ALILA VENTANA BIG SUR FUELS TREATMENT PROJECT SPECIFIC ANALYSIS

Prepared for:

RESOURCE CONSERVATION DISTRICT OF MONTEREY COUNTY

Prepared by:

January 21, 2025
Final Report

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LIST OF ABBREVIATIONS

AB	Assembly Bill
AVBS	Alila Ventana Big Sur
APN	Assessor's Parcel Number
BOF	California Board of Forestry and Fire Protection
BSVFB	Big Sur Volunteer Fire Brigade
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
Cal/VTP	California Vegetation Treatment Program (California State Board of Forestry)
CalVTP PEIR	The programmatic environmental impact report developed for the Cal/VTP
CVTS	Coastal Vegetation Treatment Standards
CCC	California Coastal Commission
CCR	California Code of Regulations

CCZ	California Coastal Zone
CDF&W	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFPR	California Forest Practice Rules
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
EDL	Electrical Distribution Line
ESHA	Environmentally Sensitive Habitat Area
FIZ	Fall-in Zone
FRAP	Fire and Resources Assessment Program
FT	Fuel Type
FPR	California Forest Practice Rules
G&O	Goals and Objectives
GSEI	Google Earth Satellite Imagery
JOW	Jurisdictional Oak Woodlands
LRA	Local Responsibility Area
MM	Mitigation Measures, as described in the VTP PEIR
MTV	Micro-Topographic Variations
MU	Management Unit
NEPA	National Environmental Policy Act
OSFM	Office of the State Fire Marshal (California)
OWCA	Oak Woodland Conservation Act (California)
PEIR	Programmatic Environmental Impact Report
PG&E	Pacific Gas and Electric Company
PWP	Public Works Plan (Resource Conservation Districts)
PRC	Public Resources Code
PSA	Project Specific Analysis
PTA	AVBS Project Treatment Area
PWP	Public Works Program
RCDMC	Resource Conservation District of Monterey County
RPF	California Registered Professional Forester
SFB	Shaded Fuel Break
SMS	Special Management Situations
SOD	Sudden Oak Death
SPR	Standard Project Requirements, as defined in the VTP PEIR
SR	State Route (highway designation)
SRA	State Responsibility Area

TA	Treatment Activities
TT	Treatment Types
TSS	TSS Consultants, Inc.
USDA	United States Department of Agriculture
USDA/FS	United States Department of Agriculture/Forest Service
USDI	United State Department of the Interior
USF&WS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VegCAMP	Vegetation Classification and Mapping Program (CDF&W)
VMRx	Vegetation Management Prescription
WH	Wildfire Hazard
WLPZ	Watercourse and Lake Protection Zone (California Forest Practice Rules)
WUI	Wildland/Urban Interface zone

GLOSSARY

All terms included in the following list are to be interpreted solely within the context of their meaning in this specific study. The definitions are not to be applied to any other situations that are not directly related to the analysis completed herein.

Alliance – A category of vegetation classification which describes repeating patterns of plants across a landscape. Each alliance is defined by plant species composition, and reflects the effects of local climate, soil, water, disturbance, and other environmental factors.

Associations – Unique combinations of plant species, usually identified by a name-sake dominant species, and/or a small number of co-dominant species, and a consistently recurring mixture of other species.

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.

Catastrophic wildfire events – A wildfire event that results in complete, or near complete, destruction of feature or conditions that previously occupied the surface over which the event occurred.

Crown Base Height – the height, above the surface of the ground, which defines the bottom of the leafy crown.

Desirable species – Species of plants whose treatment within the prescribed management described herein fulfills both the applicant's goals and objectives pertaining to increased protection from adverse wildfire impacts and improving the ecological condition and functioning of the subject plant and animal species involved.

Defensible Space – A zone around habitable structures located in a wildland setting in which vegetation management is employed to lessen the risk that an un-controlled wildfire can make contact with the structures. The requirement for creating this zone and implementing the necessary vegetation management is found in California Public Resources Code (PRC) Section 4291.

Desktop-Level Analysis – An analysis that typically depends on review and analysis of existing, and available, literature and databases. What is generally not involved is collecting, primarily through the process of conducting field surveys, and analyzing original data.

Disturbance – Results of actions taken, in this case, those associated with the original development of the Resort and it ongoing groundskeeping management, which include changes in the ecological nature and functioning within the AVBS PTA.

Ecological Functioning – The processes associated with 1) the initial occupation of a site by plant or animal species (or groups thereof), 2) completion of maturation cycles, and 3) continuing occupation of the site through a period characterized by the demise of individuals of the occupying species that are determined by non-management determined environmental influences (a.k.a. natural succession).

Ecosystem Restoration – Changes in the setting elements that indicate a movement toward more of a "natural succession" degree of ecological functioning that result from implementing intended management actions.

Fairy Rings – A circular arrangement of coast redwood trees that originated from the peripheral stump sprouts of an extremely large individual that has been either removed during past logging operations or fallen due to natural causes.

Floristics – A branch of phytogeography that deals with plants and plant groups from the numerical standpoint.

Fuel Bed Continuity – A measure of the spacing between flammable elements in vegetation formations. A high level of continuity indicates that the flammable elements are actually touching or where there are very little distances and element-to-element ignition is rapid. This measure applies to fuels in either horizontal or vertical arrangements.

Fuels-Related Vegetation – Vegetation material that is available for consumption during a wildfire event.

Hazard Tree – A tree that has been examined by a qualified individual (California Registered Professional Forester or Professional Arborist) and found to pose a risk of injury or death to people, or destruction of property, in its vicinity due to its health, general condition, and location.

Hydric Soils - A hydric soil is typically defined as a soil that has formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part.

Jurisdictional Oak Woodlands – A special status oak tree community as defined in Sections 1360-1372 of the California Oak Woodlands Conservation Act and Section 21083.4 of the California Environmental quality Act Guidelines.

Jurisdictional Wetlands – As defined in statutes, regulations, or official policy.

Lop and Scatter – An in-place process of reducing forest waste material by cutting large pieces into prescribed lengths and distributing them in a manner to not create an excessively thick surface fuel bed.

Manage Against – Initial management designed to decrease the presence and functional influence of an individual species in a unit of vegetation.

Manage For – Initial management designed to increase the presence and functional influence of an individual species in a unit of vegetation.

Membership Rules – A set of descriptions establishing species composition threshold levels as they present themselves in the canopy of a vegetation formation.

Micro-Topographic Variations – Topographic features that have either an exaggerated concave or convex structure. These structures typically have slope values that are significantly higher than average slope around them.

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.

Mitigating Actions – Management actions taken to protect the nature and condition of resources considered to be of high value or sensitivity. The objective is to avoid altogether undesirable impacts or reduce the impacts to acceptable levels.

Namesake Species – Species identified by CNPS as the dominant, or principal co-dominants, of plant communities entitled “Alliances”.

Overstory Canopy – The upper stratum of a forest or woodland stand that is comprised of leaves, fine twigs, and moderately-sized branches. It occupies the space between a point that is referred to as the "crown base height" and the total height occupied by the crown materials.

Prescriptive – Generating action requiring statements that have performance standards using measures that are uninterpretable. For example in protecting riparian values SPR BIO-4 states that the proponent "will design treatments in riparian habitats to . . . retain at least 75 percent of the *overstory*". This is a measurable performance result and if not attained make the proponent out of compliance with the CalVTP PEIR. This type of action requiring statement is contrasted with subjective approaches.

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.

Protocol-level Surveys – Collection, and processing of, original field data using procedures prescribed by regulatory agencies for specifically defined resources.

Residual Cover – The vegetation cover that remains after a management treatment has been completed.

Sensitive Resources – This term will be used to specifically identify special status plant and animal and/or natural vegetation communities.

Shaded Fuel Break – A tract of land where there is an overstory of intermediate and dominant tree canopy, low quantities of "ladder fuels", and low-growing surface vegetation. The tree canopy has openings in it that are large enough to create fuel discontinuities and yet small enough to provide high relative time periods of full, or partial, shade at the ground level.

Site Quality Retention – Maintaining the ability of a tract to successfully support, over the long term, occupation by desirable vegetation species and communities. This involves primarily the conservation of soils resources, soil moisture conditions, and resistance to stand replacing events (wildfire, wind events, infection by pathogens, and infestation by insects).

Special Status Plant Species – Individual species of plants that have been designated as "Rare". "Threatened", "Endangered", Candidate for Listing, or "special interest" by federal or California State agencies, or rarity rankings assigned by officially recognized non-governmental organizations.

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 MMs consistent with Section 15126.4 of the State CEQA Guidelines.

Structure Hardening – The rendering the physical aspects of a structure to be more resilient to ignition and consummation in the event of its involvement in a wildfire. This added resilience is accomplished by employing specific design approaches and the use of fire-resistant building materials.

Subjective - Generating action requiring statements that have performance standards using measures that are determined in decision processes not entirely based on empirical evidence. A typical example of this process would be where empirical evidence would require an additional assessment based on professional judgment prior to making the decision.

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).

Upland (Vegetation) Type – A vegetation type that is not associated with riparian or wetland influences but is generally located on the upper two-thirds of the slope profile and ridgetops. The sites generally have more shallow, rapidly drained soils and a greater degree of exposure that can result in greater wind, temperature, and aridity stresses.

Watercourse Transition Line – The point that is usually defined at the top of a watercourse's bank structure; it is the break point between the bank system and the more gently sloping terrace formation.

Wildfire Hazard – Similar to the flood zone maps generated by the Federal Emergency Management Agency (FEMA), the California Fire Hazard Severity Zone (FHSZ) identifies where lands are described in terms of the probability that they will be involved in a wildfire event, and not specifically prescriptive of impacts. "Hazard" is based on the physical conditions that create a likelihood and expected fire behavior without considering mitigation measures such as home hardening, recent wildfire, or fuel reduction efforts.

Wildfire Risk – Risk is the potential damage a fire can do to the area under existing conditions, accounting for any modifications such as fuel reduction projects, defensible space, and ignition resistant building construction.

Wildland/Urban Interface (WUI) **–** The WUI is the zone of transition between unoccupied wildland and human development. It is the line, area or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels.

ALILA VENTANA BIG SUR FUELS TREATMENT PROJECT

PROJECT SPECIFIC ANALYSIS

CHAPTER 1 - INTRODUCTION

General Background

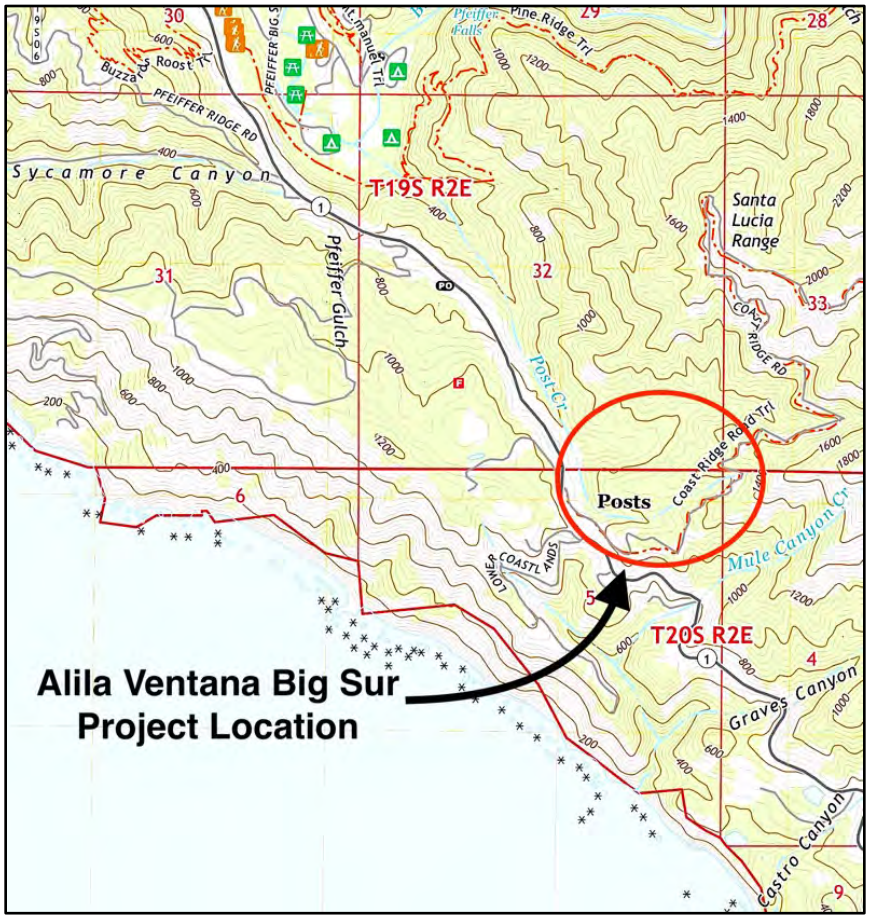
In 2021, Alila Ventana Big Sur (AVBS) retained TSS Consultants to prepare a Fire Mitigation Assessment report for their resort located at 48123 Highway One, in Big Sur. The assessment included detailed strategies and actions for protecting the AVBS resort (Resort) from wildfire impacts, including vegetation management actions designed to guide the installation of ***shaded fuelbreak*** conditions in strategic locations. Subsequently, the AVBS management became aware of the Monterey County Forest Health and Fire Resilience Public Works Plan (PWP), administered by the Resource Conservation District of Monterey County (RCDMC). The PWP is a companion to the Board of Forestry's California Vegetation Treatment Program (CalVTP) Programmatic Environmental Impact Report (PEIR). This Project Specific Analysis (PSA) demonstrates how the project will adhere to both the Standard Project Requirements (SPRs) and Mitigation Measures (MMs) of the CalVTP PEIR in compliance with the California Environmental Quality Act (CEQA), as well as the Coastal Vegetation Treatment Standards (CVTS) of the Monterey County PWP for Coastal Act compliance. This Project Specific Analysis (PSA) is a key step towards securing regulatory approval to implement strategically located vegetation-related fuels treatments, thus mitigating the likelihood of wildfire hazard-related impacts to the AVBS resort and its environment setting.

Project Location

This project, hereinafter referred to as the Alila Ventana Big Sur ("AVBS") Fuels Treatment Project (Project) is sited just east of SR1 (Cabrillo Highway) on the lower elevations of the west-facing edge of the Santa Lucia Mountains. Specifically, the project is situated approximately 4.1 miles south of the main commercial center of the community of Big Sur, as shown, in Figure 1, on a portion of the United States Geological Survey's (USGS) Pfeffer Point Quadrangle[1]. It is situated in Monterey County with an approximate project center point at 36° 13' 42.35" N and 121° 45' 36.35" W.

[1] United States Geological Survey. 2021.

Figure 1. General location of the Ventana Big Sur Project



Alila Ventana Big Sur's Wildfire Planning Framework

The ***planning framework*** for this proposed project has two very important sets of goals and objectives (G&O). The first of these two is to manage subject situations, or specific resources, to fully comply with statutory, regulatory, and/or policy requirements. Two examples that are very pertinent for this application to the PWP program would be 1) in order to protect the natural, cultural, and social resource base there will be full compliance with the requirements set out in CEQA (and more specifically with the provisions of the CalVTP PEIR[2]), and 2) protect specific resources as illustrated by the need to establish *defensible space* around buildings and structures per California Public Resources Code (PRC) Section 4291 and electrical distribution line vegetation clearance standards set out in PRC Sections 4292 through 4296.

[2] California Department of Forestry and Fire Protection. December, 2019.

The second G&O set reflects AVBS ownership's intent to manage the lands in the Project Treatment Area (PTA) in support of the resort facility's functioning. This core set of G&Os forms an "umbrella" under which several themes are involved; each theme having its own subset that is comprised of more specific G&Os and management actions. The most important themes that are pertinent to the project proposed in AVBS' application include:

- Assuring a Proper Functional Setting - Provide all of the setting elements needed to support the effective, efficient, and sustainable operation of the resort's physical facilities and programs. Elements of the required setting would include a proper amount of space to function, access throughout the facility, and availability of resources;
- Protecting Lives, Health, and Welfare – Managing the resort facility so as to assure the lives, health, and welfare of the resort's visitors, staff, and emergency services providers (should they be needed) are protected to the greatest level possible;
- Conserving the Natural Resources Base – Maintaining the quality, to the greatest extent possible within the resort's functional requirements, of the ecological functioning and wildland experience has been a key ingredient in this resort attaining its world-renowned status. AVBS' ownership recognizes this aspect and is requiring consideration of the aesthetic qualities and ecological functioning when identifying management plans, and;
- Wildfire Hazard Reduction – One of the greatest threats to the resort facilities, programs, and environmental values is wildfire. Given the immediate proximity to the ignition source that Highway 1 represents the likelihood (hazard) of a wildfire event impacting the AVBS ownership, and the specifically defined PTA, is considered to be high. AVBS ownership believes the actions proposed in this PWP application, along with the SPRs and MMs required in the VTP PEIR, will address this theme and maintain a proper level of environmental conservation.

Alila Ventana Big Sur's (AVBS) management is putting forth this project proposal with the full knowledge that it is not typical of those usually considered within the current regulatory framework; with one notable exception. The elements of consideration listed above are typical when land uses, social values, and economics related to ***Wildland-Urban Interface*** (WUI) situations are in force. In these situations the most important actions to take, in order to conserve WUI values, are, 1) mitigating wildfire behavior, through appropriate fuels management, prior to it making contact with the infrastructure, is paramount and then, 2) assuring that infrastructure is as resistant to ignition as it can possibly be.

The Resort's ownership is also keenly aware of the role the vegetation resource plays in the Big Sur experience and expressed the desire to have the project design include vegetation management actions that 1) put immediately into place protections to avoid impacts from catastrophic wildfire events, and 2) lead over time to ***ecosystem restoration,*** forest health, and a return to ecological functioning pre-fire suppression, through management of invasive species and improved fire resilient vegetation cover. Through the implementation of these vegetation management approaches, specific practices, and the preparation of proper guidance instructions, the vegetation management

prescriptions (VMRx), that will be discussed in greater detail in the following sections in this PSA, can be used as a tool to implement the following restorative management objectives:

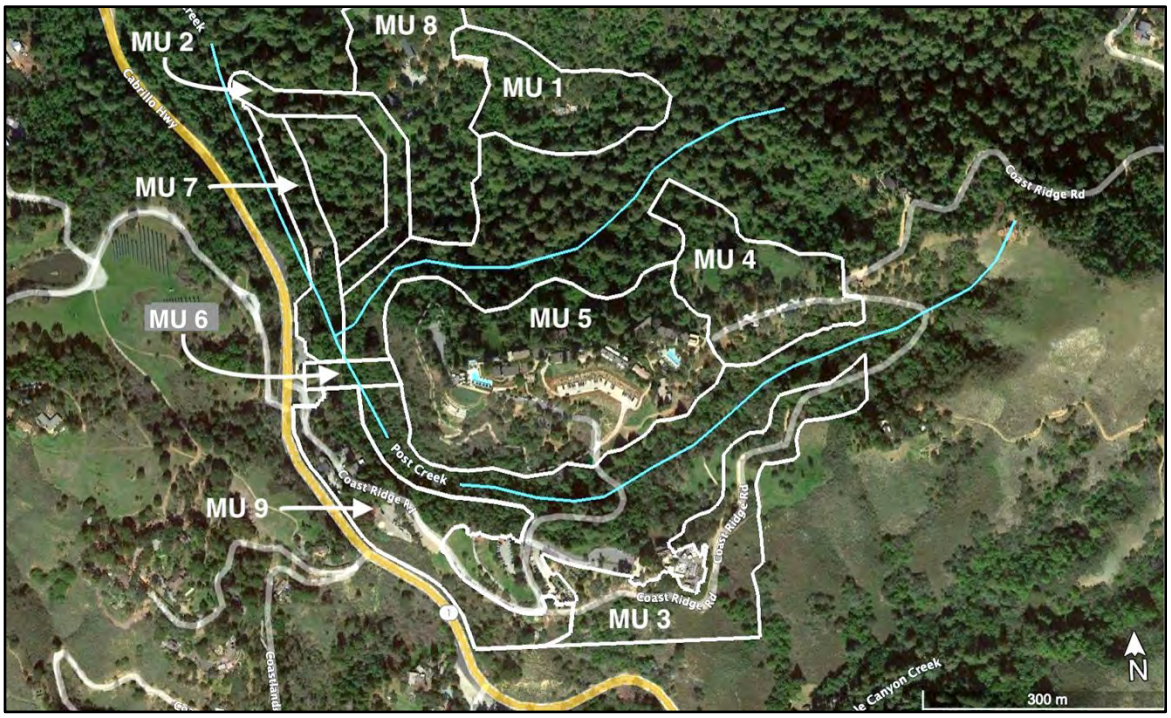
- Control species compositions to achieve desirable species diversity;
- Effect fuel reduction to achieve a higher resistance to stand-replacing wildfire events;
- Through species management, achieve greater control over pathogen and insect impact on the resort's vegetation, and;
- Through the actions of both the initial treatments and recurring maintenance operations, achieve more effective removal of invasive species.

This commonality of existing land uses and ecosystem protection needs is why AVBS' management has opted to use the WUI Fuel Reduction and Ecological Restoration as vegetation treatment types under the Public Works Plan (PWP). The RCD of Monterey County's PWP empowers the RCD to implement fuel reduction treatments with its partners in the Coastal Zone, and the RCD is working with TSS Consultants and AVBS to utilize the PWP programmatic permitting process. AVBS will contract with qualified and licensed vegetation management contractors to implement fuel treatment and ecosystem restoration activities. The RCD, as the project proponent, is responsible for overseeing the development of the Project Specific Analysis and PWP supporting documentation, as well as providing oversight to ensure that project implementation is consistent with PWP requirements and NOID conditions.

General Project Design

The applicant is proposing that vegetation treatments designed to mitigate wildfire hazard, i.e., the likelihood of occurrence, within a 62.09-acre tract hereinafter referred to as the AVBS Project Treatment Area (PTA). Based on an initial assessment of ground conditions, specific land uses, and the jurisdictional/regulatory requirements, the PTA has been broken down into nine individual management units (MU). The distribution of these MUs, indicated by the white boundary lines and MU number, is shown in Figure 2. This figure also shows the locations of two watercourses, Post Creek (a Class II watercourse) and an un-named Class III watercourse, indicated by the cyan-colored lines. The un-named Class III passes through a small portion of MU 7 and the associated wetland and riparian values will be protected by the establishment of a Watercourse and Lake Protection Zone (WLPZ). The establishment of the system of MU boundaries has intentionally excluded the course of the Class II Post Creek (with the exception of small distances within MUs 6 and 7). Greater detailed for the protection of this resource are provided in the section entitled "Addressing Expected Impacts Resulting from Project Implementation" in this PSA.

Figure 2. The Nine Management Units Comprising the Alila Ventana Big Sur Project Treatment Area



Project Setting

The following sections describe the elements of the setting within which this proposed project will take place. The described elements will include all those that have a direct influential relationship on wildfire behavior and associated hazard levels. The categories of setting elements that have been addressed include:

- Regional setting and surrounding land uses;
- Current level of disturbance
- Elements specific to the Project Treatment area
    - Physical elements
        - Topographic position and associated slopes
        - Soils
    - Biological elements
        - Special status animal and plant species
        - Special status plant communities
- Jurisdictional and regulatory setting
- Management constraints

Regional Setting and Surrounding Land Uses

The regional setting is primarily wildlands characterized by a mosaic of coast redwood forest, mixed hardwood woodlands, oak savannah, brush/scrub lands, and grasslands. In the areas surrounding the AVBS property, the principal land uses include resort facilities, tourism-related services, campgrounds, medium-to-large tract private ownerships, California state parks, national forest lands (Los Padres National Forest), and designated wilderness. Portions of the northern boundary of the AVBS ownership are shared with the Pfeiffer Big Sur State Park (Park), however, the central facility of the Park is at a distance 0.90 miles to the north and there is not a system of trails or roads that permits access from the Park to the AVBS property.

Current Level Disturbance in the Project Treatment Area

The actions associated with constructing and operating both the resort itself and the campground have resulted in a current, and expected long-term, very high level of **disturbance**. In this case the term "disturbance" refers to the degree of departure from states and functions considered to be the result of natural ecological processes. Over half of the AVBS PTA is currently in a highly disturbed condition and will be maintained in this condition for the foreseeable future, through 1) intentional management, and 2) obligatory compliance with applicable laws and regulations. Vegetation management actions, and any resulting associated disturbance causing movement away from regional natural ecological condition and functioning, in the above areas are dictated by need to 1) maintain the ongoing viability of the resort facility, 2) comply with applicable law and regulations, and 3) where resulting in adverse ecosystem impacts, employ appropriate mitigation measures.

Although the remaining half of the PTA is not under the full set of legal compliance requirements it will not be isolated from disturbing actions. There will be the ongoing disturbances associated with the operation of the resort and via a comprehensive series of trails the full PTA is open for guest use, either as individuals or group activities. Thus, it is reasonable to conclude that the PTA is subject to a range of disturbance.

Through the use of certain management approaches, specific practices, and the preparation of proper guidance instructions, the vegetation management prescriptions (VMRx) can be used as a tool to implement restorative management as follows:

- Control species compositions to achieve desirable species diversity;
- Effect fuel reduction to achieve a higher resistance to stand-replacing wildfire events;
- Through species management, achieve greater control over pathogen and insect impact on the resort's vegetation, and;
- Through the actions of both the initial treatments and recurring maintenance operations, realize more effective control over the removal of invasive species.

Current Land Uses Characterizing the Project Treatment Area

Within the Alila ownership 62.09 acres have been identified as being appropriate for implementing fuels-related wildfire hazard reduction management. The lands within this treatment area, referred to

as the Project Treatment Area (PTA), are characterized by very specialized land uses that affect wildfire-related mitigation planning and implementation efforts. Three dominant land uses have been identified and they are:

- Operation of the Alila Ventana Big Sur resort;
- Operation of the campground that is available for public use, and;
- Two 12 KV electrical distribution line (EDL) corridors (MUs 2 and 6 shown in Figure 2).

Opened in 1975 as the Ventana Inn, and in continuous operation since, the resort, now known as the Alila Ventana Big Sur Resort (AVBS), is an internationally recognized destination resort and a core element of the tourist services in the Big Sur community. The land uses specific to the operation of the resort include 59 guest quarters, campsites, restaurant services, leisure facilities, walking trails, staff housing, administrative and operations services, a potable water treatment plant, a sanitary waste treatment facility, and parking. All roads and parking areas associated with the resort are paved, with the exception of the Coast Ridge Road access to the water treatment plant. All resort activities occur 365 days of the year.

The camping facility offers 65 campsites and 15 glamping facilities and is comprised of the camping/glamping sites, restrooms and showers, a potable water system, and a network of paved access roads. The facility is located in the redwood forest along the un-named creek (tributary of Post Creek) to the north of the main resort facility. Coast redwood trees are carefully managed to minimize any dangers to guests posed by ***hazard trees***.

