ATTACHMENT B

Coastal Vegetation Treatment Standards (CVTS)

Alila Ventana Big Sur Fuels Treatment Project

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Following are the responses to the Items comprising the Coastal Vegetation Treatment Standards that are applicable to the Alila Ventana Big Sur (AVBS) Wildfire Hazard Reduction Project. The VTS query text for each subject area is in normal Calibri font and the AVBS responses are in Calibri ***bold and italic*** font.

CVTS Item 1 – Compliance with the Provisions of the CalVTP PEIR

All projects shall comply with and carry out the requirements of the CalVTP PEIR, including use of approved treatment methods, treatment activities and all applicable standard project requirements (SPRs) and mitigation measures (MMs).

CVTS Item 1 AVBS Response

Compliance with these requirements is described in the body of this PSA and the Environmental Checklist.

CVTS Item 2 – PSA Submission and Collaboration Process

Project-Specific Analyses (PSAs) shall be submitted to the California Coastal Commission (CCC) for review and approval pursuant to the PWP prior to conducting projects. Coordination between the Resource on Conservation District of Monterey County (RCD) and CCC shall occur as early as feasible in the design process in order to avoid delays.

CVTS Item 3 – Problem, Goals, and Objective Statements

PSAs shall include clear problem and goal statements (i.e., overall project goals, fire prevention goals, ecological goals, etc.) associated with each project proposed pursuant to this Public Works Plan. These statements are intended to assist the RCD and CCC in developing mutual understanding of the potential impacts and benefits – both short and long term – for each project. It is expected that this information will be incorporated into item #7 of each PSA.

CVTS Item 3 AVBS Response

Problem Statement – Overall Goal

This project has been designed to achieve the goal of countering the hazards and risks associated with a local history of fire suppression and uncontrolled wildfire that have a reasonable potential for impacting the lands and structures of the Alila Ventana Big Sur resort facility. At risk are 1) the lives, safety, and health of the patrons of this world-renowned resort facility, 2) persons employed as staff, 3) emergency response personnel, 4) physical facilities comprising the resort complex, and 5) the natural resource conditions that are a core feature of this iconic resort's reputation. The Alila Ventana Big Sur Fuels Treatment Project is necessitated by 1) vegetation conditions that are characterized by a buildup of unnatural vegetation densities, including dense, overstocked stands and an accumulation of dead and dying vegetation, that are in close proximity to elements of the facility, 2) directional slopes that can exacerbate fire-front advancement rates, and 3) immediate proximity to a recognized source of wildfire ignitions; State Route 1.

Multiple large wildfires have impacted the Big Sur region over the past several decades, with the periodicity, intensity and scale of wildfires increasing on an annual basis. Enhanced levels of wildfire safety and restored

forest health is needed through targeted fuel reduction management around elements of the resort's infrastructure, while conducting ecologically-appropriate vegetation management in:

- ***A conifer-dominated forest fuel model type (corresponding to the CNPS Coast Redwood (Sequoia sempervirens) Forest and Woodland Alliance);***
- ***A hardwood-dominated forest and woodland fuel model type (corresponding to the CNPS Coast Live Oak (Quercus agrifolia) Forest and Woodland Alliance);***
- ***A brush/scrub fuel model type that did not show floristic characteristics that corresponded to any of the brush-related Natural CNPS alliances. An exception was observations of species that were members of the Cytisus scoparius, Genista monspessulana, Cotoneaster Shrubland Semi-Natural Alliance (broom patches);***
- ***Special purpose grass swards that are composed of non-native grasses planted, and maintained, for the purpose of providing a transpiration cover crop for leach fields;***
- ***Corridors in which electrical distribution lines are located, and;***
- ***A stand of Eucalyptus globulus (blue gum).***

Guiding the management of both the fuels reduction and ecological restoration activities will be, 1) a set of six prescriptive vegetation management guidelines (presented in Attachment C), 2) selected sections that are considered applicable, in an updated setting, from an invasive species management plan first completed in 2014 (Attachment D) (excluding herbicide), and a goat grazing management plan (subject to final CCC approval).

