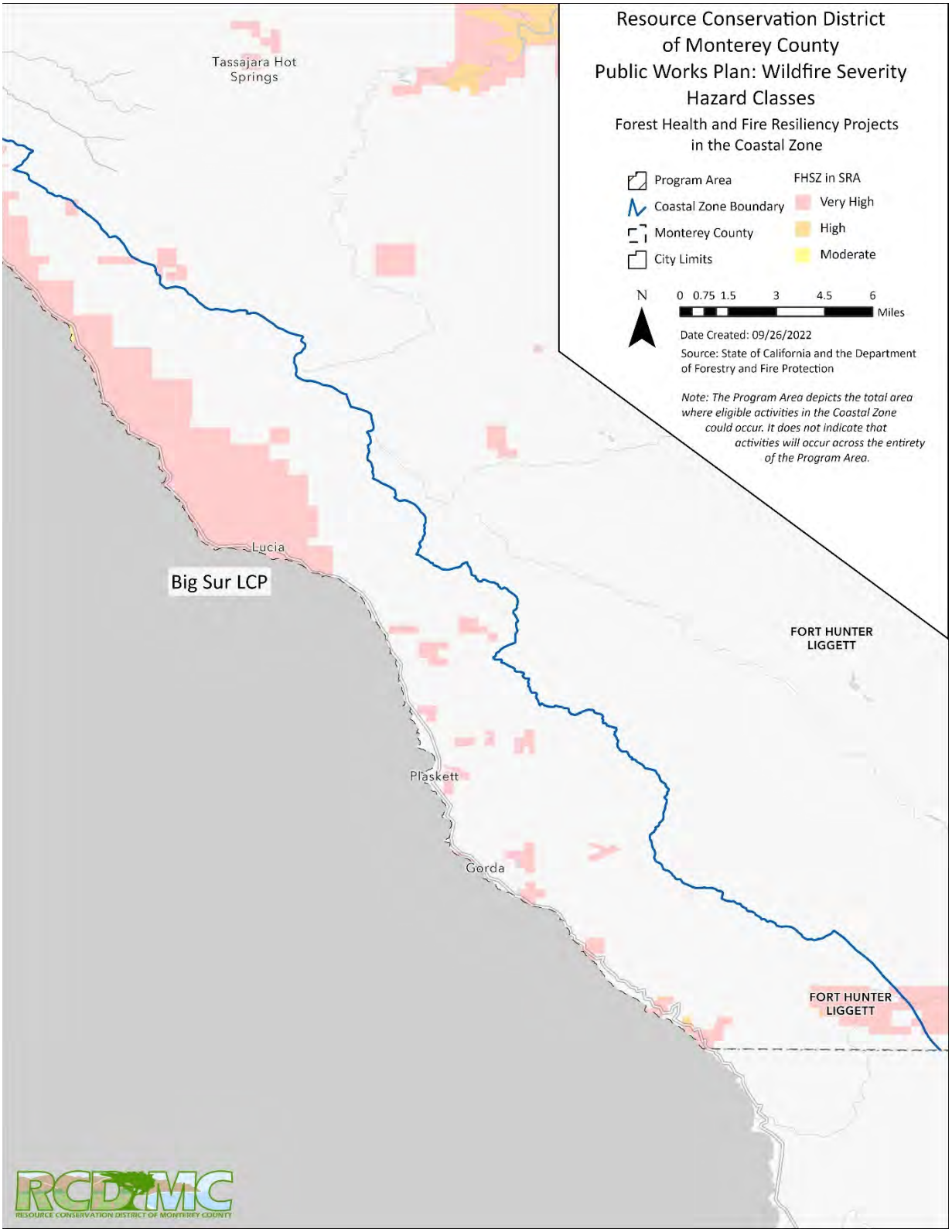
# Exhibit D

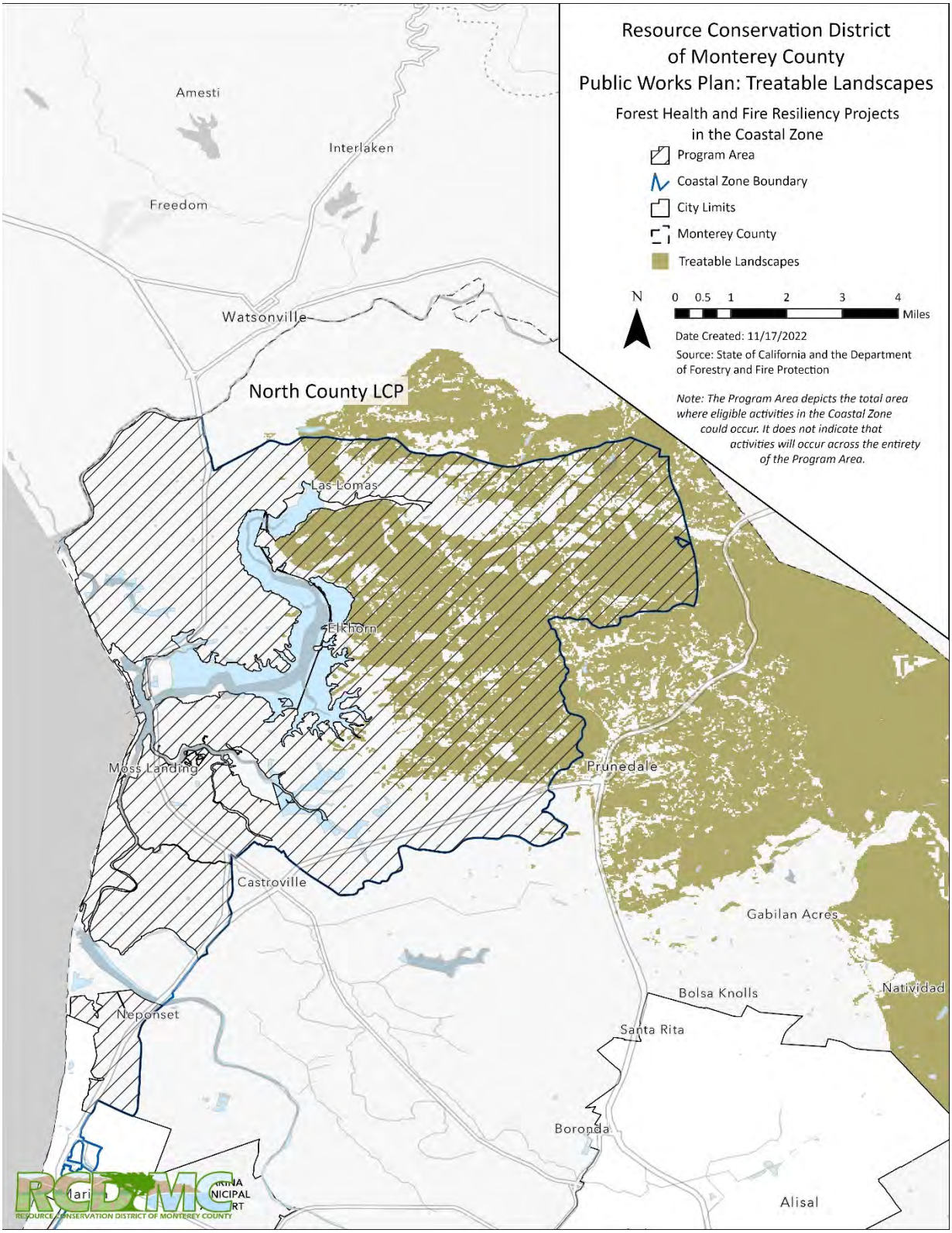
Monterey County LCP Maps

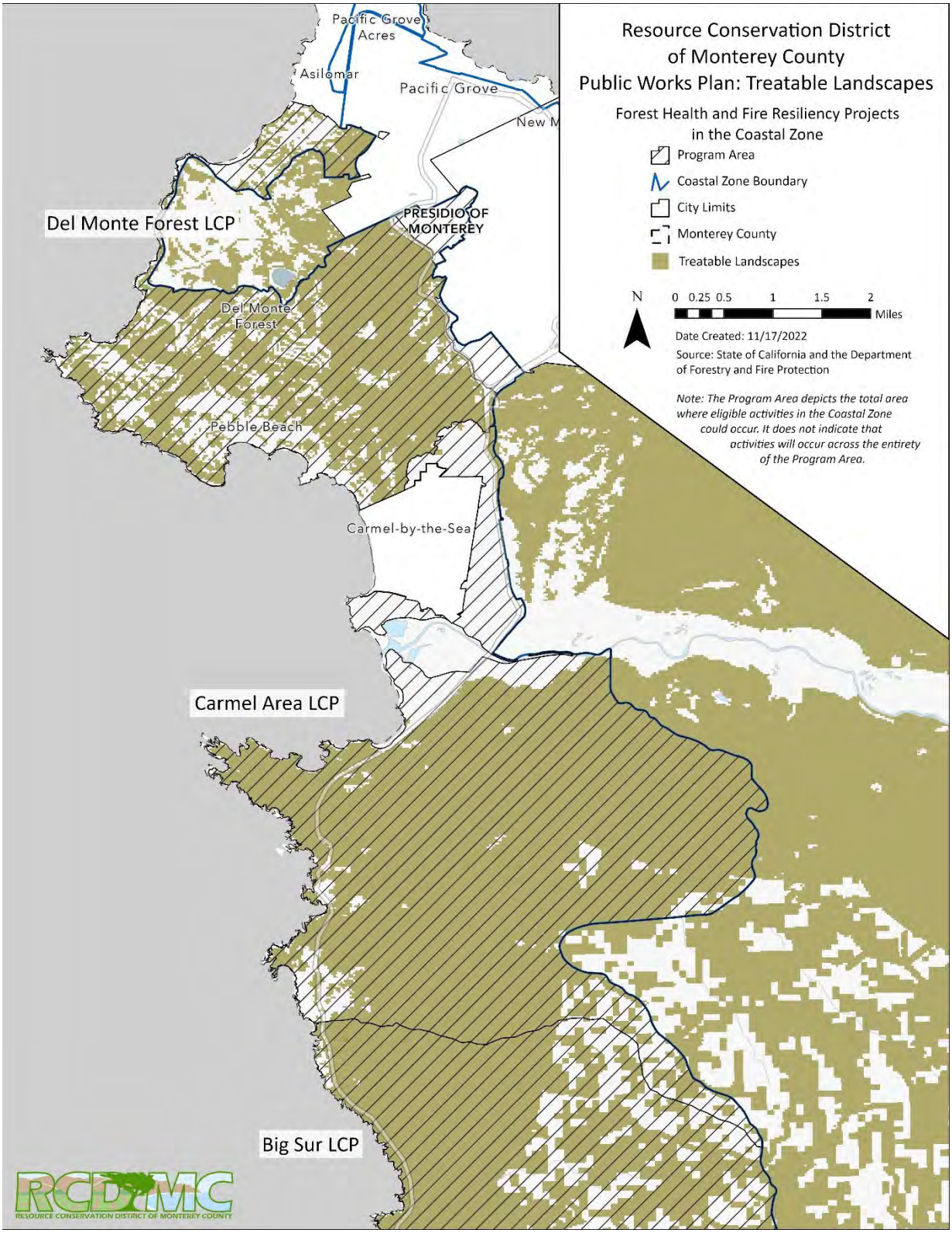

Resource Conservation District
of Monterey County
Public Works Plan: Wildfire Severity
Hazard Classes
Forest Health and Fire Resiliency Projects
in the Coastal Zone
Program Area
Coastal Zone Boundary
Monterey County
City Limits
FHSZ in SRA
Very High
High
Moderate
N
0 0.5 1 2 3 4
Miles
Date Created: 09/26/2022
Source: State of California and the Department of Forestry and Fire Protection
Note: The Program Area depicts the total area where eligible activities in the Coastal Zone could occur. It does not indicate that activities will occur across the entirety of the Program Area.
Amesti
Interlaken
Freedom
Watsonville
North County LCP
Las Lomas
Elkhorn
Moss Landing
Prunedale
Castroville
Gabilan Acres
Bolsa Knolls
Santa Rita
Neponset
Boronda
Alisal
AIRPORT


Resource Conservation District of Monterey County
Public Works Plan: Wildfire Severity Hazard Classes
Forest Health and Fire Resiliency Projects in the Coastal Zone
Program Area
Coastal Zone Boundary
Monterey County
City Limits
FHSZ in SRA
Very High
High
Moderate
N
0 0.25 0.5 1 1.5 2
Miles
Date Created: 09/26/2022
Source: State of California and the Department of Forestry and Fire Protection
Note: The Program Area depicts the total area where eligible activities in the Coastal Zone could occur. It does not indicate that activities will occur across the entirety of the Program Area.
Del Monte Forest LCP
Carmel Area LCP
Big Sur LCP
Pacific Grove
Acres
Asilomar
Pacific Grove
PRESIDIO OF MONTEREY
Del Monte Forest
Pebble Beach
Carmel-by-the-Sea
Carmel Highlands
RCDMC
RESOURCE CONSERVATION DISTRICT OF MONTEREY COUNTY


Resource Conservation District
of Monterey County
Public Works Plan: Wildfire Severity
Hazard Classes