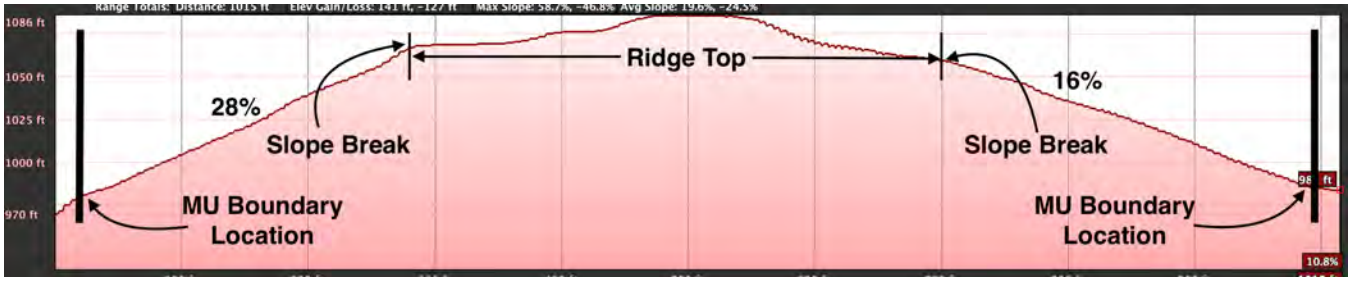
A core management goal of the applicant is to maintain full sustainability of the facilities and on-going operations into the foreseeable future. Recognized objectives associated with these goals include creating/maintaining a vegetation resource base that 1) that has visual and experiential qualities, 2) is more fire resistant in the event of a wildfire occurring, and 3) maintains, or improves, to the greatest extent possible, its ***ecological functioning***.

Physical Setting Elements of the Project Treatment Area

Topographic Position and Associated Slopes

This project is positioned primarily on the tops of east-to-west trending ridges and associated side ridges. Figure 3 shows a diagram of a typical cross section of MU 5. The MU, itself is comprised of the ridge tops, slope break points, and the mid-to-upper side slope areas. Also shown in the diagram is the two boundary locations representing the extent of the MU. The ridge tops have slopes that are, typically, no greater than 5% and, in this case the side slope areas within the MU are all less than 30%.

Figure 3. Example of a cross-section slope diagram



Two different types of slopes characterizing the AVBS PTA were considered: Averaged and those associated with ***micro-topographic variations*** (MTV). For each MU a series of slope profiles were examined that included the long axis (usually associated with a ridgetop location) and several cross-sections. The results of these examinations are presented in Table 1, below.

Table 1. Slope conditions for each Management Unit in the Project Treatment Area

MU	Slopes		MTV	Comments
	MU Average	Range		
1	26%	15% - 34%	Y	Below-road concavities
2	28%	4% - 47%	N	
3	22%	20% - 25%	Y	Below-road concavities; near-drainage ***inner gorge***
4	22%	18% - 27%	N	
5	22%	16% - 28%	N	
6	32%	26% - 38%	N	
7	34%	9% - 80%	Y	Near-drainage ***inner gorge***
8	38%	19% - 56%	Y	Below-road concavities; near-drainage ***inner gorge***
9	14%	4% - 35%	N	

In general, slopes within the PTA will not constrain the treatment approach employed to affect the implement management prescriptions. However, where micro-topographic variations occur (typically associated with road prisms, slope concavities, and inner gorges) these site-specific conditions will affect the decisions regarding treatment approach.

Soils Characterizing the Project Treatment Area

Accessing the Web Soil Survey web portal[3] for an Area of Interest (AOI) in which the AVBS PTA is located showed seven (7) major surface area contributing soil types (in five (5) complexes) and eleven (11) minor contributing series. These major and minor contributors are listed below:

[3] USDA/NRCS. December 12, 2023.

Major Contributors

- Gamboa-Sur Complex (Ga),
- McCoy-Gilroy Complex, 15 to 30 percent slopes (MbE),
- McCoy-Gilroy Complex, 30 to 75 percent slopes (MbG),
- Millsholm-Gazos Complex (Mm), and.
- Pfeiffer-Rock Outcrop Complex (Pe).

Minor Contributor

- Cieneba Series,
- Junipero Series,
- Lopez Series,
- Los Osos Series,
- McMullin Series,
- Pinnacles Series,
- Plaskett Series,
- Reliz Series,
- San Timoteo Series,
- Sheridan Series, and,
- Vista Series.

None of these types, major or minor, had topographic positioning and profile descriptions that related them to lowland or wetland conditions and none were identified as ***hydric soils***.

Project Treatment Area – Biological Setting Elements

The biological setting in which the 62.09-acre PTA is situated was established through a combination of 1) direct reconnaissance-level field observations, and 2) plant and animal species presence information contained in various publicly-available databases. The direct field observations were made over the course of several years and were conducted by TSS forestry experts Tad Mason and Dr. Steven Daus (see the biographical information in Attachment A). The entire PTA was observed to be located on mid-slope to ridgetop positions and all vegetation types were considered ***upland types***. By design, all areas associated with any riparian influences were excluded from the PTA and no ***jurisdictional wetlands*** were determined to be present within, or immediately adjacent to, the PTA. Five general vegetation categories were observed to be present:

- Forest stands dominated in the ***overstory canopy*** by *Sequoia sempervirens* (coast redwood)[4], minor percentage inclusions in the overstory canopy of *Umbellularia californica*[5] (California bay), *Notholithocarpus densiflorus*[6] (tanoak), *Arbutus menziesii*[7] (Pacific madrone) and *Acer*

[4] Calflora. June 8, 2023.
[5] Ibid. January 3, 2023.
[6] Ibid. January 3, 2023a.
[7] Ibid. January 3, 2023c.

macrophyllum[8] (Big-leaf maple). The total canopy cover percentage varied between (based on occular estimates) 80% and 100% with redwood cover percentage no less than 90%. The total stand heights varied between 60' to 130' and the crown base height were, on the average, 50' to 60' above the ground. These stand characteristics correspond to those of the CNPS *Sequoia sempervirens* Forest and Woodland Alliance[9] (86.100.00) and are considered to be an Environmentally Sensitive Habitat Area (ESHA);

- Woodlands comprised of hardwood species with the overstory canopy dominated by *Quercus agrifolia*[10] (71.060.00) with minor percentage inclusions (based on ocular estimates) in the overstory canopy of *Umbellularia californica*[11] (California bay), coast redwood, and Arbutus menziesii[12] (Pacific madrone). The total canopy cover percentage varied between (again, based on occular estimates) 40% and 100% with a coast live oak cover percentage at less than 80%. The total stand heights varied between 30' to 50' and the crown base height were, on the average, 10' to 16' above the ground. These stand characteristics correspond to those of the CNPS *Quercus agrifolia* Forest and Woodland Alliance[13] and are considered to be an Environmentally Sensitive Habitat Area (ESHA);
- Low-to-moderate height (4' to 6') brush/shrub formation, occupying 4.76 acres, with a highly variable mixed species composition including *Baccharis pilularis* (Coyote brush)[14], *Toxicodendron diversilobum*[15] (Poison oak), *Adenostoma fasciculatum*[16] (Chamise), *Heteromeles arbutifolia*[17], and *Ceanothus* spp. The presence of these species could lead to a determination that three CNPS shrubland alliances could be involved: *Baccharis pilularis*, *Adenostoma fasciculatum*, and *Toxicodendron diversilobum*. However, the total area was comprised of seven individual patches and the relatively small areas occupied by these patches hampered defining any dominance trends that could be expanded to the entire formation. Also noted in the most recent site visit, completed in July of 2024, were species characteristic of a Semi-Natural (i.e., non-native dominated) CNPS Alliance (SNA) entitled "*Cytisus scoparius*, *Genista monspessulana*, *Cotoneaster* spp. Shrubland" (broom patches). This semi-natural community presented unusual attributes, relative to its consideration in this assessment, which will be explained in greater detail in this document and the supporting Attachments. Furthermore, as will be discussed in greater detail in following sections and is evident when examining the VMRx prepared for this fuel model type (see Attachment C), the type's management will not result in changes to the three alliance or the semi-natural alliance profiles (principally the MCV "Membership Rules").

[8] Ibid. November 28, 2023.
[9] CNPS. July 14, 2022.
[10] Calflora. March 3, 2023.
[11] Ibid. January 3, 2023b.
[12] Ibid. January 3, 2023c.
[13] CNPS. March 3, 2023.
[14] Calflora. November 5, 2023.
[15] Ibid. November 5, 2023a.
[16] Calflora. November 5, 2023b.
[17] Ibid. November 5, 2023c.

Given the lack of sensitive natural communities within the shrub formations, it would reasonably follow that ESHA condition presence determination would not be supportable;

- Areas dominated by a mix of annual and perennial grass species (leach field cover crops of primarily non-native, special purpose, species), and;
- Managed landscaped areas associated with the Resort.

Within this framework of the presence of general vegetation types a desktop-level analysis was completed to identify the presence of 1) individual plant or animal species considered to have special legal status (in terms of protection requirements), and 2) plant communities having special legal, or sensitivity, status. These features will be, hereinafter referred to collectively as ***sensitive resources***. Both of these categories need to be identified as the proposed treatments will have direct effects on individual species but also direct, and indirect, effects on the greater ecological units (EU) in which the individual species are situated. Key indicators of a species sensitivity to impacts include official listing as "Threatened" or "Endangered" on either a federal, or State of California, level and indications of relative rarity. This PSA analysis uses the standard nomenclature and definitions contained in the following document that are administered by the CDF&W:

- State and Federally Listed Endangered, Threatened, and Rare Plants of California – January 2024[18], and,
- State and Federally Listed Endangered and Threatened Animals of California – January 2024.

Sensitive Resources – Individual Species

In order to identify the individual species, considered sensitive resources, with a potential for presence within, or adjacent to, the AVBS PTA a request for a search of the California Natural Diversity Database (CNDDB), within a 5-mile radius of the project's center point, was conducted by the Resource Conservation District of Monterey County of Monterey County (see Attachment H) on October 1, 2023. The result of the search showed there to be nine animal species and eleven plant species with a presence within the search area. Below, in Table 2, are the species identified and their specific sensitive resource status.

Table 2. Results of the 5-mile CNDDB Records Search

	Scientific Name	Common Name	FT	FE	CST	CSE	SSC	R	PP
Animal Species	*Coelus globosus*	Globus dune beetle	X						NR
	Cypseloides niger	Black swift					BCC		L
	Danaus plexippus plexippus	Monarch butterfly					CFL		M
	Euphiloides enoptes smithi	Smith's blue butterfly		X					H
	Falco mexicanus	Prairie falcon							VL
	Onchorhynchus mykiss irideus	Steelhead trout	X						NR
	Optioservus canus	Pinnacles optioservus riffle beetle							NR
	Rana boylii	Foothill yellow-legged frog		X		X			L
	Rana draytonii	California red-legged frog	X						L

[18] CDF&W, January, 2024.

	Scientific Name	Common Name	FT	FE	CST	CSE	SSC	R	PP
Plant Species	*Abies bractrata*[19]	Bristlecone fir					X	1B.3	L
	Arctostaphylos edmunsii[20]	Little Sur manzanita						1B.2	M
	Cirsium occidentale compactum[21]	Compact cobwebby thistle						1B.2	NR
	Clarkia jolonensis[22]	Jolon Clarkia						1B.2	M
	Dacryophyllum falcifolium[23]	Tear drop moss						1B.3	L
	Delphinium hutchinsoniae[24]	Hutchinson's larkspur						1B.3	M
	Fritillaria liliacae[25]	Fragrant Fritillary						1B.2	L
	Galium californicum luciense[26]	Cone Peak bedstraw						1B.3	NR
	Grimma torenii[27]	Toren's grimma						1B.2	NR
	Malacothamnus palmeri lucianus[28]	Arroyo Seco bush-mallow							M
	Sanicula maritima[29]	Adobe sanicle						1B.1	NR

BCC – Biological Conservation Concern CFL – Candidate for Listing. PFL – Proposed for Listing
R – CNPS Rarity Rank] PP – Potential for Presence NR – No Reasonable Expectation L – Low M – Moderate H – High
VL - Very Low

However, it was determined that two additional plant species were to be added and treated as part of any subsequent considerations and project actions: *Eriogonum latifolium*[30] and *E. parvifolium*[31]. Although these two species have no official sensitivity designation, they were included because they are known to be key components of the Smith's blue butterfly habitat and could be an indicator of possible presence.

These 22 species were then addressed for their reasonable potential for presence in the AVBS PTA on the basis of habitat suitability. Combining information accumulated from 1) the results of the direct field observations, 2) databases describing the physical nature of the setting, 3) reports and species profiles regarding the species requirements, and 4) historical date and proximity observation records, habitat suitability analyses were conducted for each individual species. Five of the animal species and seven plant species were considered to be without a reasonable expectation of presence.

[19] Calflora. November 1, 2023
[20] Ibid. November 1, 2023a.
[21] Ibid. November 1, 2023b.
[22] Ibid. November 1, 2023c.
[23] Ibid. November 1, 2023d.
[24] Ibid. November 1, 2023e.
[25] Ibid. November 1, 2023f.
[26] Ibid. November 1, 2023g.
[27] Ibid. November 1, 2023h.
[28] Ibid. November 1, 2023i.
[29] Ibid. November 1, 2023j.
[30] ibid. January 22, 2024.
[31] Ibid. January 22, 2024a

The remaining four animal and four plant species originally identified in the 5-mile radius CNDDB database search, as well as the Monterey dusky-footed woodrat, plus the two *Eriogonum* species, will be the species addressed in this PSA and through to the completion of the project's implementation. These species are shown in the table below.

Table 3. Sensitive Resource Species that will be Given Ongoing Consideration

Scientific Name	Common Name	FT	FE	CST	CSE	SSC	R	PP
Danaus plexippus plexippus	Monarch butterfly					CFL		M
Euphiloides enoptes smithi	Smith's blue butterfly		X					H
Rana boylii	Foothill yellow-legged frog		X		X			L
Rana draytonii	California red-legged frog	X						L
Neotomas macrotis luciana	Monterey dusky-footed woodrat					SSC		M
Abies bracteata[32]	Bristlecone fir					X	1B.3	L
Arctostaphylos edmunsii[33]	Little Sur manzanita						1B.2	M
Eriogonum latifolium	Coast buckwheat						NCR	L
Eriogonum parviflorum	Dune buckwheat						NCR	M
Delphinium hutchinsoniae[34]	Hutchinson's larkspur						1B.3	M
Malacothamnus palmeri lucianus[35]	Arroyo Seco bush-mallow						1B.2	M

FT – Federal Threatened FE – Federal Endangered CST – California State Threatened CSE – California State Endangered
R – CNPS Rarity Ranking CFL – Candidate for Listing NCR – No Current Ranking PP – Potential for Presence
NR – No Reasonable Expectation L – Low M – Moderate H – High

Sensitive Resources – Plant Communities

As the vegetation treatment types proposed will affect the component individual species of an EU, the types of units characterizing the PTA need to be identified. The types of units that will be defined will comply with those in the set of Alliances comprising the California Sensitive Natural Community List administered by the California Department of Fish and Wildlife (CDF&W)[36]. Furthermore, complying with the floristic standards laid out in the California Native Plant Society's Alliance set will be adopted, as the ***standards of performance***, in the design and implementation of the proposed project.

Once again, observed field conditions were coupled with the floristic descriptions and standards of performance for each CNPS Alliance (i.e. those that have a reasonable potential for presence with the

[32] Calflora. November 1, 2023
[33] Ibid. November 1, 2023a.
[34] Ibid. November 1, 2023e.
[35] Ibid. November 1, 2023i.
[36] CDF&W. June 1, 2023

AVBS PTA) in the process of identifying what type, and intensity, of management would be the most appropriate given the overall goals and objectives of the proposed project.

As previously indicated, the result of this process was the identification of two CNPS Alliances that is considered as examples of Environmentally Sensitive Habitat Areas (ESHA):

- *Sequoia sempervirens* (Coast redwood) Forest and Woodland (86.100.00), and,
- *Quercus agrifolia* (Coast live oak) Forest and Woodland (71.060.00).

The Semi-Natural broom patch Alliance is not considered to be representative of ESHA conditions.

This process considered another alliance that could potentially be present: The *Umbellularia californica* (California bay-laurel) Forest and Woodland Alliance (74.100.00. Direct visual evaluations, by experienced professional foresters, of the bay's role in the vegetation types characterizing the AVBS PTA, showed that the species was not present in overstory canopy percentages high enough to be considered dominant or co-dominant and therefore the alliance was not present; the species' presence was primarily exhibited in the form of scattered, or very small groups (2-4) trees. This species, given it is a vector of the Sudden Oak Death pathogen, will be designated as a high priority removal item, but will not be eliminated, as a component, from the species composition of either the redwood or coast live oak Alliances.

A relatively small portion of the PTA is occupied by brush/shrub formation (4.76 acres and 11.3% of the total). Due to the presence of *Baccharis pilularis*, *Adenostoma fasciculatum*, and *Toxicodendron diversilobum*, the following CNPS Alliances were given consideration in the brush/scrub habitat, but were ultimately determined to not be present because of a lack of a clear dominance trend:

- *Baccharis pilularis* Shrubland Alliance (Coyote brush scrub: CDFW CA Code 32.060.00), with State and Global rarity rankings of S5 and G5;
- *Adenostoma fasciculatum* Shrubland Alliance (Chamise chaparral: CDFW CA Code 31.101.00), with State and Global rarity rankings of S5 and G5, respectively;
- *Toxicodendron diversilobum* Shrubland Alliance (Poison oak scrub: CDFW CA Code 37.940.00), with State and Global rarity rankings of S4 and G4, respectively, and;
- *Cytisus scoparius, Genista monspessulana, Cotoneaster* spp. Shrubland Semi-Natural Alliance (Broom patches CDFW CA Code 32.180.00), with no State or Global rarity ranking designations.

The brush/scrub treatment includes seven patch mosaics planned for thinning in MUs 3, 5, and 8 and will prioritize non-native species. Untouched mosaic "islands" will be designed to retain native plants (e.g., *B. pilularis*). Over the course of several field investigations, there were not any 'Sensitive' associations or alliances identified in the brush/scrub habitat. There was one invasive semi-natural alliance identified: *Cytisus scoparius, Genista monspessulana, Cotoneaster* spp. Shrubland Semi-Natural Alliance (Broom patches).

The area occupied by non-native grass swards is also relatively small and have been managed historically to provide an evapo-transpirative cover over the leach field system that is essential for the operation of the sanitary waste facility. The species are primarily exotic perennial grasses and selected

specifically to perform the elevated evapo-transpiration function. Altering the species compositions will not be an objective into the foreseeable future. This area is being included in this PSA as fuels management will be an objective in line with the WUI goals and will be subjected to the same historic, regular periodic maintenance management (e.g., mowing).

Project Treatment Area – Jurisdictional/Regulatory Setting

This project has been designed to protect the AVBS resort; its guests, staff, and potentially, emergency response personnel, from wildfire-associated hazards and risks, and a return to a more similar ecosystem function that existed prior to fire suppression. The project design also reflects the consideration of other very important aspects:

- The health and sustainability of the vegetation communities that are a core element of visitor experiences to this iconic facility;
- The visual aesthetics that are so characteristic of the Big Sur area;
- Maintaining the economic viability of the resort/campground facility as it is a significant contributor to the local economy, and;
- The necessity to comply with all laws and regulations applicable to the operation of the resort

The resort/campground operations, and any associated management and planning efforts, fall within the jurisdiction of six principal planning and enforcement entities:

- Monterey County;
- Big Sur Volunteer Fire Brigade (BSVFB);
- California Department of Forestry and Fire Protection (CAL FIRE);
- Pacific Gas and Electric Company (PG&E);
- Office of the State Fire Marshall (OSFM), and;
- California Coastal Commission (CCC).

Monterey County has general jurisdiction over enforcement of local ordinances and codes, issuance of conditional use permits, issuance of other more specialized permits, and, as the AVBS resort is in an unincorporated portion of the county, law enforcement.

The Big Sur Volunteer Fire Brigade, CAL FIRE, and the OSFM collaborate to provide emergency wildfire, structure fire, and medical emergency response. They are also responsible for enforcing the provisions of PRC §4291 (defensible space requirements) and PRC §4292-4294 (powerline clearance requirements).

CAL FIRE's primary role is to provide a comprehensive planning and permitting process, and when required, code enforcement, for actions that come under the jurisdiction of the California Forest Practice Rules (FPR)[37].

[37] 14 CCR, Chapters 4, 4.5, & 10

OSFM provides assistance with wildfire planning and management processes at a programmatic level and could become involved in enforcement actions associated with PRC §4291 and PRC §4292-4294.

PG&E is the owner and operator of the EDLs located in MUs 2 and 6. They are responsible for the physical condition and functionality of the powerlines but have agreed to allow AVBS to maintain clearance conditions (to the specifications in California Public Resources Code (PRC) Section §§ 4292-4294) due to Alila's special interests in mitigating wildfire risk and maintaining visual quality and ecosystem health.

CCC is involved in permitting procedures when actions defined as being development are proposed within the California Coastal Zone. In an effort to streamline their permitting process where wildfire issues are involved, the CCC has supported the Public Works Plan (PWP) process (administered by local Resource Conservation Districts) and adopted the provisions and results of the California Vegetation Treatment Program's (CalVTP) Programmatic Environmental Impact Report (PEIR). To fulfill the application requirements for inclusion in the PWP the applicant has prepared this PSA and a Coastal Vegetation Treatment Standards document specific to this proposed project (see Attachment B).

Management Constraints on Lands Within the Project Treatment Area

Regardless of participation in any programmatic approach to permitting proposed projects, addressing the ever-increasing wildfire risk in the Big Sur region absolutely requires implementing mitigating actions. With respect to taking these actions within the PTA it has been determined that there are two categories of land that need to be considered, 1) lands where law, regulation, or existing ongoing management (e.g. defensible space around buildings and structures, electrical distribution lines, and understory vegetation management for fire prevention), directs that wildfire hazard and risk ***mitigating actions*** and fire prevention actions be taken, and 2) additional lands where ecological resilience and forest health, as well as controlling wildfire behavior as it makes its approach to the resort facilities is, as well, important. The following sections address these two categories in greater detail. In consideration of these two different management option categories being present AVBS ownership requested that, for the purposes of operational effectiveness and efficiency, the project be designed, and submitted for inclusion in the PWP process, with a project area comprised of both categories.

Management Constraints – Specialized Land Uses and/or Regulatory Requirements

Currently, a significant portion of the proposed 62.09 acre PTA is under management constraints imposed by, 1) ongoing wildfire fuels-related management that is required by California law (and associated regulatory codes), and 2) specialized management directly related to the operation of the resort facility. With regards to the statutory requirements, and specifically those contained in Sections 4291 through 4296 of Division 4 of California's Public Resources Code. If an ownership fails to comply by not taking abatement actions, they will be subject to citation by an agency with civil or criminal enforcement powers (in this case the California Department of Forestry and Fire Protection).

Given that the need for ecosystem-focused fuels treatment near electrical lines within the PTA exceeds the services and resources available and/or provided by PG&E and the landowner has received authorization from the utility company to manage the vegetation, the RCD of Monterey County is supportive of TSS in providing a comprehensive fuels management plan for AVBS that includes EDL fuels management. AVBS has included the EDL fuels treatment in their project scope to help mitigate the potentially catastrophic risks posed by high severity fires near the electrical power lines on their property. Powerlines can ignite wildfires in many ways, including but not limited to, downed lines, contact with vegetation, or apparatus failures. EDLs pose a risk to nearby wildland while also potentially worsening wildfire conditions if wildfire meets the lines, exacerbated by unfavorable weather conditions and an unhealthy buildup of fuels. There is a severe need within the AVBS property to complete critical fuels reduction work near the EDLs in a timely, responsible, and environmentally sensitive manner. The line clearance prism (Figure 6) will include fire prevention work. Outside of the prism, work to remove dead, dying, and diseased trees, as well as invasive vegetation and ladder fuels under the Ecological Restoration/Forest Health treatment type, with oversight by TSS Consultants, will ensure that coastal ESHA will be protected through adherence to the programmatic conditions of the CalVTP and PWP.

Public Resources Code Section 4291: Defensible Space

This project situation involves the presence of habitable structures within a wildland setting which requires that it comply with defensible space requirements in California's Public Resources Code (PRC) Section 4291. This statute requires that vegetation-related fuels within 100 feet of the perimeter of the structures be managed to reduce the hazards and risks associated with uncontrolled wildfire. Figure 4, below, presents, for the nine Management Units (MUs) comprising the project treatment area (PTM), the location and distribution of the involved structures (red-lined polygons) and the corresponding defensible space zones (yellow-lined polygons). It is notable that some MUs have portions of a 4291 zone due to a structure's presence in an adjacent MU.

With respect to prescribed fuels management within the 4291 zones, the key issue is the location of combustible material; not just live or dead vegetation but also including firewood, building materials, flammable liquids, etc. The full 100' zones have been broken down into three parts, each with its own fuels management standards:

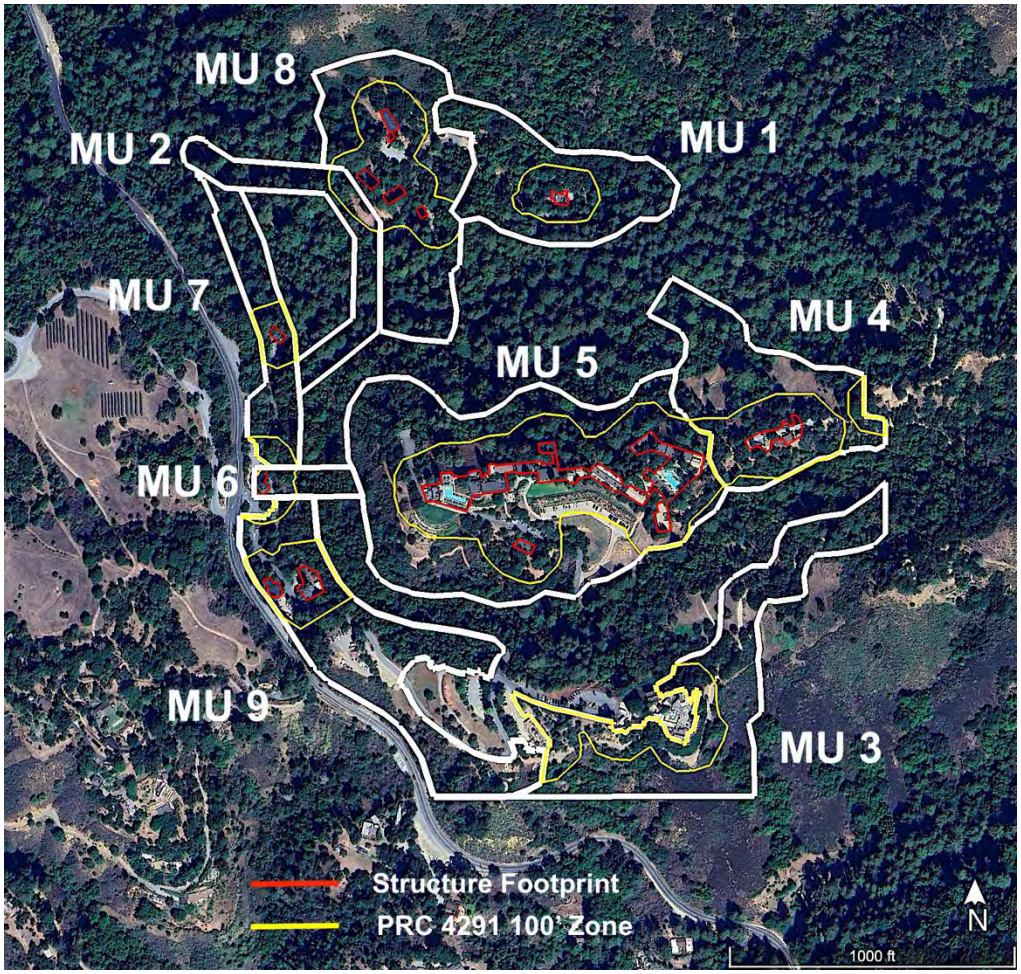
- 0 to 5 feet – Considered to be the most important zone, keep it clear of all reasonably flammable material;
- 5 to 30 feet – Clear the zone of all combustible material to locations beyond 30', and;
- 30 to 100 feet – Conduct fuels reduction management appropriate to the situational condition where management actions can include mowing (or masticating) material close to the surface of the ground, removing "ladder fuels" material (side limbs and small diameter tree or brush species), and, increasing the spacing between trees in the overhead canopy.

