# Rancho Rico Community Fuels Treatment
# Project Specific Analysis

An Addendum to the CalVTP PEIR

Photo by Albion Environmental Inc. May 2022

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September 2023

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LIST OF ABBREVIATIONS

| | |
|---|---|
| ASR | Archaeological Survey Report |
| BEU | San Benito-Monterey Unit (CAL FIRE) |
| CAL FIRE | California Department of Forestry and Fire Protection |
| CalVTP | California Vegetation Treatment Program |
| CAAQS | California Ambient Air Quality Standards |
| CCC | California Coastal Commission |
| CCIC | Central Coast Information Center |
| CDFW | California Department of Fish and Wildlife |
| CEQA | California Environmental Quality Act |
| CESA | California Endangered Species Act |
| CNDDB | California Natural Diversity Database |
| CNPS | California Native Plant Society |
| CRLF | California Red-Legged Frog |
| CRPR | California Rare Plant Rank |
| CWHR | California Wildlife Habitat Relationships |
| CWPP | Community Wildfire Protection Plan |
| DBH | Diameter at Breast Height |
| DTSC | Department of Toxic Substances Control |
| ESA | Endangered Species Act |
| ESHA | Environmentally Sensitive Habitat Area |
| FRAP | Fire and Resource Assessment Program |
| GIS | Geographic Information Systems |
| HCP | Habitat Conservation Plan |
| IAP | Incident Action Plan |
| IPC | Invasive Plant Council |
| LCP | Local Coastal Program |
| LTO | Licensed Timber Operator |

| | |
|---|---|
| LTS | Less Than Significant |
| LTSM | Less Than Significant with Mitigation |
| MBARD | Monterey Bay Air Resources District |
| MTCO2e | Metric tons of carbon dioxide-equivalent |
| NAAQS | National Ambient Air Quality Standards |
| NAHC | Native American Heritage Commission |
| NCCP | Natural Community Conservation Plans |
| PEIR | Programmatic Environmental Impact Report |
| PPE | Personal Protective Equipment |
| PRC | Public Resource Code |
| PS | Potentially Significant |
| PSA | Project-Specific Analysis |
| PSU | Potentially Significant and Unavoidable |
| PWP | Public Works Plan |
| RCDMC | Resource Conservation District of Monterey |
| RM | Resource Management |
| RPF | Registered Professional Forester |
| RTE | Rare Threatened and Endangered Species |
| RWQCB | Regional Water Quality Control Board |
| SENL | Single Event Noise Level |
| SOD | Sudden Oak Death |
| VTS | Vegetation Treatment Standards |

# CHAPTER 1 INTRODUCTION

## 1.1 BACKGROUND

The Rancho Rico Community Fuels Treatment Project is necessitated by suboptimal forest conditions due to decades of buildup of unnatural vegetation densities, including dense, overstocked stands and an accumulation of dead and dying vegetation, often as a result of historic fire suppression practices. 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. The Rancho Rico Community Fuels Treatment Project will thus enhance community wildfire safety and restore forest health (for mixed-conifer, oak woodland and coastal redwood forest habitats) through targeted fuel reduction around community infrastructure, as well as ecologically-appropriate vegetation management, including the removal of invasive French broom.

## 1.2 CEQA AND COASTAL ACT COMPLIANCE

The Board of Forestry's California Vegetation Treatment Program (CalVTP) is a Programmatic Environmental Impact Report (PEIR) (2019) that encompasses a range of fuel management actions in the State (Fire) Responsibility Area (SRA) Treatable Landscape. The Treatable Landscape (which comprises approximately 20.3 million acres in California) is a combination of SRA lands that fall under three categories: identified WUI areas, existing fuel breaks along ridgelines and along roadways, and treatment areas for ecological restoration. The CalVTP was developed to meet state policy and planning objectives including mitigating wildfire risk to life, property and natural resources by reducing hazardous fuels, increasing the scale and pace of fire fuels reduction treatments, increasing the use of prescribed burns, and better managing forests and working lands to serve as a net carbon sink to help meet California's GHG emissions goals. Under the CalVTP, CAL FIRE and other project proponents submit a Project Specific Analysis (PSA) to implement vegetation maintenance projects across three treatment types (wildland-urban interface (WUI) fuel reduction, fuel breaks, and ecological restoration) for five (5) vegetation treatment activities (prescribed burning, manual treatment, mechanical treatment, prescribed herbivory, and herbicide application). The PSA documents that the project fits within the CalVTP's PEIR scope and complies with the Standard Project Requirements (SPRs) and Mitigation Measures (MMs). The Standard Project Requirements and Mitigation Measures Checklist is included in Attachment A.

According to the CalVTP, a project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to implement vegetation treatments consistent with this PEIR for CEQA compliance. For the CalVTP and this PSA, the Resource Conservation District of Monterey County (RCDMC) is the public agency that has received program funding from CAL FIRE and will implement vegetation treatments consistent with the CalVTP in cooperation with the Rancho Rico community landowners. While the CalVTP provides for streamlined CEQA compliance for vegetation treatment projects within California's Treatable Landscape, the Monterey County Forest Health and Fire Resilience Public Works Plan (PWP) is a companion to the CalVTP that provides for programmatic streamlining of Coastal Act authorizations for fuels management activities consistent with the Coastal Act and Monterey County's Local Coastal Program (LCP). The PWP includes an additional set of project standards for the Coastal Zone of Monterey County called the Coastal Vegetation Treatment Standards (VTS), which are included in Attachment C of this PSA.

# CHAPTER 2 ENVIRONMENTAL CHECKLIST

## VEGETATION TREATMENT PROJECT INFORMATION

1. Project Title: Rancho Rico Community Fuels Treatment
2. Project Proponent Name and Address: Resource Conservation District of Monterey County
   744-A La Guardia St., Salinas CA 93905
3. Contact Person Information and Phone Number: Jamie Tuitele-Lewis. Forest Health Coordinator
   559-593-9235
   jtlewis@rcdmonterey.org
4. Project Location: Big Sur, CA, Monterey County. Township 19S, Range 01E (M), Sections 31 and Township 19S, Range 02E (M), Section 36. Pfeiffer Point USGS Quadrangle.
5. Total Area to be Treated (acres) 101.1 acres
6. Description of Project: (Describe the whole action involved, including any phasing of initial treatments as well as planned treatment maintenance, including equipment to be used and planned duration of treatments. Provide cross reference to specific subsections and page numbers from Chapter 2 of the PEIR to demonstrate that treatments are consistent with those analyzed in the PEIR. Attach additional sheets if necessary.)

*Continued on next page*.

# INITIAL TREATMENT DESCRIPTION

## Project Goals

The Rancho Rico Community Fuels Treatment Project is proposed by the Resource Conservation District of Monterey County to enhance forest stand health, create a heterogeneous vegetation mosaic structure, augment wildlife habitat, remove invasive French broom, reduce wildfire spread rate and intensity through increasing horizontal and vertical spacing in the understory, and provide an area for fire personnel to defend the Rancho Rico Community in the event of a wildfire.

This project will primarily use manual and mechanical treatments to mimic the effect of historic fire occurrences, by removing lower limbs on mature trees and ladder fuels (shrubs and trees less than 8-inch DBH) and mowing of annual grasslands to reduce the accumulation of fine fuels along the main road to the community. The selective reduction of forest stand density and removal of French broom will provide increased sunlight to the forest floor and maintain desired stand structure, based on the Manual of California Vegetation (MCV) membership rules for Tanoak forest*(Notholithocarpus densiflorus* Forest Alliance), California bay forest (*Umbellularia californica* Forest & Woodland Alliance), Redwood forest (*Sequoia sempervirens* Forest & Woodland Alliance) and Coast live oak woodland (*Quercus agrifolia* Woodland Alliance). Currently much of the north slope of the project area has high stand density (>300 trees per acre) due to a combination of vigorous stand growth in the understory as well as an increase in French broom along the margins of the project area. This fire mimicry will be utilized to achieve a desired condition of a less dense stand structure, which will provide the previously mentioned benefits as well as decrease the risk of pathogens and disease affecting Rancho Rico's overstocked forest, including Sudden Oak Death (SOD). The project follows a Vegetation Removal Hierarchy defined under the Public Works Plan (PWP).

## Project Location

Rancho Rico is a small family community west of Highway 1 that sits atop a ridge above Sycamore Canyon and extends west to the coastline. The Post Ranch Resort and the Big Sur Fire Brigade station are immediately to the south of Rancho Rico, while private residences and Pfeiffer Beach are to the north and west. There are several parcels in the project area, some of which contain homes and ancillary structures, including barns, gardens, fences and sheds. A series of private roads connect these areas, with only a single ingress and egress to Highway 1. The Fuel Break Treatment Area, which is located at the top of the ridge, has mostly been cleared for agricultural use, and is now composed of non-native annual grasslands, pockets of native vegetation, including coast live oak woodland, non-native invasive French broom, and developed areas with homes. As the project area slopes north towards Sycamore Canyon in the Ecological Restoration Treatment Area, the vegetation is composed of Tanoak *(Notholithocarpus densiflorus* Forest Alliance), California bay forest (*Umbellularia californica* Forest & Woodland Alliance), Redwood forest (*Sequoia sempervirens* Forest & Woodland Alliance) and Coast live oak woodland (*Quercus agrifolia* Woodland Alliance) and annual grasslands (*Avena* spp.-*Bromus* spp. Herbaceous Semi-Natural Alliance) based on the MCV alliances[1]. Locations of the two treatment areas are shown in Figure 11; MCV Alliance Types for the Rancho Rico Community Fuels Treatment Project are shown in Figure 12.

[1] CNPS. 2023. A Manual of California Vegetation, Online Edition. http://www.cnps.org/cnps/vegetation/; searched on June 16th, 2023. California Native Plant Society, Sacramento, CA

Figure 1. Rancho Rico Community Fuels Treatment Project Location

Figure 2. Rancho Rico Community Fuels Treatment Topography

# TREATMENT TYPES

a. Treatment Types *[see description in CalVTP PEIR Section 2.5.1, check every applicable category; provide detail in description of Initial Treatment*]

☐ Wildland-Urban Interface Fuel Reduction

☒ Fuel Break

☒ Ecological Restoration

The proposed treatment types, Fuel Break and Ecological Restoration, will be implemented to 101.1 acres within the CalVTP Treatable Landscape. The proposed acreages are shown in Table 1.

Table 1. Proposed Treatment Type by Rancho Rico Project Area

| Rancho Rico Project Treatment Type | Treatment Activity | Treatment Area (max) within CalVTP Treatable Landscape (acres) | Total Maximum Treatment Area (acres) |
|---|---|---|---|
| Fuel Break | Mechanical | 17.4 | 17.4 |
| | Manual | ~8.0* | |
| Ecological Restoration | Mechanical | 24.3 | 83.7 |
| | Manual | 59.4 | |

* Approximately 8.0 acres of potential manual treatment are subsumed into mechanical treatment areas and are not included in the total acreage per treatment type.

**Fuel Break Treatment**

The Fuel Break Treatment Area stretches approximately 1.26 miles along Rancho Rico Road, an unpaved road that sits atop a ridge south of Sycamore Canyon and serves as the primary ingress/egress into the Rancho Rico Community. The Fuel Break Treatment Area is approximately 17.4 acres and comprised of a shaded fuel break treatment in *Notholithocarpus densiflorus* and *Umbellularia californica* alliances (Observed species in the project area included tanoak, Pacific madrone, bay laurel, coast live oak, oak, redwood, big leaf maple and buckeye), *Avena* spp.- *Bromus* spp. Herbaceous Semi-Natural Alliance, *Quercus agrifolia* Woodland Alliance, and French broom. The Fuel Break Treatment Area is approximately 1,000ft ASL, with slopes less than 30 percent. Vegetation (grasses, forbs, etc.) will be mowed and/or woody stemmed species masticated or pruned to create a shaded fuel break primarily within 50 feet of Rancho Rico Road along the ridge top, with some sections widening to approximately 300 feet on either side of the road in the flatter areas on top of the ridge within the *Avena spp. – Bromus spp. Herbaceous Semi-Natural Alliance* habitat to provide staging areas for fire response and allow for evacuation, if necessary.