Forest Health and Fire Resiliency Projects
in the Coastal Zone
Program Area
Coastal Zone Boundary
Monterey County
City Limits
FHSZ in SRA
Very High
High
Moderate
N
0 0.63 1.25 2.5 3.75 5
Miles
Date Created: 09/26/2022
Source: State of California and the Department
of Forestry and Fire Protection
Note: The Program Area depicts the total area
where eligible activities in the Coastal Zone
could occur. It does not indicate that
activities will occur across the entirety
of the Program Area.
Big Sur LCP
Big Sur
Posts
RCDMC
RESOURCE CONSERVATION DISTRICT OF MONTEREY COUNTY


Resource Conservation District
of Monterey County
Public Works Plan: Wildfire Severity
Hazard Classes
Forest Health and Fire Resiliency Projects
in the Coastal Zone
Program Area
Coastal Zone Boundary
Monterey County
City Limits
FHSZ in SRA
Very High
High
Moderate
N
0 0.75 1.5 3 4.5 6
Miles
Date Created: 09/26/2022
Source: State of California and the Department of Forestry and Fire Protection
Note: The Program Area depicts the total area where eligible activities in the Coastal Zone could occur. It does not indicate that activities will occur across the entirety of the Program Area.
Tassajara Hot Springs
Lucia
Big Sur LCP
FORT HUNTER LIGGETT
Plaskett
Gorda
FORT HUNTER LIGGETT
RCDMC
RESOURCE CONSERVATION DISTRICT OF MONTEREY COUNTY


Resource Conservation District
of Monterey County
Public Works Plan: Treatable Landscapes
Forest Health and Fire Resiliency Projects
in the Coastal Zone
Program Area
Coastal Zone Boundary
City Limits
Monterey County
Treatable Landscapes
N
0 0.5 1 2 3 4
Miles
Date Created: 11/17/2022
Source: State of California and the Department of Forestry and Fire Protection
Note: The Program Area depicts the total area where eligible activities in the Coastal Zone could occur. It does not indicate that activities will occur across the entirety of the Program Area.