The specific provisions of the vegetation management prescriptions (VMRx) have been defined in consideration of, 1) complying with the letter and intent of PRC 4291, 2) resulting in more resilient vegetation stands that are less vulnerable to wildfire impacts, and 3) moving the characteristics of the

vegetation (species compositions, stand structures, patterns across the landscape, etc.) toward conditions more reflective of the Big Sur's natural setting.

Following Figure 4 is Table 4 showing the acreages, by individual MU, within the defensible zones. It must be noted that these are "net" acreages, i.e., it is the acreage within the yellow-lined polygon minus the surface covered by the red-lined structural footprint. Maps of each MU with detailed graphics showing 4291 and 4293 defensible treatment zones are included in Attachment F.

Figure 4. Locations and Distribution of the PRC 4291-Required Defensible Space Zones



White lines: MU boundaries Red Lines: Structure footprint boundaries Yellow Lines: 100' Defensible space boundaries

Table 4. Acreages Comprising the Fire Prevention/Defensible Space Zones

MU	4291 Acres	Comments
1	1.06	SFR-Property Manager

MU	4291 Acres	Comments
2	0.39	Both 4291 and 4293 jurisdictions
3	2.62	All of the 4291 zone, due to resort facilities immediately adjacent to, but not in, the MU
4	2.60	Potable water & sanitary waste facilities, portion of zone from immediately adjacent private residence
5	7.96	Principal resort facility
6	0.25	Both 4291 and 4293 jurisdictions
7	0.80	One within structure related 4291 zone and one associated with Big Sur Smokehouse
8	2.90	MFR-General staff
9	1.49	Administration & operations facilities plus a portion of zone associated with Big Sur Smokehouse
Total 4291 Zone	**20.07 acres**	**Represents approximately 32% of the treated areas**

California Regulatory Requirements: Electrical Distribution Line Clearances

In wildland settings electrical lines, either transmission or distribution facilities, are important features to be considered in wildfire planning and control operations. There are three aspects that warrant consideration:

- Given lines and transformer facilities that carry significant voltages of electrical current these facilities can be significant sources of wildfire ignition;
- They are vulnerable to the types and intensities of wildfire and can often suffer a complete loss of function due to accidental conditions or intentional management actions, and;
- Due to a combination of their linear alignment and clearing activities typically associated with their operation they can provide access for emergency operations.

Due to the critical function-nature of these facilities they have been afforded codified protection. In California, protection requirements and protective action standards are provided by the California Code of Regulations (CCR), Title 14, §§ 1250-1258 and the California Public Resources Code, Division 4, §§ 4292-4295.

Contained within this Project's MUs 2 and 6 (see Figure 5, below) are two 12,000-volt electrical distribution lines (EDL) owned, and operated by the Pacific Gas and Electric Company (PG&E). The lines are overhead supported on wooden poles with the overhead separation between the two lines is typically eight (8) feet. Given the 12,000-volt current loading the prescribed (PRC, Paragraph 1, § 4293) from-line clearance is four (4) feet; resulting in a sixteen-foot (16) ground surface distance. The clearance where all fuels must be addressed is known as the "line clearance prism." However, in addition Paragraph 2 of PRC § 4293 provides for protections against materials falling onto the lines from positions outside of this sixteen-foot line protective prism. The width of this "fall-in zone" (Figure

6) requiring this evaluation is typically defined by 1) the overall condition of individual trees in proximity to the lines and 2) the falling arc of trees dominating the canopy. Specific to this Project situation the evaluation zone can range from a minimum of 30 feet if the mixed hardwood type is present to up to an average of 150 feet if the stands are redwoods. The average width of the two MUs ("Management Unit Limits" in Figure 6) containing the EDLs is 95 feet, and given the 16-foot width of the line clearance prism (LCP) this leaves a potential for approximately 40 feet of "Fall-In" on either side of the centrally located EDL. Table 5 presents the acreages involved in the two PRC 4293 zones for the two MUs.

The Fall-In zones in these two MUs are slated to be treated according to the Ecological Resilience/Forest Health VMRxs for the redwood and mixed hardwood types. Any of the trees determined to be a direct threat to the EDL facility, due to a poor condition or significant lean, would be designated as a hazard tree and removed from the formation.

Figure 5. Topo Map Showing Streams & Management Units Containing Electrical Distribution Lines

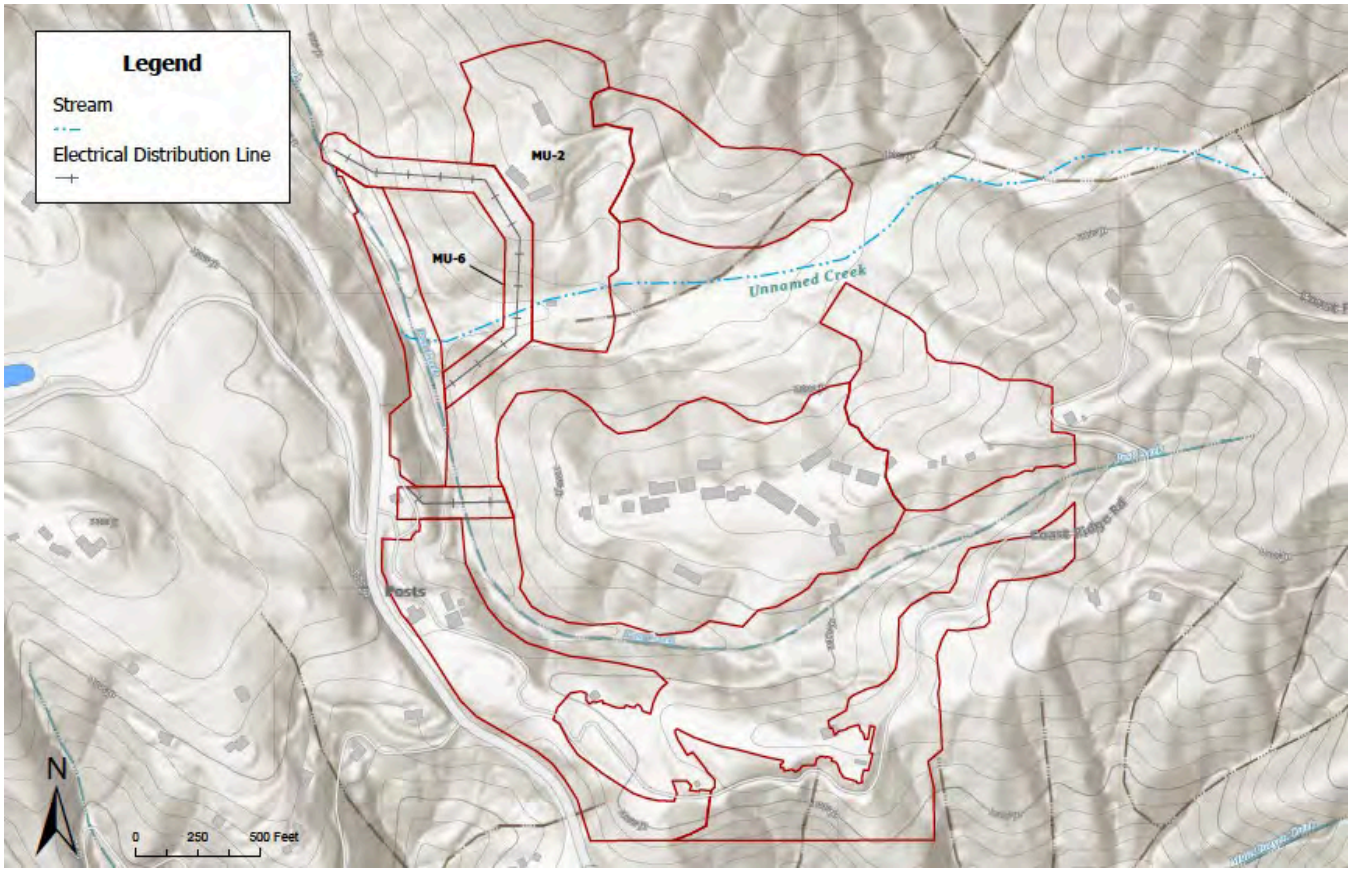


Figure 6. Electrical Distribution Line Clearance Zones Addressed in PRC 4293

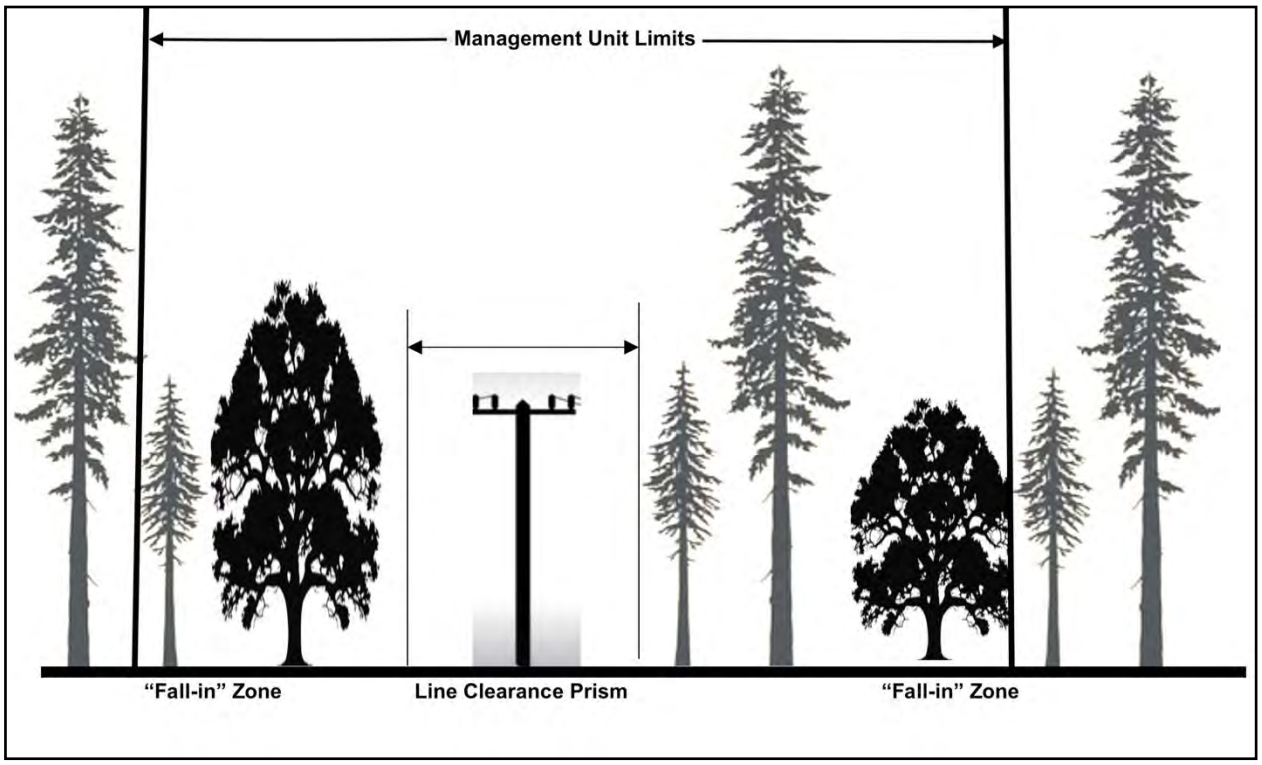


Table 5. Vegetation Management Zones Defined in PRC 4293

MU	Fire prevention: LCP (acres)	Forest health: Fall-in Zone (Approximate acres)	Adjacent Vegetation Type
2	0.51	2.16	Redwood forest
6	0.13	0.49	Mixed Hardwood Forest
Totals	0.64	2.65	

MU: Management Unit LCP: Line Clearance Prism

Lands characterized by these regulatory/land use constraining factors occupy a surface area equaling 23.36 acres (approximately 37 % of the full AVBS PTA). This acreage figure is a summation of those shown in the "PRC 4291", PRC 4293/LCP", and "PRC 4293/FIZ" columns in Table 6. Descriptions of the specific type of constraint, and the associated surface area affected, are broken down by MU in the following bullet list:

- MU 1: A total of 1.06 acres within the 100' PRC 4291 clearance zone. Excluded from this calculation, and those for subsequent MUs, was the acreage cover of the structural footprints;

- MU2: A total of 1) the 0.39 acres within the 4291 defensible space zone (again excluding the footprints of the structures), 2) the 2.67 acres comprising the 4293 designations (LCP and FIZ). Note that there is an overlap between the 4291 and 4293 acreages with a resulting double counting of the total acreages, requiring an downward adjustment of the actual mapped area of the FIZ;
- MU 3: A total of 2.62 acres within the 100' PRC 4291 clearance zone;
- MU 4 A total of 2.60 acres within the 100' PRC 4291 clearance zone;
- MU 5: A total of 7.96 acres within the 100' PRC 4291 clearance zone;
- MU6: A total of 1) the 0.25 acres within the 4291 defensible space zone (again excluding the footprints of the structures), 2) the 0.62 acres comprising the 4293 designations (LCP and FIZ). Note that there is an overlap between the 4291 and 4293 acreages with a resulting double counting of the total acreages, requiring an downward adjustment of the actual mapped area of the FIZ;
- MU 7: A total of 0.80 acres within the 100' PRC 4291 clearance zone;
- MU 8: A total of 2.90 acres within the 100' PRC 4291 clearance zone, and;
- MU 9: A total of 1.49 acres within the 100' PRC 4291 clearance zone.

Neither the CalVTP or the PWP specifically excludes the jurisdictional areas covered under PRC Sections 4292-4294 that pertain to the EDL clearance and management requirements. As stated previously, PRC Section 4292 requires that vegetation around poles is cleared to a distance of 10 feet, while Section 4293 requires that a 4 ft to 10 ft clearance be maintained from electrical lines, depending on voltage. Section 4294 requires that all trees that are at risk of falling into the electrical lines be removed. Therefore, the goal of the treatment bordering the EDLs is to 1) maintain the required total clearance of between 4 ft and 10 ft, 2) remove all hazard trees at risk of structure failure and within falling distance of the EDLs, and 3) mitigate wildfire risk by managing dead/downed fuels, ladder fuels, understory overgrowth, and forest canopy crowding that could contribute to increased fire risk near the electrical lines. The project will maintain the vegetation outside the EDL clearance prism requirement zone but within the boundaries of MUs 2 and 6 under Ecological Restoration treatment type, adhering to the MCV Membership Rules of two alliances, *Sequoia sempervirens* Forest and Woodland and *Quercus agrifolia* Woodland, in line with the objectives of Monterey County Big Sur Coast LCP Coastal Implementation Plan Chapter 20.145.

The CalVTP PEIR designates the Wildland-Urban Interface (WUI) Fuel Reduction as the overlap of wildland and structures with the goal of mitigating the risk of wildland fire that could spread to a structure, as well as the risk that a structure fire could spread to wildland vegetation. While the CalVTP PEIR Program Description provides the example of a building as a type of structure in WUI Fuel Reduction, it does not specifically define 'structure' nor does not specifically exclude all treatments around structures from coverage under the CalVTP. The Monterey County PWP (pg. 19) states, *"The CalVTP PEIR intentionally did not analyze defensible space areas- areas up to 100 feet radius surrounding homes or structures, or 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 and can 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."

Therefore, an area within defensible space could be included under the Monterey County PWP if it is consistent with the intent of mitigating wildlife risk between development and wildlands, and adheres to the programmatic conditions of the CalVTP and PWP to ensure protection of coastal ESHA. This PSA proposes that vegetation within 100-ft radius from AVBS buildings or other resort infrastructure and the clearance prisms around electrical distribution lines and poles be treated under the Fire Prevention treatment type. Outside of the 100 ft-radius, under the Ecological Restoration/Forest Health treatment type, consistent with the Monterey County PWP, AVBS will remove dead/dying vegetation, control weedy and invasive species, and reduce the uncharacteristic fuel build up due to an unnatural fire regime, resulting in an ecological restoration fuel treatment that improves native species composition, structure and habitat value. Prescribed treatments are further detailed in Attachment C.

Lands Not Constrained by Specialized Land Uses and/or Regulatory Requirements

The remaining surface area that is not under specific regulatory jurisdictions, or existing management actions required for the operations of the resort facility, has been included in the AVBS PTA in order to provide management opportunities for lands that have been identified as 1) able to benefit from the management actions in the VMRx set prepared for this project that can result in enhancing ecological restoration, and 2) characterized by fuels conditions that could resulted in elevated levels of CAL FIRE-defined wildfire hazard and risk. Table 6, below, presents the distribution of acreage categories amongst the nine MUs. In the "Management Units" block are the primary categories including the total acres within the MU, how many of those acres are being managed according to the goals and performance standards laid out in the Calveg VMP PEIR and the acres associated with the PRC 4291 (Defensible Space) and 4293 (Electrical Distribution Line Clearances) sections. The 4291 acreage does not include that for the qualifying structures footprints; it is included on the "NFS" Fuel Model Category column. It must also be noted that there are overlapping jurisdictions associated with both areas associated with 4291 and 4293 designations. In all portions of this proposed project the management prescription identified for implementation meets the goals and requirements of the Resources Conservation District, the California Coastal Commission, and AVBS.

Table 6. Treatment Types by Management Unit

Management Units						Fuel Model Categories (ac.)				
				PRC 4293						
No.	Total Acres	Ecological Restoration	PRC 4291	LCP	FIZ	NFS	Grass	Scrub/ Brush	Hardwood	Conifer
1	5.62	4.56	1.06			0.07	0.00	0.00	2.95	2.60

Management Units						Fuel Model Categories (ac.)				
2	3.06	0.00	0.39	0.51	2.16	0.00	0.16	0.00	0.00	2.90
3	8.64	6.02	2.62			0.66	0.28	1.86	4.87	0.97
4	6.91	4.31	2.60			0.34	0.88	0.00	2.99	2.70
5	18.15	10.19	7.96			3.59	2.63	1.47	4.46	6.00
6	0.87	0.00	0.25	0.13	0.49	0.08	0.00	0.00	0.79	0.00
7	3.09	2.29	0.80			0.00	0.00	0.00	1.33	1.76
8	7.94	5.04	2.90			0.34	0.15	0.57	1.53	5.35
9	7.81	6.32	1.49			1.27	0.14	0.86	5.20	0.34
				0.64	**2.65**	**6.35**	**4.24**	**4.76**	**24.12**	**22.62**
	62.09	**38.73**	**20.07**	**3.29**		**62.09**				

NFS; Non-flammable surface LCP; Line clearance prism FIZ; Fall-in zone

California Public Resources Code

CA Pub Res Code Section 4291 requires that owners of buildings or structure in fire-prone areas maintain defensible space of 100 ft from each side of the structure but not beyond the property line

PRC Section 4292 requires that a 10-ft clearance be maintained around all electrical poles that support a switch, fuse or transformer.

PRC Section 4293 requires "Except as otherwise provided in Sections 4294 to 4296, inclusive, any person that owns, controls, operates, or maintains any electrical transmission or distribution line upon any mountainous land, or in forest-covered land, brush-covered land, or grass-covered land shall, during such times and in such areas as are determined to be necessary by the director or the agency which has primary responsibility for the fire protection of such areas, maintain a clearance of the respective distances which are specified in this section in all directions between all vegetation and all conductors which are carrying electric current:

(a) For any line which is operating at 2,400 or more volts, but less than 72,000 volts, four feet.
(b) For any line which is operating at 72,000 or more volts, but less than 110,000 volts, six feet.
(c) For any line which is operating at 110,000 or more volts, 10 feet."

PRC Section 4294 states "A clearing to obtain line clearance is not required if self-supporting aerial cable is used. Forked trees, leaning trees, and any other growth which may fall across the line and break it shall, however, be removed."

Special Management Situations

There are four special management situations (SMS) that are known to be present within the 62.09-acre AVBS PTA and in adjacent locations: Riparian conditions along Post Creek, electrical distribution corridors, grass cover crops over leach fields, and control of invasive species. The conditions

characterizing these areas, and the management approach being proposed to affect wildfire mitigation, will be discussed in the following sections.

Post Creek Riparian Zones

Post Creek, determined by its bed and bank structure to be a Class II as described in Section 956.4 and 956.5 of California's Forest Practice Rules[38], passes through, or adjacent to, three of the established MUs (1, 7, and 9). The watercourse, from its headwaters position to where it exits the AVBS PTA, measures 0.80 miles with the top half characterized by a bed gradient of 17% and the bottom half by 10%. At 71.0 acres the drainage basin would be considered very small and to be characterized by a "flashy" hydrograph (high volume, short duration flows). These watershed dynamics will typically result in a cessation of surface water flow and ponding early on into the dry season. These conditions have resulted in 1) the formation of a bed and bank system that qualifies it for a Class II designation 2) a significantly reduced availability of available water, and 3) gallery formation that is dominated by upland tree and brush/scrub species rather than species that are found in more true wetland conditions.

Regardless of the impact these conditions could have on the presence of special status species, these areas will be afforded protection as if they were fully functioning riparian systems. The slope-determined buffer zones, referred to as watercourse and lake protections zones (WLPZs), will be employed in two situations: where the watercourse crosses an MU and where it has immediate adjacency. Where the watercourse flows within an MU a standard two-sided WLPZ will be implemented by placing highly visible flag lines at an upslope positions whose distance from the transition point of the watercourse meets the requirements in Table 1 contained in Section 956.5 of the California Forest Practice Rules (which are the performance standards required for compliance with the Board of Forestry's VTP PEIR and are described later). The second instance will be where the watercourse flows adjacent to an MU. In this case the boundary line of the MU was set at the location of the upper position of the WLPZ, and again, this WLPZ limit will be identified by a highly visible flag line. Lastly, no project actions will take place within the established WLPZs and a VMRx specific to these zones will not be prepared.

Defensible Space Requirements

Protecting residential resources, located in wildland settings, from the impacts of un-controlled wildfire is addressed in PRC Section 4291. The provisions therein describe a "defensible space" zone that starts at the outer point of habitable structures and extends out a maximum of 100. There are three sub-zones (0'-5', 5'-30', and 30'-100') within the fire prevention treatments in which the nature and intensity of fuel reduction action increases as one moves outward toward the 100' boundary line. All nine MUs have these defensible space zones and a more in-depth discussion, supported by location maps, is provided in Attachment F of this PSA. With regard to the specific vegetation management actions slated for use in these zones the prescriptive actions contained in this Project's set of VMRxs would be fully compliant with the 4291 requirements.

[38] 14 CCR §§ 956.4 and 956.4.

Electrical Power Distribution Corridors

MUs 2 and 6 have overhead electrical power distribution infrastructure contained within their boundaries. By law and regulatory requirement[39] elements of these infrastructures must be provided with prescribed clearances from surrounding vegetation. These performance standards will be the core of a VMRx that has been prepared for surfaces occupied by this land use (see Attachment C to this PSA). The VMRx will prescribe the clearance requirements and actions that move, through implementation of the initial treatment and subsequent maintenance, the residual stands toward 1) ongoing clearance protections, 2) increased stand condition and health, 3) reduced influence of invasive species, and 4) greater levels of species diversity with dominance by ecologically desirable species. These two MUs involve the presence of two fuel model types that correspond to Manual of California Vegetation (MCV) Alliances: Coast Live Oak and Redwood Forest and Woodlands. These treatments involve approximately 2.90 acres of the Redwood Alliance and 0.79 acres of the Coast Live Oak. The presented estimated acreage that comes under the requirements of sections PRC 4292 and 4293 in Table 4 will be validated following the treatment. However, when treatment is needed outside of the PRC jurisdictional zone the requirements to keep within the MCV Membership Rules of the two Alliances will be respected.

Leach Field Cover Crops

Surface areas in MUs 3 and 4 were originally sown by cover crops of non-native Fescue species suitable for higher soil moisture contents. The primary function of these cover crops, and the species selected specifically for use in this leach field situation, is to accelerate the rate of evapotranspiration to offset the increase in soil moisture due to the leaching process. Current observations show that three additional species are entering the species composition: Kikuyu grass[40], western wheatgrass[41], California oatgrass[42]. Two of the species are native in California, western wheatgrass and California oatgrass; the Kikuyu is a non-native species. All three species are associated with the elevated soil moisture found in wetland sites and are appropriate to the need for higher levels of evapotranspiration called for in the operation of the leach field. None of these species was identified in the CNDDB 5-mile database query or California Natural Communities List and they have not been designated with special status. This management situation will not require an initial treatment prescription but will have guidance for maintenance management in the Grass Formation VMRx included in Attachment C to this PSA.

Invasive Species Control

In August of 2014 the project proponent developed a comprehensive invasive species management plan[43] (ISMP) that is provided, in its original form, as Attachment D to this PSA. In this plan thirty-five

[39] 4 PRC §§ 4293-4296.
[40] Calflora. *Pennisetum clandestinum*
[41] Calflora. *Elymus smithii*
[42] Calflora. *Danthonia californica*
[43] Ventana Inn Invasive Species Management Plan, Nicole Nedeff Consulting Ecologist, 2013.

869 species were identified as being of interest, of which two were identified as horticultural landscape
870 species and five as being on a weedy plant watch list. However, this plan was prepared under a
871 different set of management goals and objectives and described control actions, i.e., the use of
872 herbicides and prescribed fire, that are no longer acceptable to current ownership. The ISMP has
873 provided a baseline list of invasive species that were the subject of control actions in the intervening
874 ten years.
875
876 As both the biotic and regulatory conditions associated with invasive species have changed since the
877 date of preparation it was considered prudent to update the list of species currently addressed at the
878 Monterey County and state level. Lists of invasive species currently the subject of regulatory interest
879 were obtained through web portals administered by the County of Monterey[44] and the State of
880 California[45]. It was considered most appropriate to utilize the Monterey County list as a baseline as it
881 was more reflective of local conditions. The Monterey County list included a total of thirteen species
882 with county-wide presence potential. In order to further refine the focus on conditions most
883 appropriate to the AVBS Project area, each of the thirteen species was subjected to a "potential for
884 presence" analysis using the observation records in the Calflora species profiles. The results of this
885 analysis indicated six of the thirteen baseline species had a significant likelihood of presence within, or
886 reasonably adjacent to, the Project area. Table 7 presents the results of this update process. The six
887 species that will be further addressed during the Project's initial treatment, and maintenance, phases
888 are indicated by the gray-shaded cells. For the seven species that are not to be given on-going
889 consideration the observation information supporting this decision is provided in the "Comments"
890 section.
891
892 Table 7. Updated Invasive Species List for Monterey County

Scientific Name	Common Name	Presence	Additional Comments
Achnatherum brachychaetum	Puna Grass	NRO	5 observation records; Salinas Valley
Ageratina adenophora	Sticky Eupatorium	KTBP	
Arctotheca calendula	Cape weed	NRO	Observed only in Salinas Valley
Arundo donax	Ncn	OWR	Julia Pfeiffer Burns SP @ 12km south on SR1
Cortaderia jubata	Purple Pampas Grass	KTBP	
Cortaderia selloana	Uruguayan pampas grass	KTBP	
Centaurea solstitialis	Yellow starthistle	KTBP	

[44] County of Monterey. July 17, 2024.
[45] UC Davis. July 17, 2024.