Specific Objectives

Through adherence to the Coastal VTS, the treatment activities proposed for this project will consider the unique ecological conditions characterizing Alila Ventana Big Sur's setting while making this near-coastal landscape more resilient to future climate change-induced wildfire. The project will improve overall resistance to wildfire and improve formation health through achieving the following specific objectives:

- *Generate vegetation stands that are more resistant to adverse impacts from uncontrolled wildfire by:*
  - *Reducing overall fuel volumes*
  - *Producing significant surface fuel-bed discontinuities, and;*
  - *Producing significant vertical discontinuities (surface to crown base zone; a.k.a. ladder fuels)*
- *Produce compliant vegetation conditions in accordance with the provisions of California's Public Resources Code ("PRC"), Division 4, Chapter 3, §§ 4291 and 4292 (clearance zone requirements);*
- *Will remove trees deemed to be hazardous, and not of significant wildlife habitat value, as designated by either a California Registered Professional Forester or an arborist certified by the International Society of Arboriculture ("ISA"),;*
- *Abatement of invasive plant species throughout the treatment zone;*
- *Generate vegetation stands that are more resistant to adverse impacts from pathogens and insect infestations by selectively removing individuals that are either vectors for, or highly susceptible to, impacts from, these agents, and;*

- *Generate vegetation stands that are more ecologically suitable through controlling 1) over-competition for limited resources and 2) percentage dominance by means of preferentially selecting retention/regeneration of more environmentally adapted species.*

The project will achieve these specific objectives by implementing the following vegetation management approaches and specific actions:

- *This project will use hand, mechanical, and herbivore grazing treatment types to mimic the effect of historic fire occurrences, by removing lower limbs on mature trees and minimizing ladder fuels (live, or dead, shrubs and trees with individual boles no greater than 12" DBH as well as trees deemed hazardous;*
- *Provide increased sunlight to the forest floor and maintain stand structure of Redwood (Sequoia sempervirens) and Coast Live Oak (Quercus agrifolia) Forest & Woodland Alliances, thus, promoting the growth of larger, more mature trees.*
- *Employ fire mimicry through selective vegetation reduction to either maintain, or improve ecological functioning by achieving 1) a condition of a less dense stand structure, 2) reducing density in higher density stands to a lower relative density to obtain a more heterogeneous stand structure, 3) open the tree canopy and 4) reduce the risk of wildfire moving into the canopy.*
- *Decrease the risk of pathogens and disease affecting Alila Ventana Big Sur's project area, including sudden oak death (SOD), by removing currently infected individuals and assigning known SOD vectors relatively high removal priorities in the VMRx prepared for the two forest/woodland fuel type categories, and;*
- *Implementing the prescribed management actions included in 1) the set of VMRxs (Attachment C) and 2) the invasive species plan (Attachment D) (but excluding prescribed fire and herbicide)*

CVTS Item 4 –Coastal Vegetation Treatment Types

In the coastal zone, vegetation treatment projects fall into two categories: (1) Forest Health projects and (2) Fire Prevention projects. The purpose of Forest Health projects is to restore and enhance ecosystems, including to prevent fire behavior to which the ecosystem is not adapted. The ecosystems that can be treated under this category include forested ecosystems as well as other ecosystems such as woodlands, grasslands and scrub dominated systems. The purpose of Fire Prevention projects is to protect existing structures and infrastructure, including access roads. Fire Prevention projects shall be limited to the applicable defensible space requirement (which is typically 100 feet from habitable structures in the Wildland Urban Interface), unless accompanied by a clear rationale, provided by a qualified professional, as to why additional defensible space is required to protect existing structures and infrastructure.