North County LCP
Amesti
Interlaken
Freedom
Watsonville
Las Lomas
Elkhorn
Moss Landing
Prunedale
Castroville
Gabilan Acres
Bolsa Knolls
Natividad
Neponset
Santa Rita
Boronda
Alisal
RCDMC
RESOURCE CONSERVATION DISTRICT OF MONTEREY COUNTY


Resource Conservation District
of Monterey County
Public Works Plan: Treatable Landscapes
Forest Health and Fire Resiliency Projects
in the Coastal Zone
Program Area
Coastal Zone Boundary
City Limits
Monterey County
Treatable Landscapes
N
0 0.25 0.5 1 1.5 2
Miles
Date Created: 11/17/2022
Source: State of California and the Department of Forestry and Fire Protection
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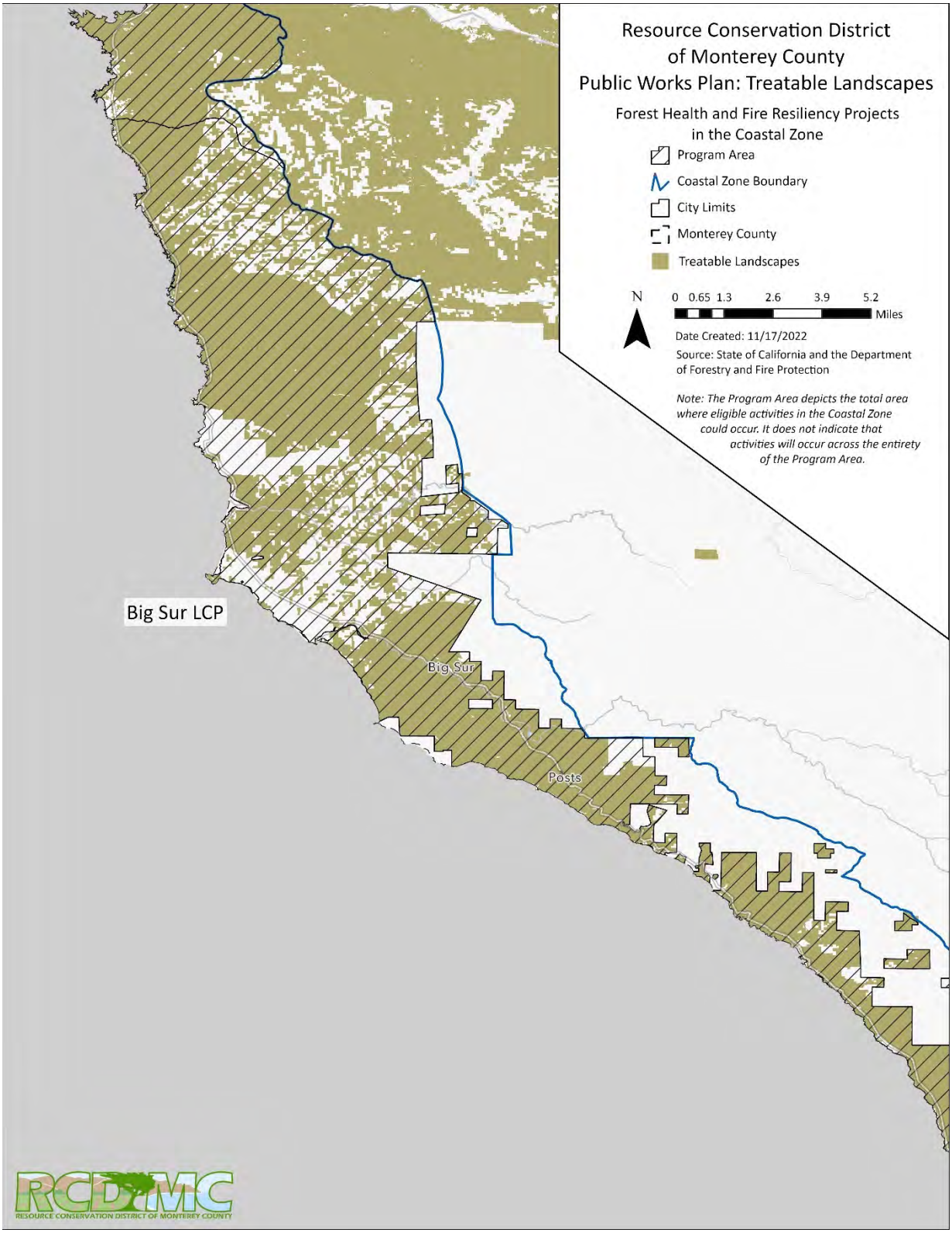
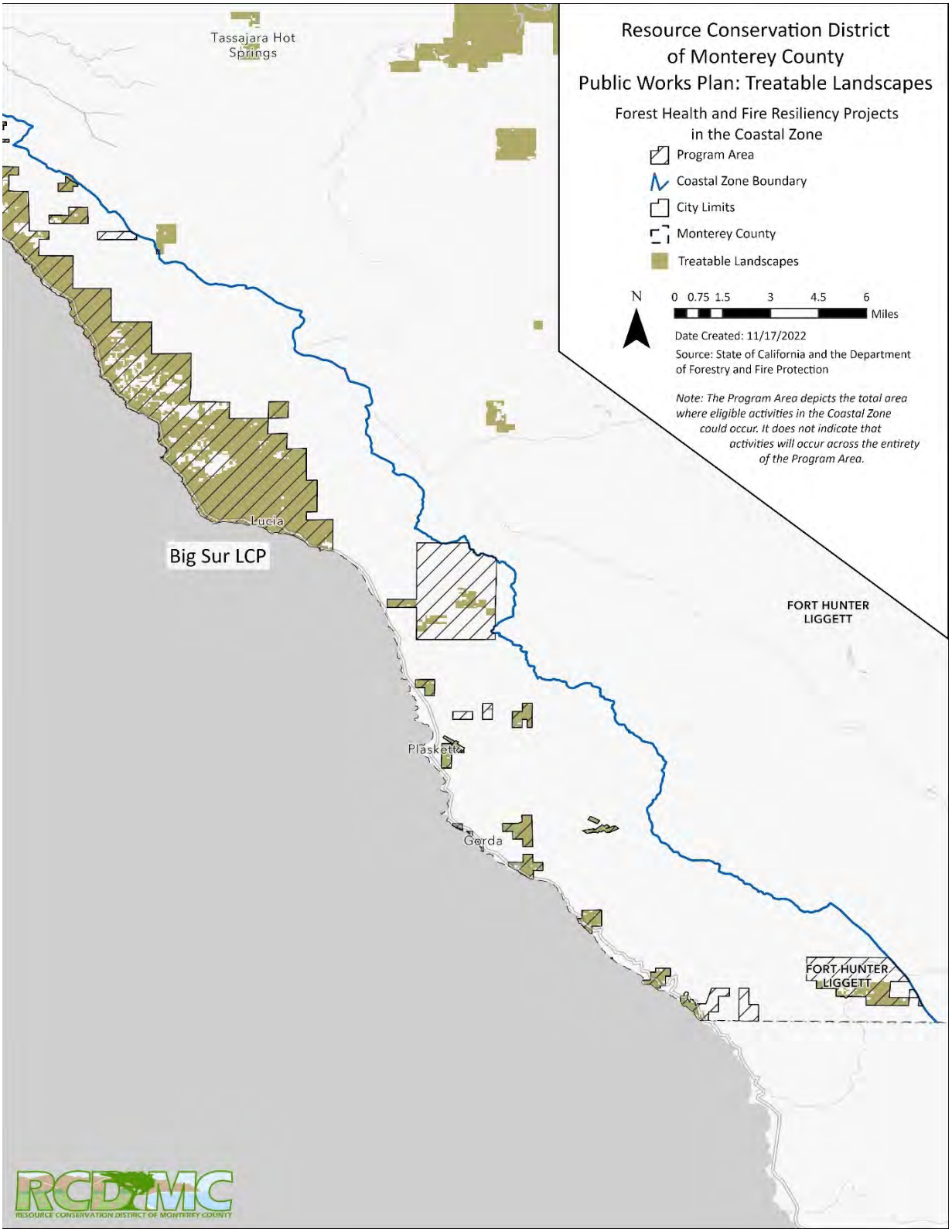
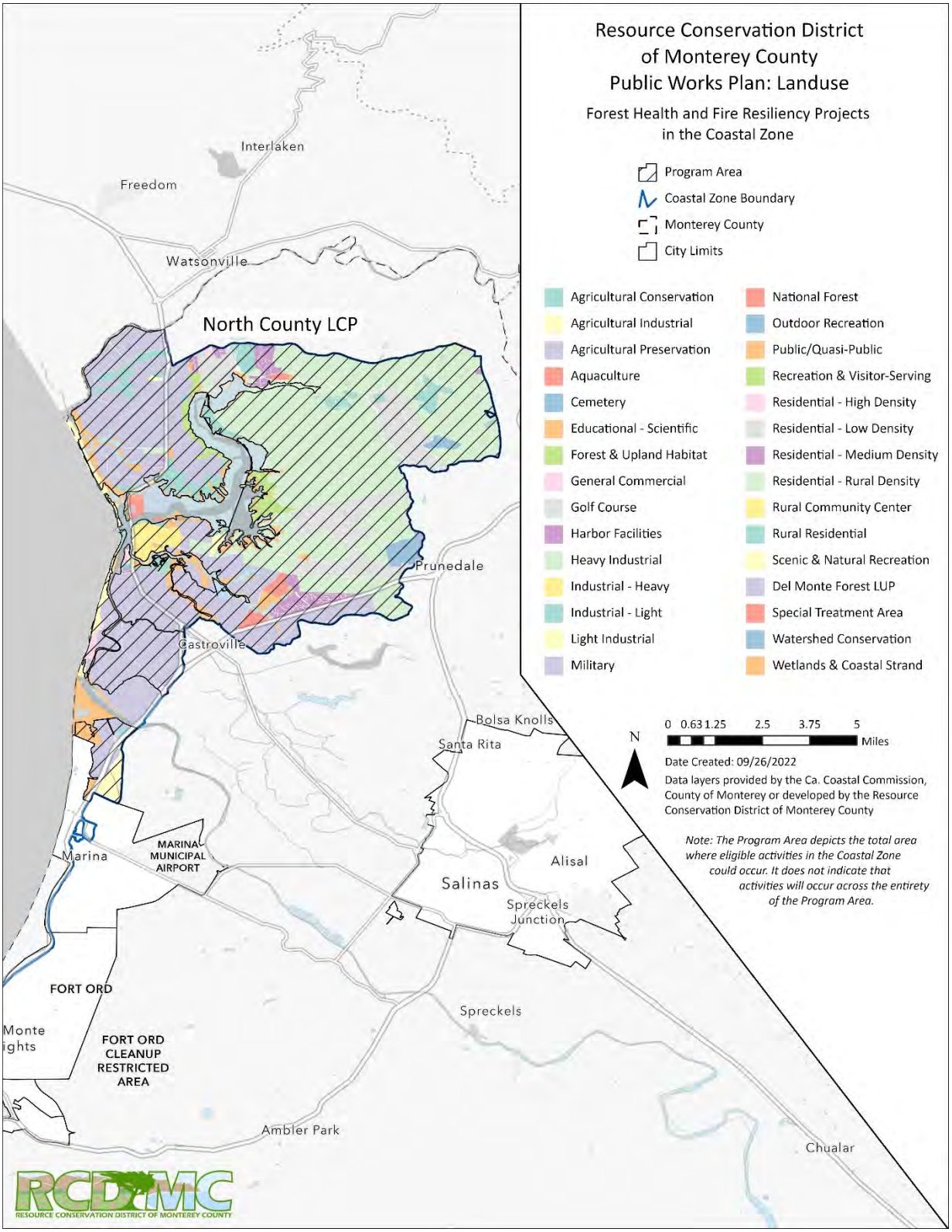
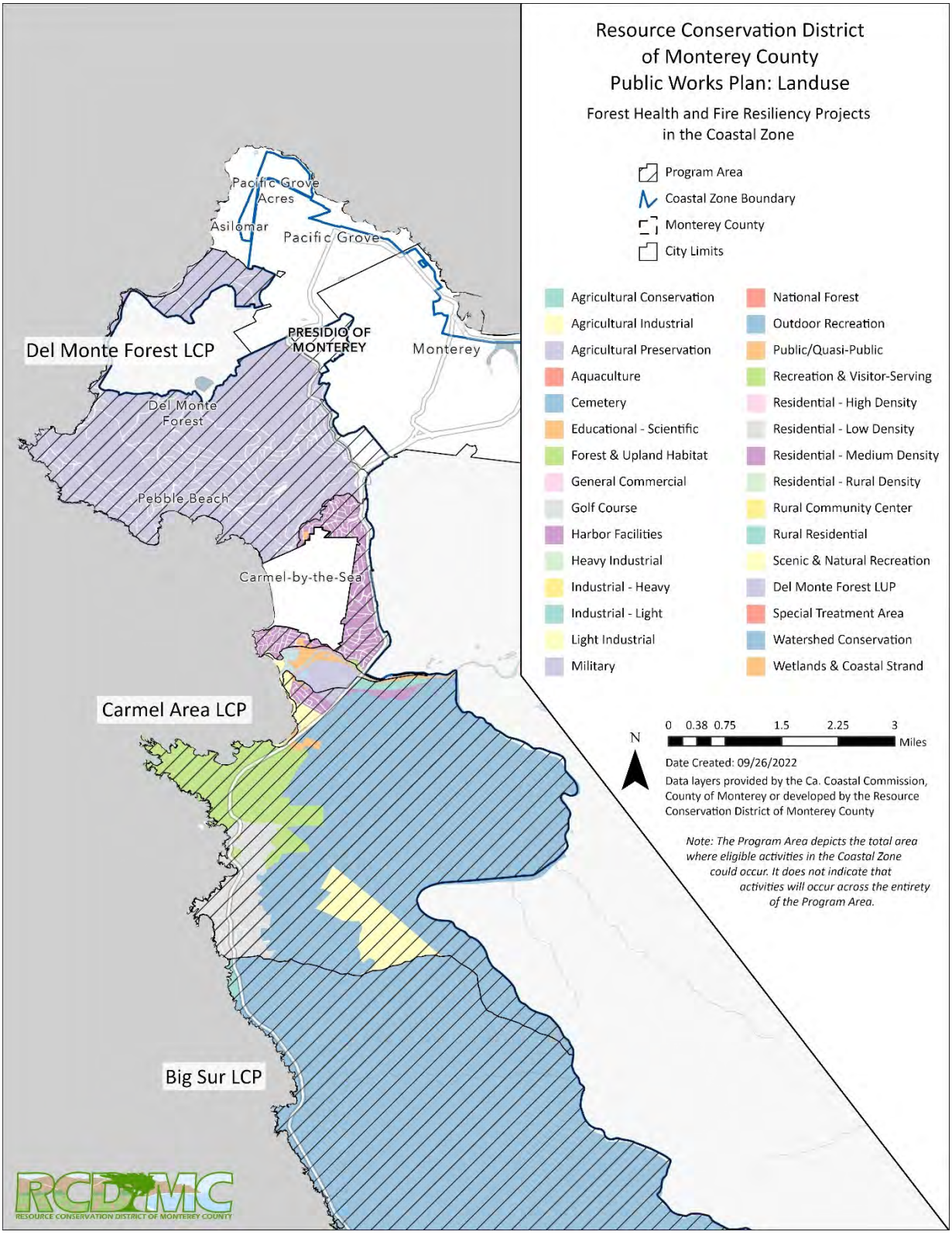
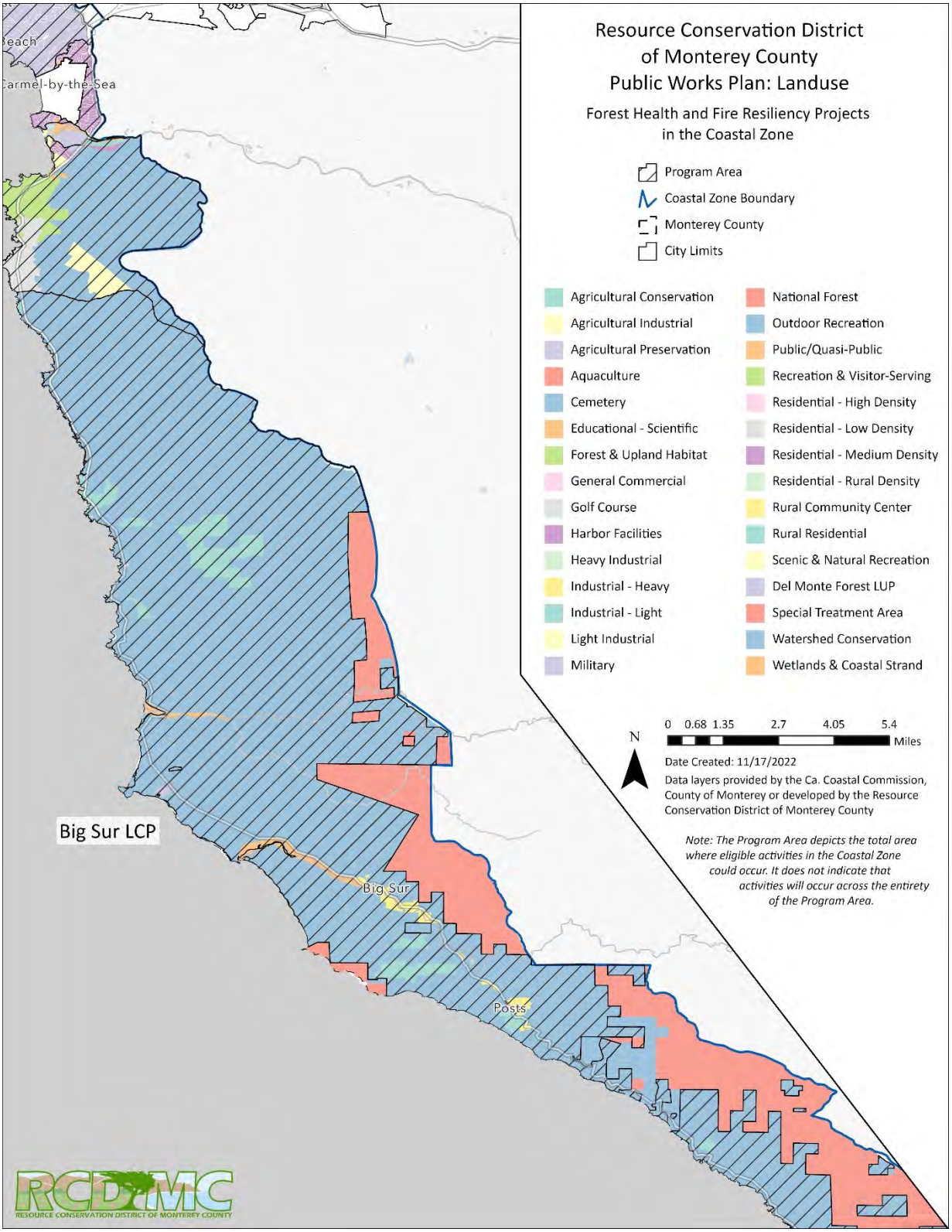
Pacific Grove Acres
Asilomar
Pacific Grove
PRESIDIO OF MONTEREY
Del Monte Forest LCP
Del Monte Forest
Pebble Beach
Carmel-by-the-Sea
Carmel Area LCP
Big Sur LCP
RCDMC
RESOURCE CONSERVATION DISTRICT OF MONTEREY COUNTY


Resource Conservation District
of Monterey County
Public Works Plan: Treatable Landscapes
Forest Health and Fire Resiliency Projects
in the Coastal Zone
Program Area
Coastal Zone Boundary
City Limits
Monterey County
Treatable Landscapes
N
0 0.65 1.3 2.6 3.9 5.2
Miles
Date Created: 11/17/2022
Source: State of California and the Department of Forestry and Fire Protection
Note: The Program Area depicts the total area where eligible activities in the Coastal Zone could occur. It does not indicate that activities will occur across the entirety of the Program Area.
Big Sur LCP
Big Sur
Posts
RCDMC
RESOURCE CONSERVATION DISTRICT OF MONTEREY COUNTY