Scientific Name	Common Name	Presence	Additional Comments
Chondrilla juncea	Skeletonweed	NRO	Monterey area and Salinas Valley
Delairia odorata	Cape Ivy	KTBP	
Ehrharta calycina	Veldt Grass	NRO	Observed in Monterey urban/suburban area
Genista monspessulana	French Broom	KTBP	
Onopordum acanthium	Scotch Thistle	NRO	Several observation records; Salinas Valley
O. tauricum	Taurian Thistle	NRO	1 observation record; Salinas Valley

NRO: No Records of Observation within, or with a reasonable proximity to, the Project site
KTBP: Known to be present within, or with a reasonable proximity to, the Project site
ncn: No Common name OWR: Observed to be present Within the Region

Eight invasive species were observed to be present in, or within a reasonable proximity to, the Project site during the preparation of the ISMP: Sticky Eupatorium *(Ageratina Adenophora)*, *Yellow starthistle (Centaurea solstitialis),* Purple Pampas Grass (*Cortaderia jubata),* Uruguayan pampas grass *(Cortaderia selloana),* Cotoneaster *(Cotoneaster spp.),* Scotch broom (*Cytisus scoparius*) Cape Ivy (*Delairia odorata)* and French broom (*Genista monspessulana).* Specific control actions for these species determined to require on-going consideration are defined in the set of VMRx's presented in Attachment C to this PSA. As noted in the introductory sections of Attachment C, the set of control actions are to be implemented independently of which VMRx was involved; the actions are common to them all. Ongoing maintenance will include:

- An appropriate field examination to determine whether a target species is present prior to either initial or maintenance actions;
- For each species determined to be present identification of the most effective seasonal period for implementing control actions, and;
- Implementing the physical removal and reduction of removed materials that is most appropriate to the species involved.

This program of management is to be supported by the preparation of training materials describing how to identify the subject species as well as the manner of their removal/reduction. French broom, for example, should be entirely removed (root wads, stems, and foliage) before the blooming period in March to June or cut and piled in discrete piles on tarps and covered (or bagged) to reduce seed germination and spread, and removed from the site to be disposed of at a landfill. Additional invasive plant removal guidelines are included in Attachment C: VMRx. These training materials are to be appropriate to the circumstances of the individuals who will be conducting the field implementation, and will be provided in multiple languages as needed.

The original ISMP also addresses the issue of Sudden Oak Death and recommended actions to control the spread of the pathogen. Control of this pathogen remains an issue and CAL FIRE continues to take an active role in enforcing the associated regulatory requirements. The most current and appropriate

practices will be included as part of the "Special Management Situation" section of the prepared VMRxs.

Special attention will be devoted to the removal of the 0.34-acre stand of *Eucalyptus globulus* and isolated individuals, where they occur. The location of the principal stand targeted for removal, is in the northwest corner of MU 9 (see Figure 2). This stand of Eucalyptus is of special interest, not only because it is considered an invasive species, but also that its presence creates extremely high levels of wildfire hazard and risk. These extreme levels are a product of the sheer volume of fuel present, the amount of fine fuel surface litter produced by the species, and the immediate proximity to the ignition potential associated with State Route 1. The management approach for this stand is defined in a separate VMRx included in Attachment C to this PSA, and will include:

- In an initial treatment, complete cutting and removal of the existing standing trees. The boles will be cut into appropriate lengths and moved to a site designated on the Alila property or to an off-property site. Fine materials will be either chipped and spread back on site, or masticated, producing a surface fuel layer no greater than 6", and,
- For maintenance, annual, or semi-annual, removal of the stump sprouts via hand removal and subsequent reduction of the material produced by either mastication or chipping, or prescribed herbivory utilizing goats in accordance with a final grazing management plan after approval by the CCC Executive Director.

Plant Communities with Special Jurisdictional Status

There are three classes of communities that have special status, as described in law and regulatory code, that require consideration in the design and implementation of this proposed project:

- Riparian formations (which also involve considerations of wetland issues);
- Oak Woodlands, and;
- Environmentally Sensitive Habitat Areas (Includes the CNPS Coast Redwood and Coast Live Oak Alliances)

Riparian Formations

There are some segments of riparian vegetation gallery formations along Post Creek whose species presence includes western sycamore (*Platanus racemosa*), arroyo willow (*Salix lasiolepis*), black cottonwood (*Populus trichocarpa*), and white alder (*Alnus rhombifolia*). It is also typical to have lower-, and mid-, slope upland species in the gallery compositions that include coast redwood (*Sequoia sempervirens*), bigleaf maple (*Acer macrophyllum)*, coast live oak (*Quercus agrifolia*), California bay laurel (*Umbellularia californica*) and tanoak (*Lithocarpus densiflorus*).

Research of the National Wetland Mapper database, accessed in September, 2022, for the PTA showed one riverine feature (Post Creek) but no open water features or wetlands. This is consistent with the primary location of the PTA on ridgetops down to mid-slope positions. The riverine feature has been classified as a R3UBH[46] feature. Examination of the sections of Post Creek within the full ownership

[46] Classification code: **R3UBH**

showed that the conditions do not meet the those in the full description of a R3UBH feature. It is reasonable to conclude that there are no wetlands within, or immediately adjacent to, the AVBS PTA; however, if a wetland is discovered at any point prior to or during treatment activities, it will be avoided.

Post Creek does pass adjacent to, or through, portions of five of the MUs in the PTA and in order to protect the riparian conditions in the associated watercourse and lake protection zones ("WLPZ") the provisions of SPR HYD-4 will be implemented. The conditions of the watercourse indicate it is in the Class II category. Protections of these WLPZs will be provided by 1) adjusting the boundary line of a subject MU, 2) establishing a WLPZ within the boundary of a subject MU, and 3) implementing no project actions within any identified WLPZ. The placement of the adjusted boundary line, or the limits of the WLPZs within the boundary of subject MU, will conform to the slope-related distance measures presented in the table entitled "Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) Widths"[47]. These measures, from the ***watercourse transition line*** to the WLPZ boundary, are:

- Slopes <30% = 50 feet;
- Slopes 30-50% = 75 feet, and;
- Slopes >50% = 100 feet

It must be noted that these measures are also consistent with those in the California Forest Practice Rules, Table 1, Section 14 CCR 795.1[48]

Oak Woodlands

Throughout the AVBS PTA, where it occurs, the cover percentages of *Quercus* species qualify for consideration under California's Oak Woodland Conservation Act[49](OWCA) and the Guidelines to the California Environmental Quality Act[50]. As such this oak community (referred to hereinafter as Jurisdictional Oak Woodlands or JOW) will be considered to have special status and will be given full consideration in the development of the management prescriptions for the *Sequoia sempervirens* Forest and Woodland and *Quercus agrifolia* Forest and Woodland Alliances. Adhering to the Manual of California Vegetation (MCV) Membership rules of the *Q. agrifolia* Alliance will provide a greater level of protection than that prescribed in the OWCA; requiring a minimum of 33% canopy occupation whereas the OWCA requires only 10% to be designated as Oak Woodland. Complying with the provisions of the

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System Riverine (R) : The Riverine System includes all wetlands and deepwater habitats contained within a channel, with two exceptions: (1) wetlands dominated by trees, shrubs, persistent emergents, emergent mosses, or lichens, and (2) habitats with water containing ocean-derived salts of 0.5 ppt or greater. A channel is an open conduit either naturally or artificially created which periodically or continuously contains moving water, or which forms a connecting link between two bodies of standing water.
Subsystem Upper Perennial (3) : This Subsystem is characterized by a high gradient. There is no tidal influence, and some water flows all year, except during years of extreme drought. The substrate consists of rock, cobbles, or gravel with occasional patches of sand. The natural dissolved oxygen concentration is normally near saturation. The fauna is characteristic of running water, and there are few or no planktonic forms. The gradient is high compared with that of the Lower Perennial Subsystem, and there is very little floodplain development.
Class Unconsolidated Bottom (UB) : Includes all wetlands and deepwater habitats with at least 25% cover of particles smaller than stones (less than 6-7 cm), and a vegetative cover less than 30%.
Water Regime Permanently Flooded (H) : Water covers the substrate throughout the year in all years. Source: https://www.fws.gov/program/national-wetlands-inventory/classification-codes

[47] CBFFP, Finale Program EIR for the California Vegetation Program. Pag 2-51.
[48] 14 CCR, Section 916.5].
[49] CF&GC §§ 1360 to 1372
[50] PRC §21083.4

CalVTP PEIR will provide levels of protection that will ensure that there will not be a significant adverse impact on jurisdictional oak woodlands by maintaining at least 33% relative cover of tree canopy in a where there is co-dominance.

Project Candidacy for Inclusion Under the CalVTP and Public Works Plan

Accessing published maps and other databases administered by the regulatory agencies involved in the Resource Conservation District of Monterey County (RCDMC) Public Works Plan program (PWP) the following subject areas pertinent to 1) the candidacy of AVBS Resort's fuels treatment project for inclusion in the PWP program, and 2) guidance on the preparation of PSA documents were addressed. The specific subject areas, along with the principal sources of the information include:

- Vegetation Treatment Program/Programmatic Environmental Impact Report (VTP/PEIR)[51]. Source: California State Board of Forestry;
- Planning related requirements under the California Coastal Act of 1976 (CCA)[52]. Source: California Coastal Commission.
- Public Works Program[53]. Source: Resource Conservation District of Monterey County.
- Project location within the California Coastal Zone. Source: California Coastal Commission.
- Project location within the Big Sur Coast Land Use Plan – Local Coastal Program. Source: Monterey County.
- Wildfire Hazard Severity designation. Source: CAL FIRE, Fire and Resources Assessment Program (FRAP)
- Treatable Landscape status. Source: California State Board of Forestry (BOF), and;
- Wildland/Urban Interface (WUI) status. Source: CAL FIRE/FRAP

Location Within the California Coastal Zone and the Big Sur Coast Land Use Plan

Research of several databases[54 and 55] clearly shows all portions of the project's treatment areas to be in the California Coastal Zone (CCZ). Furthermore, the project treatment area is also completely contained within the lands addressed in the Big Sur Coast Land Use Plan[56]. These relationships are shown in Figure 7, where the air covered in the Big Sur Land Use Plan is indicated by pink shading, and the heavy blue line shows the eastern boundary of the CCZ.

[51] California State Board of Forestry. December, 2019.
[52] California Coastal Commission. 1976
[53] Monterey County Resource Conservation District
[54] California Coastal Commission, 2019.
[55] USF&WS, May 2015.
[56] Monterey County Planning Department. January, 1996

Figure 7. Location of the AVBS PTA Within the California Coastal Zone & Big Sur Coastal Land Use Plan

CAL FIRE State Responsibility Areas and Wildfire Hazard Severity Zone Designation

Accessing published maps and other databases administered by CAL FIRE, the following subject areas pertinent to 1) the candidacy of AVBS Resort's fuels treatment project for inclusion in the Resource Conservation District Monterey County's PWP, and 2) guidance on the preparation of PSA documents. The specific subject areas, along with the principal sources of the information include:

- Vegetation Treatment Program/Programmatic Environmental Impact Report (VTP/PEIR)[57]. Source: California State Board of Forestry;
- Wildfire Hazard Severity designation. Source: CAL FIRE/FRAP;
- Treatable Landscape status. Source: California State Board of Forestry, and;
- Wildland/Urban Interface ("WUI") status: CAL FIRE/FRAP.

[57] California State Board of Forestry. December, 2019.

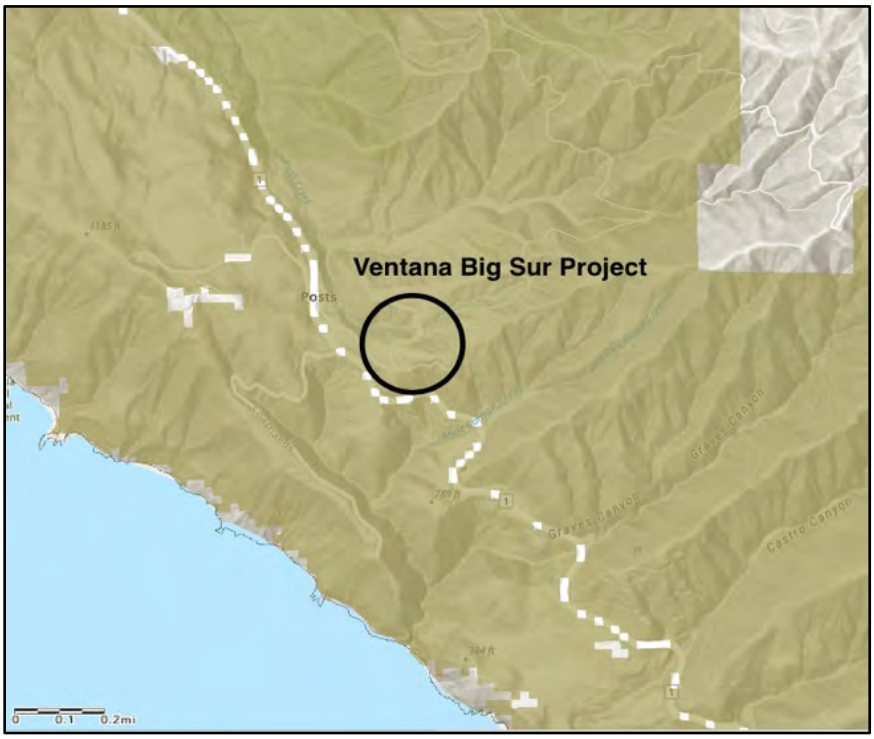
Wildfire Hazard Severity Zone Designation

Accessing the maps, specific to Monterey County, available through CAL FIRE/FRAP[58] the entire treatment area of the subject project is contained within the State Responsibility Area (SRA) in which the CAL FIRE has responsibility for providing emergency wildfire response. Furthermore, the project area has been designated with a "Very High" fire hazard severity rating[59].

Treatable Landscape

Research of the Board of Forestry's VTP website clearly indicated that the AVBS PTA is within the zone designated as Treatable Landscape (TL)[60]. As shown in Figure 8, the project site is well within the TL-designated zone which is indicated by the khaki-shading.

Figure 8. Location of AVBS PTA Relative to State Board of Forestry's Treatable Landscape



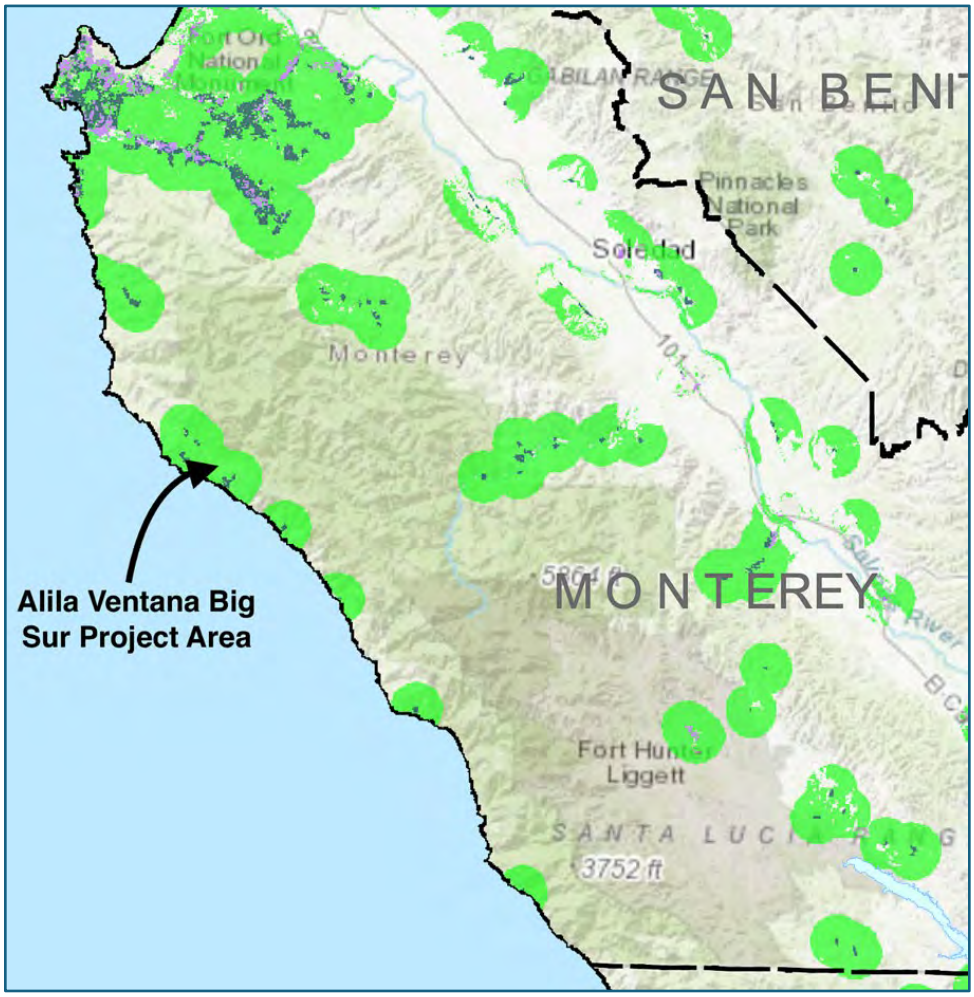
Wildland/Urban Interface Designation

In order to select the WUI-related Treatment Type it was necessary to establish that the AVBS PTA was, in fact within an area officially designated as having WUI characteristics. Figure 9 shows a portion of a

[58] CAL FIRE. November, 2007.
[59] Ibid. November 21, 2022.
[60] Board of Forestry. December, 2022.

Monterey County WUI map available through the CAL FIRE/FRAP website[61]. The areas officially designated as WUI are shaded in lime green and the location of the AVBS project area is highlighted.

Figure 9. Location of the AVBS PTA within Lands Classified as WUI



Other Public Agencies Whose Approval is Required

Given that the work proposed in this PSA is considered 'development' per Coastal Act Section 30106 and the PWP, involvement of agencies other than the Coastal Commission in this planning process is considered to be unlikely, and the main contemplation is the appropriate permitting pathway to ensure regulatory compliance. The PWP is founded on a CEQA compliant Programmatic Environmental

[61] CAL FIRE/FRAP. 2015.

Impact Report (PEIR) and has a "functionally equivalent" status. The results of the analysis of the subject area impacts (presented in the following checklist section) and the incorporation of SPRs and MMs detailed in the PEIR in the project design has led to the conclusion that federally listed plant and animal species, and their habitats, will not experience significant adverse impact and the involvement of federal agencies is not reasonably expected. Furthermore, no wetland resources will be impacted and no activities are proposed that would require permitting under the Clean Water Act.

Coastal Act Compliance

☐ The proposed project is NOT within the Coastal Zone

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

The proposed project is within the Coastal Zone, as defined by the California Coastal Act, and described in SPR AD-9 in the CalVTP Program EIR (CalVTP Final Program EIR Volume II page 2-34), and therefore requires approval by the Coastal Commission. However, in a collaborative effort staff from the Coastal Commission, RCDMC, and Monterey County developed, and received certification for, a PWP (Public Works Plan), which provides a framework for permitting individual vegetation management projects in Monterey County, and which includes the Coastal Vegetation Treatment Standards (Coastal VTS) (see Attachment C for the Coastal VTS and Coastal VTS consistency documentation for the proposed project). Upon preparation of a PSA, project approval is still subject to the review and issuance of a Notice of Impending Development (NOID) by the Commission.

Native American Consultation

As the AVBS wildfire risk reduction project is within the scope of the CalVTP PEIR, AB 52 consultation for AB 52 compliance was completed by RCDMC in May of 2024. RCDMC contacted the following tribal groups: the Amah Mutsun, Costanoan Rumsen Carmel Tribe, Esselen Tribe of Monterey County, Indian Canyon Costanoan-Ohlone, KaKoon Ta Ruk Band of Ohlone-Costanoan, Ohlone-Costanoan Esselen Nation, and Xolon Salinan Tribe. No feedback was received from any of the tribal groups that were contacted. Pursuant to the process of completing the VTP/PEIR the Board of Forestry and Fire Protection conducted consultation in accordance with Public Resources Code section 21080.3.1. For treatment projects with impacts not within the scope of the PEIR, pursuant to PRC Sections 21080.3.1, 21080.3.2, and 21082.3, the project proponents preparing a new negative declaration, mitigated negative declaration, or EIR will notify any California Native American tribe who has submitted written request for notification of a project in the area of the treatment site. Upon a timely receipt of a written request for consultation by a tribe, the project proponent must begin consultation before the release of the environmental document and must follow the requirements of the cited PRC sections.

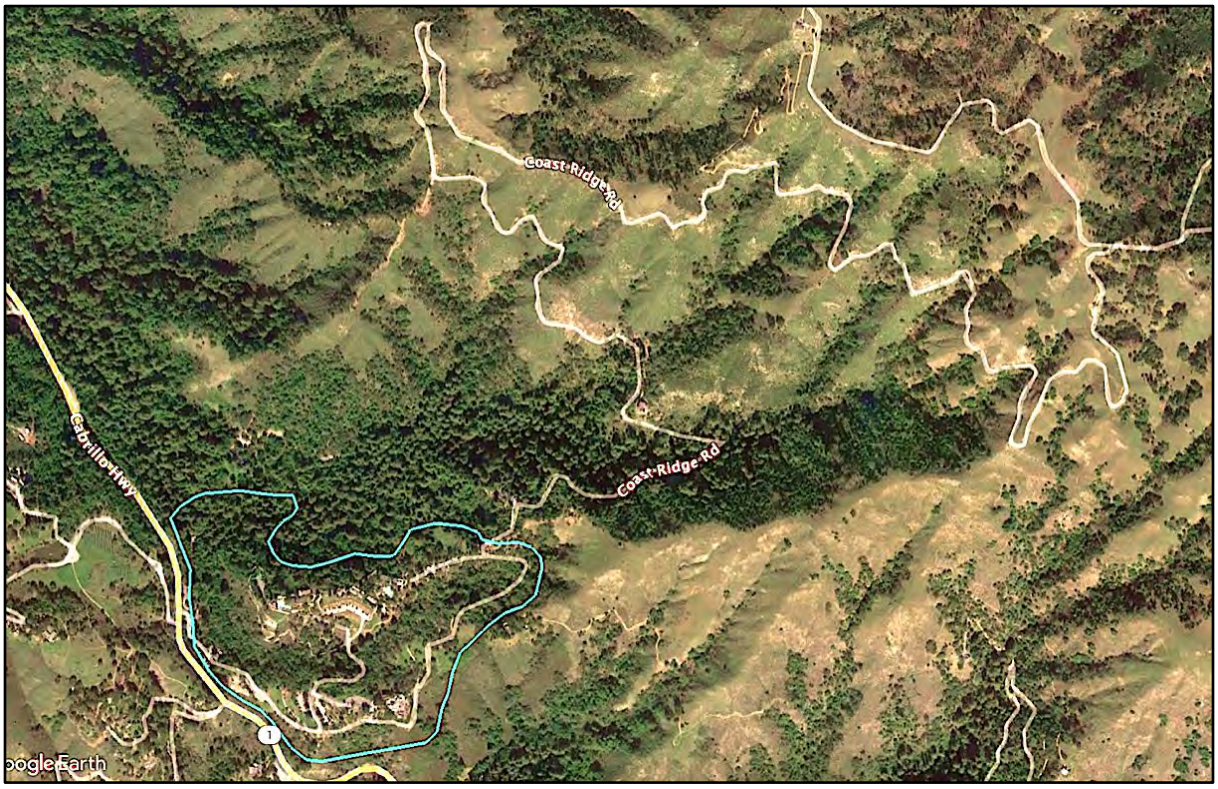
Additional Benefits Accruing from the Project's Strategic Location

This project has been designed with the primary goal being to protect the visitors to the AVBS resort and campground, its staff, facilities, and, in the event of the requirement for emergency services (wildfire, medical, law enforcement, etc.), the lives, health, and welfare of emergency responders. However, there are additional benefits that accrue, when considering indirect effects from

implementing the project, on a more on a regional scale. Referring to Figure 10, the strategic location of the project area, indicated by the cyan border, becomes evident. There are three different benefits that can be derived from this positioning:

- The treated, and maintained, tracts act as a buffer for wildfire ignitions originating with traffic-related situations occurring on SR1 and the electrical distribution lines;
- The 0.75 miles of treated lands along Coast Ridge Road reduces the likelihood that this key route providing access to the private holdings, national forest lands, and wilderness areas, will have a loss of function in the event of it being involved in a wildfire event, and;
- Reduces the likelihood that the west-to-east oriented aggregation of forest vegetation will provide a pathway, characterized by dangerous wildfire behavior, into the upslope resources.

Figure 10. Strategic Location of the AVBS Wildfire Risk Reduction Project



CHAPTER 2 - ENVIRONMENTAL CHECKLIST

Vegetation Treatment Project Information

Project Title: Alila Ventana Big Sur Fuels Treatment Project
Project Proponent Name and Address: Resource Conservation District of Monterey County
Contact Person Information and Phone Number: Jamie Tuitele-Lewis, Forest Health Coordinator
744-A LaGuardia St. Salinas CA 93905
Telephone: (831) 975-7775
Project Location: See previous discussion in "Location" section;
Total Area to be Treated (acres): Within the 62.09-acre surface area of the PTA, 55.74 acres are occupied by surface conditions that will carry wildfire, and thus, will require management.

Treatment Types Appropriate to the Proposed Project's Goals

As previously stated, the primary goal of implementing this project is protecting all aspects of the AVBS resort facility from the dangers posed by uncontrolled wildfire to its guests, staff, physical facilities, natural resources base, and if the need should arise, the lives and safety of emergency response personnel. These goals are in close alignment with those of the Ecosystem Restoration/Forest Health and Wildland-Urban Interface ("WUI") Fuel Reduction Treatment/Fire Prevention covered in the CalVTP PEIR[62], and as the project site is located in an area officially designated as having WUI characteristics it will be selected as the primary Treatment Type (TT) in this PSA. Although not the primary goal in this project situation, ownership does have a strong desire to maintain the resort's guest experience by, conserving, and enhancing where possible, the natural setting and its ecological functioning. Thus, goals and objectives in alignment with those of the Ecological Restoration Treatment Type[63] will be built into the design, and implementation, of the wildfire hazard reduction activities proposed herein, and it will also be a selected as a Treatment Type option. The specific beneficial results in terms of improved ecological condition and functioning will include:

- The vegetation cover will be more resistant to stand-replacing wildfire events;
- An opportunity to implement applicable provisions of the Invasive Species Management Plan (presented in Attachment D);
- An augmented ability to manage future individual species composition percentages through prescriptive regeneration control, and;
- Increase the level of control over infection by pathogens and insect infestation.

Project Description

Within the goals and objectives framework defined by the two Treatment Types selected, the desired result will be, 1) a reduction of the absolute volume of fuel available for consumption should a wildfire event occur, and 2) alteration of the physical fuelbed structures, and 3) a return to pre-fire suppression

[62] California State Board of Forestry. CalVTP PEIR, Treatment Types. Section 2.5.1, Pg 2-8
[63] ibid. Section 2.5.1, Pg. 2-15

ecological functioning. The project has been designed to accomplish these operational objectives and would involve the following task areas:

- Identify the nature of the wildfire-related setting elements that would be subject to management actions;
- Define the area in which management actions would be implemented;
- Identify the Treatment Activities that are within the scope of the CalVTP PEIR and appropriate for the conditions within the AVBS PTA;
- Generate management prescriptions for each fuel model category that requires management;
- Assess the impacts of implementing the management prescriptions;
- Identify pre-operational activities, and;
- Implement the prescribed actions.