Treatment activities will prioritize the following activities:

1) Removal of dead or dying trees that pose a risk to safety. Some dead or dying trees will be retained if they do not pose a risk to safety.
2) French broom removal (either mechanically, or by hand with a weed wrench, loppers, chainsaws or other manual methods) to promote native vegetation while also providing a buffer that reduces wildfire risk to

surrounding vegetation and communities. Invasive French broom will be removed following Best Management Practices described in the 'Treatment Activities – Invasive Species' section to prevent its spread.

3) All mature French broom in this treatment type will be removed mechanically or by hand. Cut French broom will be piled away from other vegetation and pile burned or covered with plastic sheeting until it can be disposed of.

4) Mechanically treat (mowing or mastication) understory vegetation in *Notholithocarpus densiflorus* Forest Alliance habitat, *Umbellularia californica* Forest & Woodland Alliance habitat, *Quercus agrifolia* Woodland Alliance habitat and *Avena* spp.- *Bromus* spp. Herbaceous Semi-Natural Alliance habitats. Mastication of brush and trees less than 8 inches DBH (see the MCV treatment descriptions in the 'Fuel Types' section for more information).

5) Limbing and pruning of trees and shrubs up to 8 ft high, primarily with hand tools. Finally, other shrubs will be pruned or in some cases, masticated as needed to prevent horizontal layering of fuels, with at least five radial feet kept between shrubs. A Shrub Treatment Hierarchy will be used and is found in the 'Treatment Activities' section and in the Rancho Rico Coastal VTS Attachment C.

Figures 3 and 4. (Left) French broom (*Genista monspessulana*) along roadside area in the Fuel Break Treatment Area; (Right) Coast live oak overstory by the roadside in the Fuel Break Treatment Area.

<u>Ecological Restoration Treatment</u>

The Ecological Restoration Treatment Area encompasses approximately 83.7 acres and is comprised of Tanoak *(Notholithocarpus densiflorus* Forest Alliance), California bay forest (*Umbellularia californica* Forest & Woodland Alliance), Redwood forest (*Sequoia sempervirens* Forest & Woodland Alliance) and Coast live oak woodland (*Quercus agrifolia* Woodland Alliance) and annual grasslands (*Avena* spp.- *Bromus* spp. Herbaceous Semi-Natural Alliance). The slope in the Ecological Restoration Treatment Area ranges from 30 percent to 75 percent slope, south to north, respectively. The *Notholithocarpus densiflorus* and *Umbellularia californica* alliances, *Sequoia sempervirens* Forest & Woodland Alliance and *Quercus agrifolia* Woodland Alliance areas within the Ecological Restoration Treatment Area

have become overstocked with small trees, shrubs and French broom to a density of 300 or more trees per acre, particularly in the northern slope of the project area. Treatment activities will reduce stand density to a lower density while prioritizing the following activities:

1) Removing diseased bay laurel, coast live oak and tan oak trees (chipping them and leaving them in place to a depth not exceeding 6 inches).
2) Retaining downed logs and snags to benefit wildlife habitat.
3) Removing any invasive French broom (following Best Management Practices described in the 'Disease' section to prevent further spread) if found in this treatment type.
4) Masticating brush and trees less than 8 inches DBH (see the MCV Alliance treatment descriptions in the 'Fuel Types' section for more information).
5) Limbing trees up greater than 8 inches DBH to at least ten feet from the ground level starting at a radial distance of 100 feet from homes and continuing "down" the slope towards the northern part of the treatment area.
6) Bushes and other woody vegetation will be masticated, mowed or cut to reduce ground cover of non-tree woody vegetation that act as ladder fuels.
7) Retention of understory shrubs (refer to the Shrub Treatment Hierarchy in the 'Treatment Activities' section for more information) will be done in a manner to provide horizontal spacing for retained shrubs at least two to three times the average shrub height on slopes less than 25 percent and greater spacing on steeper slopes. The *Notholithocarpus densiflorus* and *Umbellularia californica* alliances, *Sequoia sempervirens* Forest & Woodland Alliance and *Quercus agrifolia* Woodland Alliance be treated as described in the 'Fuel Type' section while maintaining consistency with vegetation community membership rules for cover and composition, to ensure that sensitive communities are not converted.

Figures 5 and 6. (Left) Representative coast redwood stand condition in Ecological Restoration Treatment Area; (right) >50 percent slope redwood stand

Figures 7 and 8. (Left) Overgrown bay laurel forest and woodland stand in the Ecological Restoration Treatment Area; (right) treated bay laurel forest and woodland stand near the south side of the project area in the Ecological Restoration Treatment Area.

Figures 9 and 10. (Left) Dense growth in coast live oak woodland, with dying madrone, and live manzanita and coast live oak understory; (right) coast live oak and tanoak forest showing desired condition with treatment done by landowners.

## Treatment Activities

Treatment Activities [*see description in CalVTP PEIR Section 2.5.2, check every applicable category; include number of acres subject to each treatment activity, provide detail in description of Initial Treatment*]

☐ Prescribed Burning (Broadcast), _____ acres

☒ Prescribed Burning (Pile Burning)

☒ Mechanical Treatment, 41.7 acres

☒ Manual Treatment, 59.4 acres

☐ Prescribed Herbivory, _____ acres

☐ Herbicide Application, _____ acres

Table 2. Mechanical and manual treatment acreage for Initial Treatment

| Rancho Rico Project Treatment Type | Mechanical Treatment | Manual Treatment | Total acreage per treatment type |
|---|---|---|---|
| Fuel Break Treatment | 17.4 | ~8.0* | 17.4 |
| Ecological Restoration Treatment | 24.3 | 59.4 | 83.7 |
| Total acreage per treatment activity | 41.7 | 59.4 | 101.1 |

* Approximately 8,0 acres of potential manual treatment are subsumed into mechanical treatment areas and are not included in the total acreage per treatment type.

Table 3. Proposed CalVTP Initial Treatment Activities

| CalVTP Treatment Type | Treatment Description | CalVTP Treatment Activity | Equipment used for Treatments | Typical Duration of Treatments |
|---|---|---|---|---|
| Fuel Break | Shaded fuel break along Rancho Rico Road and ridge top | Mechanical (mastication, biomass chipping) | Tractor/skidder, skid steer, masticators, chippers, water tender | 1 week to 2 weeks |
| | Prescribed burning for biomass disposal | Pile burning | Chainsaws, hand saws, weed wrenches | 1 day to 1 week |
| Ecological Restoration | Forest habitat improvement and forest health treatments | Mechanical (biomass chipping, mastication); Manual (cutting, piling, clearing) | Chippers, masticators, chainsaws, hand saws, brush cutters | 2 to 4 weeks |
| | Prescribed burning for biomass disposal | Pile Burning | Chainsaws; pickup truck with water tank and pump; skid steer, tractor, excavator or bulldozer for piling biomass | 1 day to 1 week |

Mechanical Treatments

The Initial Treatment activities consist of approximately 41.7 cumulative acres of mechanical treatment in the Fuel Break and Ecological Restoration Treatment Areas. Mechanical treatment may sometimes include manual treatment as part of the overall treatment; areas with manual treatment will typically overlap with mechanical treatment (i.e. pruning using hand tools directly above a mowed or masticated area) and do not count towards total acreage calculations for mechanical treatments in this PSA. This includes 17.4 acres of roadside mowing and/or mastication of vegetation within 50 ft to 300 ft of Rancho Rico Road in the Fuel Break Treatment Area and 24.3 acres on slopes less than 50 percent (approx. 30 degrees) in the Ecological Restoration Treatment Area to reduce ground cover of non-tree woody vegetation that act as ladder fuels. French broom may be removed mechanically, where feasible. Cut material may be chipped (if native plant material), masticated or lopped and scattered in mechanical treatment areas.

Manual Treatments

For all slopes greater than 50 percent or where mechanical treatment is not feasible, hand tools such as shovels, chainsaws, weedwhackers, or loppers will be used to remove target vegetation. This includes approximately 59.4 acres of the project area. A hand crew will limb trees and remove ground fuels with chainsaws and loppers to create a "shaded" fuel break in the Fuel Break Treatment Area. Trees and shrubs may be limbed and pruned by hand as needed to prevent horizontal layering of fuels, with ground distance between retained shrubs being at least six to eight times the height of the average treated "non-retained" shrub on slopes over 50 percent and on slopes ranging from 10 percent to 25 percent, shrub spacing retention will average four times the height of the average shrub (per the Board of Forestry Defensible Space recommendations). Manual treatment activities will only occur more than 100 feet from the Class II stream, Sycamore Creek. Manual treatment may occur within 50 feet of Class III streams, preferably outside of bird nesting season, if feasible.

The treatment, disposal or removal method for manually cut vegetation (i.e., lop and scatter, piling or complete removal), will depend on the slope and access to less steep project areas. Lop and scatter will be the primary method for disposal of cut materials left to break down in place, with cut material not to exceed 6 inches in depth in any given area.

Shrub Treatment Hierarchy

In areas that contain important understory shrub species but are not identified as chaparral habitat, the project will institute a Shrub Treatment Hierarchy based on ecological characteristics of the existing species, relative rarity of the shrub species, and/or relative rarity of a vegetation alliance. If threatened, endangered or species of concern shrubs are found within the project area, the vegetation removal hierarchy will not be applied to those plants and instead applicable SPRs and Mitigation Measures will be applied.

The purpose of this table is to provide guidelines for treatment for shrub species that are found throughout the project site and allow for population health while creating a fire-mimicry treatment that provides existing vegetation communities with increased resources. Shrubs higher on the treatment table can receive more aggressive treatment methods (full removal or cut down to the root crown) while lower down in the table, more conservative treatment methods are used to treat shrub species (pruning only). Plants at the bottom of the table will not be treated at all and will be left untreated during implementation and maintenance. Although Manual of California Vegetation (MCV) Associations are not mapped or identified in the project area, MCV Alliances with notable component shrub species that form a known Association within that Alliance will receive less aggressive treatment on those component shrubs (i.e. manual pruning only).

The Shrub Treatment Hierarchy (Table 4) lists the most commonly encountered shrub species in the Rancho Rico Community Fuels Treatment Project area and their relative hierarchy for treatment. If other non-listed shrub species

are encountered, they will be treated with a similar hierarchy, based on their rarity and ecological characteristics. This treatment hierarchy has been specifically developed for the Rancho Rico Community Fuels Treatment Project and the known vegetation onsite.