Resource Conservation District
of Monterey County
Public Works Plan: Treatable Landscapes
Forest Health and Fire Resiliency Projects
in the Coastal Zone
Program Area
Coastal Zone Boundary
City Limits
Monterey County
Treatable Landscapes
N
0 0.75 1.5 3 4.5 6
Miles
Date Created: 11/17/2022
Source: State of California and the Department of Forestry and Fire Protection
Note: The Program Area depicts the total area where eligible activities in the Coastal Zone could occur. It does not indicate that activities will occur across the entirety of the Program Area.
Tassajara Hot Springs
Lucia
Big Sur LCP
FORT HUNTER LIGGETT
Plaskett
Gorda
FORT HUNTER LIGGETT
RCDMC
RESOURCE CONSERVATION DISTRICT OF MONTEREY COUNTY


Resource Conservation District
of Monterey County
Public Works Plan: Landuse
Forest Health and Fire Resiliency Projects
in the Coastal Zone
Program Area
Coastal Zone Boundary
Monterey County
City Limits
Agricultural Conservation
Agricultural Industrial
Agricultural Preservation
Aquaculture
Cemetery
Educational - Scientific
Forest & Upland Habitat
General Commercial
Golf Course
Harbor Facilities
Heavy Industrial
Industrial - Heavy
Industrial - Light
Light Industrial
Military
National Forest
Outdoor Recreation
Public/Quasi-Public
Recreation & Visitor-Serving
Residential - High Density
Residential - Low Density
Residential - Medium Density
Residential - Rural Density
Rural Community Center
Rural Residential
Scenic & Natural Recreation
Del Monte Forest LUP
Special Treatment Area
Watershed Conservation
Wetlands & Coastal Strand
0 0.63 1.25 2.5 3.75 5
Miles
N
Date Created: 09/26/2022
Data layers provided by the Ca. Coastal Commission, County of Monterey or developed by the Resource Conservation District of Monterey County