Wildfire-Related Setting Elements that Would be Subject to Management Actions

The mapping units comprising the AVBS PTA represent ground condition categories that would result in significantly different wildfire behaviors and were based on the fuel model classes reported on in the work of Anderson[64], Scott and Reinhardt[65], and Scott and Burgan[66]. In this body of work five basic categories have been identified based on either the vegetation formation present or the nature of the surface where there is no occupying vegetation. These five categories are:

- Non-flammable surfaces (bare ground; pavement, water surfaces, and snow/ice fields)
- Grass formations;
- Scrub/Brush formations;
- Hardwood woodlands, and;
- Conifer-dominated forests

Standard Fuel Models Mapped in the AVBS PTA

Table 8 shows the results of the PTA mapping effort; for each fuel model category, the acreage of the occupied surface area, and the correspondence to special interest vegetation types.

Table 8. Alliances Represented in Each Standard Fuel Model Category

Fuel Model Category	Occupied Surface Area	Component Alliances
Non-flammable Surface	6.35 acres	Roads, paved areas, structure footprints - No vegetation cover present
Grass Formations	4.24 acres	Landscaping and leach field cover crop- No involved CNPS Alliances

[64] Anderson. 1982
[65] Scott and Reinhardt. 2001
[66] Scott & Burgan

Scrub/Brush Formations	4.76 acres	No discernible CNPS Alliances, Member species of *Cytisus scoparius, Genista monspessulana, Cotoneaster* spp. Shrubland Semi-Natural Alliance (Broom patches) are present – Special Mgt. Approach
Hardwood Woodlands	24.12	*Quercus agrifolia* Forest and Woodland
Conifer-Dominated Forests	22.62	*Sequoia sempervirens* Forest and Woodland
Total Acres	62.09	

There are four notable aspects of the mapping results shown in the table:

- 46.74 acres, representing 75% of the total PTA, are occupied by a CNPS MCV Alliance (*Quercus agrifolia* Forest and Woodland and *Sequoia sempervirens* Forest and Woodland) and to be considered as ESHA;
- 6.35 acres, representing 10% of the total PTA, are occupied by surface conditions that will not support wildfire, i.e., no vegetation cover is present;
- 4.24 acres, representing 7% of the total PTA, are occupied by non-native grass species that are in place to perform a facility operational function and will not be returned to natural ecological conditions, and;
- 4.76 acres, representing 8% of the total PTA, are occupied by brush formations where visual evaluation showed floristic characteristics that did not match up with any brush-related CNPS Alliances, but could involve the Semi-Natural broom patch Alliance.

Defining the Alila Ventana Big Sur Project Treatment Area

The first step in designing this proposed project, from the standpoint of achieving the objectives associated with wildfire risk reduction, was to define the area where the vegetation management would yield the highest level of wildfire behavior mitigation benefit. Combining direct on-the-ground experience in the project treatment area (PTA) with additional information gathered through interpretation of satellite imagery available on the Google Earth platform (GESI)[67] nine Management Units (MU) that occupied 62.09 acres within the AVBS resort property were identified. Again, these nine units are shown in Figure 2. In this figure the MUs are outlined in medium-weight white lines and also shown is Post Creek (medium-weight blue lines) that has been determined to be a Class II watercourse per the provisions of Article 6 of California's Forest Practice Rules[68]

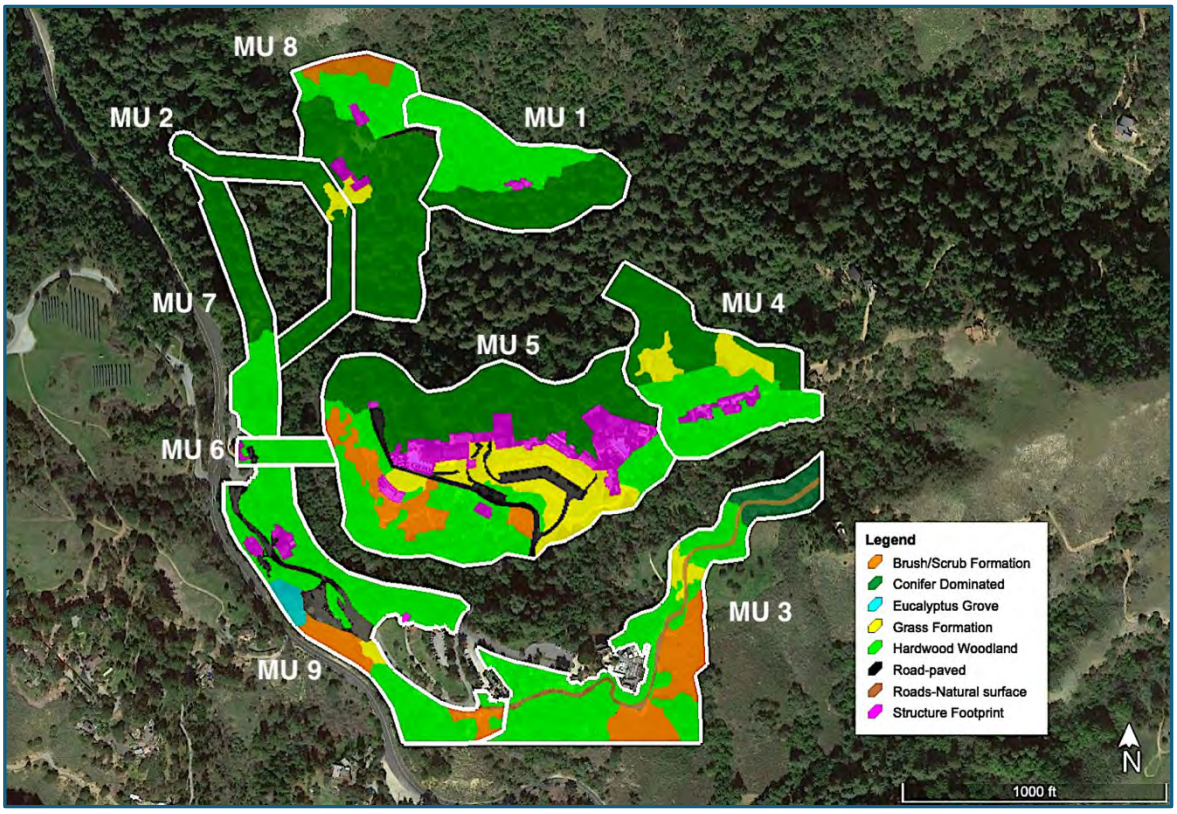
Mapping Fuel Model Categories for the Nine Management Unit Project Treatment Area

A map was generated, over the Google Earth satellite imagery (GESI), showing the distribution of the five fuel models within the nine MU PTAs. The interpretation was completed by an experienced remote sensing expert who also has direct experience with ground conditions on the subject property. The results of this mapping effort is presented in Figure 11 (below) and a summary of the acreages

[67] Google Earth Pro. December 29, 2022.
[68] 14 CCR §§ 956.4 and 956.5

involved is shown in Table 6, which shows the acreage of each mapped fuel model category by MU. It also shows where the Special Management Situation (SMS) Electrical Distribution Lines predominate the management requirements. The two MUs involved, #2 and #6, are shaded in light blue and the bottom two rows present the SMS situation in comparison to the full PTA acreages.

Figure 11. Fuel Model Categories for the Nine Management Units Comprising the AVBS PTA



A more detailed presentation for each individual MU can be found in Attachment F to this PSA.

Treatment Activities to be Employed for Both Initial Treatment and Maintenance Operations

In Section 2.5.2 of the PEIR Program Description five general categories of Treatment Activities (TA) were identified as having been addressed in the PEIR:

- Prescribed Burning;
- Mechanical Treatment;
- Manual Treatment;
- Prescribed Herbivory, and;
- Herbicides.

After careful consideration of the applicant's management goals and objectives for the resort facility, and its surrounding lands, it was determined that three of the five TAs covered in the CalVTP/PEIR were the most compatible approaches for wildfire risk-reducing fuels management. These three TAs were: Mechanical (Mc), Manual (Mn), and Prescribed Herbivory (PH). Mechanical and manual treatments will be employed when conducting both the initial and maintenance operations phases of the project; prescribed herbivory is only proposed as a maintenance phase treatment and is subject to a grazing plan review and approval by the CCC Executive Director. Attachment E serves as a placeholder for the goat grazing management plan. As they were deemed incompatible with ownership's management goals and objectives, Prescribed Burning and application of Herbicides are not proposed for use in this project.

Selection of Appropriate Treatment Activities: Site Conditions and Management Requirements

The selection of which of the three TAs would be the most appropriate at any given site within the AVBS PTA will be made on the basis of the physical elements of the setting present and operational goals and objectives of AVBS' ownership. These determinations will be made in discussions with Resort management personnel, those providing professional oversight, and the in-field contractor.

The principal setting characteristics that would be considered would include, but may not be limited to, are:

- Terrain slope – with an initial threshold being where slopes are less than 30% and those greater than 30%. Analysis of topographic terrain models have shown that the AVBS PTA is characterized by approximately 75% of slopes 30% or less, 25% in slopes between 30% and 50%, and no proposed treatment areas with slopes greater than 50%;
- Vegetation characteristics – nature and quantities that require management, for example, if there is the possibility of special status plant species being present (although both literature research and ground observations have produced no indications of presence) treatments would be scheduled outside of the flowering/seed shattering period;
- Wildlife resources – Provide avoidance by scheduling treatments outside of protocol periods for individual, or groups (e.g. migratory bird species), species;
- Geologically, or edaphically (soils), sensitive areas

Those considerations that would be related to operations of the resort facility would include, but may not be limited to, are:

- Seasonal use patterns of clients of both the Alila resort and campground;
- Noise disturbance potential from the operation of mechanized equipment;
- Visual intrusion on client experience, and;
- Potential for the generation of dust.

With this complexity of considerations involved in the decision of what TA to use, when, and where, it was concluded that the decision is best made by the professionals (Alila management staff, oversight

by professional consultants, and qualified contractors) involved in the management implementation. Given this conclusion to rely on professional judgment, and the number of aspects requiring consideration and "field fit", mechanical and manual estimates have been provided as the max acreage value that might occur, either individually and/or in conjunction with one another, i.e. mechanical and/or manual. For example, in field conditions that may not be appropriate for mechanical treatment due to difficult terrain or topography, manual treatment would be utilized as an alternative. A map showing the proposed treatment activities has been included in Attachment F.

Treatment Phases

Management actions are to be implemented in two phases, an initial treatment phase then a phase of ongoing maintenance. The purpose of the initial phase is to transition the treatment area from fuel conditions considered to be more dangerous to one that is 1) less dangerous, and 2) easier to maintain in the more desirable condition. It is estimated that the initial treatment phase will require no more than 60 calendar days of in-field work, phased in over a two-year period, and will be limited to 1) a Monday through Saturday work week and 2) 7AM to 5PM work days. The initial vegetation treatments will be designed to modify the characteristics of the current vegetation cover to achieve more desirable wildfire behaviors and restore forest ecosytems to pre-fire suppression conditions.

Initial Treatment – Summary of Treatment Types, Activities, and Fuels Types

Figure 12 shows the Treatment Types (TT) and Treatment Activities (TA) that will be employed, and the Fuel Types (FT) addressed, in the initial treatment phase.

Figure 12. Treatment Types, Activities and Fuels Involved in The Initial Treatment Phase

Treatment Types
☒ Wildland-Urban Interface Fuel Reduction ☐ Fuel Break ☒ Ecological Restoration
Treatment Activities
☐ Prescribed Burning (Broadcast)): 0.0 ac. ☐ Prescribed Burning (Pile Burning)): 0.0 ac. ☒ Mechanical Treatment (Map code in Attachment F is "Mc"): up to 48 ac. ☒ Manual Treatment (Map code in Attachment F is "Mn"): up to 45 ac. ☐ Prescribed Herbivory: 0.0 ac

☐ Herbicide Application): 0.0 ac.
Fuel Type
☒ Grass Fuel Type ☒ Shrub Fuel Type ☒ Tree Fuel Type

In order to properly handle the larger-sized and heavier vegetation that is slated to be removed during the initial treatment phase three types of treatment activities will be employed: 1) Hand operations employing primarily chainsaws and motorized pole saws, 2) Hand treatments employing chainsaws and motorized pole saws and mechanical equipment (e.g., chippers) for reducing the cut material, and 3) Mechanical treatments employing light-duty skid-steer tractors equipped with masticating head.

Initial Treatment Phase - Hand Crew Operations

The hand-crew operations will utilize light-to-medium sized chainsaws and pole-mounted pruning saws to facilitate removal of vegetation from their position in the vegetation formation structure. Subsequently, there will be two options for reducing the removed material into smaller pieces and scattering the reduced material back out onto the treated areas. The first option will use a lop-and-scatter procedure where the large pieces are cut with a chainsaw and scattered back out onto the surface of the treated areas. This operation produce will produce larger bole (medium and heavy weight fuels) materials with lengths greater than 48” and a surface fuel bed no thicker than 6”.

Initial Treatment Phase - Hand Crew Operations with Mechanical Reduction of Materials

The second option will be to site a medium duty wood chipper at appropriate locations as the work progresses and have the crew members transport the initially cut materials to the chipper site for reduction and dispersal of the chipped material back out onto the treated areas. This operation produce will produce larger bole (medium and heavy weight fuels) materials with lengths greater than 48” and a surface fuel bed no thicker than 6”. A picture of the medium-duty portable type of wood chipper that will be used for this project is to the right. The choice of specific option employed will be a field decision based on the physical characteristics of the site (primarily slope) and ability to get the chipper into the areas being treated. This machine can be equipped with a diesel-powered engine from a range of engine power output starting at 165 HP and going up to 225 HP.

Initial Treatment Phase - Mechanical Treatment

To the left is an image of the light-to-medium duty skid-steer that will be used when site conditions are appropriate. The tractor and masticating head typically weighs less than 8,000 pounds, is rubber track equipped, diesel powered, and mounted with a Fecon®-style mastication head. The machine is transportable loaded onto an equipment trailer with a 10,000lb. weight maximum and pulled by a medium-duty pickup truck or light duty material transport truck. The machine would be trailered to the primary staging area adjacent to the maintenance operations facilities, dropped off, and "walked" to the treatment locations over the resort's system of paved roads or cross country. All equipment considered for use will have gross weight under the 10,000 lb. threshold and will not be defined as "heavy" equipment under the Program.

Vegetation Maintenance Treatments

In order to retain the hazardous fuel reduction benefits produced during the initial treatment phase a regular program of maintenance will be implemented. The objectives of conducting the maintenance management will include:

- Keeping the layer of surface fuels to post-initial treatment levels in both the treated areas in brush formation mosaic and the understory in woodland formations;
- Managing the ladder fuel portion of forest and woodland formations to 1) maintain the vertical discontinuity of fuels hindering ground fire's movement into crown positions, and 2) managing for recruitment of desirable species within the constraints of keeping the ladder fuel structure to a minimum, and;
- Managing the recruitment of desirable species into crown positions in the forest and woodland formations while maintaining the desired crown spacing, the result of which is the desired horizontal fuel discontinuity.

Maintenance Treatment – Summary of Treatment Types, Activities, and Fuels

Presented below, in Figure 13, is a summary of the Treatment Types, Treatment Activities, and Fuel Types that will be involved in the program of management actions designed to maintain the shaded fuel break conditions created through the Initial Treatment process. With respect to the Treatment Activities, manual approaches will be used 1) in the vegetation-related fuel model types to maintain the established surface fuels conditions in the grass and brush associations, and 2) in multi-storied arborescent associations maintain the understory vegetation levels, continued removal of ladder-fuels in-growth, and continued bole pruning to maintain a desirable crown base height.

Figure 13. Treatment Types, Activities and Fuels Involved in the Maintenance Program Phase

Treatment Types
☒ Wildland-Urban Interface Fuel Reduction ☐ Fuel Break ☒ Ecological Restoration
Treatment Activities
☐ Prescribed Burning (Broadcast) ☐ Prescribed Burning (Pile Burning) ☒ Mechanical Treatment (Map code in Attachment F is "Mc"): up to 42 ac. ☒ Manual Treatment Map code in Attachment F is "Mn"): up to 43 ac. ☒ Prescribed Herbivory Map code in Attachment F is "PH"): up to 42 ac. ☐ Herbicide Application: 0.0 ac.
Fuel Type
☒ Grass Fuel Type ☒ Shrub Fuel Type ☒ Tree Fuel Type

Two (2) of the Treatment Types addressed in the CalVTP/PEIR[69] have been selected as appropriate to the goals and objectives of the for the Ventana Big Sur Wildfire Risk Reduction Project: Wildland-Urban Interface Fuel Reduction (Fire Prevention), and Ecological Restoration (Forest Health; referred to in Figure 1 as "Wildfire Fuel Reduction Treatments" and "Ecological Restoration Treatments", respectively).

Figure 14 shows the lands within each of the nine Management Units that will undergo vegetation management treatments designed to 1) alter the structure, and 2) reduce the amount of, wildfire fuels. The figure shows the locations of two CalVTP/PEIR Treatment Types; those that:

- Employ management practices that support Ecosystem Restoration ("ESR" in Table 9, also known as Forest Health), on lands as indicated by light green-shaded areas, and,
- Lands ("WUIFR" in Table 9), as indicated by the orange shading, where either 1) the vegetation management-related fuel reduction practices are more specific to the AVBS's goals and

[69] https://bof.fire.ca.gov/projects-and-programs/calvtp-homepage-and-storymap/

objectives (primarily landscaping) and compliance with PRC 4291 (treatment zones within 100' of structures).

In this PWP report section the practices, and subsequent resulting Ecosystem Restoration, include:

- Giving retention priority to native species when conducting the initial fuels reduction treatments;
- Creating stands that mimic those that have been historically present from the standpoint of physiognomic characteristic and species composition;
- Stands that have, in general, a healthier condition and a correspondingly lower vulnerability to wildfire, and;
- Encouraging increased levels of site occupation by desirable species through prioritized control of the species allowed to regenerate in treated areas.

In contrast, the second category involves lands occupied by structure footprints, impervious surfaces (e.g., paved or rocked surfaces), and landscaping. The impervious surfaces require no wildfire-related management, the structures require "hardening" types of management practices but do not require those that are specifically vegetation-related. The 100' defensible zone immediately adjacent to structures will receive vegetation management (in compliance with Public Resource Code 4291 specifications). The landscaping element does involve management of tree, brush, and grass species; some of which are native species. However, regardless of whether they are native species or exotics, they have been selected, and are being managed, specifically to support their resort-related uses. Due to the special use needs that are being supported by the landscape elements there is no anticipated future changes in the program's management strategies or practices.

Referring to the acreage figures in Table 9, it can be seen that approximately 80% of the proposed Project area will be subject to management practices that will, reasonably, result in vegetation conditions (both short- and long-term) that are more reflective of the natural ecology of the Big Sur region: Species compositions and overall greater levels of resiliency to diseases, insect infestations, and wildfire.

In addition, with respect to the vegetation management being proposed for implementation herein, there are other regulatory requirements that need to be considered. These regulatory requirements are found principally in the California Public Resources Code, Sections 4291 through 4296. These codes address protection of structural resources, and electrical distribution facilities, that are set in wildfire-prone environments. A more in-depth discussion regarding these requirements and how they can have an effect in this project situation can be found in Attachment C to this PSA. These regulatory requirements have been identified as a Special Management Situation (SMS) and a separate vegetation management prescription (VMRx) has been prepared and is included in Attachment C to this PSA. The vegetation management actions and performance standards set out in this VMRx have been identified to 1) fulfill the protection goals and objectives set out in the PRC sections and 2) implement processes that can lead to ecological restoration within the areas treated.

Figure 14. Map of the Management Units Showing the Distribution of the Two Treatment Types

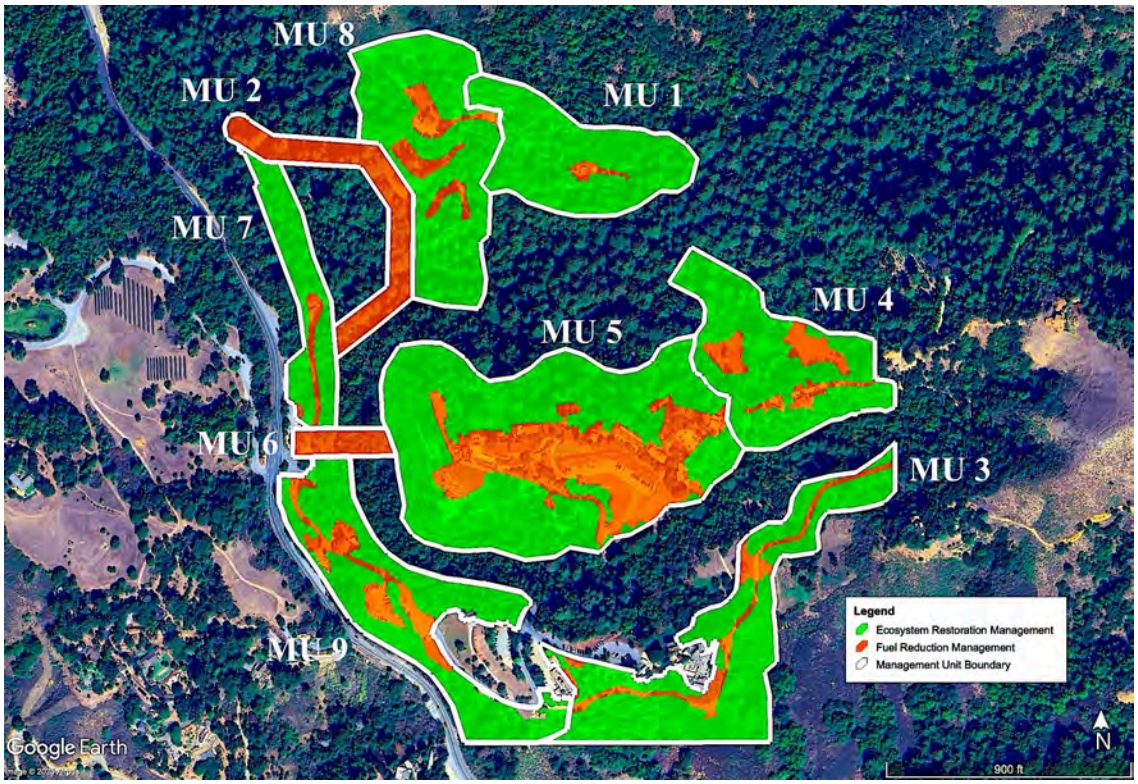


Table 9. Acreage by Treatment Types Within the Management Units

Management Units						Fuel Model Categories (ac.)				
No.	Total Acres	Ecological Restoration	PRC 4291	PRC 4293 LCP	PRC 4293 FIZ	NFS	Grass	Scrub/ Brush	Hardwood	Conifer
1	5.62	4.56	1.06			0.07	0.00	0.00	2.95	2.60
2	3.06	0.00	0.39	0.51	2.16	0.00	0.16	0.00	0.00	2.90
3	8.64	6.02	2.62			0.66	0.28	1.86	4.87	0.97
4	6.91	4.31	2.60			0.34	0.88	0.00	2.99	2.70
5	18.15	10.19	7.96			3.59	2.63	1.47	4.46	6.00
6	0.87	0.00	0.25	0.13	0.49	0.08	0.00	0.00	0.79	0.00
7	3.09	2.29	0.80			0.00	0.00	0.00	1.33	1.76
8	7.94	5.04	2.90			0.34	0.15	0.57	1.53	5.35
9	7.81	6.32	1.49			1.27	0.14	0.86	5.20	0.34
				0.64	**2.65**	**6.35**	**4.24**	**4.76**	**24.12**	**22.62**
	62.09	**38.73**	**20.07**	**3.29**		**62.09**				

NFS: Non-flammable surface LCP: Line clearance prism FIZ: Fall-in zone

Vegetation Management Prescriptions (VMRx)

The set of vegetation management prescriptions (VMRx) will be the primary tool for guiding the in-field implementation of the management actions. These VMRxs will direct the implementation of the Standard Project Requirements and Mitigation Measures, as well as additional actions required to attain the fuel reduction goals and ecological improvements desired, appropriate to the management situation addressed by each individual VMRx. Following are the principal management actions called for in the VMRx set:

- Instructions for completing reconnaissance-level field surveys to ascertain the presence of sensitive animal and plant species;
- Species-level instructions for making the fuels modifications required;
- Specific priority hierarchies for species to be removed and those to be retained (done in consideration of wildfire fuel management needs and conservation of sensitive vegetation resources);
- Specific measures to be taken to protect sensitive vegetation resources, and;
- Instructions for implementing regeneration control in order to improve ecological functioning in the treated areas

A total of six separate VMRxs will be generated and are briefly described below. The full details for each VMRx are presented in Attachment C to this PSA.

Conifer Dominated Formation (Sequoia sempervirens Alliance)

Current Setting

This 22.62-acre treatment unit has one dominant in the crown area: Coast redwood (*Sequoia sempervirens*) and corresponds directly with the conditions described as the CNPS Coast Redwood Alliance. Coast redwood is present in MUs 1, 2, 3, 4, 5, 7, and 8, but absent in MUs 6 and 9. Within the 22.62-acre treatment area, no co-dominants, such as Douglas-fir or tanoak, contribute significant cover percentages. The overstory cover percentage typically ranges from 60% to 90%, the total stand heights range from 80’ to 150’, and crown base heights range between 50 and 80 feet. Several “***fairy rings***” are present, scattered throughout the area mapped for this class. Portions of the stands in MUs 4 and 5 are within the boundaries of the resort’s campground facility and the current vegetation management activities are focused on wildfire resistance, primarily by eliminating ground fuels, and eliminating hazardous situations to resort guests. Hardwood species, principally California bay and coast live oak, are present in the understory space and were observed to be growing into the lower crown.

Prescribed Actions

Initial Treatment

In the initial treatment phase, two proposed management approaches constitute the prescribed actions for this alliance: reduction of ground surface fuels and removal of ladder fuels using the previously discussed thin-from-below approach. All “***fairy rings***” encountered will be left untouched with the exception of removing stump sprouts that are contributing significantly to the surface or ladder fuel components. Unless representing a hazardous situation, coast redwood trees will not be removed from their positions in the upper crown. Woody surface fuels (standing live and downed) are

to be cut and reduced on site using either hand (***lop and scatter***) or mechanized methods (chipper). Standing trees up to 12" DBH and limb materials are to be removed and reduced on site using the same hand or mechanized methods as with the surface fuels. For Ecological Restoration/Forest Health treatment areas, the final target density will be 75 to 100 trees per acre, representative of pre-fire suppression densities. No trees greater than 12" DBH will be removed unless they are deemed hazard trees or are dead, dying or diseased. With regard to species removed from the ladder fuel locations, the focus will be on California bay and coast live oak, not only for the primary wildfire hazard reduction, but also for their vector contributions to the transmission of the Sudden Oak Death pathogen (*Phytophthora ramorum*). Within Ecological Restoration/Forest Health areas, pockets of understory vegetation and large downed woody debris will be retained for habitat (see Attachment C).

Maintenance Treatments

There will be two rotations of maintenance treatments that will be conducted in the Coast Redwood Alliance:

- A 1-3yr rotation where either manual or mechanical treatments, or approved prescribed herbivory will be applied to control surface fuels, and,
- A 3-5yr rotation that will target ladder position fuels.

Prescribed herbivory, in this case goat grazing, will be the preferred treatment type and will be implemented consistent with the requirements of a final goat grazing management plan after approval by the CCC Executive Director.[70] The Alternative method would be mechanical mastication should the nature of the regrowth be beyond the capability of the goats to adequately remove it. Ladder fuel regrowth would be removed and reduced by hand methods (primarily use of chainsaws and pruning saws).