Table 4. Shrub Treatment Hierarchy for the Rancho Rico Community Fuels Treatment Project

| Species | Common name | Treatment Hierarchy | Removal Priority | Note |
|---|---|---|---|---|
| *Genista monspessulana* | French broom | Full removal | High[1] | Cal-IPC: highly invasive; high flammability |
| *Adenostema fasciculatum* | chamise | Mechanical or manual | Moderate[2] | Locally aggressive |
| *Baccharis pilularis* | coyote brush | Mechanical or manual | Moderate[2] | Moderately invasive native shrub |
| *Toxicodendron diversilobium* | poison oak | Mechanical or manual | Moderate[2] | Aggressive vegetative reproduction and wide dispersal over Central Coast region |
| *Ceanothus spp.* | California lilac | Mechanical or manual | Moderate[2] | Several potential non-rare species (see below for *C. rigidus*) |
| *Eriodictyon californicum* | yerba santa | Mechanical or manual | Moderate[2] | Early seral species that thrives in disturbed areas |
| *Frangula spp.* | coffeeberry | Mechanical or manual | Moderate[2] | Sprouts from root crown when disturbed, also a facultative seeding plant |
| *Heteromeles arbutifolia* | toyon | Mechanical or manual | Moderate[2] | Sprouts from root crown when disturbed, facultative seeder |
| *Lupinus spp. (albifrons)* | bush lupine | Mechanical or manual | Moderate[2] | Bush lupine is fairly tolerant of pruning and other disturbance |
| *Rosa spp. (californica; gymnocarpa var. gymnocarpa; pinetorum)* | rose | Mechanical or manual | Moderate[2] | Most rose species in the Central Coast region can be pruned to the root crown |
| *Salix spp.* | willow | Mechanical or manual | Moderate[2] | Larger, older-growth willow species will be classified as Low Priority |
| *Sambucus spp. (nigra)* | elderberry | Mechanical or manual | Moderate[2] | Cutting to root crown should only be done in |

| | | | | |
|---|---|---|---|---|
| | | | | winter months, otherwise can only be pruned |
| *Symphoricarpus spp.* | snowberry | Mechanical or manual | Moderate[2] | Facultative seeder |
| *Salvia mellifera* | black sage | Mechanical or manual | Moderate to low[2] | Facultative seeder, prefers disturbed areas and self-propagates |
| *Arctostaphylos spp.* | manzanitas | Manual pruning only | Low[3] | Obligate seeder, slow-growing genus |
| *Eriogonum spp.* | buckwheat | Manual pruning only | Low[4] | Not likely in project area but importance to Smith's blue urged listing |
| *Garrya elliptica* | Silk tassels | Manual pruning only | Low[5] | Obligate seeder; some ability to re-sprout but not reliably |
| *Ribes spp.* | gooseberry/currant | Manual pruning only | Low[6] | Ribes spp. can sprout from roots when cut but *R. sericeum* has lowered treatment ranking to prevent accidental impacts |
| *Ceanothus rigidus* | Monterey ceanothus | Manual pruning only | Low to none[7] | CRPR 4.2; |

[1] Removal of entire plant, including root mass, to control invasive plant spread
[2] May be mowed, masticated or cut down to just above root crown but will not violate vegetation community membership cover rules
[3] Manzanitas may be pruned but sensitive species *A. hookeri* ssp. *hookeri* (CRPR: 1B.2) and *A. pumila* (CRPR: 1B.2) will be avoided to maximum extent feasible
[4] Host plants for Smith's blue butterfly will be treated only where necessary to meet project goals and after ensuring plants are not occupied
[5] *Garrya elliptica* seems to rely on sexual reproduction primarily to maintain populations; pruning only is recommended to prevent potential damage
[6] *Ribes* may be pruned but sensitive *Ribes sericeum* (CRPR: 4.3) will be avoided to maximum extent feasible
[7] May be pruned only if plants are acting as fuel ladders but will be otherwise avoided to maximum extent feasible

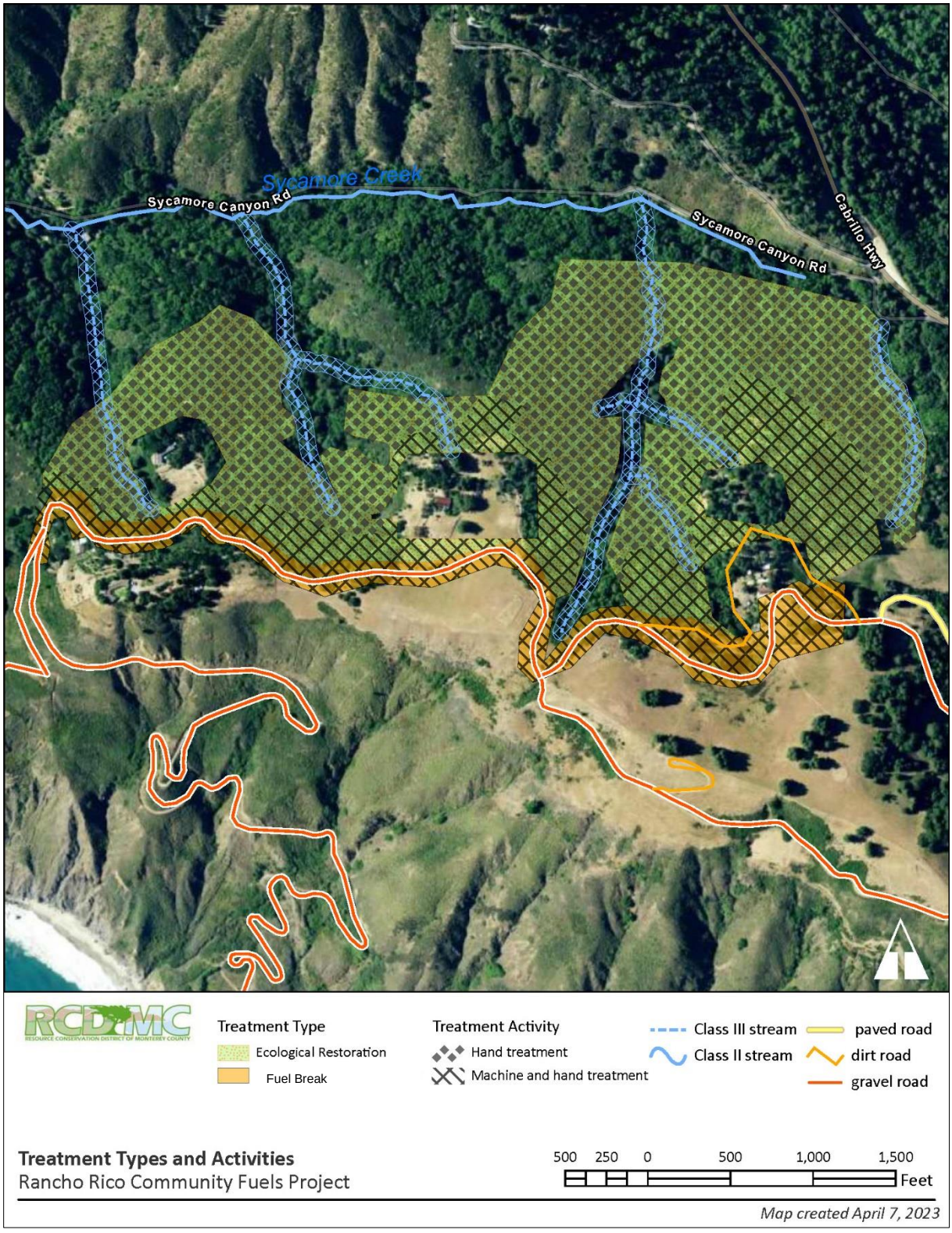


Figure 11. Rancho Rico Community Fuels Treatment Project: Treatment Types

Prescribed Burns (Pile Burns)

Cut French broom will be accumulated into piles no more than 4-ft high and 4-ft wide. Depending on the location and amount of piled broom, it will either be burned during the wet season or left in piles to decompose. Unburned piles will be covered with material and have a tarp below the pile to reduce germination of seeds in the pile as well as accelerate decomposition of piled broom; smaller piles may be bagged. All burn piles will be assembled at the top of the ridge in a cleared area near the road or trail. Pile burning of French broom will be done primarily as a maintenance treatment, but may also occur during the initial treatment, if needed.

French broom may also be cut by hand and piled at the ridge top or in open, flat areas; removal of broom will either be done before seed pod formation in late winter/spring (February to April) or cut and piled in place if a majority (>70 percent) of the French broom is in flower, indicating seed set in most of the plants. In both cases, piles will be either burned when appropriate or covered with material to reduce germination success of any existing seeds or seed bank to reduce the risk of spread from piled material.

Biomass Disposal

The proposed vegetation treatments include biomass disposal by several methods:

- Masticating (mulching) - Masticated material may be distributed within machine treatment areas to a depth of no greater than six (6) inches in any given area. Any flagged resource requiring exclusion and/or a buffer will not have masticated material inside flagged areas.
- Chipping materials within 50 ft of the road or trail to slow understory vegetation growth; chipped material will not exceed six (6) inches depth in any given area.
- Lopping and scattering in the Ecological Restoration Treatment Area
- Pile burning along road in the Fuel Break Treatment Area
- Invasive French broom will be treated onsite, piled, and either burned or left in piles to decompose on and under tarps to inhibit seed germination in the Fuel Break and Ecological Restoration Treatment Areas.

Disease

*Sudden Oak Death*

Sudden Oak Death (SOD), caused by the pathogen *Phytophthora ramorum,* is widespread within both the Fuel Break and Ecological Restoration Treatment Areas. To prevent the spread of SOD within the project area, small to medium sized bay laurel trees will be removed around coast live oak and tanoak trees a minimum radial distance of 30 feet from oak trees, with a diameter at breast height (DBH) of up to 32 inches. Larger bay trees may be difficult to remove, and, in those circumstances, there should be aggressive pruning of branches that come within 30 feet of oaks and tanoaks. For larger oak trees over 32 inches DBH, the buffer of bay laurel treatment should be increased to 50 feet to 60 feet.

To avoid the spread of SOD, all hand equipment, including boots, will be sanitized and heavily hosed off prior to and immediately following project activities in areas where the pathogen is present. The California Oak Mortality Task Force website maintains information on appropriate treatments and disposal of plant material infected with SOD, including the following guidelines:

- RPF (or LTO for most Exemptions) should inform personnel that they are working in an area with Sudden Oak Death disease, unauthorized movement of plant material is prohibited, and the intent of mitigation measures is to prevent disease spread (14 CCR 1035.2). If some sites in the general operating area are found to be disease-free or have a low incidence of disease, consider initiating operations on these sites before moving to more heavily infested sites[2].
- To the extent practical and feasible, route equipment away from host plants and trees, especially in areas with disease symptoms. Locate landings, log decks, logging roads, tractor roads, and other sites of equipment activity away from host plants, especially areas with disease symptoms.
- Each time equipment or vehicles leave the site, the equipment or vehicles should be inspected by operations personnel for host plant debris (leaves, twigs, and branches). Host plant debris should be removed from equipment and vehicles prior to their departure. This applies to all equipment and vehicles associated with the operation, including logging equipment, log-hauling trucks, pick-up trucks, employee's personal vehicles, etc. An exception will be granted for equipment or vehicles that leave the site temporarily and will not be traveling to uninfested areas prior to their return.
- Conduct operations during the dry season. Utilize paved and rocked roads and landings to the extent possible.
- After working in an infested area, remove or wash off accumulations of soil, mud, and organic debris from shoes, boots, vehicles and heavy equipment, etc. before traveling to an area that is not infested with Sudden Oak Death. Lysol® or a bleach solution can be used to disinfect shoes and boots after cleaning.
- Vegetative materials that are cut from infected or potentially infected hosts will be disposed of on-site (through lop and scatter or chipping) and not removed from the infested area.

Invasive Species

French broom (*Genista monspessulana*)

French broom is a highly invasive species present in the Rancho Rico Community, particularly in the Fuel Break Treatment Area, but also in the broader Ecological Restoration Treatment Area. The plant presents a fire hazard because it is very ignitable, acts as a ladder fuel that suppresses and replaces native plants, and spreads rapidly in disturbed areas. Due to its large seed bank (it can produce over 8,000 seeds per year) and its ability to re-sprout from the root after cutting or fire, the plants should be entirely removed from the root before the blooming period in March to June or cut in place and piled in discrete piles separate from other cut vegetation where it can be further treated by either pile burning or placed on tarps and covered to reduce seed germination and spread. Some smaller amounts of French broom may be bagged to prevent seed spread and to accelerate decomposition.