Note: The Program Area depicts the total area where eligible activities in the Coastal Zone could occur. It does not indicate that activities will occur across the entirety of the Program Area.
Interlaken
Freedom
Watsonville
North County LCP
Prunedale
Castroville
Bolsa Knolls
Santa Rita
Marina
MARINA MUNICIPAL AIRPORT
Alisal
Salinas
Spreckels Junction
FORT ORD
FORT ORD CLEANUP RESTRICTED AREA
Spreckels
Ambler Park
Chualar
RCDMC
RESOURCE CONSERVATION DISTRICT OF MONTEREY COUNTY


Resource Conservation District
of Monterey County
Public Works Plan: Landuse
Forest Health and Fire Resiliency Projects
in the Coastal Zone
Program Area
Coastal Zone Boundary
Monterey County
City Limits
Agricultural Conservation
Agricultural Industrial
Agricultural Preservation
Aquaculture
Cemetery
Educational - Scientific
Forest & Upland Habitat
General Commercial
Golf Course
Harbor Facilities
Heavy Industrial
Industrial - Heavy
Industrial - Light
Light Industrial
Military
National Forest
Outdoor Recreation
Public/Quasi-Public
Recreation & Visitor-Serving
Residential - High Density
Residential - Low Density
Residential - Medium Density
Residential - Rural Density
Rural Community Center
Rural Residential
Scenic & Natural Recreation
Del Monte Forest LUP
Special Treatment Area
Watershed Conservation
Wetlands & Coastal Strand
N
0 0.38 0.75 1.5 2.25 3
Miles
Date Created: 09/26/2022
Data layers provided by the Ca. Coastal Commission, County of Monterey or developed by the Resource Conservation District of Monterey County
Note: The Program Area depicts the total area where eligible activities in the Coastal Zone could occur. It does not indicate that activities will occur across the entirety of the Program Area.