Hardwood Woodland Formation (Coast Live Oak Alliance)

Current Setting

The Hardwood Woodland Fuel Model category corresponds to the CNPS Alliance entitled, Coast Live Oak (*Quercus agrifolia*) Forest and Woodland. Individuals of California bay (*Umbellularia californica*) are present in the stands but never occurring in crown level percentages that would be considered as being either a dominant or co-dominant. This category occupies 24.12 acres across all MUs and is proposed for both initial treatment and maintenance treatment. The overstory cover percentage typically ranges from 40% to 90%, the total stand heights range from 35' to 60', and crown base heights range between 8' and 14'. Two primary cover percentage patterns were observed in this treatment unit:

- A high percentage dominance (up to 95%) of coast live oak with very minor inclusions of other broad-leafed species, and,
- A moderate to high percentage (no greater than 75%) dominance of coast live oak with 10 -15% inclusion of California bay.

[70] TSS. April, 2023

Prescribed Actions

Initial Treatment

This category will treated in the initial phase by, 1) removal/reduction of all surface fuels including tree regeneration, 2) removal of all stump sprouts, 3) removal/reduction of free-standing tree, scrub, and/or brush species that would be considered as ladder fuels, 4) removal of side limbs of residual trees up to a height above the ground that is appropriate to the position of the crown base height, and 5) cut/reduce suppressed, and or hazard, trees per the retention/removal rankings set out in the alliance-specific VMRx. The initial complete removal of currently existing tree regeneration will provide immediate control over the regrowth (essentially taking control of the species, and their composition percentages, that will re-occupy the stand and establish the nature of future generations). For Ecological Restoration/Forest Health treatment areas, the final target density will be 50 to 75 trees per acre, representative of pre-fire suppression densities. Within Ecological Restoration/Forest Health areas, pockets of understory vegetation and large downed woody debris will also be retained for habitat (see Attachment C).

Maintenance Treatments

Once again, there will be two rotations of maintenance management that will be conducted in the two Woodland Alliances:

- A 1-3yr rotation where either manual or prescribed herbivory will be applied to control surface fuels, and,
- A 3-5yr rotation that will target ladder position fuels.

Prescribed herbivory, in this case goat grazing, will be implemented consistent with the requirements of a final goat grazing management plan after approval by the CCC Executive Director [71] . The Alternative method would be mechanical mastication should the nature of the regrowth be beyond the capability of the goats to adequately remove it. Ladder fuel regrowth would be removed and reduced by hand methods (primarily use of chainsaws and pruning saws). In order to control the evolution of the stand using species selection management, regenerating tree species need to be identified and protected during surface fuel maintenance operations.

Scrub/Brush Formation

The total mapped area in this treatment unit is equal to 4.76 acres in MUs 3, 5, 8 and 9. However, only a portion of the total area will be subjected to initial treatment and maintenance treatments with estimates of the treated area ranging from 1.90 to 2.86 acres. This final number will be based on considerations of 1) the effectiveness with respect to wildfire protection, and 2) preservation of the ecological functioning of the residual untouched vegetation cover. The result of the proposed management of the current formations present, regardless of the species that are actually present will include:

- A vegetation pattern that will mimic the “patchiness” of areas involved in wildfire events, and,

[71] TSS. April, 2023

- Full maintenance of the ability to fulfill the ecological roles of each, and every, individual species' currently present in the retention groups; i.e. maintaining the current community-level ecological functioning.

This approach will leave, in untouched conditions, approximately 50% of the treatment area. Should any of the general species identified as sensitive resources, and/or, those associated with the following CNPS Shrubland Alliances be observed during layout of the retention groups they will have a high priority for inclusion in the areas to be left untouched.

No sensitive vegetation alliances have been identified by TSS within the scrub/brush treatments in Management Units 3, 5, 8 or 9. Because of the presence of *Baccharis pilularis, Adenostoma fasciculatum, Toxicodendron diversilobum*, the following CNPS Alliances that were given consideration, but were ultimately determined to not be present:

- *Baccharis pilularis* Shrubland Alliance (Coyote brush scrub: CDFW CA Code 32.060.00), with State and Global rarity rankings of S5 and G5;
- *Adenostoma fasciculatum* Shrubland Alliance (Chamise chaparral: CDFW CA Code 31.101.00), with State and Global rarity rankings of S5 and G5, respectively;
- *Toxicodendron diversilobum* Shrubland Alliance (Poison oak scrub: CDFW CA Code 37.940.00), with State and Global rarity rankings of S4 and G4, respectively, and;

In addition, elements of a Shrubland Semi-Natural Alliance (*Cytisus scoparius, Genista monspessulana, Cotoneaster spp.* - Broom patches CDFW CA Code 32.180.00), were occasionally encountered. Given the combination of a strong indication of actual presence and a lack of State or Global rarity ranking designations, this group was removed from further consideration.

It is worth noting that none of the alliances identified as having the potential to be present in the brush/scrub formation are considered 'Sensitive' by the CNPS ranking (i.e., S1-S3) and are therefore not considered ESHA.

Current Setting

Within this 4.76-acre treatment unit the overstory cover percentages range from 70% to 100%, average total height ranges from 4' to 6', and the crown base height criteria is not applicable. Species compositions change measurably over short distances in the MU due to very localized micro-habitat and micro-climatic influences.

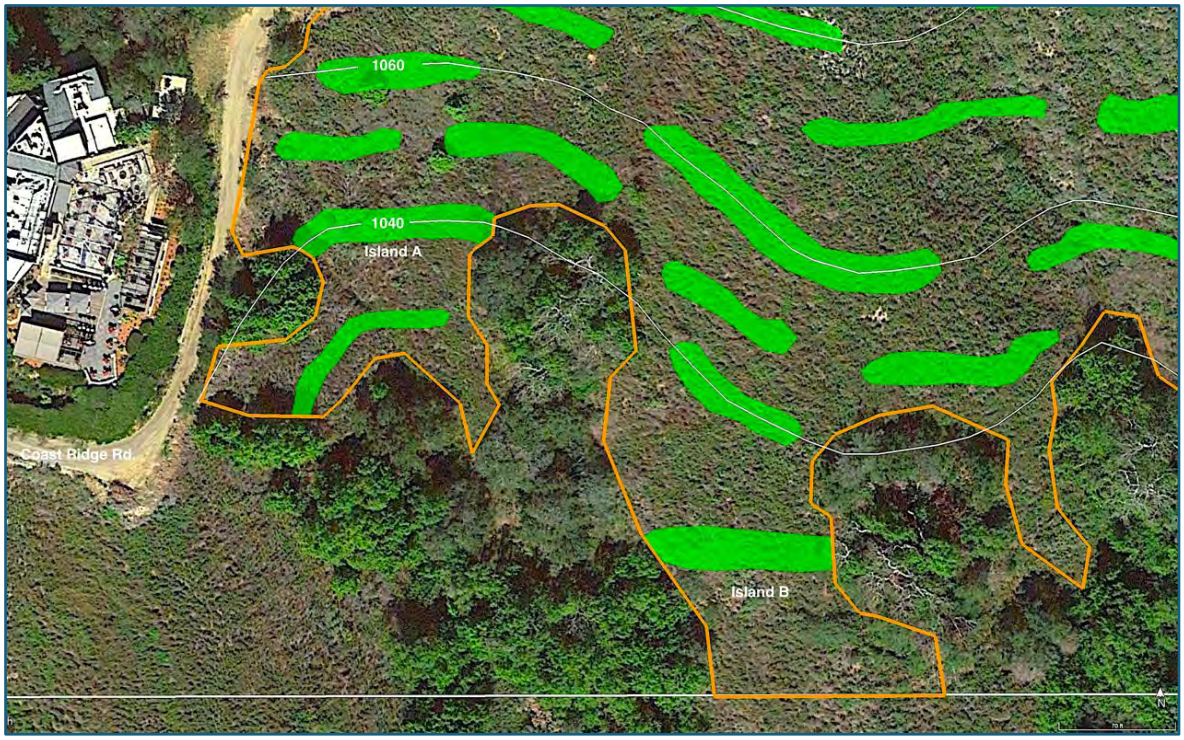
Prescribed Actions

Initial Treatment

Given the complex and ever-changing species compositions of the scrub/brush formations characterizing the AVBS PTA, managing vegetation for the purposes of reducing wildfire hazards and risks is problematic. A standard approach that is not individual species-dependent is to produce a mosaic of areas of the original vegetation cover that remains entirely untouched with areas in between changed to a native grass/low growing forbs. An illustrative example of the arrangement of the original untouched patches (also referred to as "islands") is present for a portion of a scrub/brush treatment

unit bordering Coast Ridge Road. Figure 11 shows the boundaries of the treatment unit (orange boundary line), the contour lines and elevations (white lines and numerals) and the residual islands (green shading). The islands are elongated in the "on contour" direction and overlapped to increase control of downhill surface water flow, to offset losses of the level of water disbursement control that came from the original 100% cover. Note that two islands, A and B, have been specially identified. These two examples illustrate how these islands can be configured and located to provide cover corridors to maintain the ability of wildlife to move across a landscape into a variety of habits. In this case the protective cover links areas of oak-dominated habitat. As indicated Figure 10 has been prepared to illustrate the location and form that the residual islands would take. This illustration shows a retention of original cover of approximately 20%; the number, spacing, and size of the islands can be adjusted to achieve different retention percentages.

Figure 15. Example of a Mosaic Approach to Fuels Reduction in Scrub/Brush Formations



Depending on the terrain and resource sensitivities these mosaics will be created using tracked medium-weight skid steer vehicles equipped with mastication heads (the preferred method) or hand operations. Each island will be laid out using a system of stakes that are tall enough to be visible above crown and flagging. The stakes will indicate the center point and two end points of the island of the and flagging will be hung at reasonable distances around the perimeter.

Maintenance Treatments

On a two-to-five year rotation, the originally cleared areas in between the residual islands will be treated to maintain the grass/forb formation. These actions will be completed using either prescribed

herbivory (in this case goats are the preferred method), mechanical using the same mastication equipment, or hand work. The setting of the rotation timing and method of treatment will depend on the nature (height, stem and branch sizes, etc.) of the scrub/brush regrowth. Should prescribed herbivory be selected, a Prescribed Herbivory plan submitted to the Coastal Commission for Executive Director approval. Exclusion barriers will be erected to exclude entry into the residual islands.

Grass Formations

Current Setting

This 4.24-acre treatment unit is comprised of two distinctly different land uses that are currently maintained, 1) part of the resort's landscaping, and 2) vegetation cover that provides a transpiration function over the sanitary waste treatment facilities' leach fields. Grass formations are found in MUs 2, 3, 4, 5, 8 and 9. These two types are currently under management specific to their function and, in general, do not involve native grass or forb species. These units will not be subject to any Initial Treatment actions. An VMRx has been prepared for maintenance actions to add wildfire mitigation considerations to the current management scheme and allow for the use of prescribed herbivory as a management option.

Prescribed Actions

Initial Treatment

No initial treatment actions are proposed.

Maintenance Treatments

These MUs are currently being managed on nearly a daily basis with regard to the landscaping grass areas and a bi-annual basis for the leach field cover. The actions are currently being implemented using hand tool operation or hand guided mowers. The maintenance portion of this unit's VMRx could add the use of prescribed herbivory as an additional tool.

Electrical Distribution Line Corridors

The two MUs containing these corridors (2 and 6) will receive both Initial and Maintenance treatments per the descriptions in the VMRx: Fuel reduction/Fire Prevention in the clearance prism (Figure 6) and Ecological Restoration/Forest Health outside the clearance prism. Portions of the corridors have been the subject of clearance management but there still needs the removal, and reduction, of a significant volume of larger material. The primary purpose of the management actions in the initial period will be to gain control of the regeneration process; essentially be able to promote occupation of the site by species that are compatible with the infrastructure protection needs and ***site quality retention.***

Blue Gum (Eucalyptus globulus) Stand

It is proposed, as part of this project, that this 1/3-acre stand located in the northwest corner of MU 9 be removed and the site transitioned to an oak dominated woodland. There are two primary reasons for this stand's removal:

- It is a key contributor to an elevated hazard level due to 1) its proximity to the potential ignition source created by the presence of Highway 1, the very heavy surface fuel loading, and 3) the high flammability of the eucalyptus fuels, and,
- It is considered an exotic invasive species.

However, in this part of the Central Coast eucalyptus stands can provide over-wintering habitat for the Monarch butterfly. The USFWS has found that listing is warranted but action has been precluded by work on higher-priority listing actions. With this decision, the monarch becomes a candidate for listing under the Endangered Species Act (ESA), and its status will be reviewed each year until it is no longer a candidate72. The insect's presence, or absence, in this particular stand was not documented as a result of the initial "Desktop" effort. As such, as part of the pre-operational preparation, a reconnaissance-level survey will be conducted to determine whether the species has, or has not, a significant presence in the stand. Should the species be determined to be present, work will not occur during the Monarch butterfly overwintering season.

Prescribed Actions

Initial Treatment

The initial treatment will involve removal of all the aerial portions of the trees by hand falling and lopping. Bole materials (up to a small end diameter of six (6) inches) will be cut into manageable lengths and removed to a designated staging/storage area on the AVBS ownership. All lopped material and accumulated surface fuels will be chipped and also removed to the designated staging/storage location.

Maintenance Treatments

The maintenance treatment will commence one year after the initial removal with 1) a regeneration survey that will be conducted in order to determine if desirable native species (as defined in the Eucalyptus VMRx present in Attachment C) are regenerating back onto the open site or if artificial regeneration needs to be considered, and 2) removal of all stump sprouts using hand-held equipment. In the second year after the removal the two tasks described above will be completed. In the third year, control of regenerating surface fuels could be accomplished using herbivores (goats) per the guidelines established in a goat grazing management plan, subject to review and approval by the CCC Executive Director. Subsequent management past the fifth year is to assume a regular 3-to-5-year return rotation based on the need for wildfire hazard reduction.

Addressing Expected Impacts Resulting from Project Implementation

Implementing the proposed project will result in changes to the current setting. To ensure that these changes do not either exceed thresholds levels of adversity and significance, or, if these thresholds are exceeded, that appropriate mitigation measures are implemented, there will be full compliance with the provisions in the:

- CalVTP PEIR,

[72] USF&WS. December 15, 2020.

- Coastal Vegetation Treatment Standards (see Attachment B), and;
- Standard Project Requirements and Mitigation Measures Checklist (see Attachment G).

Following, in Chapter 3, is the completed Project Specific Analysis Checklist that details, for each of the CalVTP PEIR addressed impacts, the applicability in the case of the AVBS proposed project, the Standard Project Requirements and Mitigation Measures that apply, and an evaluation of the AVBS project's impact's significance in comparison to the standard set out in the CalVTP PEIR.

Pre-Operational Preparation

Prior to the commencement of field operations, including both the initial treatment phase and on-going maintenance, the following preparation activities will be completed:

- Delineating the treatment area boundaries with highly visible flag lines;
- Conducting reconnaissance-level field surveys, if called for in the pertinent VMRx, to acertain the presence of sensitive resources, and;
- If sensitive resources are determined to be present install suitable identification, or physical protection, materials.

Implementation of Management Activities

The in-field management will be implemented by a fully capable, experienced and licensed contractor. Periodic oversight will be provided by a California Registered Professional Forester, or a suitable qualified designee, on no less than a weekly basis. For each distinctly identified treatment area the visits will include:

- An initial training session with all members of the contractor's crew to go over the management actions and protection measures required for sensitive resources;
- A visit prior to the commencement of field work to assure all the pertinent pre-operational preparation has been completed and any required installations properly deployed;
- Weekly visits to assess progress and ensure the work is being properly implemented, and;
- A completion meeting prior to any off-site movement of the contractor to assure the work has been completed, meets the performance standards, and all boundary and sensitive resource protection material have been removed.

CHAPTER 3 - PROJECT SPECIFIC ANALYSIS

Determination

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

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

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

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

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

_____ _____

Signature Date

_____ _____

Printed Name Title

_____

Agency

Aesthetics and Visual Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities	LTS	Impact AES-1, pp. 3.2-16 – 3.2-19	Yes	AES-1 and AES-2	None	LTS	No	Yes
Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	LTS	Impact AES-2, pp. 3.2-20 – 3.2-25	Yes	AES-3	None	LTS	No	Yes
Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Non-Shaded Fuel Break Treatment Type	LTS	Impact AES-3, pp. 3.2-25 – 3.2-27	No	None	None	NA	NA	NA

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

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

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

Discussion

Impact AES-1

California State Route 1 (also a federal byway) has been officially designated as a Scenic Highway[73], runs along the western and southwestern boundaries of the AVBS ownership in which the nine MUs are located, and provides the only vantage point from which significant numbers of the public could potentially view the AVBS PTA. The traveled surface is separated from the project parcel by the Caltrans right of way.

In order to assess the reasonability that the treatment areas could actually be viewed from SR1 an analysis of the potential constraints was conducted. This analysis considered two elements of the viewshed's setting:

- Topographic relief relationship of the potential vantage points and the PTA, and,
- The oblique nature of the lines of sight.

Six topographic profiles were generated and showed that in every case the potential vantage point was in a significantly lower position (approximately 100' in every case) relative to the PTA. The conclusion, with respect to a topographic relationship, was that there were no vantage points where significant numbers of the public could view the PTA. The second element addressed was the oblique nature of the lines of sight. When a vantage point is directly above a feature of interest the line of sight is considered to have an oblique value of 90º and when it is perfectly level the value would 0º. An analysis of the base topography and the addition of an overlay of screening vegetation with an average crown height of 100', indicated very low levels of obliqueness (not ever greater than 10º) for all four topographic profiles. The conclusion here was, that in every case, the low angle of view would make it impossible to see through the intervening vegetation to view the PTA.

Lastly, the proposed actions will not result in a readily identifiable change in the visual appearances of the vegetation associations being managed, with the exception of the removal of the Eucalyptus grove per guidance in the Invasive Species Management Plan. The removal of this grove is a first step in a transition to the site being occupied by a mixed hardwood, but oak dominated, woodland. For example, employing the mosaic approach for the scrub/brush association will not completely remove the brush as a visual feature; only modify into a variation that is also encountered in the natural setting found throughout the region. In general, none of the nature or intensity of the proposed actions are reasonably expected to cause significantly observable changes in the visual appearances of the vegetation associations present.

Impact AES-2

In addition to the segments of SR1, views of the general project area are also possible from Coast Ridge Road. This road originates at the entrance to the AVBS resort and affords access via system branches that are all fully paved. The Coast Ridge Road then continues on past the facility toward the east on an

[73] Caltrans. January, 2023

un-paved road with access controlled by a coded gate. The road beyond the gate provides access to a very limited number of private residences (estimated at less than 10) and the national forest (including the Ventana Wilderness area). Coast Ridge Road has not been designated as a federal, state, or county, scenic highway or route.

Impact AES-3

This impact is not applicable in this project situation as neither initial treatment nor maintenance treatment will result in producing a Non-Shaded Fuel Break Treatment Type.

New Aesthetic and Visual Resource Impacts

None

Agricultural and Forestry Resources

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

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Impact AG-1: Directly Result in the Loss of Forest Land or Conversion of Forest Land to a Non-Forest Use or Involve Other Changes in the Existing Environment Which, Due to Their Location or Nature, Could Result in Conversion of Forest Land to Non-Forest Use	LTS	Impact AG-1, pp. 3.3-7 – 3.3-8	Yes	None	None	LTS	No	Yes

New Agriculture and Forestry Resource Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact AG-1

Although, treatment activities would alter forestland through vegetation removal, the prescriptions for the forests/woodland area would retain cover consistent with the definition of forestland as defined by PRC Section 12220(g) and MCV alliance membership rules. Management actions (both initial treatment and maintenance treatments) comprising the PTA that is the subject of this PSA, would not result in the loss of forestland or conversion of forest land to a non-forest use.

New Agriculture and Forestry Resource Impacts

None

Air Quality

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	SU	Table 3.4-1; Impact AQ-1, pp. 3.4-26 – 3.4-32; Appendix AQ-1	Yes	AQ-1	MM AQ-1	LTS	No	Yes
Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk	LTS	Table 3.4-6; Impact AQ-2 pp. 3.4-33 – 3.4-34; Appendix AQ-1	Yes	HAZ-1; NOI-4 and 5	None	LTS	No	Yes

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	LTS	Section 3.4.2; Impact AQ-3, pp. 3.4-34 – 3.4-35	No	AQ-4 and 5	None	LTS	No	Yes
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	SU	Section 3.4.2; Impact AQ-4, pp. 3.4-35 – 3.4-37	No	None	None	NA	NA	NA
Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust	LTS	Impact AQ-5, pp. 3.4-37 – 3.4-38	Yes	HAZ-1; AQ-2; NOI-4 and 5	None	LTS	No	Yes
Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	SU	Section 2.5.2; Impact AQ-6; pp. 3.4-38	No	None	None	NA	No	Yes

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

New Air Quality Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact AQ-1

The potential significance of Impact AQ-1 needs to be considered in light of several conditions characterizing the PTA that is the subject of this PSA:

- Relatively small size of surface area to be treated (a total of 62.09 acres);
- Short, estimated to be a 60 calendar-duration for the operation;

- An operational approach dominated by use of hand crews for both the initial treatment and maintenance treatments;
- With the exception of the segment of Coast Ridge Road described in the following bullet, all transport of required equipment and personnel will primarily be over public and private paved roadways;
- A naturally surfaced 0.48-mile section of Coast Ridge Road will be required to access the 12.26 acres comprising MUs 3 and 4 (~40% of the full project area and requiring ~24 calendar days of operations),
- Contractor-supplied hand crews will travel to and from management locations in multi-person-type vehicles;
- The mechanized equipment to be used (chippers, skid-steer tractors, and remotely guided mowing machines) will all be either trailer-ready (up to 10,000 lbs.), towable, or suitable to be placed in the bed of standard-sized pickup trucks.

Given the combination of a minimal emissions "footprint" and the implementation of Mitigation Measure AQ-1, it is reasonable to conclude that implementing the proposed project actions will result in a Less Than Significant (LTS) impact.

Impact AQ-2

In regard to this impact, given the combination of the project design and implementation of the Standard Project Requirements (SPR) identified in the PEIR, it is reasonable to conclude that project implementation would not exceed the impact level of LTS. The project will be implemented over a comparatively low total acreage of 62.09 acres and the primary operational approach will employ manual removal and reduction in both the initial treatment and maintenance treatments. Furthermore, the full initial treatment management period is not expected to exceed 60 calendar days and, due primarily to biological resources conservation considerations, will take place in the winter period; a period where the number of guests at the Resort are minimal.

Impact AQ-3

This impact is not pertinent to either initial treatment or maintenance treatments that are the subject of this analysis. This conclusion is due to the facts that, 1) the geologic substrate under any of the MUs, or, for that matter, the full ownership parcel, is not characterized by the presence of serpentine rock nor is surface by serpentine-derived soils, and 2) few unpaved roads will be used for the moving of equipment.

Impact AQ-4

This impact is not pertinent to this analysis as no form of prescribed burning will be employed in either initial treatment or maintenance treatments.

Impact AQ-5

With respect to the resort guests being exposed to odors from diesel exhaust, it is reasonable to conclude that the risk will be minimal due to, 1) the short durations of time required for completion of both the initial treatment and subsequent maintenance treatments, 2) the relatively low volume of exhaust emissions put out by the hand tools and medium-weight skid-steer equipment, and 3) the implementation of SPR HAZ-1 (proper equipment maintenance), SPR NOI-4 (separation distance requirements between operations and receptors), and SPR NOI-5 (restrictions on equipment idling time). It is expected that the LTS impact level will not be exceeded due to implementation of either the initial treatment or maintenance treatment phases of this project.

Impact AQ-6

This impact is not pertinent to this analysis as no form of prescribed burning will be employed in either initial treatment or maintenance treatments.

New Air Quality Impacts

None

Biological Resources

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project1	List MMs Applicable to the Treatment Project1	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	PS	Impact BIO-1, pp 3.6-131–3.6.138	Yes	AD-2; BIO-1, 2, 3, 4, 5, 6, 7, & 8; GEO-1 & 7; HYD-1, 3, 4,	MM/BIO-1a, 1b, & 1c	LTS Check this with impact post-MM	No	Yes

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project1	List MMs Applicable to the Treatment Project1	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	PS	Impact BIO-2, pp 3.6-138–3.6-184	Yes	AD-2; BIO-1, 2, 9, 10, 11, 12,	MM/BIO-2a, 2b, 2c, 2d, 2e, 2f, 2g, & 2h; MM/BIO-3a, 3b, &, 3c	LTS	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function	PS	Impact BIO-3, pp 3.6-186–3.6-191	Yes	AD-2; BIO-1, 2, 3, 4, 5, 6, 8, GEO-1 & 7; HYD-1, 3, & 4	MM/BIO-3a, 3b, &, 3c	LTS	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	PS	Impact BIO-4, pp 3.6-191–3.6-192	No	BIO-1, 4,	NA	LTS	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	PS	Impact BIO-5, pp 3.6-192–3.6-196	No	BIO-10, 11,	NA	LTS	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197–3.6-198	Yes	BIO-1, 3, 4 5, & 12,	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	No Impact	Impact BIO-7, pp 3.6-198–3.6-199	Yes	AD-1, 2, and 3; BIO-1, 9	NA	No Impact	No	Yes

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project1	List MMs Applicable to the Treatment Project1	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	No Impact	Impact BIO-8, pp 3.6-199–3.6-200	Yes	AD-3	NA	No Impact	No	Yes

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

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

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

General Aspects

Technical leadership on this project has been, and will be through its implementation, provided by Tad Mason and Steven Daus, who between them have over sixty years of experience as California Registered Professional Foresters. Both graduated from the School of Forestry at the University of California, Berkeley and Dr. Daus continued on to a doctorate in Ecological Systems Analysis at the University of California, Davis. During his tenure as a registered forester Dr. Daus also held a CAL FIRE certification enabling survey and recording of cultural resources for projects under the jurisdiction of California's Forest Practice Act.

As previously discussed in the section on the vegetation management prescriptions (VMRxs), the set of VMRxs will be the key implementation guidance documents. Included in each VRMx will be instructions regarding the following:

- Content requirements for the pre-operations reconnaissance-level survey (if warranted) (SPR BIO1.1, SPR BIO-3, SPR BIO-7, SPR BIO-8, and SPR BIO-10));

- Actions required to prepare the site, and the contract crew, for the operations including PTA boundary flagging, barrier fencing, installing protection measures for identified sensitive resources where required, and work crew procedures training (SPR BIO-2 and SPR BIO-11);
- Incorporating the provisions of the invasive species control plan (See Attachment D) previously developed (SPR BIO-9);
- Implementing the actions taken in the initial phase that will result in the desired fuel modifications (SPR BIO-4 and SPR BIO-8);
- Actions needed to cleanup and address any site vulnerabilities, if warranted, and;
- Implementing the actions taken in the subsequent maintenance phase that will result in the desired fuels conditions and movement toward natural ecological function of the residual stand of vegetation.

Discussion of Individual Impacts

Impact BIO-1

A desktop analysis was completed for the eleven species identified in the CNDDB 5-mile database search, plus the two Eriogonum species that are elements of the Smith's blue butterfly habitat, using 1) the metadata for the individual records of observation (distance between the project site and the closest observation and the most recent date the observation was recorded; found in the individual Calflora species profiles) and 2) a comparison of the published habitat requirements for each species and the habitats characterizing the AVBS PTA. Of these eleven species it was determined that seven could be eliminated from further consideration due to their very low, or even non-existent, likelihood they would be present in the TA.