[2] https://www.suddenoakdeath.org/diagnosis-and-management/best-management-practices/

## Fuel Types

Fuel Type [*see description in CalVTP PEIR Section 2.4.1, check every applicable category; provide detail in description of Initial Treatment*]

☒ Grass Fuel Type

☐ Shrub Fuel Type

☒ Tree Fuel Type

The project includes fuels treatment in the tree and grass fuel types. These areas are comprised of 88.1 acres in the tree fuel type (*Sequoia sempervirens* Forest & Woodland Alliance, *Quercus agrifolia* Woodland Alliance, *Notholithocarpus densiflorus* Forest Alliance and *Umbellularia californica* Forest & Woodland Alliance ), , and 12.95 acres of grass fuel type (*Avena* spp.- *Bromus* spp. Herbaceous Semi-Natural Alliance ) across the two treatment types. The fuel types and vegetation alliances across the treatment types are shown in Table 5. Treatment modifications are based on fuel types/habitat types and vegetation communities and are described with more detail below. No treated vegetation will be transported offsite for this project.

Table 5. Proposed Treatment Acres by Manual of California Vegetation Alliance Classifications (Initial Treatment)

| CalVTP PEIR Fuel Type | *Manual of California Vegetation* Alliance | Acres in Fuel Break Treatment | Acres in Ecological Restoration Treatment | Total Habitat Acres |
|---|---|---|---|---|
| Tree | *Sequoia sempervirens* Forest & Woodland Alliance | 0.33 | 13.2 | 13.5 |
| | *Quercus agrifolia* Woodland Alliance | 0.79 | 4.25 | 5.0 |
| | *Notholithocarpus densiflorus* Forest Alliance/ *Umbellularia californica* Forest & Woodland Alliance | 6.6 | 63.0 | 69.6 |
| Grass | *Avena* spp.- *Bromus* spp. Herbaceous Semi-Natural Alliance | 9.7 | 3.25 | 12.95 |
| | Total treatment acres | 17.4 acres | 83.7 acres | 101.1 acres |

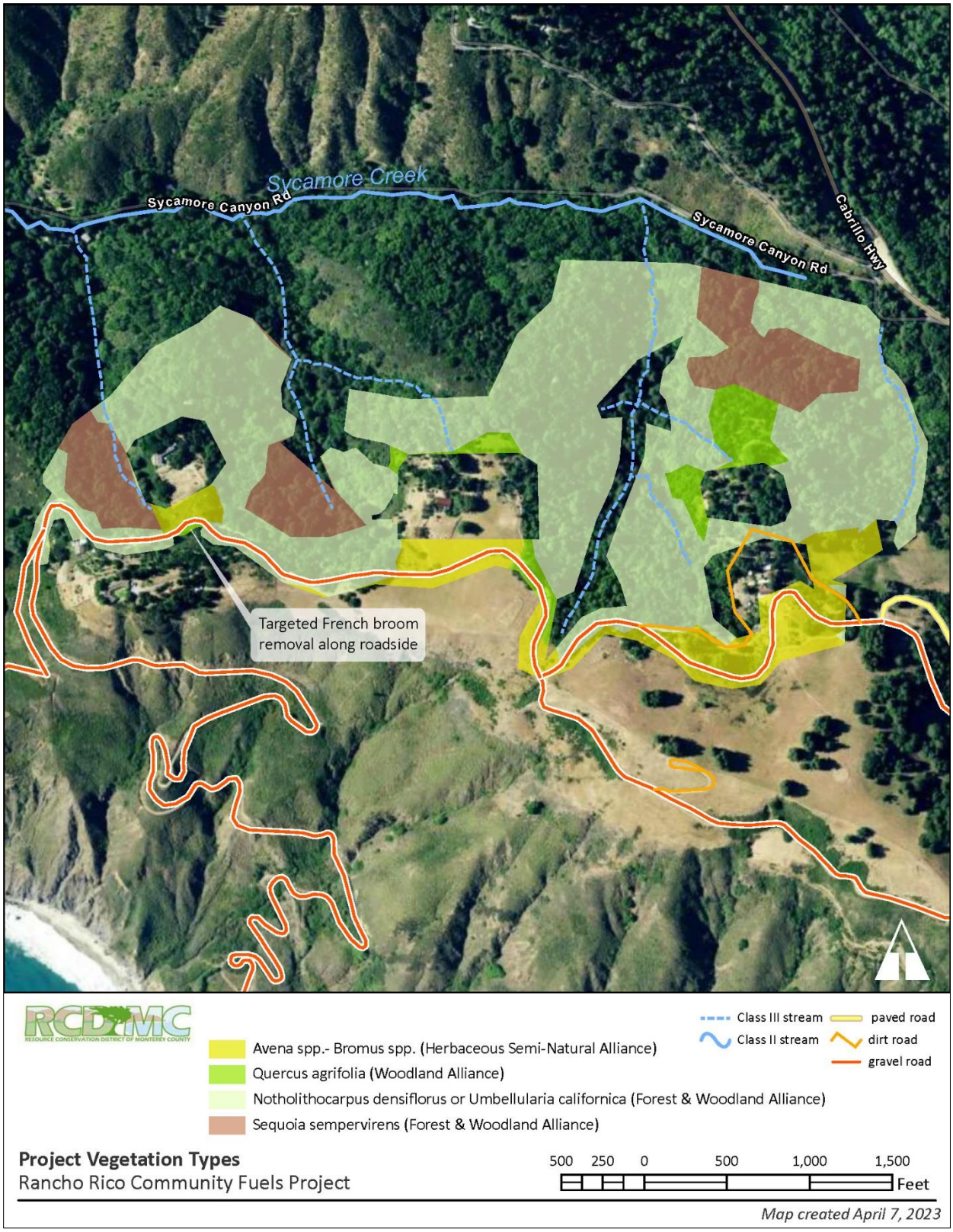


Figure 12. Manual of California Vegetation Classification of Rancho Rico Community Fuels Treatment Project

**Tree Fuel Type**

*Sequoia sempervirens Forest & Woodland Alliance*

Treatments within the *Sequoia sempervirens Forest & Woodland Alliance* will be limited to pruning or limbing of trees up to a minimum height of ten feet to reduce wildfire risk, removal of excessive basal sprouting (retaining two to three basal sprouts per clump), removal of fuel ladders near redwood canopies, and French broom removal, as needed. Desired or target post-treatment conditions are based on the compositions in the California Manual of Vegetation (Keeler-Wolf et al. 2003a, Evens and San. 2004, Keeler-Wolf and Evens 2006). For redwood forest, coastal redwood (*Sequoia sempervirens*) will be retained to at least 50 percent relative cover in the tree canopy, or at least 30 percent relative cover with other conifers such as Douglas fir (*Pseudotsuga menziesii)* or with a lower tier of hardwood trees such as tanoak, *Notholithocarpus densiflorus.* Steeper sloped redwood stands (greater than 25 percent slope or K-factor greater than 0.4) will have limitations for management required by the VTS for redwoods and will be treated only by manual methods. Larger trees (greater than 12-in DBH) will be retained to maintain a density of at least 50 percent relative canopy cover. Redwood understory species such as sorrel (*Oxalis spp.*), bracken fern (*Pteridium aquilinum)*, and sword fern (*Polystichum* spp.) will be pruned back only if they function as fuel ladders into the redwood canopy; otherwise, they will be left untreated.

Pile burning is prohibited in any redwood habitat.

*Notholithocarpus densiflorus Forest Alliance*

The *Notholithocarpus densiflorus* Forest Alliance consists of *Notholithocarpus densiflorus* overstory with over 60 percent relative cover in the tree canopy or over 30 percent relative cover with *Arbutus menziesii* or *Umbellularia californica* with less cover (Buck-Diaz et al. 2021, Sikes et al. 2021) The treatment will retain the mature canopy of all species of trees, retain select healthy trees in the understory, and maintain heterogeneity in the stand structure to improve wildlife habitat conditions, adhere to MCV Alliance membership rules, and enhance forest stand health. Excessive sprouting of trees, specifically madrone, will be pruned to retain two to three sprouts per clump. Bay laurel tree clusters will be pruned or removed depending on their relative location to coast live oak trees (see the 'Disease' section below for more information). The understory in the *Notholithocarpus densiflorus* Forest Alliance is comprised of coffeeberry (*Frangula* spp.), toyon (*Heteromeles arbutifolia*), gooseberry (*R. menziesii v. menziesii)*, silk tassel (*Garrya elliptica*), C*eanothus* spp. and coffeeberry (*Frangula* spp.), which will be treated in accordance with the Shrub Treatment Hierarchy. Sudden oak death prevention treatments will be used in these stands and diseased trees will be cut, with cut materials lopped and scattered in place or chipped and spread out in place to a depth no greater than 6 inches. Additionally, potential SOD carrier bay laurel trees near coast live oak or tanoak trees will be cut or pruned back (see the 'Disease' section below for more information).

*Umbellularia californica* Forest & Woodland Alliance

The *Umbellularia californica* Forest & Woodland Alliance consists of *Umbellularia californica* with over 50 percent relative cover in the tree canopy, or greater than 30 percent relative cover with *Quercus agrifolia* (Buck-Diaz et al. 2021, Sikes et al. 2021). The primary focus of treatments in this alliance is reduction in Sudden Oak Death transmission and reducing vertical and horizontal continuity of surface fuels and fuel ladders. Bay laurel tree clusters will be pruned or removed depending on their relative location to coast live oak trees (see the 'Disease' section below for more information) while maintaining Alliance cover definitions for bay laurel. The primary understory species in this particular alliance are comprised of toyon (H*eteromeles arbutifolia*), poison oak (*Toxicodendron diversilobium*), *Ceanothus* spp. and coffeeberry (*Frangula* spp.), which will be treated in accordance with the Shrub Treatment Hierarchy. Sudden oak death prevention treatments will be the primary management goal used in these stands, with diseased trees being cut, with cut materials lopped and scattered in place or chipped and spread out in place to a depth of no greater than 6

inches. Additionally, potential SOD carrier bay laurel trees near coast live oaks or tanoak trees will be cut or pruned back (see the 'Disease' section below for more information).

*Quercus agrifolia Woodland Alliance*

Treatment within the *Quercus agrifolia Woodland Alliance* will remove fuel ladders and maintain mature coast live oak and tanoak trees for partial shade and to provide a source of seeds for coastal oak woodland stand maintenance. Desired or target post-treatment conditions are based on the compositions in the California Manual of Vegetation (Keeler-Wolf et al. 2003a, Evens and San. 2004, Keeler-Wolf and Evens 2006). For coastal oak woodland *Q. agrifolia* will be retained to at least 50 percent relative cover in the tree canopy. In areas where bay laurel (*Umbellularia californica*) trees are present within the coastal oak woodland, then coast live oak trees will be less than 33 percent of the relative cover in the tree canopy. Retention of the mature overstory while providing adequate understory space for seedlings to establish and compete is the primary objective within the coastal oak woodland vegetation areas. Sudden oak death prevention treatments will be used in these stands as well to mitigate tree mortality and decrease the severity of weather-driven wildfire. In the understory, dead and dying madrone will be removed, manzanita and other understory species, including coffeeberry and toyon, will be retained and trimmed in accordance with the Shrub Treatment Hierarchy. All other understory vegetation (including poison oak (*Toxicodendron diversilobum*), gooseberry (*Ribes* spp.), California brome (*Bromus carinatus*) and other species) will be trimmed or pruned and kept low to the ground, depending on the prioritization level in the Shrub Treatment Hierarchy.