CVTS Item 4 AVBS Response

In accordance with PWP Project Standard 4, Monterey County Coastal Resource Protection, the AVBS project has been structured to protect habitat and coastal resources consistent with the standards of the Monterey

County Big Sur Coast LCP Chapter 20.145. The proposed AVBS project includes the use of CalVTP PEIR treatment types that take into consideration the goals and objectives of both the Forest Health and Fire Prevention categories of CVTS projects. The AVBS Fuels Treatment Project has built in actions that lead to greater general control of species presence and composition percentages (through the MCV Membership Rules) and protection of special status plant and wildlife species consistent with either the WUI Fuels Reduction or the Ecosystem Restoration treatment type. The WUI-related CalVTP PEIR treatment type alternative has been identified as being the most in alignment with AVBS's managements' goal and objectives due to the hazard and risk levels posed by wildfire in the resort situation. However, there are specific instances where the proposed AVBS PTA exceeds the 100-foot defensible space standard (Please refer to the PSA for a more in-depth discussion of the regulatory, and operational, framework associated with defensible space and electrical distribution line protection measures). The decision to propose this enlargement is based on the observation, by qualified forestry professionals, that there are potential, and significant, pathways of wildfire approach (based on fuels conditions) in areas beyond the 100-foot limit from structures and would benefit ecologically from a fuels reduction. Therefore, treatments in these areas (more than 100ft from structures) will be included within the scope of the project and consistent with the Ecosystem Restoration treatments utilized elsewhere in the PTA.

Furthermore, PWP Project Standard 5 states: Defensible Space as a Component of Fire Prevention, states that "Qualifying projects under this PWP may include treatment activities (as defined under the CalVTP) within 100 feet (or to the property line, whichever is closer) of a building subject to County defensible space requirements. Such projects shall comply with all of the following conditions:

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

Defensible Space treatments will adhere to the Coastal VTS and protect ESHA through three primary mechanisms, 1) pre-implementation reconnaissance level surveys for sensitive biological resources, 2) adherence to the WLPZ protection zone, and 3) maintaining the MCV Alliance Membership Rules for Sequoia sempervirens and Quercus agrifolia.

Additionally, in accordance with the Public Works Plan, upon approval of a final grazing management plan approved by CCC, prescribed herbivory may be used in habitats during maintenance activities if it is the least environmentally damaging feasible alternative so long as the slopes do not exceed 25% and/or K-factor of 0.4.

CVTS Item 5 – Environmentally Sensitive Habitat Areas (ESHA)

In the coastal zone, environmentally sensitive [habitat] area (or ESHA) is defined as any area in which plant or animal life, or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and that could be easily disturbed or degraded by human activities and developments (see Coastal Act Section 30107.5). Rarity determinations for habitats and species are made by CDFW, USFWS, and CNPS, and are used to support a CCC ESA determination.[1] In addition, an ESHA determination may be made on the basis of an area constituting 'especially valuable habitat' where it is of a special nature and/or serves a special role in the ecosystem, such as providing a pristine example of a habitat type or supporting important ecological linkages. The Coastal Act requires that environmentally sensitive habitat areas be protected against any significant disruption of habitat values and only allows uses dependent on the ESHA resources within those areas (see Coastal Act Section 30240). It is anticipated that many of the Forest Health and Fire Prevention activities pursued within the coastal zone of Monterey County will take place within natural communities that qualify as ESHA (e.g., redwood forest, Monterey pine forest, Monterey cypress, Gowen cypress, maritime chaparral, etc.). For habitats containing federally listed species such as Gowen cypress, USFWS will be consulted during the PSA to develop identify appropriate treatments.

CVTS Item 5 AVBS Response

The results of the previously conducted direct field-based observations and the "desktop" research activities have indicated that two of the fuel model types present, Conifer-Dominated Forest and Mixed Hardwood Woodland, have floristic characteristics that qualify them as Natural CNPS Alliances: Sequoia sempervirens Forest and Woodland and Quercus agrifolia Forest and Woodland, respectively. As such, these types are to be consider as ESHAs and the performance standards set out in each of these Alliances, in regard to conserving their nature and ecological functioning, will be met. A third Natural alliance was also considered for inclusion in the project's planning and implementation: Umbellularia californica Forest and Woodland. However, direct field observations indicated that, although California bay individuals were present in the Conifer-Dominated Forest and Mixed Hardwood Woodland fuel model types, their canopy percentages did not rise to a level that indicated presence of the Alliance, or that it would qualify as a Co-Dominant in the redwood or coast live oak alliances. The bay will be a species that has the highest priority for removal, due both to its fuels contribution and vector function for the SOD pathogen. However, the VMRxs limit its removal

in accordance with the removal/retention priorities with a conservative reduction in basal area (and a corresponding canopy membership percentage). There will be no risk that it will be eliminated completely from compositions of the two principal Alliances.