These species, along with their listing status and presence likelihood estimation results are shown below in Table 10. Greater details with regard to information used in a desktop-level habitat relationship analysis are presented for each of the involved species in the following sections.

Table 10. Six Plant Species Identified for On-going Consideration

Scientific Name	Common Name	FT	FE	CST	CSE	SSC	G/S	R	PP
Abies bracteata	Bristlecone fir					X	G2G3/ S2S3	1B.3	L
Arctostaphylos edmunsii	Little Sur manzanita						G2S2	1B.2	M
Erigonum latifolium	Coast buckwheat						NR	NR	L
Eriogonum parvifolium	Dune buckwheat						NR	NR	M
Delphinium hutchinsoniae	Hutchinson's larkspur						G2S2	1B.2	L
Malacothamnus palmeri lucianus	Arroyo Seco bush-mallow						G3T1Q /S1	1B.2	M

BCC – Biological Conservation Concern CFL – Candidate for Listing. PFL – Proposed for Listing
R – CNPS Rarity Rank PP – Potential for Presence NR – No Reasonable Expectation L – Low M – Moderate H – High
VL - Very Low G/S – Global or State Rank

Bristlecone fir (Abies bracteata)

Bristlecone fir is a tree species in the Pinaceae family that exists only in Monterey County in the Santa Lucia Mountains. The species has a CNDDB Sensitive Natural Communities Rank of S2-S3 and CNPS California Rare Plant Rank of 1B.3. The nearest known occurrence is 3.88 km (2.41 miles to the north of the project area along Pfeiffer Ridge. While no occurrences are known in the PTA, potential habitat (mixed conifer forest) does exist and it was reasonably considered to have a low level likelihood for presence. If suitable habitat is confirmed to be present during the reconnaissance-level survey (SPR BIO-1) and cannot be avoided, protocol-level surveys will be completed for the species (BIO-7). If the species is encountered during the protocol-level surveys, it will be mapped and flagged for avoidance with at least a 50 ft no-disturbance buffer per MM BIO-1b. The VMRxs prepared for the Redwood and Coast Live Oak types will assign a high level of priority for retention should the species be encountered in either the initial treatment or the regeneration process occurring during the maintenance period.

Little Sur manzanita (Arctostaphylos edmundsii)

Little Sur manzanita is an evergreen shrub with a low growth form found in chaparral and coastal scrub. The species has a CNDDB Sensitive Natural Communities Rank of S2 and CNPS California Rare Plant Rank of 1B.2. The general habitat for this species is indicated as coastal and the associated communities include Northern Coastal Scrub and chaparral. Calflora's "Observation Search" tool shows that the closest observation, at a distance of 3.5 km (2.17 mi.) from the AVBS PTA, was recorded in 1981, and six others at distances greater than 4.5 km (2.80 mi.) from 1963 to 2002. The indicated elevational range for occurrence is 0 – 260 meters (0-853 ft.) which is below the average 1080-foot elevation of the PTA. The Calscape species profile shows that this species is found 1) on sandy, coarse-grained or other fast draining soils with a PH range between 5.0 - 7.5, and 2) in association with Coyote Brush (*Baccharis pilularis*), *Ceanothus* species, Seaside Daisy (*Erigeron glaucus*), Cliff Buckwheat (*Eriogonum parvifolium*), *Iris douglasiana*, and native ferns. This species was not observed to be present during any of the project team site visits nor is its presence clearly indicated in the materials reviewed in the "Desktop" analysis. Thus, it is reasonable to conclude that it is unlikely to be present. However, it has been given a high priority for inclusion as a component in the retained groups in the VMRx prepared for the Brush/Scrub formation should it be identified during operations.

Hutchinson's larkspur (Delphinium hutchinsoniae)

Hutchinson's larkspur is a perennial herb in the Ranunculaceae family. The species has a CNDDB Sensitive Natural Communities Rank of S2 and CNPS California Rare Plant Rank of 1B.2. The general habitat for this species has not been defined and the associated communities are indicated as Chaparral, Coastal Prairie, Northern Coastal Scrub, and Mixed Evergreen Forest. Calflora's "Observation Search" tool shows that the closest observation, at a distance of 1.71 km (1.06 mi.) north along SR1 from the AVBS PTA, was recorded in 2022. Two additional records were obtained along Pfeiffer Ridge Road, at a distance of 5.39 km (3.35 mi.) north along SR1 from the AVBS PTA, in 2002. The indicated elevational range for occurrence is 0 – 2,280 meters (0-7.480 ft.) which includes the average 1080-foot elevation of the PTA. The available literature has no information on either soils, or other vegetation species, associations. The results of the "desktop" habitat relationship analysis indicate that this species would have a moderate-to-high likelihood of presence within, or immediately adjacent to, the AVBS PTA. If suitable habitat is confirmed

to be present during operations and cannot be avoided, protocol-level surveys will be completed for the species (SPR BIO-7). If the species is encountered during the protocol-level surveys, it will be mapped and flagged for avoidance with at least a 50 ft no-disturbance buffer per MM BIO-1b.

Coast Buckwheat (Eriogonum latifolium)

Coast buckwheat (Eriogonum latifolium) is a perennial herb that is native to California. Its habitat is designated "Coastal" and associated communities include Coastal Strand and Norther Coastal Scrub. The species has not been listed as having federal or California state special status. The Calflora species profile[74] shows no occurrence records with a reasonable distance of the AVBS project site; the closest being in Andrew Molera State Park approximately 9 kilometers (5.6 miles) up coast. This species is being included as it is a primary food source for the Smith's blue butterfly, would be in indicator of appropriate habitat, and a potential indicator of species presence. This species has been included as one of the target plants when conducting the pre-operational reconnaissance-level field surveys.

Dune Buckwheat (Eriogonum parvifolium)

Dune Buckwheat (Eriogonum parvifolium) is a shrub that is native and endemic to California. Its habitat is designated "Coastal" and associated communities include Coastal Strand and Coastal Sage Scrub. The species has not been listed as having federal or California state special status. The Calflora species profile[75] shows a large number of occurrence records with a reasonable distance of the AVBS project site; the closest being just to the south of the project area across the Mule Creek drainage, at a distance of approximately 450 meters (0.28 miles). Although not carrying a special status designation, this species is being included for consideration as it is a primary food source for the Smith's blue butterfly, would be in indicator of appropriate habitat, and a potential indicator of species presence. This species has been included as one of the target plants that will be looked for when conducting the pre-operational reconnaissance-level field surveys.

Arroyo Seco Bush-mallow (Malacothamnus palmeri var. lucianus)

This bush-mallow is a perennial shrub in the Malvaceae family that is known to be associated with chaparral vegetation types. The species has a CNPS California Rare Plant Rank of 1B.2. The general habitat is described as meadow and the associated vegetation community as chaparral. The species has been observed to occupy bed rock sites and soils described as sandy loams. Calflora's "Observation Search" tool shows that the closest observation, at a distance of 3.00 km (1.86 mi.) from the AVBS PTA, was recorded at an elevation of 400 ft, and in 1973. There were an additional four records available and all were located within the floodplain of the Big Sur river at elevation no greater than 282 ft. The results of the "desktop" habitat relationship analysis indicate that this species would have low likelihood of presence within, or immediately adjacent to, the AVBS PTA. However, If the species is encountered during any further project team's site visits or the reconnaissance level survey, it will be mapped and flagged for avoidance with at least a 50 ft no-disturbance buffer per MM BIO-1b.

[74] Calflora. January 22, 2024

[75] Calflora. January 22, 2024a

In addition, the set of VMRx's prepared to guide the vegetation management actions proposed for this project have been developed in consideration of potential impacts on VegCAMP-identified Sensitive Natural Communities at the alliance level. The performance standard, with regard to determining significance of an adverse impact, are the alliance and alliance/association membership rules (Rules) that are included in each CNPS alliance profile. The significance threshold determinants in these Rules involve individual species percentage changes in the canopy. This project is proposing fuel reductions that require removal of individuals from a variety of species, but the primary focus is on breaking fuel bed continuities at the surface levels and below crown base height positions (ladder fuels) in these multi-storied Hardwood Woodland and Redwood Forest grouping of alliances. It would be reasonable to conclude that any changes in crown species compositions would be, 1) far under a level of significance, and 2) justifiable. Another area that has been proven to be problematic, in terms of preparing a species dependent management prescription, is management of scrub/brush formations that have a moderate (10 to 15) number of species that would be considered co-dominants across a landscape. Attempting to manage these formations by removing individual plants is not reasonable due to the high total crown cover percentages and densities where the removal actions could result in unacceptable levels of damage to the residual vegetation. A proposed solution is to use a professional-standard area-based method referred to herein as "mosaicking". The AVBS PTA contains a surface area of 4.76 acres of scrub/brush type and it is proposed to remove up to 50% (2.38 acres) of the brush cover and replace it with sustainable areas covered by short grass and low growing forb species. The remaining 2.38 acres would be maintained in its original condition in the form of "islands" on which no vegetation management would occur.

Given that:

- There is no involvement of plant species federally designated as threatened or endangered;
- None of the namesake species for the alliances involved have been federally designated as threatened or endangered, nor do they carry any CNPS state ranking;
- The proposed wildfire hazard/risk reduction approach (thin-from-below) will result in insignificant changes in the crown thus meeting the performance standards set out in the MCV Rules set out for each alliance;
- There are very low acreages involved;
- The selected treatment activities result in minimal ground disturbance, and;
- There will be implementation of any warranted SPRs and/or MMs

it is reasonable to conclude that impacts on special-status plant species, either directly or through habitat modifications would not rise above the LTS level.

The potential for adverse effects from the treatment activities, impacts, and intensity of disturbance onto special-status plant species is addressed and consistent with those analyzed within the scope of the Program Environmental Impact Report (PEIR). In reference to SPR BIO-1, AVBS will conduct, prior to any commencement of vegetation removal, reconnaissance-level surveys for the Conifer-Dominated, Hardwood Woodland, and Brush/Scrub fuel model types. One objective of this survey effort will be to identify whether any of the species listed in Table 10 are present. There is likely only one species present where Mitigation Measures BIO-1a and BIO-1b would apply: Bristlecone fir. If

this species is found to be within the project area, a no-disturbance buffer of at least 50 ft will be established around the areas occupied by the species, within which treatments will not occur. All implementation crews will be trained to identify special-status species discovered in the project area, as well as some potential species with suitable habitat (SPR BIO-2). Surveys and mapping of sensitive natural communities has been done within the project area and the treatments designed to promote ecological resilience for sensitive vegetation communities (SPR BIO-3). In relation to SPR BIO-6, all work will adhere to sanitation standards for Sudden Oak Death. Invasive plant treatment will be specifically done in the project, and preventing spread of French broom seeds will be done through training of work crews on identification, timing and management (SPR-BIO-8). To comply with SPR AQ-4, vehicles will limit their speeds on AVBS roads to 15 mph and water them if necessary to avoid spreading dust. Any mechanical treatments will be suspended with a likely forecast of rain within 24 hours (SPR GEO-1). Potential erosion will be monitored after the first significant rainfall post-implementation (SPR GEO-4). No heavy equipment (i.e. equipment weighing more than 10,000 pounds) will be used on slopes over 30 percent (SPR GEO-7).

Impact BIO-2

After conducting the habitat relationship analyses for the nine animal species identified as having a presence in the CNDDB 5-mile database, five species were removed from further consideration. The information considered in drawing this conclusion was based on each species' published habitat requirements and they related to habitats characterizing the AVBS PTA. The four individual species retained in the process, along with their current listing status, rarity rankings and likelihood of presence indicator are listed below:

Table 11. Animal Species Identified for On-going Consideration

Species	Listing Status – Federal and California State					Rarity Rankings		Presence Likelihood			
	FT	FE	CST	CSE	SIS	G	S	N	L	M	H
Danaus plexippus plexippus					**WL**	**ICUN RL G4T2T3**	**S2S3**		**X**		
Euphiloides enoptes smithi		**X**				**G5T1T2**	**S1S2**		**X**		
Rana boylii		**X**		**X**					**X**		
Rana dratonyii	**X**				**SSC**	**G2G3**	**S2S3**		**X**		
Neotoma fuscipes luciana					**SSC**	**T3**	**S3**			**X**	

FT = Federal Threatened FE = Federal endangered CST = California Threatened CSE = California Endangered
SIS = Special Interest Species G = Global S = California State WL = Watch List SSC = Special Species of Concern
IUCN RL = International Union for Conservation of Nature – Red List S = California State N = No Likelihood
L = Low Likelihood M = Moderate Likelihood H = High Likelihood

Greater details regarding the information used in this "desktop" analysis are presented for each of the three retained species in the following sections. In addition, consideration was given to the avoidance measures that will be implemented in addition to the SPRs and MMs (e.g., excluding all project actions from areas determined to be characterized by riparian conditions) when making the determinations of presence likelihood.

Consideration was also given to two groups of bird species that, as common knowledge indicates, are known to be present: nesting birds and species that come under the jurisdiction of the Migratory Bird Treaty Act of 1918[76]. The preferred management implementation season is from October 15th to December 15th and it was selected primarily to avoid activity/nesting periods of MBTA species and non-MBTA birds found in the Monterey County area. The Monterey Audubon Society posted on their web portal that all species known to be present in the Monterey County Area, including eagles, hawks, owls, hummingbirds, songbirds, woodpeckers, shorebirds, and waterbirds, nested in the period starting January 1st through August 31st with an exception being Acorn Woodpeckers who, if food supplies are good can nest twice in a season with pre-fledgling chicks present in the nest through to early November[77].

Monarch (Danaus plexippus)

The western monarch butterfly is listed as a candidate for protection under the federal Endangered Species Act, however, its listing action has been precluded and it is on a watch list. Overwintering habitat for this species within the Coastal Zone represents ESHA. Local ordinances often protect this species as well. The butterfly relies on the California landscape for both breeding and overwintering habitat. In the spring, adult butterflies begin to move inland feeding on flower nectar, and mating and laying eggs on a variety of milkweed plants, the sole source of food for monarch caterpillars. Several overwintering sites have been recorded for the central coast and Big Sur coastline including: near the mouth of Castro Canyon, about 1.8 miles south of the project area (2016) and Sycamore Canyon near Pfeiffer Beach, about 1.2 miles northwest of the project area (2016). There are no identified California monarch overwintering sites within the project area and the potential for impact is very low. A reconnaissance-level survey (per SPR BIO-1) will be completed prior to operations to determine if there is a significant presence in the 0.34 acre treatment area. If such a presence determination is made, then operations will be deferred until the overwintering season has concluded.

Smith's Blue Butterfly (Euphilotes enoptes smithi)

Smith's Blue Butterfly is listed as Endangered under the federal Endangered Species Act. Coast (*Eriogonum latifolium*) and Seacliff (*Eriogonum parvifolium).* Buckwheat are the exclusive host plants of Smith's blue butterfly. Each plant species blooms at different times, creating a temporal breeding boundary within the species. Females lay eggs on the flower heads and one week later, larvae emerge. Larvae feed on the petals and seeds and are cryptically colored. The four larval stages, or instars, last 3-4 weeks. Pupation occurs either in the flower or leaf litter beneath the plant. If the former occurs, it

[76] USF&WS, MBTA. 16 U.S.C. §§703-712.

[77] Monterey Audubon Society. January 15, 2024.

will fall into the leaf litter and remain there for 47 weeks until the butterfly emerges. Several populations have been reported in the Big Sur area through the CNDDB database including: chaparral habitat in cliffs northwest of Pfeiffer Big Sur State Park (1989), east side of Highway 1 in Lafler Canyon (1998), road cuts along east side of Highway 1 near Torre Canyon (1998). Hostplants *E. latifolium* and *E. parvifolium* are most commonly associated with coastal dunes and coastal sage scrub plants communities. If there is direct observation of the butterfly, or either of the host plants, during the reconnaissance-level survey (SPR BIO-1) and cannot be avoided, the plant will be flagged and avoided with a 10-ft no-disturbance buffer. If a Smith's blue butterfly is observed during treatment activities, the location will be mapped, flagged and individual avoided with a minimum 100 feet no-disturbance buffer (MM BIO-2b).

Foothill Yellow-Legged Frog (Rana boylii)

Foothill yellow-legged frog is listed as Endangered at the federal and California state levels. This aquatic species requires shallow, flowing water, found in small to moderate-sized streams with at least some cobble-sized substrate. This type of habitat is best suited to oviposition and provides significant refuge habitat for larvae and post-metamorphs. Foothill yellow-legged frogs are infrequent or absent in habitats where introduced aquatic predators such as fishes and bullfrogs are found including small streams and wet areas. Extant individuals occurring near the AVBS PTA have been recorded in the Big Sur River including Pfeifer Big Sur State Park, Pheneger Creek (2018), Andrew Molera State Park (2018) and 1 mile south of the town of Big Sur (2018). Individuals have also been reported in the creek of Sycamore Canyon, upstream and east of Pfeiffer Beach (2018). Data displaying extant and verified sightings of this species showed no indication of this species within the PTA, thus suitable habitat for this species are not documented in the project area. As with the California red-legged frog, any areas that could provide these essential conditions are to be excluded from any project actions by the implementation of the WLPZ system. As legally compliant protection measures are to be put into place, based solely on the presence of the Class II Post Creek, the need for protocol-levels surveys would not be reasonably warranted.

California Red-Legged Frog (Rana draytonii)

California red-legged frog (CRLF) is listed as Endangered under the federal Endangered Species Act and as a Species of Special Concern by the California Department of Fish and Wildlife. The project area is located within USFWS-designated critical habitat for the California red-legged frog. The species requires a variety of habitat elements with aquatic breeding areas embedded within a matrix of riparian and upland dispersal habitats. Breeding sites of the California red-legged frog are in aquatic habitats including pools and backwaters within streams and creeks, ponds, marshes, springs, sag ponds, dune ponds and lagoons. Additionally, California red-legged frogs frequently breed in artificial impoundments such as stock ponds. Reported populations of CRLF for the Big Sur region include Point Sur (2007), Swiss Canyon Creek just NW of Andrew Molera State Park (2006), an unnamed drainage approximately 0.8 miles NW of Pfeiffer Rock (2018), Pfeiffer Beach Creek (2016 and 2018), a private ephemeral pond owned by Post Ranch Inn (2018), and a perennial creek between Castro and Grimes canyon 6 miles SE of Big Sur (2000). There is no known suitable breeding habitat in the AVBS PTA and any areas that could provide these essential conditions are to be excluded from any project actions by the implementation of the WLPZ system. As legally compliant protection measures are to be put into

place, based solely on the presence of the Class II Post Creek, therefore, the need for protocol-levels surveys would not be reasonably warranted.

Monterey Dusky-footed Woodrat (Neotoma fuscipes luciana)

Monterey dusky-footed woodrat is listed as a Species of Special Concern by the California Department of Fish and Wildlife. Dusky-footed woodrats could occur within and adjacent to the project area and are common throughout forested habitats in the project region. Woodrat nests made of sticks are typically constructed at the base of a shrub or tree, but nests may also occur arboreally. Individual nests may be occupied by successive generations for decades. If any woodrat nests are encountered during the reconnaissance-level survey or during project implementation, nests will be mapped, flagged for avoidance with at least a 10-ft no-disturbance buffer or a buffer deemed appropriate by the qualified biologist.

Given that the individual species, and special status groups, will be 1) the subject of the reconnaissance -level surveys, that 2) any indications of presence or sensitive activity revealed by the survey will be addressed with appropriate protection measures, and 3) that the operational window has been defined to avoid the breeding period (SPR BIO-12), it is reasonable to conclude that there will not be a significantly adverse effect on special status wildlife species either directly or through habitat modifications.

Impact BIO-3

Riparian habitat is present within the AVBS PTA, in the form of a 624-foot (0.12 mile) segment of the Class II (CAL FIRE designation[78]) Post Creek in MUs 2 and 7. Protection of the riparian resources in this section will be afforded by 1) creating Watercourse and Lake Protection Zones WLPZ with widths consistent with the provisions of Sections 956.5 of the California Forest Practice Rules - 2022[79], 2) implementing the provisions of SPRs Bio-3 and BIO-4 (along with the pertinent Mitigations Measures) and 3) exclusion of any project-related management activities within the protection zones. This watercourse is also adjacent to the boundaries of MUs 2, 4, 5, 6, and 7. The boundaries of these MUs have been placed to be beyond the outer limits of the WLPZ appropriate to the side-slopes involved, thus isolating these watercourse sections from the effects of project implementation.

Oak woodland conditions that fall under the jurisdiction of California's Oak Woodland Conservation Act[80] occur within the AVBS PTA. By implementing the provisions of SPRs BIO-3 and BIO-4 and the VMRxs prepared for both the *Sequoia sempervirens* and *Quercus agrifolia* Forest and Woodland Alliances (namely the "Membership Rules") the 10% cover percentage standard laid out in the OWCA will not be breached. In fact, *Q. agrifolia* has been identified as a species that is being "managed for" and therefore has been assigned a high priority for retention in both the initial management phase and

[78] 14 CCR §956.5, Table I. 2022.
[79] 14 CCR, Chapters 4, 4.5, and 10, §956.5 2022.
[80] CF&GC. §§1360 – 1372.

management of the regeneration during the on-going maintenance. The resut is an expected increase, over time, in relative cover of native oak presence within the stands.

Within the AVBS PTA Environmentally Sensitive Habitat Area (ESHA) conditions could, but mostly likely do not, exist in the form of the two natural and one Semi-Natural CNPS Alliances. Once again, in the event that subsequent field examination does indicate a qualified (i.e. per the required cover percentage of the member species) alliance is present, implementing SPRs BIO-3 and BIO-4 and complying with the the "Membership Rules" and other performance standards in the alliance profiles will ensure that these conditions are appropriately conserved.

Given the implementation of SPRs BIO-3 and BIO-4, adherence to the standards of the two CNPS Alliances involved, and implementation of the management details in the set of VMRxs, it is reasonable to conclude that these sensitive vegetation types will not experience direct loss or significant degrees of degradation leading to loss of habitat function.

Impact BIO-4

Through a series of field examinations that 1) have occurred over several years, and 2) were conducted by two CEQA-qualified experts in natural resources, TSS CEO and California Registered Professional Forester (CRPF) Tad Mason and Steven Daus, Ph.D. (retired CRPF), of the two-watercourse system present on the full AVBS ownership, it was determined that jurisdictional wetlands are not present. Guiding these examinations were the criteria for making a determination of wetland presence provided by the United States Army Corps of Engineers (ACOE)[81], the California Coastal Act[82], and Wetlands Initiative[83]. The most recent criteria acceptable to the CCC are the three set out in the "What is a Wetland?" page on the Wetlands Initiative portal and are as follows:

1. Have, at least periodically, an occupation by hydrophytic plant species;
2. Have substrates that are predominated by un-drained hydric soils, and;
3. The substrate is saturated with water, or covered by shallow water during the growing season of each year.

The results of literature research and onsite observations indicated that the physical setting was not supportive of the presence, or future development, of wetland conditions. As previously discussed in the "Special Management Situations – Post Creek Riparian Zone" section (Page 10) the Post Creek watercourse is characterized by moderate-to-high gradient averages (10% to 17%) and indications of a "flashy" hydrograph. These characteristics do not define a physical structure that would be defined as as an "un-drained substrate. Furthermore, research of the NRCS national soils data base[84] showed that the project AOI was characterized by complexes comprised of 1) eight (8) predominating soil types, 2) one rock outcrop type and 3) fourteen (14) named, and un-named, minor components. None of these soils were designated as having a "hydric" rating. Lastly, the bed-and-bank conditions characterizing

[81] USACOE
[82] CCA, Section 30121.
[83] Wetlands Initiative, December 2, 2023.
[84] NRCS

the entire watercourse systems indicated that the only ponding opportunity was presented at the riffle-pool structural level and the pooling was associated only with the proximity of the bedrock.

With respect to the first criteria, hydrophytic plant species were not observed in significant numbers at any location within the system. These observations included water-dwelling broad-leafed forms, transition zone-dwelling rushes, bank-dwelling monocots and dicots, or the brush and tree species occupying positions in the gallery formations.

A check was also made of the National Wetlands Inventory, surface waters and wetlands (NWI/SWW) database[85]. Within the setting area in which the project is sited three wetland features have been mapped:

- An isolated freshwater pond located at a distance of 0.2 miles from the western boundary of the AVBS PTA. It is designated as a Palustrine system feature (PUBH), with an Unconsolidated Bottom, and is flooded year-round, every year;
- An un-named Riverine feature (R3UBF) designated as Upper Perennial (high gradient, no tidal influences); with an Unconsolidated Bottom, and; has a water regime considered to be Semi-permanently Flooded, and;
- A riverine feature named Post Creek (R3UBH) designated as Upper Perennial (high gradient, no tidal influences); with an Unconsolidated Bottom, and; has a water regime considered to be Permanently Flooded

Using the California Coastal Act definition of wetlands[86] as a guide, a process of, 1) research of official databases pertaining to wetlands and 2) a reconnaissance-level survey of the AVBS PTA was completed. An initial analysis of the PTA's topographic setting showed that the entirety of the PTA is located on mid-slope, upper slopes, "shoulder" areas, and ridgetops; no portion of the PTA was located in bottom-land settings. Accessing the National Wetland mapping portal[87] showed two riverine features but no associated riparian or listed wetland features. A reconnaissance-level survey of the bed and banks conditions at several locations along Post Creek showed a well-formed bed and bank system of a typical Class II watercourse[88] but the bank system showed no indications of hydromorphic conditions, either soils or riparian species. It was concluded from this process that no conditions within the AVBS PTA qualified as "lands within the coastal zone which 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". Given the combination of 1) the absence of CCA-defined wetlands, 2) the removal of the areas in established WLPZs from the implementation of

[85] United States Fish and wildlife Service.

[86] [https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PRC&division=20.&title=&part=&chapter=2.&article=]

[87] NF&WS. National Wetlands Mapper portal. [https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper]

[88] 14 CCR , Article 6, Section 916.5.

any proposed management actions, and 3) complying with the provisions of SPR-1 and SPR-4, the riparian resources within areas adjacent to the PTA will experience ""Less Than Significant" levels of either direct, or indirect, impacts.

Impact BIO-5

Previous biological work has not found any wildlife movement corridors or nursery habitat that are typically used by the species commonly found in the area (primarily western mule deer (*Odocoileus hemionus*), mountain lion (*Puma concolor*), coyote (*Canus latrans*), Common Gray Fox (*Urocyon cinereoargentus*), wild pigs (*Sus scrofa*) and black bear (*Ursus americanus*). The actions comprising the proposed project will all be carried out in areas where there already exists a high level of human presence and activities that would discourage, or even preclude, these two uses of the habitat. No new roads will be constructed to introduce barriers to movement. Moreover, the design of the implementation approaches was developed in order to maintain reasonable levels of cover to support the ability of these species to transit the AVBS PTA; an example being the design of the mosaicking approach to managing the brush/scrub formation. This approach establishes an alignment of the retention groups, and an inter-group open space distance, that allows for near constant cover when moving. Given the combination of 1) low acreages involved, 2) established level of human presence and related activities, 3) avoidance of any level of type conversion, and 4) implementing SPRs BIO-10 and BIO-11 it is reasonable to conclude that impacts on wildlife movement or nursery functions would not rise above the LTS level.

Impact BIO-6

Both initial treatment or maintenance treatments could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds, because habitat suitable for these species is present throughout PTA. The potential for the proposed project actions in the two phases of treatment activities to result in adverse effects on these resources was examined in the PEIR.