### Grassland Fuel Type

*Avena spp.- Bromus spp. Herbaceous Semi-Natural Alliance*

The *Avena* spp.- *Bromus* spp. Herbaceous Semi-Natural Alliance are made up primarily of non-native annuals including wild oats (*Avena* spp.), soft chess (*Bromus hordeaceus*), ripgut brome (*Bromus diandrus*), red brome *(Bromus madritensis*), wild barley (*Erodium* spp*.)*, and foxtail fescue (*Vulpia myuros*). The *Avena* spp.- *Bromus* spp. Herbaceous Semi-Natural Alliance will be mowed or weed-whacked for treatment; any trees or shrubs found in these Alliance areas will be limited to pruning treatments, with the exception of *Genista monspessulana* found in these areas. *Genista* will be fully removed with a combination of manual pulling and/or cutting with loppers or chainsaws and then removing the root mass whenever feasible.

## TREATMENT MAINTENANCE

*[Insert description here; identify planned maintenance intervals, including the site conditions that are reasonably expected to be present in the future in response to the initial treatment, and vegetation conditions that would trigger the need for maintenance.]*

Retreatment of the project area is anticipated to occur every 2 years. Retreatment/treatment maintenance methods would involve similar treatment activities used in the initial treatment; however, RCDMC anticipates the use of more

hand crews than mechanical equipment for the maintenance treatments, particularly on slopes steeper than 30 percent. Mechanical treatments in the Treatment Maintenance phase will essentially be limited to mowing of roadside areas in the Fuel Break Treatment Area and some limited roadside or trailside mowing in the Ecological Restoration area; mechanical maintenance treatments will also include some manual pruning and limbing of trees or shrubs. Manual treatments similar to those in the implementation treatment (pruning and limbing of trees and shrubs) would also be used in accordance with the Shrub Treatment Hierarchy. Cut material from treatment maintenance activities may be piled burned or lopped and scattered, depending on the location of the material. Pile burns will only occur in relatively flat, cleared areas near roads or trails. Any piles created for burning will not exceed 4 feet in height and 4 feet in width/depth and will be done in accordance with Monterey County regulations, in addition to CAL FIRE burn status windows.

Table 6. Maintenance Treatment Activities (Acres)

| Rancho Rico Project Treatment Area | Mechanical Treatment | Manual Treatment | Total acreage per treatment area |
|---|---|---|---|
| Fuel Break Treatment Area | ~9.4* | 8.0 | 17.4 |
| Ecological Restoration Treatment Area | ~10* | 73.7 | 83.7 |
| Total acreage per treatment method | 19.4* | 81.7 | 101.1 |

* Mechanical treatment acreages are estimates and will overlap with manual treatments; Total acreages per treatment area are accurate, but the exact acreages of the mechanical and manual treatments are estimated and may vary based on in-field conditions.

Treatment Types *[see description in CalVTP PEIR Section 2.5.1, check every applicable category; provide detail in description of Treatment Maintenance*]

☐ Wildland-Urban Interface Fuel Reduction

☒ Fuel Break

☒ Ecological Restoration

Treatment Activities [*see description in CalVTP PEIR Section 2.5.2, check every applicable category; include number of acres subject to each treatment activity, provide detail in description of Treatment Maintenance*]

☐ Prescribed Burning (Broadcast), _____ acres

☒ Prescribed Burning (Pile Burning)

☒ Mechanical Treatment, 19.4 acres

☒ Manual Treatment, 81.7 acres

☐ Prescribed Herbivory (Limited to maintenance Tx) _____ acres

☐ Herbicide Application, _____ acres

Fuel Type [*see description in CalVTP PEIR Section 2.4.1, check every applicable category; provide detail in description of Treatment Maintenance*]

☒ Grass Fuel Type

☐ Shrub Fuel Type

☒ Tree Fuel Type

Use of the PSA for Treatment Maintenance

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

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

7. Regional Setting and Surrounding Land Uses: (Briefly describe the project's surroundings)
The current land use of the project area consists of residential use, conservation, and grazing. The land has been used for these purposes since the colonization of California by the Spanish in the late 18th century. Pre-colonization, the project area was occupied by the Ohlone-Rumsen, Costanoan and the Esselen tribes of central California until the 19th century, when Spanish settlers forced them into missions and rancherias. Rancho Rico is a small community occupied by the Chappellet family for at least the last four decades. It is assumed that some portion of this area was historically grazed by cattle and/or sheep, due to the extensive amount of land in the Big Sur coastal area that was used for this purpose in the 18th and 19th centuries. Logging of redwood trees also occurred around this area, although it is not known how intensively this was done in the project area itself.

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

- Notice of Impending Development (Monterey County Forest Health and Fire Resilience Public Works Plan) (Targeting September 2023)
- CalFire Burn Permit (pile burns during initial or maintenance treatment)

Coastal Act Compliance

☐ The proposed project is NOT within the Coastal Zone

☒ The proposed project is within the Coastal Zone

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. Collaboration with staff from the Coastal Commission, RCDMC, and Monterey County resulted in the development and certification of a Public Works Plan (PWP) in lieu of a coastal development permit through the creation of the Coastal Vegetation Treatment Standards (Coastal VTS) (see Attachment C for the

Coastal VTS and Coastal VTS consistency documentation for the proposed project). Project approval is subject to the review and issuance of a Notice of Impending Development by the Commission.

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

   Pursuant to CalVTP SPR CUL-2, Native American tribal groups in Monterey County were contacted on July 5th, 2022. The 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. The Esselen Tribe of Monterey County requested that we have a tribal monitor on site during implementation to reduce potential impacts to unknown cultural resources.

# DETERMINATION (TO BE COMPLETED BY THE PROJECT PROPONENT)

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

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

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

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

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

_____ _____

Signature Date

_____ _____

Printed Name Title

_____

Agency

# EVALUATION OF ENVIRONMENTAL IMPACTS

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

7. Project proponents should incorporate into the PSA checklist references to information sources for potential impacts. Include a list of references cited in the PSA and make copies of such references available to the public upon request.
8. See Attachment A for the Standard Project Requirements and Mitigation Measures Checklist

# CHAPTER 3 PROJECT SPECIFIC ANALYSIS

## 3.1. AESTHETICS AND VISUAL RESOURCES

| Impact in the PEIR | | | Project-Specific Checklist | | | | | |
|---|---|---|---|---|---|---|---|---|
| Environmental Impact Covered In the PEIR | Identify Impact Significance in the PEIR | Identify Location of Impact Analysis in the PEIR | Does the Impact Apply to the Treatment Project? | List SPRs Applicable to the Treatment Project[1] | List MMs Applicable to the Treatment Project[1] | Identify Impact Significance for Treatment Project | Would this be a Substantially More Severe Significant Impact than Identified in the PEIR? | Is this Impact Within the Scope of the PEIR? |
| Would the project: | | | | | | | | |
| Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities | LTS | Impact AES-1, pp. 3.2-16 – 3.2-19 | Yes | SPR AES-2 SPR AQ-2, 3 SPR REC-1 | None | NA | 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 | SPR AES-1 SPR AES-3 SPR REC-1 | None | NA | 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 | NA | 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 |

## Discussion

Impact AES-1

The project area is entirely on private property. The project area perimeter closest to California State Scenic Highway Route 1 (i.e. northeast edge) ranges from 850 ft to 1,500 ft. The property is closed to public access and no public recreation trails exist within the project area. Parts of the project area may be visible from National Forest hiking trails including Mount Manuel and Pine Ridge Trail. For areas visible from the public viewshed, treatment activities will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. Project activities would result in a less than substantial short-term impact on visual resources and would only be temporary, including traversing mechanical equipment and smoke generated from prescribed pile burning, which will be minimized pursuant to SPRs related to smoke management (e.g., SPR-AQ-1.). Due to the angle at which Highway 1 sits in comparison to the project area, equipment nor project treatments would be visible, only potential for small plumes of smoke generated by pile burning. Therefore, the potential for project activities to result in a substantial impact on short-term scenic vistas, visual character, or scenic resources would be less than significant.

Impact AES-2

Initial vegetation and maintenance treatments include Shaded Fuel Break and Ecological Restoration treatment types. The impacts of these treatments and their potential to result in long-term degradation of visual aesthetics was assessed in the PEIR (CalVTP Final PEIR Volume II Section 3.2.3, page 20-22). The project area perimeter closest to California State Scenic Highway Route 1 (i.e. northeast edge) ranges from 850 ft to 1,500 ft. The property is closed to public access and no public recreation trails exist within the project area. Due to the nature of the treatment types, primarily focused on dead-woody debris removal and understory thinning, treatments would not be visible from public viewsheds such as Highway 1 and National Forest hiking trails. Therefore, based on the applicable SPR's and implementation of treatment types, the potential for substantial impact on short-term scenic vistas, visual character, or scenic resources would be less than significant.

Impact AES-3

This project does not include a Non-Shaded Fuel Break Treatment Type, therefore, this impact is not applicable to the project.

New Aesthetic and Visual Resource Impacts

The proposed treatment types for the Rancho Rico Community Fuels Project are consistent with the CalVTP PEIR. The Resource Conservation District of Monterey County will be guiding project implementation with consideration of site-specific characteristics that will be consistent with the CalVTP PEIR requirements (CalVTP Final PEIR Volume II Section 3.2.1 and 3.2.2). With this, there will be no new impacts to aesthetics and visual resources not addressed in the CalVTP PEIR.

# 3.2. AGRICULTURE AND FORESTRY RESOURCES

| Impact in the PEIR | | | Project-Specific Checklist | | | | | |
|---|---|---|---|---|---|---|---|---|
| Environmental Impact Covered In the PEIR | Identify Impact Significance in the PEIR | Identify Location of Impact Analysis in the PEIR | Does the Impact Apply to the Treatment Project? | List SPRs Applicable to the Treatment Project[1] | List MMs Applicable to the Treatment Project[1] | Identify Impact Significance for Treatment Project | Would this be a Substantially More Severe Significant Impact than Identified in the PEIR? | Is this Impact Within the Scope of the PEIR? |
| Would the project: | | | | | | | | |
| Impact AG-1: Directly Result in the Loss of Forest Land or Conversion of Forest Land to a Non-Forest Use or Involve Other Changes in the Existing Environment Which, Due to Their Location or Nature, Could Result in Conversion of Forest Land to Non-Forest Use | LTS | Impact AG-1, pp. 3.3-7 – 3.3-8 | Yes | None | 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 Agriculture and Forestry Resource Impacts: Would the treatment result in other impacts to agriculture and forestry resources that are not evaluated in the CalVTP PEIR? | ☐ Yes | ☒ No | If yes, complete row(s) below and discussion |
|---|---|---|---|

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

## Discussion

Impact AG-1

Initial and maintenance treatments would include mechanical treatments, manual treatments, and pile burning. The project area includes Tanoak *(Notholithocarpus densiflorus* Forest Alliance), California bay forest (*Umbellularia californica* Forest & Woodland Alliance), Redwood forest (*Sequoia sempervirens* Forest & Woodland Alliance) and Coast live oak woodland (*Quercus agrifolia* Woodland Alliance) and annual grasslands (*Avena* spp.- *Bromus* spp. Herbaceous Semi-Natural Alliance). Mastication treatment may include removing brush and trees less than 8 inches DBH. Vegetation remaining after treatments would be consistent with the definition of forest land as defined in Public Resources Code Section 12220(g). Treatments would include the removal of trees in the understory to improve forest health, increase carbon sequestration, and reduce wildfire risk. Treatments would improve forest stand conditions and would not result in conversion to non-forest use. Vegetation management has the potential to improve the forest stand conditions by removing competitive vegetation and opening up the forest floor, allowing for natural seeding of tree species. The potential for proposed treatment activities to result in loss or conversion of forest land was examined in the PEIR. This impact is within the scope of the PEIR because the treatment activities and intensity are consistent with those analyzed in the PEIR. This determination is consistent with the PEIR and would not constitute a more severe significant impact than what was covered in the PEIR.