Another fuel model type that has been proven to be problematic, both in terms of identifying whether a Natural CNPS Alliance is present, and then preparing a species dependent management prescription, is posed by the scrub/brush formation. The current formation covers 4.76 acres, was mapped as having seven individual patches, and has a significant number (10 to 15) of species that could contribute to the composition. It was concluded that projecting one, or more, Natural CNPS Alliance designations would not be well supported due the very small surface area available for evaluation. In addition, member species of a Semi-Natural Alliance were observed during site visits. The three core member species (Cytisus scoparius, Genista monspessulana, and Cotoneaster spp. are officially considered as invasives species at both the Monterey County and State of California levels, and, as such, would actually be given very high levels of removal priority in this project situation.

Attempting to manage these formations by removing individual plants is not a reasonable management approach 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" or "group selection". The proposed management is comprised of the following actions:

- ***To remove, using hand and mechanized techniques, up to 50% (2.38 acres) of the brush cover;***
- ***Allow reoccupation of the treated areas by a formation comprised of non-native short grass, and low growing forb, and:***
- ***Maintain the grass formation in the open areas between the retained islands through the use of mowers or prescribed herbivory per the guidance in the VMRx, Attachment C.***

The remaining 2.38 acres would be maintained in its original condition in the form of "islands" in which no vegetation management would occur.

CVTS Item 6 – Wetlands

In the coastal zone, wetlands are defined as where lands may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens (see Coastal Act Section 30121). Administrative Regulations (Section 13577(b)) further elaborate on this definition as where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes, and goes on to establish what is effectively a single-parameter rule, meaning that only one of the three parameters used by the US Army Corps of Engineers and various other agencies – hydric soils, hydrophytic vegetation, or hydrology – need be present to delineate a coastal wetland feature. Though it is not necessarily anticipated that Forest Health and Fire Prevention projects will

occur around coastal wetlands, it is important to recognize that they can and do occur as part of the landscape mosaic. Wetlands as referenced in the CalVTP are more narrowly defined than as would be recognized under the Coastal Act. The Coastal Act generally protects wetlands and allows for impacts in only specific situations (see Coastal Act Section 30233).

CVTS Item 6 AVBS Response

The only wetland features that have been identified as having a relationship to the AVBS Treatment Area are two riverine features: Post Creek and an un-named watercourse. By design these features have been excluded from the treatment area with exclusion zone specifications (100-ft for Class II and 50-ft for Class III) established in Sections 956.4 and 956.5 of the California Forest Practice Rules and CalVTP. No treatments described in this PSA will take place in these exclusion zones and there will be no impact on wetland resources. If an inadvertent coastal wetland discovery is made prior to or during treatment, the wetland feature will be delineated, flagged and avoided with a 100-ft avoidance buffer. All work crews will be trained on the avoidance of wetlands and their buffers.

CVTS Item 7 – Additional Resource Protection

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

CVTS Item 7(a) – Protect Ecosystems

Forest Health projects shall: (a) proactively restore and enhance ecosystems, protect watersheds, and promote long-term storage of carbon, including through the minimization of forest carbon loss from large and intense wildfires; (b) restore and maintain vegetation cover to a threshold that reflects appropriate fire frequencies (i.e., fire-return intervals) on the landscape, considering estimated pre-European settlement conditions as well as future climate change, and the maintenance or improvement of ecosystem health; (c) maintain vegetation cover and composition to comply with the standards (membership rules) set forth in the online edition of the Manual of California Vegetation (MCV) to avoid unintended habitat conversion; [2] and (d) provide for an appropriate mosaic of native plants by age, size, and class that support the specific habitat being treated. Fire Prevention projects shall meet all of the above requirements to the maximum extent feasible, while achieving overall project goals and necessary fire prevention goals, and any deviations shall be clearly explained and identified in the PSA.