The proposed project description stipulates that the initial treatments will be conducted between September 1st and February 15th and it is reasonable to conclude that a significant level of adverse effects on nesting birds would be avoided. Furthermore, as SPR BIO-2 will be implemented both hand-crew personnel and equipment operators will be trained to recognize nesting presence and employ suitable protection actions. Should maintenance-associated treatments be conducted within the nesting protocol period the survey requirements described in SPR BIO-12 shall be implemented.

The potential for adverse effects on common wildlife, including nesting birds, is within the scope of the PEIR because the treatment activities and extent of expected disturbance as a result of implementing vegetation treatments, including maintenance treatments, are consistent with those analyzed in the PEIR. SPRs applicable to this impact are BIO-1, BIO-2, and BIO-12. This impact of the proposed project

is consistent with the PEIR and would not constitute a more significant impact than what was covered in the PEIR.

Impact BIO-7

The potential for treatment activities to result in conflicts with local policies or ordinances was examined in the PEIR. The potential for project activities to conflict with local policies or ordinances was assessed in the PEIR (CalVTP Final PERI Volume II Section 3.6.3 pg. 199). This potential conflict with local policies or ordinances is within the scope of the activities and impacts assessed in the PEIR since project implementation under the CalVTP must comply with any applicable county, city, or other local policies, ordinances, and permitting procedures (SPR AD-3).

The Big Sur LUP was reviewed and flagged for important and relevant land use policies specific to Monterey County's Coastal Zone. These policies were then assessed and used to establish new Coastal Vegetation Treatment Standards (Coastal VTS):

7.a. Protect Ecosystems - The primary objectives of, 1) restoring the ecosystem function to prior fire suppression levels, 2) reducing the total amount of fuel available for consumption should a wildfire event occur within the AVBS PTA, including reducing biomass of invasive species and those that transmit Sudden Oak Death. and 3) reducing the fuel bed continuities, will result directly in greater control over wildfire behavior and a consequential reduction of the risk of catastrophic stand-replacing wildfire, as well as benefit forest health. Treatments will be utilizing "thin-from-below" management techniques that retain overstory tree species, wildlife snags, selective retention of young trees, partial shrub cover in the understory, and a desired condition of mosaic-style vegetation structure that mimics fire effects, providing natural gradients across the project area that will benefit ecosystem health.

7.d. Protect Landmark Trees - No officially recognized Landmark Trees are present in the AVBS PTA. The Resort's management have issued a directive that all the redwood "fairy rings" within, or immediately adjacent to, the AVBS PTA, are to be untouched with the exception of removing crown sprouts around the perimeter of the "ring" and the removal of hazardous trees located within the outer ring of the feature.

7.f. Vegetation Removal Hierarchy - 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. Additionally, the two Alliances identified as being present in the AVBS treatment area Coast Redwood (*Sequoia sempervirens*) Forest & Woodland Alliance (CA Code 86.100.00, 86.100.04, 86.100.21) and Coast Live Oak (*Quercus agrifolia*) Woodland Alliances (CA Code 71.060.00, 71.060.26) - are defined as Sensitive Natural Communities by the California Dept. Of Fish and Wildlife1. Sensitive Natural Communities are vegetation alliances that have a State and Global ranking of 1 to 3 on a scale of 1 (very rare and threatened) to 5 (demonstrably secure), indicating their relative rarity. In the Coast Redwood and Coast Live Oak treatment areas, TSS Consultants will oversee treatment activities to confirm that two

snags per acre (on average) will be retained for wildlife habitat, and young trees will be selectively retained for regenerative purposes. 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. 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.

7.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.

7.k. Limit Equipment Types - This project will not employ the use of heavy equipment (i.e. equipment weighing more than 10,000 pounds). Management in the initial treatment phases will employ medium-weight tracked vehicles mounted with masticating heads or light-to-medium duty vehicles equipped with mowing heads. For safety reasons, operator-mounted mastication or mowing equipment will not be used on slopes greater than 40%.

7.m. Protect Coastal Viewshed - The entire AVBS PTA is on terrain to the east and above the primary viewpoint for the general public: State Route 1. Furthermore, there is a Caltrans right-of-way on the east side of the highway that is fully vegetated and will not be treated as part of this project. Any equipment or materials staging areas will be at locations that are hidden by the topographic configuration or screening vegetation. Patrons of the resort represent potential viewers and they are concentrated on an elevated ridge position above the average crown height that would impede the coastal viewshed. Lastly, this project will not result in significant changes in the canopy that currently sets the nature of the coastal viewpoint. Consistency with the provisions of the Conservation/Open Space Element of the 2010 Monterey County Plan: Biological (Natural) Resources (Goal OS-5) is assured by implementing the SPRs applicable to Impacts BIO-1, 2, 3, 4, 5, and 6, and SPR AD-3.

Impact BIO-8

The sole resource management plan that pertains to the project's location is the Big Sur Coast Land Use Plan ("BSCLUP"). This plan, prepared through the California Coastal Commission's Local Coastal Program, was accepted. The Monterey County Board of Supervisors adopted the BSCLUP in January of 1996 and, as of the date of this PSA remains unrevised. None of the actions proposed for the project that is the subject of this PSA conflict with any provisions in this local coastal zone plan.

Archaeological, Historical, and Tribal Cultural Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources	LTS	Impact CUL-1, pp. 3.5-14 – 3.5-15	Yes	AD-3; CUL-1, 7 and 8	None	LTS	No	Yes
Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources	SU	Impact CUL-2, pp. 3.5-15 – 3.5-16	Yes	AD-3; CUL-1, 2, 3, 4, 5, and 8	MM CUL-2	LTS	No	Yes
Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	LTS	Impact CUL-3, p. 3.5-17	Yes	AD-3; CUL-1, 2, 3, 4, 5, and 8	None	LTS	No	Yes
Impact CUL-4: Disturb Human Remains	LTS	Impact CUL-4, p. 3.5-18	Yes	NA	None	LTS	No	Yes

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

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

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

Discussion

Impact CUL-1

There are classes of Built Historical Resources (roads, water conveyance systems, etc.) that if found to be present could be impacted by project actions. Implementing SPRs AD-3 and CUL-1 will inform the project proponents of the potential presence of Built Historical Resources, within, or immediately adjacent to, the proposed MUs. Furthermore, implementing the provisions of SPRs CUL-7 and SPR CUL-8 will 1) ensure that protections are included in the project design and 2) there are properly trained workers who can recognize such resources during operations and implement appropriate protections.

Should Built Historical Resources be determined to be present prior to initiation of operations, or discovered during the conduct of the operations, implementing the above listed SPRs will result in a less than significant impact.

Impact CUL-2

Implementing SPRs AD-3 and CUL-1 and CUL-2 will inform the project proponents of the potential presence of Unique Archaeological Resources or Subsurface Historical Resources, within, or immediately adjacent to, the proposed MUs. Should it be determined that there is a reasonable potential for presence of these resources, implementing SPRs CUL-3, 4, 5, and 8 and Mitigation Measure CUL-2 will provide adequate details regarding specific nature of the resources, locations, and protection measures that need to be put into place. Should Unique Archaeological Resources or Subsurface Historical Resources be discovered, implementing the above listed SPRs could still result in potentially significant or significant and unavoidable impacts. However, given the combination of 1) a high level of previous site disturbance associated with constructing and operating the resort facility, and 2) the very low level of surface disturbance associated with the proposed initial treatment or maintenance treatments, and 3) the protections afforded the resource by implementing the indicated SPRs and MM CUL-2, it is reasonable to conclude that implementing the project will result in a LTS level of impact.

Impact CUL-3

Implementing SPRs AD-3, CUL-1 and CUL-2 will inform the project proponents of the potential presence of Tribal Cultural Resources within, or immediately adjacent to, the proposed MUs. Should it be determined that there is a reasonable potential for presence of these resources, implementing SPRs CUL-3, 4, 5, and 8 will provide adequate details regarding specific nature of the resources, locations, and protection measures that need to be put into place. Should Tribal Cultural Resources be discovered implementing the above listed SPRs will result in a less than significant impact.

Impact CUL-4

Should remains of any kind be unearthed within the project's treatment areas full compliance with California Health and Safety Code Sections 7050.4 and 7052, and PRC Section 5097, shall be implemented. Should remains be discovered implementing the above listed SPRs will result in a less than significant impact.

New Archaeological, Historical, and Tribal Cultural Resource Impacts

None

Energy Resources

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

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

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

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

Discussion

Impact ENG-1

Project-related energy use requirements would be based on the following operations that would constitute the proposed project actions:

- An expected forty-five days of hand operations requiring the use of up to five chainsaws and five pruning saws on a daily basis;
- Thirty days of a medium-weight, towable, diesel-powered wood chipper;
- Thirty days of a trailer-able (10,000 lb. maximum) diesel powered skid-steer mounted with a mastication head;
- Up to an approximate maximum of 120 daily vehicle trips of light duty personnel transports, and;
- Up to an approximate maximum of 20 daily vehicle trips of light-to-medium duty vehicles required for move-in and move-out of the chippers, skid-steers, and maintenance vehicles.
-

In comparison to the energy expenditure required for the scenarios addressed in the PEIR it is reasonable to expect that the result of implementing the subject project will be a LTS impact.

New Energy Resource Impacts

None

Hazardous Materials, Public Health and Safety

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

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

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

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

Discussion

Impact HAZ-1

This project will not employ any type of prescribed fire or use of herbicides. Thus, hazardous materials associated with these operations will not be located on site for the purposes of the subject project. The sole category of hazardous materials that would be associated with project implementation include fuels, lubricants, and hydraulic fluids that are associated with vehicles and equipment. All equipment that is to be retained overnight on site will be sited either at a location associated with the resort operations administration or at sites designated within each MU. At each designated staging location equipment, and or other associated hazardous materials, will be stored within an appropriately constructed (lined and diked) retention basin. At each individual operation taking place there shall be located a spill kit appropriate to the hazardous materials in use.

Impact HAZ-2

Consideration of this impact is not pertinent to this subject project as herbicide use is not being proposed.

Impact HAZ-3

The resort development in the PTA has occurred over lands considered as wildlands. There are no known prior uses that involved the use, or production, of hazardous material nor is there current evidence, gathered during site visits, that provides indication of its existence. Given the combination of 1) a low likelihood that this land use occurred historically, 2) the implementation of Mitigation Measure HAZ-3, and 3) the very low level of surface disturbance that will be the result of implementing the subject project, it is reasonable to conclude that implementing the project will result in a LTS level of this impact.

New Hazardous Materials, Public Health and Safety Impacts

None

Hydrology and Water Quality

Impact in the PEIR			**Project-Specific Checklist**					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning	LTS	Impact HYD-1, pp. 3.11-25 – 3.11-27	No	None	None	LTS	No	Yes
Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the	LTS	Impact HYD-2, pp. 3.11-27 – 3.11-29	Yes	BIO-1, and 4; GEO-1, 2, 3, 4, 7, and 8; HAZ-1; and 5; HYD-1, 4, and 5	NA	LTS	No	Yes

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Implementation of Manual or Mechanical Treatment Activities								
Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory	LTS	Impact HYD-3, p. 3.11-29	Yes	HYD-3	None	LTS	No	Yes
Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides	LTS	Impact HYD-4, pp. 3.11-30 – 3.11-31	No	None	NA	LTS	No	Yes
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-31	Yes	HYD-1, 2, 3, and 4	NA	LTS	No	Yes

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

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

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

Discussion

Impact HYD-1

This impact is not applicable in this project situation as prescribed burning will not be implemented.

Impact HYD-2

This project proposes to treat, in the initial treatment phase, up to 62.09 acres using hand treatments as the principal operational approach and supplementary uses of light duty mastication in locations determined to be appropriate. The overall objective of implementing the initial treatment phase is to create stands with significant reduction of potential wildfire fuel volumes and significant discontinuities in fuel beds (i.e. across the surface in the understory and in the space between the surface and the base point of the overstory crown). The primary issue is the exposure of disturbed soil surfaces to laminar water flows and raindrop impacts. The combination of the project design (i.e. using a thin-from-below approach in woodlands and creating mosaics in brush/shrub types) and implementation of the SPRs required to comply with the CVTP/PEIR will result in retention of significant level of vegetation ground coverage. Furthermore, a single Class II watercourse[89], Post Creek, flows through the general project area. As previously described, three actions were taken to protect water quality in this watercourse:

- The location of the boundary lines of some of the MUs have been adjusted to align with the slope-dependent distance (50', 75', or 100') from the transition line of the watercourse;
- Where the watercourse actually traversed portions of an MU a WLPZ with slope-dependent widths were established, and;
- No project actions were, in general, to be taken outside of the MU boundaries and specifically within WLPZs establish within the boundaries of an MU.

Given the adjustment of the MU boundaries to eliminate the possibility of locating treatments in adjacent WLPZs and establishing WLPZs, where the identified watercourse traverses the MU area, from which all project treatments are to be excluded, it is reasonable to conclude that any impact from the use of mechanized equipment would be reduced to a LTS level.

Impact HYD-3

The proposed use of herbivores will only be used following review and approval of a final grazing plan by the CCC Executive Director. Prescribed herbivory could be used to maintain the shaded fuel-break conditions that result from initial treatment phase. Their primary use will be to 1) control growth of herbaceous plants and shrub/brush regeneration in the open areas between the retained islands in mosaic areas and 2) in the understory of woodlands to control regeneration and subsequent re-development of a ladder fuel component. The principal issue in this situation is control of the movement of the animals employed (i.e. keep them in the MU treatment areas), which is addressed by implementing the provisions of SPR HYD-3.

Impact HYD-4

This impact is not applicable in this project situation as use of herbicides will not be implemented.

[89] 14 CCR, Article, Section 916.5.

Impact HYD-5

This project has been specifically designed to control significant changes in current drainage patterns and flow volumes will not require the construction of new roads. The combination of the project design and implementation of the SPRs required to comply with the CalVTP/PEIR will result in insignificant changes to the current drainage pattern.

New Hydrology and Water Quality Impacts

None

Land Use and Planning, Population and Housing

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

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

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

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

Discussion

Impact LU-1

Implementing the provisions of SPR AD-3 will assure compliance with the provisions of the Big Sur Coastal Land Use Plan, relevant sections of the Monterey County General Plan, and applicable Monterey County vegetation removal/management ordinances.

Impact LU-2

This project, as described will have no effect on population growth or need for residential support in the Big Sur area. The vegetation treatment work, estimated to require 1) a maximum of 60 calendar days to complete and 2) a total personnel requirement of no more than 20 individuals, will be conducted by local contractors and hand crew and equipment operators who will travel to the work location on a daily basis.

New Land Use and Planning, Population and Housing Impacts

None

Noise

Impact in the PEIR			Project Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation	LTS	Impact NOI-1, pp. 3.13-9 – 3.13-12; Appendix NOI-1	Yes	AD-3; NOI-1, 2, 3, & 4	NA	LTS	No	Yes
Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities	LTS	Impact NOI-2, p. 3.13-12	No	NOI-6	NA	LTS	No	Yes

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

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

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

Discussion

Impact NOI-1

Implementing the vegetation management actions consistent with this proposed project will require equipment that can be significant sources of noise: hand crews utilizing chain saws and pruners, remote-control skid-steers with mowing attachments. No heavy equipment has been proposed for use on the project. All three types of equipment proposed for use have been addressed in the VTP/PEIR. Relative to assuring compliance with California State, Monterey County, and applicable localized special plans SPR AD-3 will be implemented. Managing noise levels during both the initial treatment and maintenance treatments will be accomplished by implementing SPRs NOI-1, -2, -3, and -4.

Impact NOI-2

The proposed project actions do not include the requirement for moving bulk materials with heavy duty trucks or the use of heavy-duty tractors or trailers needed to complete "move-in/move-out" sequences for heavy equipment; idling diesel equipment will not be a component of the project's noise contribution. These conditions will characterize both Initial Treatment and maintenance activities.

New Noise-Related Impacts

None

Public Services, Utilities and Service Systems

Impact in the PEIR			Project Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs	LTS	Section 3.16.1 pp. 3.16-2 – 3.16-3; Impact UTIL-1 p. 3.16-9	Yes	AD-3	NA	LTS	No	Yes

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

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

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

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

Discussion

Impact UTIL-1

The actions comprising this project, basically dust control on disturbed surfaces, will not require supplies of water for their completion. With respect to the usage of the un-paved segment of Coast Ridge Road for accessing MUs 3 and 4, there will be a maximum number of ten daily trips to get all equipment and personnel on and off site and these will be equally separated at the start and finish of the workday. Furthermore, the seasonal operations period will be in a wetter part of the year when dust control is most likely not an issue. Given the preponderance of hand work and use of light-to-medium duty equipment the generation of fugitive dust from treated surface is not a reasonable likelihood and dust-control watering not an issue. Lastly, in the event of an emergency need for water, the resort facility has a high-capacity water treatment plant that can supply what would be needed. Given the combination of the very low level of surface disturbance and very limited requirement to use unpaved roads for access, it is reasonable to conclude that implementing the project will result in a LTS level for this impact.

Impact UTIL-2

This project will not generate solid waste that requires off-site transport and deposition. All material removed for fuels management purposes will be reduced by lopping/scattering (to standards contained within fire hazard reduction sections of the California Forest Practice Rules – 2022), chipping, or mastication and dispersed on-site. This impact is not pertinent to this analysis as no solid waste will be generated, in either initial treatment or maintenance treatments, that require off-site transport and deposition.

Impact UTIL-3

This impact is not pertinent to this analysis as no solid waste will be generated, in either Initial Treatment management or maintenance, that require off-site transport and deposition.

New Impacts to Public Services, Utilities and Service Systems

None

RECREATION

Impact in the PEIR			Project Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas	LTS	Impact REC-1 pp. 3.14-6 – 3.14-7	Yes	AD-3	NA	LTS	No	Yes

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

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

	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**

[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact REC-1

There are three designated recreational facilities/properties within the region where the proposed project is to be sited: Pfeiffer Big Sur State Park, Los Padres National Forest, and the private Ventana Campground (owned and operated by the project proponent). In only one case is there a bordering of public lands; Pfeiffer Big Sur State Park along a portion of AVBS' ownership. However, the Park facilities are at a distance of 0.9 miles to the north and the intervening lands show no indication of connecting roads or trails. Thus, it is reasonable to conclude that the project actions will not directly or indirectly disrupt any of the recreational activities within these designated recreation areas and that the need to implement SPR D-3 is warranted. Although there is a degree of adjacency of the Ventana campground to MUs 1, 3, 4, and 8, it is reasonable to conclude that the nature and intensity of the vegetation management actions will not cause significant long-term disruption of the recreational experience of the campground users.

New Recreation Impacts

None

Geology, Soils, Paleontology, and Mineral Resources

Impact in the PEIR			**Project Specific Checklist**					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	LTS	Impact GEO-1, pp. 3.7-26 – 3.7-29	Yes	GEO-1,2,3,4,5,6,7 SPR AQ-4 SPR HYD-3,4	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	GEO-1,4,7	NA	LTS	No	Yes

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

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

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

Discussion

Implementing the actions comprising this project's description is not reasonably expected to result in anything other than LTS levels for Impacts GEO-1 or GEO-2 as:

- The mid-slope to ridgetop positioning of the AVBS PTA has resulted in the majority of the lands to be treated being characterized by terrain slopes less than 30% with only a few highly localized occurrences of slopes between 30% and 50% (see Table 1, Page 6);
- The use of heavy equipment (i.e., equipment weighing over 10,000 pounds) is not being proposed for this project, thus associated adverse impacts would be avoided entirely;
- Because of the ability to select from a slate of treatment activities (hand, mechanical-medium weight equipment, mechanical-lightweight equipment, or prescribed herbivory) soil surface disturbance will be minimal;
- There will be no disturbance at depth in the profile;
- On-site reduction of fuels material being removed from the vegetation formation's structures will form a protect layer on the soil surface;
- Adequate vegetation crown cover and rooting systems will be retained to protect the soil surface from the impacts of rainfall and surface drainage and deep-profile movement, and;
- No changes in the natural drainage pattern will occur.

Impact GEO-1

Implementing the actions comprising this project's description will not result in 1) significant disturbance of the soil's surface, 2) alteration of the natural drainage system within, or adjacent to, the MUs comprising the AVBS PTA, and 3) significant reduction of the soil surface protection function provided by the overstory canopies, and the layer of reduced materials. As such it was concluded that risk of loss of soil material would be at an absolute minimum.

Impact GEO-2

Landslides, both rubble fall and deep rotational movements, are not uncommon in the Big Sur area. Through interpretation of satellite imagery available on the Google Earth platform several minor

examples of both types of landslides were detected and evaluated in regard to their image signature. Within the PTA no similar satellite image signatures were detected within, or immediately adjacent to, any of the project's MUs. Special attention was given to the south facing slopes between MU 5 and the State Route 1 and no such signatures were observable. Over the course of several years the project team has made a series of site visits and no evidence of soil or geologic instability has been noted. Furthermore, the proposed actions will not destabilize the soil surface, materials comprising the full profile, nor will significantly alter the rooting function provided by the vegetation cover. Given the combination of the lack of evidence of historic landslides and the nature of the reasonably foreseeable effects of implementing the proposed project actions, it was concluded that risk of causing landslides would be at an absolute minimum.

New Geology, Soils, Paleontology, and Mineral Resource Impacts

None

Transportation

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

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

New Transportation Impacts: Would the treatment result in other impacts to transportation that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact TRAN-1

No proposed project actions, either initial treatment or maintenance treatments, involve direct contact or adjacency to a public roadway. Strictly speaking the short section of Coast Ridge Road is 1) a public road and 2) has direct adjacency to MU3 operations, however, public access to this segment is significantly limited by the presence of a coded gate. As the equipment required for implementation of the proposed project will include vehicles suitable for the move-in and move-out of 1) hand crews, 2) light duty tracked vehicles, and 3) very light duty mowers. The light duty tracked equipment will require the services of a medium-duty pickup truck and a 10,000 lb. trailer and would require a maximum of two “move-in/move-out” sequences. In California a vehicle towing a trailer with a GVWR or GVW of 10,000 pounds or less may be legally operated with a noncommercial Class C DL (California Vehicle Code. Section 12804.9[b][3][A]). No heavy-duty equipment move-in/move-out requiring commercial-level driver’s licenses or special permits, is proposed for use in implementing the proposed project. Daily transportation of hand crews will require a maximum of two light or medium duty transport vehicle trips over a maximum period estimated at 60 days; for a total of 120 vehicle trips.

Impact TRAN-2

With respect to transportation issues no additional roads will be constructed within the subject parcel and no extraordinary traffic, either in type or volume, will use the public road system.

Impact TRAN-3

As indicated in the Impact TRAN-1 discussion there will not be a significant increase in the “vehicle miles traveled” (VMT) quotient.

New Transportation Impacts

None

Wildfire

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Section 3.17.1; Impact WIL-1 pp. 3.17-14 – 3.17-15	Yes	AD-3; HAZ-2, 3, and 4; GEO-3, 4 and 8	NA	LTS	No	Yes
Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides	LTS	Section 3.17.1; Impact WIL-2 pp. 3.17-15 – 3.17-16	Yes	GEO-3, 4 and 8	None	LTS	No	Yes

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

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

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

Discussion

Impact WIL-1

Initial treatment and maintenance treatments will employ manual treatments using mechanized hand tools, mobile chippers, light duty (skid-steer Model) tracked vehicles mounted with mastication heads, and remotely guided mowing machines. Any use of equipment, hand-operated or otherwise, can exacerbate fire risk and expose people to uncontrolled spread of wildfire. The potential increase in exposure to wildfire during implementation of the proposed treatments was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.17.3, page 13-14). Increased wildfire risk associated with implementing manual treatments and using the types of equipment proposed herein, in vegetated areas is within the scope of the activities and impacts addressed in the PEIR as the equipment types and duration of use are consistent with those analyzed in the PEIR. SPRs HAZ-2, HAZ-3, and HAZ-4 will be implemented to reduce the risk of exposure to wildfire by requiring spark arrestors for all mechanical hand tools, a fire extinguisher to be carried with each chainsaw, and restricting smoking areas to non-vegetated areas. Although reasonably expected soil surface disturbance will be minimal, and there will be no significant alteration of the natural drainage patterns, SPRs GEO-3, GEO-4 and

GEO-8 will be implemented, on an as needed basis (to be determined by a qualified resource specialist) to minimize potential risk of exacerbating wildfire risk.

Impact WIL-2

Initial Treatment and maintenance treatments would employ manual treatments using mechanized hand tools, mobile chippers, light duty (skid-steer Model) tracked vehicles mounted with mastication heads, and remotely guided mowing machines; the project design does not include use of prescribed fire (broadcast or pile burning). A result of the initial treatment proposed in this project will be a reduction of vegetation cover but not to the extent created by prescribed burning. Although reasonably expected soil surface disturbance will be minimal, there will be residual vegetation cover (providing both overstory protection and full soil profile stabilization through adequate retention of the root system function), and there will be no significant alteration of the natural drainage patterns, SPRs GEO-3, GEO-4 and GEO-8 will be implemented, on an as needed basis (to be determined by a qualified resource specialist) to minimize potential risk of flooding and landslides.

New Impacts to Wildfire

The proposed treatment is consistent with the treatment types and activities considered in the PEIR. The project proponent has considered all site-specific characteristics and determined they are consistent with the environmental and regulatory setting conditions discussed in the PEIR (CalVTP Final PEIR Volume II 3.17.1 and 3.7.2). No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to wildfire would occur that is not covered in the PEIR.

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Brackebush, Arthur P. Fuel Management: A Prerequisite Not an Alternative to Fire Control. In: Journal of Forestry. October, 1973.

Calflora. Species Profiles:

Abies bracteate, November 1, 2023.
Acer macrophyllum, November 28, 2023
Adenostoma fasciculatum. November 5, 2023b.
Arbutus menziesii. January 3, 2023c.
Arctostaphylos edmundsii. November 1, 2023a.
A. glandulosa
Artemesia californica
Baccharis pilularis. November 5, 2023.
Ceanothus cuneatus
C. integerrimus
C. thrysiflorus
Cirsium occidentale compactum. November 1, 2023b.
Clarkia joloensis. November 1, 2023c.
Dacryophyllum falcifolium. November 1, 2023d.
Danthonia californica
Diplacus aurantiacus
Delphineum hutchinsoniae. November 1, 2023e.
Elymus smithii
Eriogonum fasciculatum
E. latifolium. January 22, 2024
E. parvifolium. January 22,2024a
Fritillaria liliaceae. November 1, 2023f.
Galium californicum var. luciense. November 1, 2023g.
Garrya ellptica
Grimma torenii. November 1, 2023h.
Heteromeles arbutifolia. November 5, 2023c.
Malacothamnus palmeri var. lucianus. November 1, 2023i.
Notholithocarpus densiflorus. January 3, 2023a.
Quercus agrifolia. March 3, 2023.
Q. chrysolepis
Q. garryana
Pennisetum clandestinum

Salvia leucophylla
S. mellifera
Sanicula maritima. November 1, 2023j.
Sequoia sempervirens. June 8, 2023.
Toxicodendron diversilobum. November 5, 2023a.
Umbellularia californica. January 3, 2023.

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- McCoy-Gilroy Complex, 30 to 75 percent slopes (MbG)
- Millsholm-Gazos Complex (Mm) https://soilseries.sc.egov.usda.gov/OSD_Docs/M/MILLSHOLM.html and https://soilseries.sc.egov.usda.gov/OSD_Docs/G/GAZOS.html
- Pfeiffer-Rock Outcrop Complex (Pe) https://soilseries.sc.egov.usda.gov/OSD_Docs/P/PFEIFFER.html

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