New Agriculture and Forestry Resource Impacts

The project proponent has determined that the circumstances under which the proposed treatments would be undertaken are consistent with those covered in the PEIR. No changed circumstances would give rise to new significant impacts. Therefore, no new impact related to agriculture and forestry resources would occur.

# 3.3. AIR QUALITY

| Impact in the PEIR | | | Project-Specific Checklist | | | | | |
|---|---|---|---|---|---|---|---|---|
| Environmental Impact Covered In the PEIR | Identify Impact Significance in the PEIR | Identify Location of Impact Analysis in the PEIR | Does the Impact Apply to the Treatment Project? | List SPRs Applicable to the Treatment Project[1] | List MMs Applicable to the Treatment Project[1] | Identify Impact Significance for Treatment Project | Would this be a Substantially More Severe Significant Impact than Identified in the PEIR? | Is this Impact Within the Scope of the PEIR? |
| Would the project: | | | | | | | | |
| Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS | SU | Table 3.4-1; Impact AQ-1, pp. 3.4-26 – 3.4-32; Appendix AQ-1 | Yes | SPR AQ-1, 4 GEO-6 | MM-AQ-1 | LTSM | 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 | SPR HAZ-1 NOI-4, 5 | NA | LTSM | No | Yes |
| Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk | LTS | Section 3.4.2; Impact AQ-3, pp. 3.4-34 – 3.4-35 | No | None | None | NA | NA | NA |
| 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 | Yes | SPR AD- 4 SPR AQ- 2, 6 SPR-GEO-6 | None | PSU | No | Yes |
| Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust | LTS | Impact AQ-5, pp. 3.4-37 – 3.4-38 | Yes | SPR HAZ- 1 SPR NOI- 4, 5 | NA | LTS | No | Yes |
| Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning | SU | Section 2.5.2; Impact AQ-6; pp. 3.4-38 | Yes | SPR AD- 4 SPR AQ- 2, 6 | NA | PSU | No | Yes |

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

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

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

## Discussion

Impact AQ-1

Use of vehicles, mechanical equipment, and pile burning during implementation and maintenance treatments would result in emissions of criteria pollutants that could exceed CAAQS or NAAQS thresholds. Emissions of criteria air pollutants related to the proposed treatment are within the scope of the impacts addressed in the PEIR because the proposed activities, as well as the associated equipment and duration of use, are consistent with those analyzed in the PEIR. The components of mitigation measure AQ-1 that have been determined by CAL FIRE to be feasible and would be implemented to reduce emissions include use of gasoline-powered equipment, encouraging carpooling to the project site and using Best Available Control Technology for emission reductions of NOX and PM on equipment. Equipment meeting Tier 4 emission standards and the use of renewable fuel would be implemented to the extent feasible.

Impact AQ-2

Use of vehicles and mechanical equipment during implementation and maintenance treatments could expose people to diesel particulate matter emissions. The potential to expose people to diesel particulate matter emissions was examined in the PEIR. Diesel particulate matter emissions from the proposed treatments are within the scope of the PEIR, because the exposure potential is the same as analyzed in the PEIR, and the types and amount of equipment that would be used, as well as the duration of use, during proposed treatments are consistent with those analyzed in the PEIR.

Impact AQ-3

The project area does not contain naturally occurring asbestos and therefore no impacts related to AQ-3 are expected as a result of this project.

Impact AQ-4

Pile burning during treatments could expose people to toxic air contaminants. The duration and parameters of pile burning are within the scope of the activities addressed in the PEIR; therefore, the potential for exposure to toxic air contaminants is also within the scope of impacts covered in the PEIR. SPR GEO-6 does not apply, as any burn piles will be less than 4 feet in length, width or height and will not comprise 15% or more of the project area. The project area is zoned as a Watershed and Scenic Conservation (Coastal Zone)[3] district. In regard to SPR-AQ-2, the amount and quantity of burn piles that will be generated from treatments are not expected to impact nearby areas with smoke contaminants, the closest areas that are zoned as Rural Density Residential lay to the north of the project area while the prevailing wind direction is from the west/northwest. All feasible measures to prevent and minimize smoke emissions as well as exposure to smoke are included in SPRs. No additional mitigation measures are feasible, and this impact would remain potentially significant and unavoidable, as explained in the PEIR.

Impact AQ-5

Use of vehicles and mechanical equipment during treatments could expose people to objectionable odors from diesel exhaust. Objectionable odors from diesel exhaust during the proposed treatment project are within the scope of the impacts covered in the PEIR because the proposed activities, as well as the associated equipment and duration of use, are consistent with those analyzed in the PEIR.

[3] http://www2.co.monterey.ca.us/planning/docs/ordinances/Title20/20_toc.htm

Impact AQ-6

Pile burning during implementation and maintenance treatments could expose people to objectionable odors. The duration and parameters of pile burning are within the scope of the activities addressed in the PEIR; therefore, the resultant potential for exposure to objectionable odors from smoke is also within the scope of impacts covered in the PEIR. All feasible measures to prevent and minimize smoke odors as well as exposure to smoke odors are included in SPRs. No additional mitigation measures are feasible, and this impact would remain potentially significant and unavoidable, as explained in the PEIR.

New Air Quality Impacts

The project proponent has determined that the circumstances under which the proposed treatments would be undertaken are consistent with those covered in the PEIR. No changed circumstances would give rise to new significant impacts. Therefore, no new impact related to air quality would occur.

# 3.4. ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

| Impact in the PEIR | | | Project-Specific Checklist | | | | | |
|---|---|---|---|---|---|---|---|---|
| Environmental Impact Covered In the PEIR | Identify Impact Significance in the PEIR | Identify Location of Impact Analysis in the PEIR | Does the Impact Apply to the Treatment Project? | List SPRs Applicable to the Treatment Project[1] | List MMs Applicable to the Treatment Project[1] | Identify Impact Significance for Treatment Project | Would this be a Substantially More Severe Significant Impact than Identified in the PEIR? | Is this Impact Within the Scope of the PEIR? |
| Would the project: | | | | | | | | |
| Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources | LTS | Impact CUL-1, pp. 3.5-14 – 3.5-15 | Yes | SPR CUL-1, 7, 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 | SPR CUL-2, 3, 4, 5, 6, 8 | MM CUL-2 | LTSM | No | Yes |
| Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource | LTS | Impact CUL-3, p. 3.5-17 | Yes | SPR CUL- 1, 2, 3, 4, 5, 6, 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 | Less than Significant |
|---|---|---|---|

| | | Mitigation Incorporated | |
|---|---|---|---|
| [identify new impact here, if applicable; add rows as needed] | ☐ | ☐ | ☐ |

## Discussion

Impact CUL-1

The project area was subjected to archival research and a ground survey for historical resources by Albion Environmental Inc., in May 2022. Their archival research did not identify any structures listed on the historic register within the project area. The report "*….identified a 1954 historic aerial image of the Project Area that shows the existing vegetation and dirt roads in the Project Area are much the same today as they were in 1954. The areas clear of trees where residences currently exist in the Project Area are also visible in the 1954 image, although only one of the residences, the one in the eastern portion of the Project Area, appears to have been present then. No other historic structures/buildings are present within the Project Area.*" Due to the findings that there was only a single historic building near the project area and given that there will not be any project activities within 100 ft of the historic structure, the potential for this project to impact historical resources are less than significant and within the scope of the PEIR because the treatment activities and intensity are consistent with those analyzed in the PEIR.

Impact CUL-2

This impact was identified as significant and unavoidable in the PEIR because there could be rare instances where inadvertent damage of unknown resources may be extensive due to use of heavy equipment. This impact is within the scope of the PEIR because the intensity of ground disturbance of the treatment project is consistent with that analyzed in the PEIR. For the Rancho Rico Community Fuels Treatment Project, SPRs and Mitigation Measure CUL-2 would require every reasonable effort to identify and protect resources if inadvertently found during the project implementation, including having appropriate tribal monitors on-site to ensure that cultural, archaeological and/or historic resources are not impacted by project implementation activities, such as mastication, mowing, chipping and manual methods. As per Mitigation Measure CUL-2, work will stop if archaeological resources are discovered during implementation and a qualified archaeologist will be brought onto the site to determine the significance of any new resource. Therefore, this impact would be less than significant with this mitigation measure included in addition to the PEIR SPRs CUL-2 to CUL-6 and CUL-8, which require that the project proponent contact geographically affiliated native American tribes, and that a qualified archaeologist or archaeologically-trained resource professional complete pre-field research and archaeological surveys that any archaeological or tribal cultural resources encountered during project activities will be protected, and that all workers will receive cultural resources training.

Impact CUL-3

This impact is within the scope of the PEIR because the extent and scope of the planned treatments are consistent with those analyzed in the PEIR for tribal cultural resources. The anticipated project treatments include mechanical treatment and manual treatment. Potential for adverse effects to cultural/tribal resources during implementation of the project are within the scope of the impacts addressed in the PEIR. Local indigenous tribes were contacted in July 2022 regarding the project; one tribe (Esselen Tribe of Monterey County) provided feedback that an Esselen tribal monitor be present during implementation of the project, therefore, an Esselen tribal monitor is expected to be on site for implementation activities.

Impact CUL-4

Vegetation treatment would include mechanical treatments using heavy equipment in some areas. The potential for uncovering human remains during implementation of the treatment project is within the scope of the activities and impacts addressed in the PEIR. Should human remains be discovered, the project would comply with California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097.

New Archaeological, Historical, and Tribal Cultural Resource Impacts

The project proponent has determined that the circumstances under which the proposed treatments would be undertaken are consistent with those covered in the PEIR. No changed circumstances would give rise to new significant impacts. Therefore, no new impact related to archaeological, historical and/or tribal cultural resources would occur.

# 3.5. BIOLOGICAL RESOURCES

| Impact in the PEIR | | | Project-Specific Checklist | | | | | |
|---|---|---|---|---|---|---|---|---|
| Environmental Impact Covered In the PEIR | Identify Impact Significance in the PEIR | Identify Location of Impact Analysis in the PEIR | Does the Impact Apply to the Treatment Project? | List SPRs Applicable to the Treatment Project[1] | List MMs Applicable to the Treatment Project[1] | Identify Impact Significance for Treatment Project | Would this be a Substantially More Severe Significant Impact than Identified in the PEIR? | Is this Impact Within the Scope of the PEIR? |
| Would the project: | | | | | | | | |
| Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications | PS | Impact BIO-1, pp 3.6-131–3.6.138 | Yes | SPR BIO-1, 2, 3, 6, 7, 8, 9; SPR AQ-4; SPR GEO-1, 4, 7; SPR HYD-4, 5 | MM BIO-1b | LTSM | No | Yes |
| Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications | PS (all wildlife species except bumble bees) S&U (bumble bees) | Impact BIO-2, pp 3.6-138–3.6-184 | Yes | SPR BIO-1, 2, 3, 4, 5, 8, 10, 11; SPR HYD-2, 3, 4, 5; SPR HAZ-5, 6 | MM BIO-1b, 2a, 2b, 2e, 2g, 3a | LTSM | No | Yes |
| Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function | PS | Impact BIO-3, pp 3.6-186–3.6-191 | Yes | SPR BIO-1, 2, 3, 4, 6, 9; SPR GEO-1, 2, 3, 4, 5, 7; SPR HYD-2, 4, 5 | MM BIO-3a | LTSM | No | Yes |
| Impact BIO-4: Substantially Affect State or Federally Protected Wetlands | PS | Impact BIO-4, pp 3.6-191–3.6-192 | Yes | SPR BIO-1, | None | No Impact | NA | NA |
| 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 | Yes | SPR BIO-1, 4, 10, 12; SPR HYD-4 | MM BIO - 5 | LTSM | 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 | SPR BIO-1, 2, 3, 4, 10, 12 | None | 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 | SPR AD-3 | NA | No Impact | No | Yes |
| Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan | No Impact | Impact BIO-8, pp 3.6-199–3.6-200 | No | NA | NA | No Impact | No | Yes |