CVTS Item 7(a) AVBS Response

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 syndrome. 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. Creating these mitigated conditions in the forest and woodland vegetation types will also reduce the risk of releasing significant levels of air pollutants into the atmosphere.

The design of the project also represents a tool for evolving the forest, woodland, and brush/shrub formations into units that are more fully functional ecologically given the sites they are occupying. There are two keystone prescribed actions that related directly to the ecological state of the units being treated:

- *The requirement to perform pre-operational reconnaissance surveys for the three fuel model-based and three special management situations (SMS) (leach field cover crops, Eucalyptus globulus (blue gum) stand, and electrical distribution line corridors). The pre-operational survey are designed primarily to identify the presence of sensitive resources (involving those resources having special legal or regulatory status (SSS) or included for more general Resort management purposes) that need consideration, and possibly protection with visual marking and buffers, in the design and implementation of the management actions, and,*
- *The requirement to conduct surveys, as part of the maintenance management phase, to identify the species that are reoccupying the treated surface and allow determination of which species are desirable to encourage and which need to be removed during the maintenance efforts. This information basically supports moving the unit toward greater resilience to wildfire and higher, more sustainable, ecological functioning*

There are several conditions in the CalVTP PEIR and Coastal VTS that help to protect ecosystems including:

- *Conducting a biological records search and reconnaissance-level surveys prior to all project activities to identify and protect rare flora and fauna.*
- *Flagging all sensitive areas for avoidance during treatment activities.*
- *Identifying vegetation type alliance and habitat type, and establishing membership rules for major alliances to inform treatment activities.*
- *Pre-treatment trainings with contractor to establish the treatment plans, avoidance and protection measures, sensitive resources, and work restrictions. All Ventana Alila staff responsible for maintenance treatments will also be required to attend trainings.*
- *Property owners and neighbors will be notified at least 10 days prior to the commencement of project activities.*
- *To prevent erosion, no heavy equipment (weighing more than 10,000 pounds) will be used.*
- *No prescribed herbivory will be allowed in redwood habitat with slopes greater than 25 percent or soil k-factor greater than 0.4.*

- *French broom and other invasive species will be removed within the project area in accordance with the PSA, invasive weed best management practices, and all pile burning requirements.*

CVTS Item 7(b) – Protect Gowen Cypress

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

CVTS Item 7(b) AVBS Response

The presence of Gowen Cypress was not observed during the initial series of site visits to the PTA, nor was there any indication in the database searches and literature reviewed, that it was present or had a reasonable likelihood of presence.

CVTS Item 7(c) Protect Wetlands

Coastal wetlands shall be delineated and protected from treatment activities with a 100-foot buffer. Only treatment activities that would restore ecological benefits to the wetland may be allowed within the buffer. Projects shall adhere to CalVTP SPR BIO-1 identifying and documenting the location of wetlands during project surveys and planning, and SPR HYD-3 protecting wetland water quality from prescribed herbivory treatments. The Coastal Commission considers a wetland to be any area that is wet enough long enough to support a preponderance of hydrophytic vegetation or to result in soil that is predominantly hydric. In other words, only one of the three primary indicators of wetlands need be demonstrated for an area to be identified as a wetland (California Code of Regulations, Section 13577).

CVTS Item 7(c) AVBS Response

Although there is presence of Class II and Class III streams in the project area, the site lacks wetlands, including those defined by the Coastal Commission. In the occurrence that a wetland feature is discovered, it would be flagged and avoided with a suitable avoidance buffer, as discussed in CVTS Item 6.

CVTS Item 7(d) – Protect Landmark Trees

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

CVTS Item 7(d) AVBS Response

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.

CVTS Item 7(e) – Protect Areas of Special Biological Significance (ASBS)

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

CVTS Item 7(e) AVBS Response

The project area is not within the watershed boundaries of the Del Monte Forest or Carmel Area nor have any officially designated ASBS been determined to have presence in the AVBS FTP.