Pacific Grove Acres
Asilomar
Pacific Grove
PRESIDIO OF MONTEREY
Monterey
Del Monte Forest LCP
Del Monte Forest
Pebble Beach
Carmel-by-the-Sea
Carmel Area LCP
Big Sur LCP
RCDMC
RESOURCE CONSERVATION DISTRICT OF MONTEREY COUNTY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Residential - Medium Density
Residential - Rural Density
Rural Community Center
Rural Residential
Scenic & Natural Recreation
Del Monte Forest LUP
Special Treatment Area
Watershed Conservation
Wetlands & Coastal Strand
0 0.68 1.35 2.7 4.05 5.4
Miles
N
Date Created: 11/17/2022
Data layers provided by the Ca. Coastal Commission, County of Monterey or developed by the Resource Conservation District of Monterey County
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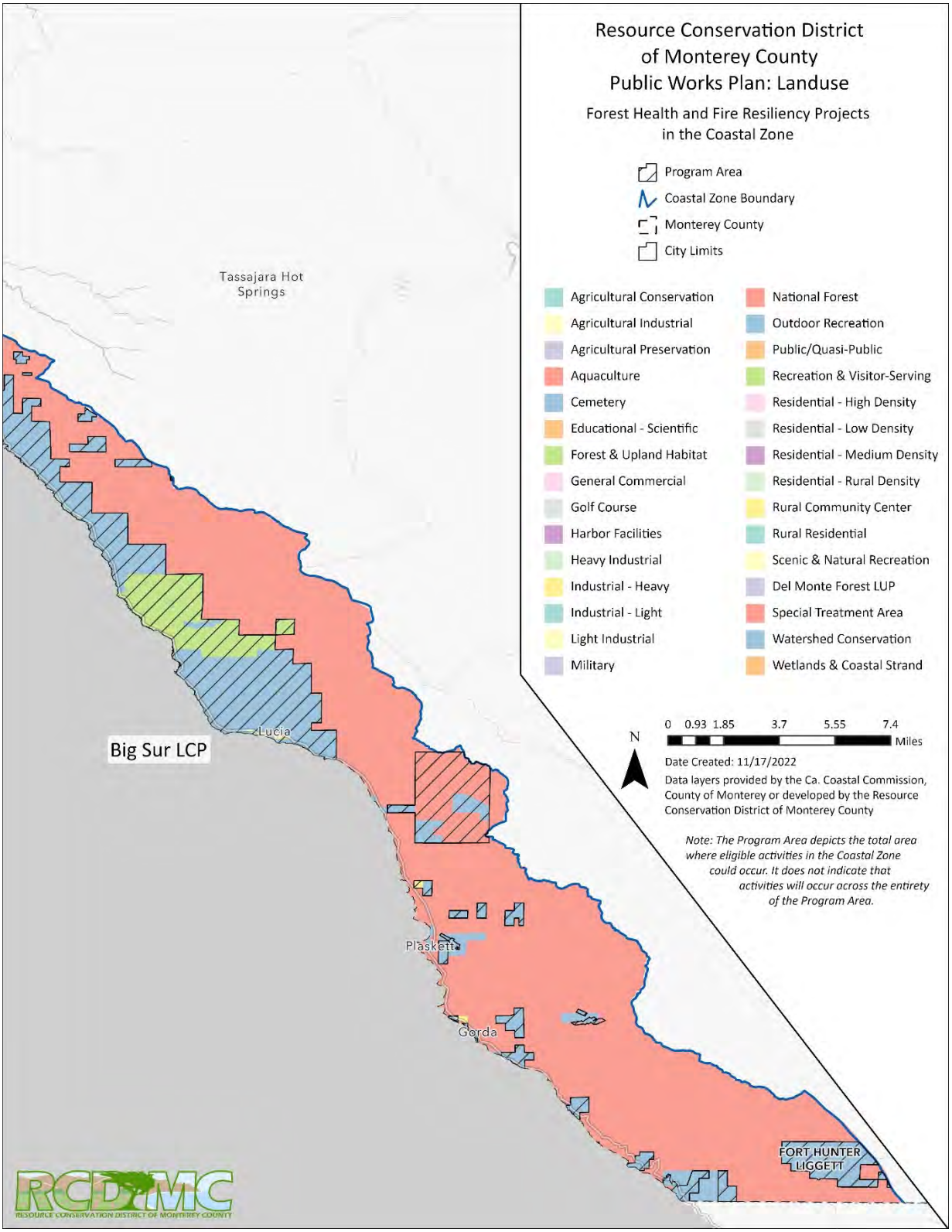
Big Sur LCP
Big Sur
Posts
RCDMC
RESOURCE CONSERVATION DISTRICT OF MONTEREY COUNTY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Del Monte Forest LUP
Special Treatment Area
Watershed Conservation
Wetlands & Coastal Strand
Tassajara Hot Springs
Big Sur LCP
Lucia
Plaskett
Gorda
FORT HUNTER LIGGETT
N
0 0.93 1.85 3.7 5.55 7.4