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

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

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

## Discussion

### Impact BIO-1

Initial and Maintenance treatments could result in direct or indirect adverse effects to special-status plant species because suitable habitat for 13 special-status plant species is potentially present within or near the project area (see Attachment B). Special-status plant species (per a 10-mile CNDDB records search completed in June 2022) that have the potential to occur within the project area include:

- Santa Lucia fir (*Abies bracteata)* (D. Don) Pott.)
- Little Sur manzanita (*Arctostaphylos edmundsii* J.T. Howell*)*
- San Luis Obispo sedge (*Carex obispoensis* Stacey*)*
- Compact cobwebby thistle (*Cirsium occidentale* (Nutt.) Jeps. *var. compactum* Hoov)
- Jolon clarkia (*Clarkia jolonensis* Parnell)
- Hutchinson's larkspur (*Delphinium hutchinsoniae* Ewan)
- Umbrella larkspur (*Delphinium umbraculorum* Lewis & Epl.*)*
- Fragrant fritillary (*Fritillaria liliacea* Lindl)
- Abram's lupine (*Lupinus albifrons* Benth. *var. abramsii* (C.P. Smith) Hoov.)
- Arroyo Seco bush-mallow (*Malacothamnus palmeri (*Wats.) Greene *var. lucianus* Kearn)
- Dudley's lousewort (*Pedicularis dudleyi* Elmer)
- San Benito pentachaeta (*Pentachaeta exilis (*Gray*) ssp. aeolica* Van Horn & Ornduff))
- Adobe sanicle (*Sanicula maritima* (Wats.))

Santa Lucia fir (*Abies bracteata* (D. Don) Pott.): Santa Lucia 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 0.10 miles to the north of the project area along Pfeiffer Ridge. While no occurrences are known in the project area, potential habitat (mixed conifer forest) does exist. 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.

Little Sur manzanita (A*rctostaphylos edmundsii* J.T. Howell): 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 nearest known occurrences are on Andrew Molera State Park property about 4 miles to the north/northwest. 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 (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.

San Luis Obispo sedge (*Carex obispoensis* Stacey): San Luis Obispo sedge is a perennial rhizomatous grass-like plant found in a wide variety of habitats, often growing in seeps, including closed-cone coniferous forests and chaparral. The species has a CNDDB Sensitive Natural Communities Rank of S3 and CNPS California Rare Plant Rank of 1B.2. While no occurrences are known in the project area, potential habitat does exist based on initial observations during site visits. If suitable habitat, which typically consists of wet areas (e.g., wetlands, mesic areas in forest or grassland, springs, seeps) 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 (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.

Compact cobwebby thistle (*Cirsium occidentale* (Nutt.) Jeps. *var. compactum* Hoov.): Compact cobwebby thistle is a perennial herb in the Asteraceae family found in coastal areas of California. The species has a CNDDB Sensitive Natural Communities Rank of S2 and CNPS California Rare Plant Rank of 1B.2. It can also be found in chaparral near coastal areas. The nearest occurrences are found approximately seven miles to the north near the mouth of the Little Sur River. 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 (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.

Jolon clarkia (*Clarkia jolonensis* Parnell): Jolon clarkia is an annual herb in the Onagraceae family. The species has a CNDDB Sensitive Natural Communities Rank of S2 and CNPS California Rare Plant Rank of 1B.2. The species is found in chaparral, dry cismontane woodlands and riparian woodlands from 65 to 2,165 feet. There is CNDDB occurrence from June 2022 that overlaps part of the project area. Given that there are recent records of the species in the project area, suitable habitat is assumed present. If it is determined during the reconnaissance-level surveys (SPR BIO-1) that the suitable habitat for Jolon clarkia 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.

Hutchinson's larkspur (*Delphinium hutchinsoniae* Ewan.): Hutchinson's larkspur is a perennial herb in the Ranunculaceae family found in broadleaf upland forests, chaparral and coastal prairie. The species has a CNDDB Sensitive Natural Communities Rank of S2 and CNPS California Rare Plant Rank of 1B.2. There are two known CNDDB occurrences 0.25 miles to the northeast of the project boundary on California State Parks land. 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 (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.

Umbrella larkspur (*Delphinium umbraculorum* Lewis & Epl.): Umbrella larkspur is a perennial herb in the Ranunculaceae family found in chaparral and cismontane habitats throughout coastal California. The species has a CNDDB Sensitive Natural Communities Rank of S3 and CNPS California Rare Plant Rank of 1B.3. While no occurrences are known in the project area, potential habitat does exist. 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 (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.

Fragrant fritillary (*Fritillaria liliacea* Lindl.): Fragrant fritillary is a perennial bulbiferous herb in the Liliaceae family that is known in a variety of habitats, including cismontane woodland. The species has a CNDDB Sensitive Natural Communities Rank of S2 and CNPS California Rare Plant Rank of 1B.2. There is a known occurrence 0.20 miles to the west of the project area. 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 (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.

Abram's lupine (*Lupinus albifrons* Benth. *var. abramsii* (C.P. Smith) Hoov.): Abram's lupine is a perennial herb in the Fabaceae family found across a variety of habitats. The species has CNDDB Sensitive Natural Communities Rank of S3 and 3.2. While no occurrences are known in the project area, potential habitat does exist. 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 (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.

Arroyo Seco bush-mallow (*Malacothamnus palmeri (*Wats.) Greene *var. lucianus* Kearn.): Arroyo Seco bush-mallow is a perennial shrub in the Malvaceae family. The species has CNDDB Sensitive Natural Communities Rank of S1 and 1B.2. It is found in foothill woodlands and chaparral of Monterey County. 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 (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.

Dudley's lousewort (*Pedicularis dudleyi* Elmer): This member of the figwort family (Orobanchaceae) grows in shaded conditions in maritime chaparral, coastal redwood, and mixed evergreen forest communities of San Luis Obispo, Monterey, and San Mateo counties. The species has a California State 'Rare' Status, CNDDB Sensitive Natural Communities Rank of S2, and CNPS California Rare Plant Rank of 1B.2. It is vulnerable to trampling and trail maintenance activities. While no occurrences are known in the project area, potential habitat does exist. 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 (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-1a.

San Benito pentachaeta (*Pentachaeta exilis (*Gray*) ssp. aeolica* Van Horn & Ornduff): San Benito pentachaeta is an annual herb in the Asteraceae family found in cismontane woodlands and foothill grasslands. The species has CNDDB Sensitive Natural Communities Rank of S2 and 1B.2. While no occurrences are known in the project area, potential habitat does exist. 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 (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.

Adobe sanicle (*Sanicula maritima* Wats.): Adobe sanicle is a perennial herb in the carrot family (Apiaceae) and is found in wet to dry clay soils of coastal prairie and coastal sage scrub plant communities. The species has a California State 'Rare' Status and CNPS California Rare Plant Rank of 1B.2. Its distribution is centered in the coastal hills of San Luis Obispo and Monterey counties, with one historical record from the San Francisco area. While no occurrences are known in the project area, potential habitat does exist near the project site. 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 (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-1a.

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, the RCDMC will have a reconnaissance-level survey completed before implementation begins for the project. Per Mitigation Measures BIO-1a and BIO-1b, if listed or non-listed special status plant species are 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 treatment area modified to avoid impacts particularly to sensitive vegetation communities (SPR BIO-3). In relation to SPR BIO-6, all work will adhere to sanitation standards for Sudden Oak Death areas described in the 'Disease' section on pages 15-16 of the PSA. 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 Rancho Rico 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 will be used on slopes over 30 percent (SPR GEO-7).

SPR BIO-7 would apply to all treatment activities, including maintenance treatments; it requires protocol-level surveys for special-status plants to be conducted prior to implementation of mechanical and manual treatments. One of the special-status plant species with suitable habitat in the treatment areas-San Luis Obispo sedge-is typically associated with wet areas (e.g., wetlands, mesic areas in forest or grassland, springs, seeps). Pursuant to SPR HYD-4, Watercourse and Lake Protection Zones (WLPZs) ranging from 50 to 100 feet adjacent to all aquatic habitat (Class III and Class II, respectively) within the treatment areas would be implemented for manual, mechanical, and pile burning maintenance treatments, which would minimize some adverse effects on this species. With the implementation of the above-referenced SPRs, Impact BIO-1 would be less than significant with mitigation and consistent with the determination in the PEIR.

Impact BIO-2

Project treatment and maintenance could result in direct or indirect adverse effects to special-status wildlife species because potentially suitable habitat is present in the project area. Prior to the initial treatment, a qualified biologist will conduct a data review and reconnaissance-level survey for special-status wildlife species to determine if suitable habitat or special-status wildlife species are present in the project area, and provide recommendations for avoidance measures (SPR BIO-1). Based on a preliminary 5-mile CNDDB records search from June 9, 2022 and regional/local data (see Appendix C), there are several special-status wildlife species that have potential to occur within or near the Rancho Rico Community Fuels Treatment project area including:

- Steelhead – south-central Ca. coast DPS (*Oncorhynchus mykiss irideus* pop. 9)

- California red-legged frog (*Rana draytonii*)
- Foothill yellow legged frog (*Rana boylii* pop. 6*)*
- Western pond turtle (*Emys marmorata*)
- Monterey Dusky-footed Woodrat (*Neotoma fuscipes luciana)*
- Black swift (*Cypseloides niger)*
- Monarch – Ca. overwintering population (*Danaus plexippus* pop 1.)
- Smith's blue butterfly (*Euphilotes enoptes smithi)*
- Crotch bumble bee *(Bombus crotchii)*
- Pinnacles optioservus riffle beetle (*Optioservus canus*)
- Globose dune beetle (*Coelus globosus*)