CVTS Item 7(f) – Vegetation Removal Hierarchy

Except for prescribed fire project components, a vegetation removal hierarchy shall be identified and implemented for each project to obtain the vegetation cover threshold identified by a Registered Professional Forester or qualified professional as necessary while ensuring that unintended habitat conversion does not occur, and that vegetation cover is sufficient to support the project's ecological goals. In order of priority and application, the hierarchy shall be as follows: (1) thinning and removal of dead, dying and diseased foliage, shrubs (except that two snags per acre on average should be retained to provide wildlife shelter, dens, etc.); (2) removal of invasive species; and (3) removal of native species that are not listed as endangered, threatened, rare, or otherwise especially valuable, with the end goal of having appropriate species composition in the plant community with a mix of vegetation age, height and density.

In all cases, indicator species and diagnostic species appropriate to the vegetation community type shall be maintained in accordance with the standards (membership rules) set forth by the online edition of the Manual of California Vegetation (MCV), with the intention of maintaining cover and composition consistent with meeting project ecological goals. For Fire Prevention projects, additional vegetation removal may be allowed if maintaining such vegetation consistent with project ecological goals would result in an unacceptable fire risk to existing structures and infrastructure, and the removal is the minimum necessary to protect existing structures and infrastructure. Any such additional removal shall be clearly explained and identified in the PSA. Lastly, if vegetation cover threshold goals, as articulated in the online edition of the MCV, cannot be met, then removal of endangered, threatened, rare or otherwise especially valuable species and habitats shall be prohibited unless: such removal is critical to reduce the area's fire risk; removal is accompanied by restoration or enhancement such that the overall project provides net benefits to the habitat; and no other alternative exists that meets the project goals.

CVTS Item 7(f) AVBS Response

Five of the six VMRxs prepared for the purposes of guiding the management actions, contain a species-by-species, or group of similar species, removal hierarchy specific to the species that are known, or where there is a high likelihood, to be present in the treatment area (see Attachment C). The one exception, the VMRx prepared for the shrub/brush formation which contains invasive species, is to be managed on an area basis as opposed to single species selection. In this case a list of species that need to be included as part of the composition of the canopy is provided along with a directive to form the "islands" so as to include as many of the desirable species as possible.

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 Wildlife[1]***. 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.***

CVTS Item 7(g) – Limit Treatment Within Chaparral

Treatment activities (as defined under the CalVTP) shall not occur within chaparral habitat unless required to establish and/or maintain the minimum defensible space of a building or structure within the County's Wildland-Urban Interface. Such treatment shall be designed to protect chaparral habitat and its indicator

[1] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities

species to the maximum extent feasible while meeting the minimum defensible space requirements pursuant to County Fire Code.

CVTS Item 7(g) AVBS Response

The results of the initial on-site field observation, and the "desktop" research efforts, did not support designating the current scrub/brush foundation as any one of the CNPS chaparral-related alliances.

CVTS Item 7(h) – Determine Suitable Use of Prescribed Fire

Prescribed fire may be allowed if it is found to be the least environmentally damaging feasible alternative to achieving project goals, except in North County's Critical Erosion Areas, in redwood and chaparral habitats when slopes exceed 25% and/or a K-factor of 0.4, and in Carmel Area redwood and chaparral habitats when slopes exceed 30%.

CVTS Item 7(h) AVBS Response

There will be no prescribed fire activity in the AVBS PTA.

CVTS Item 7(i) – Determine Suitable Use of Prescribed Herbivory

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

CVTS Item 7(i) AVBS Response

The use of a prescribed herbivory management approach, with the deployment of goats, will be employed, as called for in the applicable VMRxs in Attachment C, in primarily the maintenance phase after the heavy fuels have been removed in the initial treatment. The specifics of this management approach will be described, in detail, in a goat grazing management plan (subject to final approval by CCC). In alignment with the PWP, there will be no prescribed herbivory on slopes greater than 25% and/or soils with k-factor greater than 0.4 in redwood habitat.

CVTS Item 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.