Miles
Date Created: 11/17/2022
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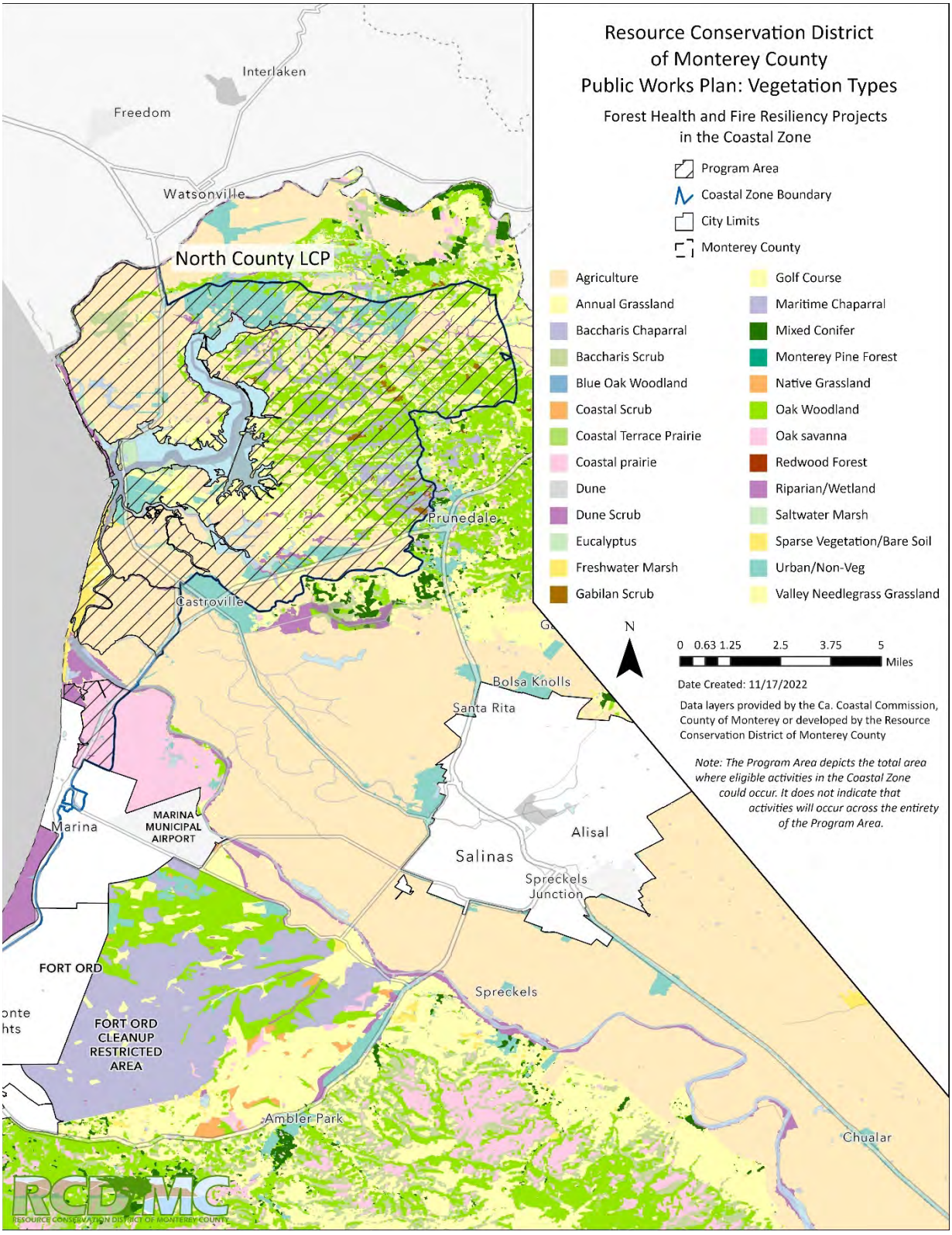
Resource Conservation District
of Monterey County
Public Works Plan: Vegetation Types
Forest Health and Fire Resiliency Projects
in the Coastal Zone
Program Area
Coastal Zone Boundary
City Limits
Monterey County
Agriculture
Annual Grassland
Baccharis Chaparral
Baccharis Scrub
Blue Oak Woodland
Coastal Scrub
Coastal Terrace Prairie
Coastal prairie
Dune
Dune Scrub
Eucalyptus
Freshwater Marsh
Gabilan Scrub
Golf Course
Maritime Chaparral
Mixed Conifer
Monterey Pine Forest
Native Grassland
Oak Woodland
Oak savanna
Redwood Forest
Riparian/Wetland
Saltwater Marsh
Sparse Vegetation/Bare Soil
Urban/Non-Veg
Valley Needlegrass Grassland
N
0 0.63 1.25 2.5 3.75 5
Miles
Date Created: 11/17/2022
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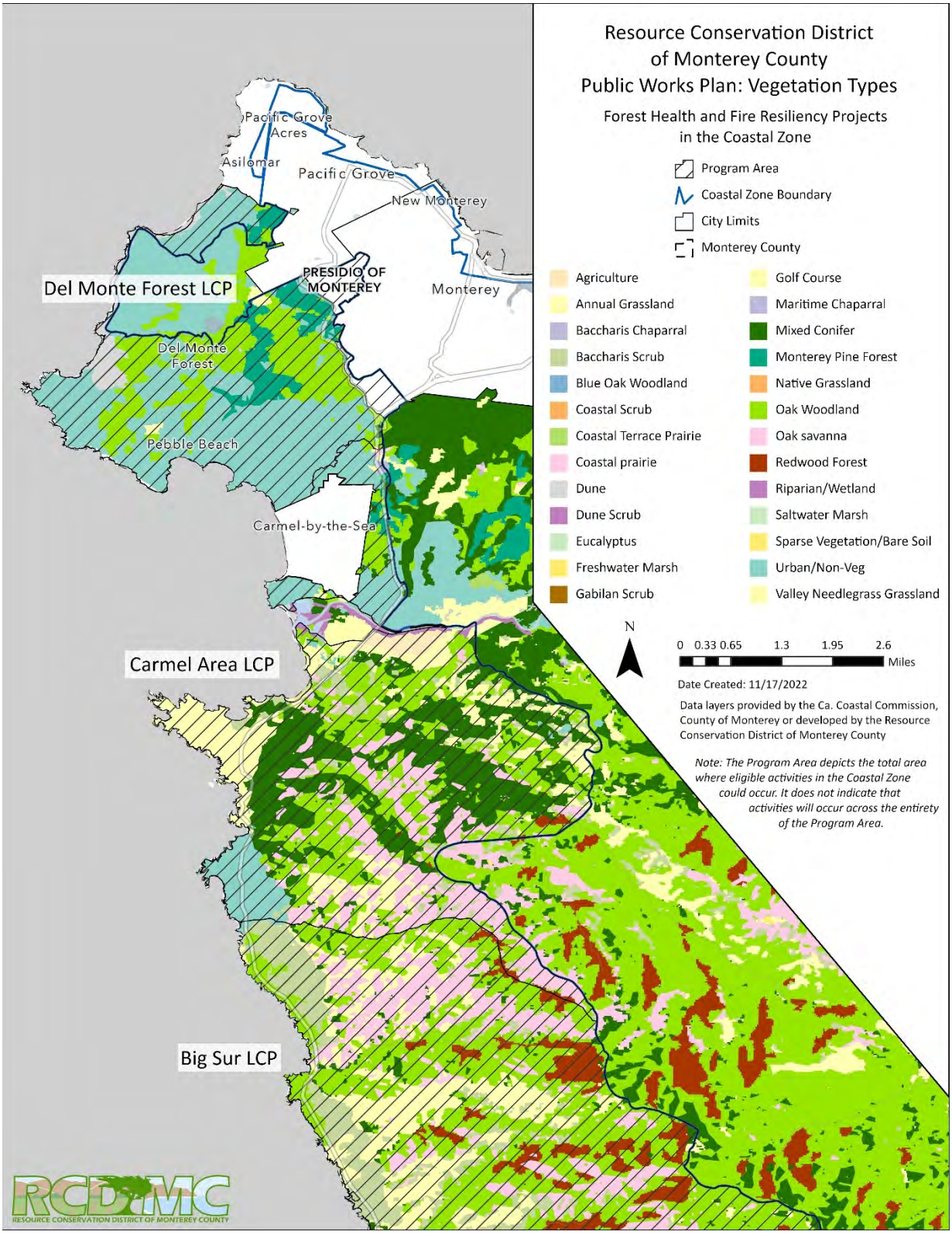
Interlaken
Freedom
Watsonville
North County LCP
Prunedale
Castroville
Bolsa Knolls
Santa Rita
Marina
MARINA MUNICIPAL AIRPORT
Alisal
Salinas
Spreckels Junction
FORT ORD
FORT ORD CLEANUP RESTRICTED AREA
Spreckels