CVTS Item 7(j) AVBS Response

In August of 2014 the project proponent developed a comprehensive invasive species management plan[2] (ISMP) that is provided, in its original form, as Attachment D to this PSA. In this plan thirty-five species were identified as being of interest, of which two were identified as horticultural landscape species and five as being on a weedy plant watch list. However, this plan was prepared under a different set of management goals and objectives and described control actions, i.e. the use of herbicides and prescribed fire, that are no longer acceptable to the current ownership. The ISMP has provided a baseline list of invasive species that were the subject of control actions in the intervening ten years.

***As both the biotic and regulatory conditions associated with invasive species have changed since the date of preparation it was considered prudent to update the list of species currently addressed at the Monterey County and state level. Lists of invasive species currently the subject of regulatory interest were obtained through web portals administered by the County of Monterey[3] and the State of California[4]. It was considered most appropriate to utilize the Monterey County list as a baseline as it was more reflective of local condition. The Monterey County list included a total of thirteen species with county-wide presence potential. In order to further refine the focus on conditions most appropriate to the AVBS Project area, each of the thirteen species was subjected to a "potential for presence" analysis using the observation records in the Calflora species profiles. The results of this analysis indicated six of the thirteen baseline species had a significant likelihood of presence within, or reasonably adjacent to, the Project area. Table 5 presents the results of this update process. The six species that will be further addressed during the Project's initial treatment, and maintenance phases are indicated by the gray*-shaded cells. For the seven species that are not to be given on-going consideration the observation information supporting this decision is provided in the "Additional Comments" column.**

Table 1. Updated invasive species list for Monterey County.

Scientific Name	Common Name	Presence	Additional Comments

[2] Ventana Inn Invasive Species Management Plan, Nicole Nedeff Consulting Ecologist, 2013.
[3] County of Monterey. July 17, 2024.
[4] UC Davis. July 17, 2024.

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 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	
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

Specific control actions for the six species determined to require on-going consideration are defined in the set of VMRx's presented in Attachment C to this PSA. The descriptions 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. These training materials are to be appropriate to the circumstances of the individuals who will be conducting the field implementation.

Sudden Oak Death (SOD), caused by the pathogen Phytophthora ramorum, has not shown a significant level of infection within the PTA, but nonetheless diseased and dying trees will be prioritized for removal and all protocols followed to prevent further spread.

CVTS Item 7(k) – Limit Equipment Types

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

CVTS Item 7(k) Response

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%.

CVTS Item 7(l) – Limit Herbicide Use

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

CVTS Item 7(l) Response

Herbicide use is not proposed for use on this project.

CVTS Item 7(m) – Protect Coastal Viewshed

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

CVTS Item 7(m) Response

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. Lastly, this project will not result in significant changes in the canopy that currently sets the nature of the coastal viewpoint.

CVTS Item 7(n) – Limit Fencing

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

CVTS Item 7(n) Response

If a final grazing plan is submitted and approved by the CCC Executive Director, goats will be restricted from grazing special status species inside the PTA and all areas outside of the PTA through the use of temporary wildlife-friendly fencing. This type of fencing will ensure that prescribed herbivory allows smaller species that might be present in the treatment area to pass through the area, reducing entanglement or entrapment, or trampling.

CVTS Item 7(o) – Accelerants

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

CVTS Item 7(o) Response

Prescribed fire, along with the potential need for accelerants, will not be a part of this project.

CVTS Item 7(p) – Limit the Need for Soil Stabilization

The use of riprap and/or chemical soil stabilizers that could significantly disrupt or degrade ESHA is prohibited.

CVTS Item 7(p) Response

The combination of the low-to-moderate slopes involved, use of light-to-moderate weigh equipment (weighing less than 10,000 pounds), and on-site deposition of removed material would support a reasonable conclusion that rip-rap or chemical stabilizers would not be required.

CVTS Item 7(q) – Protect Coastal Public Access and Recreation

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

CVTS Item 7(q) Response

The PTA is located on private property at a distance of ½ mile from the coast. The PTA is across State Route 1 and there is no direct access to the coast or involvement in recreational activities.