Ambler Park
Chualar
RCD-MC
RESOURCE CONSERVATION DISTRICT OF MONTEREY COUNTY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Coastal prairie
Dune
Dune Scrub
Eucalyptus
Freshwater Marsh
Gabilan Scrub
Golf Course
Maritime Chaparral
Mixed Conifer
Monterey Pine Forest
Native Grassland
Oak Woodland
Oak savanna
Redwood Forest
Riparian/Wetland
Saltwater Marsh
Sparse Vegetation/Bare Soil
Urban/Non-Veg
Valley Needlegrass Grassland
N
0 0.33 0.65 1.3 1.95 2.6
Miles
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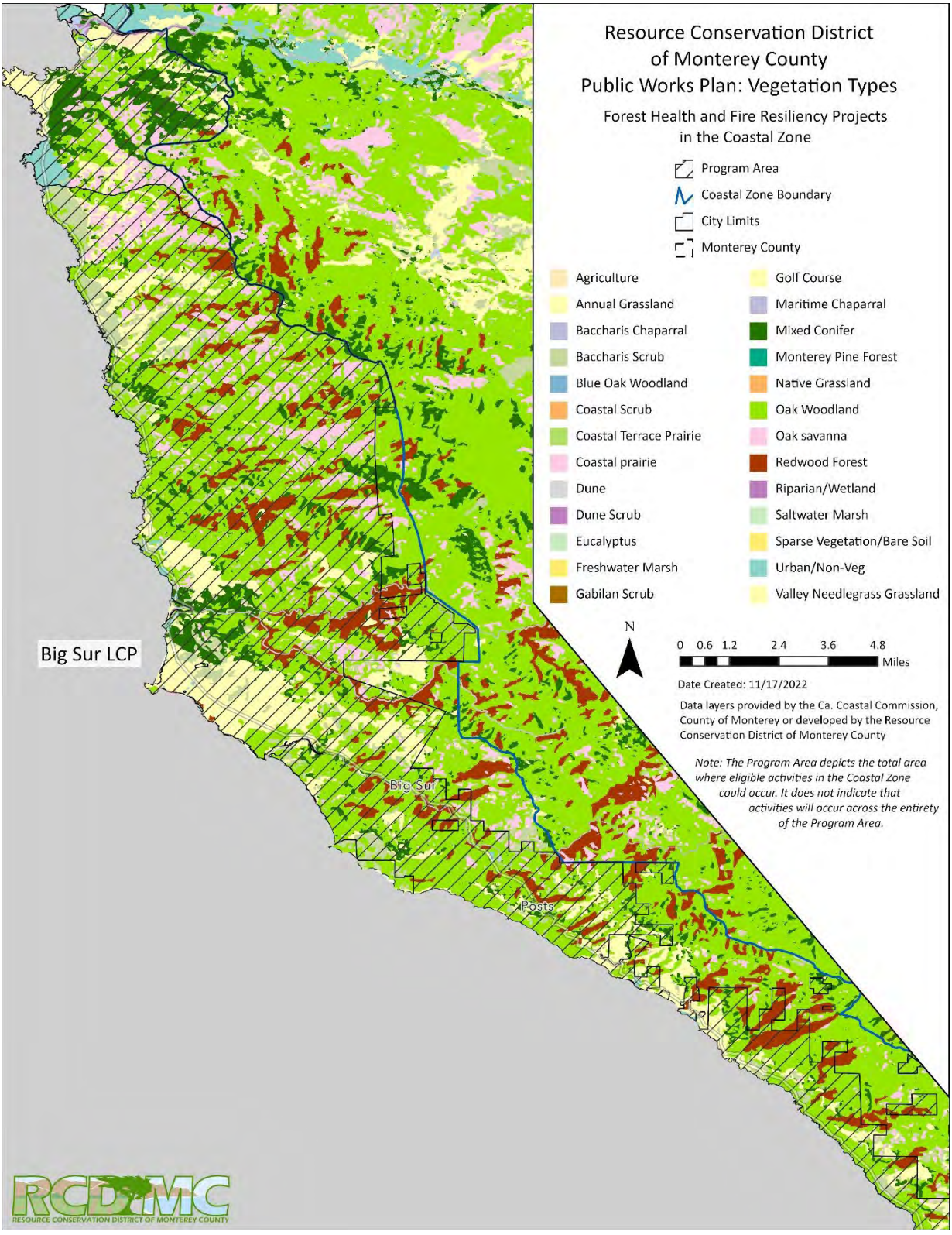
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Golf Course
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Mixed Conifer
Monterey Pine Forest
Native Grassland
Oak Woodland
Oak savanna
Redwood Forest
Riparian/Wetland
Saltwater Marsh
Sparse Vegetation/Bare Soil
Urban/Non-Veg
Valley Needlegrass Grassland
N
0 0.6 1.2 2.4 3.6 4.8
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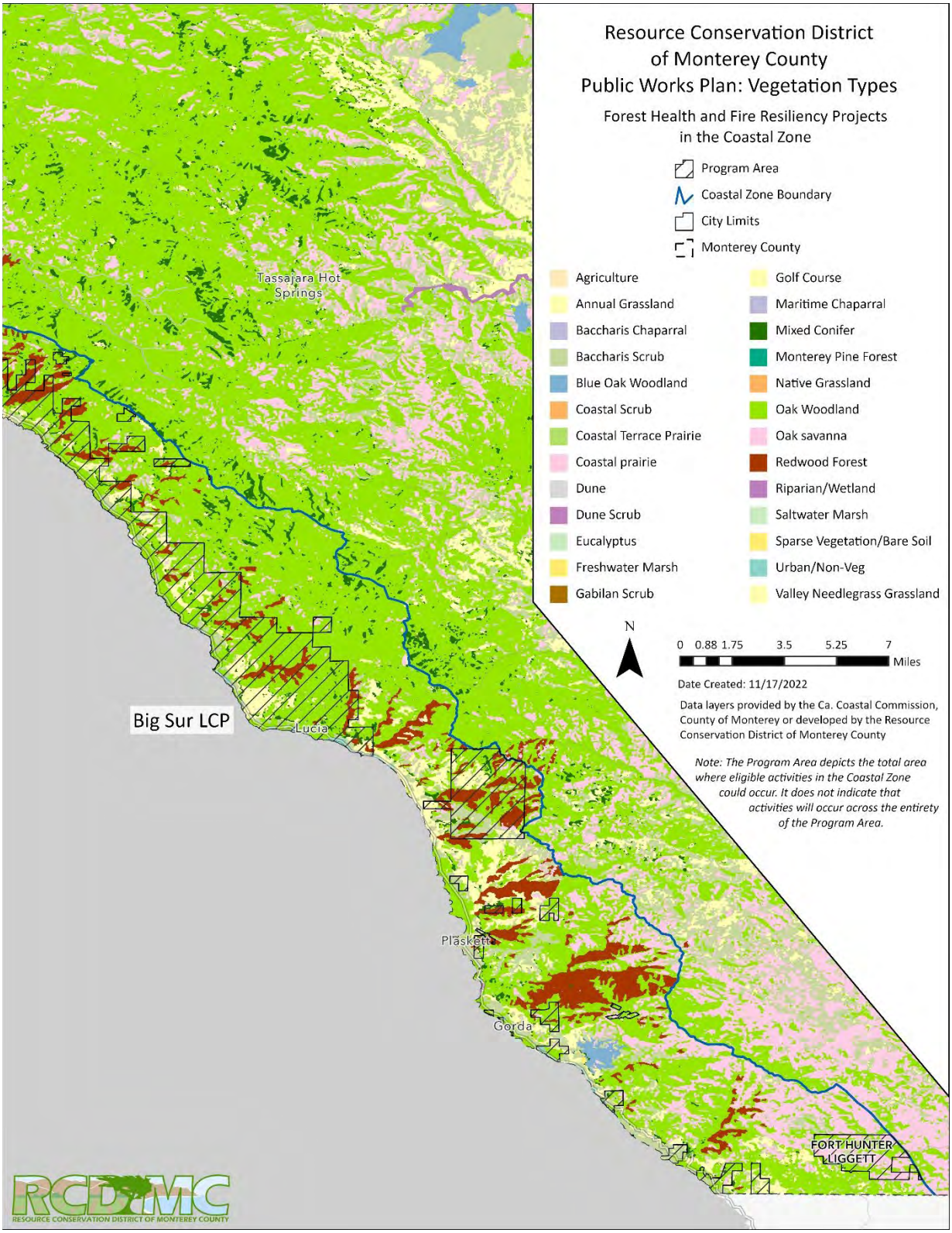
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N
0 0.88 1.75 3.5 5.25 7
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