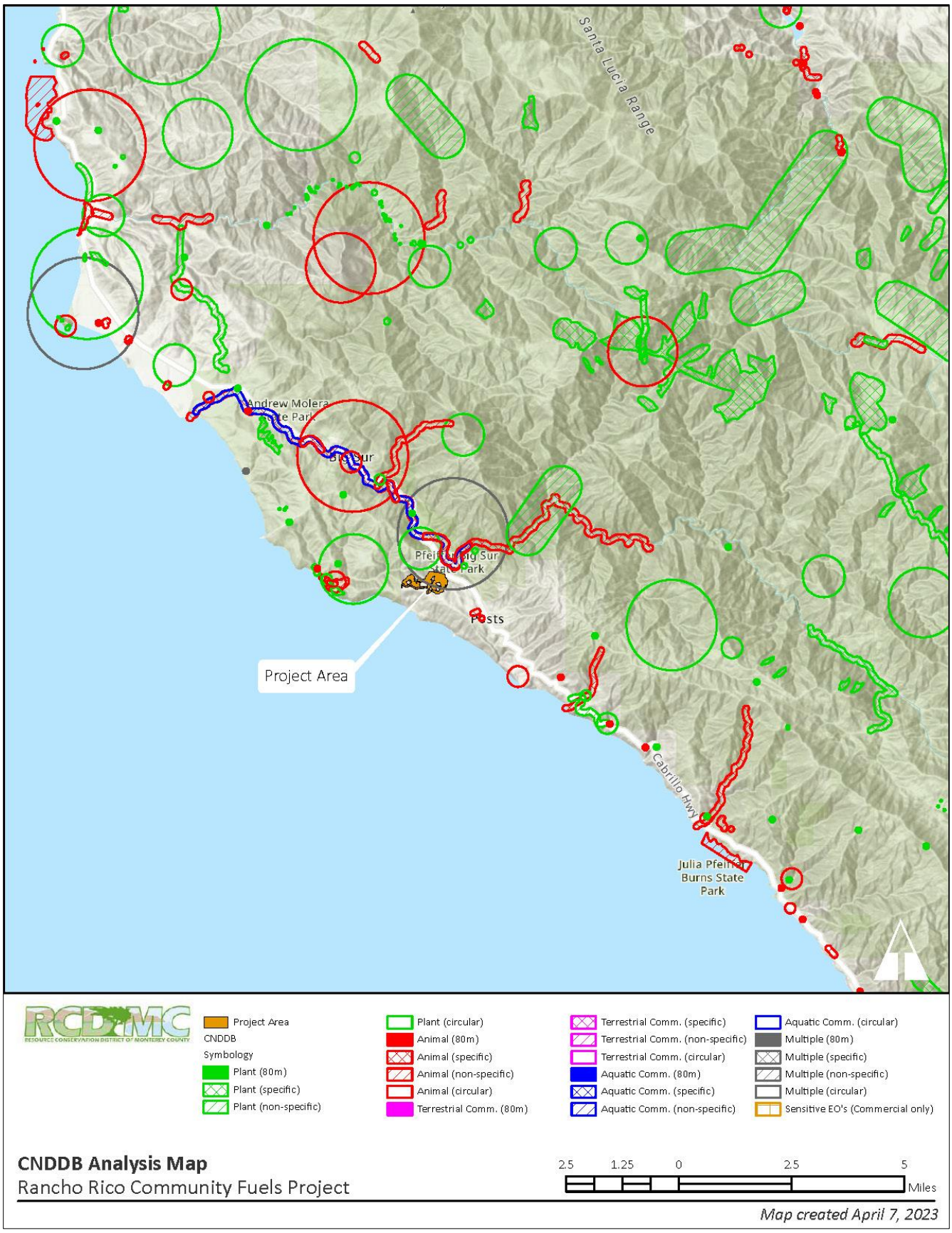


Figure 13. Preliminary CNDDB Analysis Map for 5-mile radius from Rancho Rico Community Fuels Treatment Project (data retrieved June 9, 2022)

Steelhead trout (*Oncorhynchus mykiss irideus*): South-Central California populations Steelhead trout is listed as Endangered under the federal Endangered Species Act. Cal Fish maps indicate that individuals have been recorded for the Big Sur River and its tributaries, presenting high quality spawning and rearing habitat. There will be no impacts to Steelhead trout given that the Rancho Rico project area is outside of their suitable habitat, i.e., no project activities will occur in or within 100 ft of a fish-bearing stream, Sycamore Creek. To protect the water quality an in-stream habitat provided by Sycamore Creek, the implementation of SPR HYD-1, HYD-2, HYD-4, and HYD-6 would avoid and minimize the risk of indirectly impacting steelhead through compliance with water quality regulations, avoiding construction of new roads, identifying and protecting the WLPZ, and protecting existing drainage systems.

California Red-Legged Frog (*Rana draytonii*): California red-legged frog 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 project area, but there are Class III watercourses and riparian areas that could potentially provide dispersal habitat. 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 (SPR BIO-10). If California red-legged frog is encountered during the protocol-level surveys, the location will be mapped, flagged and avoided with a minimum 100 feet no-disturbance buffers (MM BIO2a).

Foothill Yellow-Legged Frog (*Rana boylii)*: Foothill yellow-legged frog is listed as a Species of Special Concern by the California Department of Fish and Wildlife. 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 postmetamorphs. 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 Rancho Rico 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 Rancho Rico project area, thus suitable habitat for this species does not occur in the project area. 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 (SPR BIO-10). If foothill yellow-legged frog is encountered during the protocol-level surveys, the location will be mapped, flagged and avoided with a minimum 100 feet no-disturbance buffers (MM BIO2b).

Western Pond Turtle (*Emys mamoratais*): Western Pond Turtle is listed as a Species of Special Concern by the California Department of Fish and Wildlife. This species requires some slack or slow water aquatic habitat and as a result is uncommon within high gradient streams. Habitat quality seems to vary with the availability of aerial and aquatic basking sites. Hatchlings (i.e., individuals through their first year of activity) require shallow water habitat with relatively dense submergent or short emergent vegetation in which to forage. Western Pond Turtles also require an upland oviposition site in the vicinity of the aquatic site. Suitable oviposition sites must have the proper thermal and hydric environment for incubation of the eggs. There is only one recording of Western Pond Turtle within a 5 miles radius of the project area which occurs in the Big Sur River, west of Highway 1, about 2 miles northwest of Big Sur. Data displaying extant and CNDDB records of this species do not indicate that the species is likely to be present or that suitable habitat is present within the Rancho Rico project area.

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 are likely to occur within and adjacent to the project area and are common throughout forested and chaparral habitats of Monterey Bay and Big Sur. 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. This species feeds principally on woody plants, acorns, and grasses. 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 (MM BIO1b).

Black Swift (*Cypseloides niger*): The Black swift is listed as a Species of Special Concern by the California Department of Fish and Wildlife. Black swifts tend to breed near water such as coastal bluffs above the surf and cliffs behind or adjacent to waterfalls in deep canyons. Their breeding range remains largely unchanged since 1940. In Monterey County, a small population has been known from the Big Sur coast and adjacent Santa Lucia Mountains. From 1988 to 1992, a breeding bird atlas project found confirmed or suspected evidence of nesting at three coastal sites (Anderson Creek mouth, Torre Creek mouth, California Bird Species of Special Concern Rocky Point; the latter is the site called Pt. Sur in Remsen 1978 and Bixby Creek mouth in 1993 and at one inland location (Canogas Falls, Devils Canyon fork of Big Creek). Several rare summer residents of mountain foothill canyons were recorded nesting on cliffs behind or adjacent to waterfalls in Pfeiffer Big Sur State Park (1995). No black swift breeding sites or characteristics such as cliffs or bluffs have been observed in the project area. If project work would occur during the nesting season (February 1-August 31), then nesting bird surveys would occur according to SPR BIO-12 at least 7 days prior to treatment activities.

Monarch (*Danaus plexippus*): The western monarch butterfly is listed as a candidate for protection under the federal Endangered Species Act. 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. If an overwintering site is encountered during the reconnaissance-level survey (SPR BIO-1), it will be avoided during treatment.

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 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. These types of plant communities occur near the project area but will be avoided during treatment. If either of the host plants are observed 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).

Crotch bumble bee (*Bombus crotchii*): Crotch bumble bee is listed as a Candidate species under the California Endangered Species Act. Occurs in open grassland and scrub at relatively warm and dry sites. Requires plants that bloom and provide adequate nectar and pollen throughout the colony's life cycle, which is from early February to late October. The bumble bee generally nests underground, often in abandoned mammal burrows. 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 (SPR BIO-10). The project area contains annual grasslands which may provide suitable habitat for Crotch bumble bee. If suitable habitat containing sufficient floristic resources is observed during the reconnaissance-level survey, then mechanical treatment and pile burning will be limited in that area to October through February to avoid the bumble bee flight season (MM BIO-2g).

Pinnacles optioservus riffle beetle (*Optioservus canus*): Pinnacles optioservus riffle beetle is not federally or state listed, but it was included in the CNDDB database records search results. The beetle can be found on rocks and in gravel in aquatic habitats with cool, swift, clear streams. Project activities will not occur within any aquatic habitats and therefore an impact to Pinnacles optioservus riffle beetle is highly unlikely.

Globose dune beetle (*Coelus globosus*): Globose dune beetle is not federally or state listed, but it was included in the CNDDB database records search results. The beetle is an inhabitant of coastal sand dune habitat from Bodega Head in Sonoma County south to Ensenada, Mexico; inhabits foredunes and sand hummocks burrowing beneath the sand surface and is most common beneath dune vegetation. There is no sand dune habitat within the project area and therefore an impact to Globose dune beetle is highly unlikely.

The potential for adverse effects from the treatment activities, impacts, and intensity of disturbance onto special-status wildlife species is addressed and consistent with those analyzed within the scope of the CalVTP Programmatic Environmental Impact Report (PEIR). From the relevant SPRs and MMs that apply to Impact BIO-2, the following SPRs and MMs apply: SPR BIO-1 (reconnaissance-level survey), SPR BIO-2 (worker training), SPR BIO-3 (protection of sensitive natural communities), SPR BIO-4 (retain riparian function), SPR BIO-6 (prevent spread of plant pathogen, SPR BIO-8 (protect Coastal Zone ESHAs), SPR BIO-9 (prevent spread of invasive plants and wildlife), SPR BIO-10 (special-status species protocol-level surveys), SPR HYD-2 (water quality regulatory compliance), SPR HYD-3 (avoid construction of new roads), SPR HYD-4 (identify and protect WLPZs), and SPR HYD-6 (protect existing drainage systems). SPR HAZ-5 (Spill Prevention and Response), and if suitable habitat is unavoidable and special-status species are present, MM-BIO-1a, MM BIO-1b, MM BIO-2a, MM BIO-2b, MM BIO-2e, MM BIO-2g, MM BIO-3a and MM BIO-5 are applicable to this project (See SPRs and MMs sections in Appendix A). With their implementation, Impact BIO-2 would be less than significant with mitigation and consistent with the determination in the PEIR.

Impact BIO-3

Project treatment and maintenance could result in direct or indirect adverse effects to sensitive habitats, including designated sensitive natural communities, riparian habitats, and redwood, California bay, and tanoak forest. However, the potential for adverse effects from the treatment activities, impacts, and intensity of disturbance onto sensitive habitats through direct loss or degradation that leads to loss of habitat function is addressed and consistent with those analyzed within the scope of the Program Environmental Impact Report (PEIR). With the implementation of the relevant Standard Project Requirements and Mitigation Measures, Impact BIO-3 would be less than significant with mitigation and consistent with the determination in the PEIR.

SPR BIO-3 will apply through the mapping of sensitive natural communities on the ground, which a RCDMC botanist has already outlined with vegetation alliances in the project area per the Manual of California Vegetation. Riparian areas, *Notholithocarpus densiflorus* Forest Alliance, *Umbellularia californica* Forest & Woodland Alliance, *Sequoia sempervirens* Forest & Woodland Alliance and *Quercus agrifolia* Woodland Alliance have been identified and mapped within the project area. Pursuant to SPR BIO-4, riparian vegetation treatment will be limited to limbing of mature trees, removing fuel ladders and reducing woody debris causing potentially high fuel loading. Because one of the focal points of the project is French broom removal and enhancement of native vegetation community resilience, SPR BIO-9 is relevant and crews will be educated on French broom management techniques to avoid spread during implementation treatment.

For Mitigation Measure BIO-3a, the project has been designed to avoid loss of sensitive plant communities defined by California Department of Fish and Wildlife, CEQA and Coastal Act analyses. No communities with rarity ranks of S1-S3 will be impacted. Most communities appear to be out of their historic fire interval. There are no records for major fire occurrences on the majority of the property for at least seventy years, with the exception of the Pfieffer Fire in 2013, which only reached the very northern edge of the treatment area. Treatments will be guided to restore stand structure and characteristics back to or similar to communities that are within their historic fire interval.

Impact BIO-4

Projects shall adhere to CalVTP SPR BIO-1 identifying and documenting the location of wetlands during project surveys and planning. 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. There are no known State or Federally protected wetlands in the project area; therefore, it is not expected that there will be any impacts to State or Federally protected wetlands. However, should a State or Federally protected wetland be encountered before or during project activities, a 100-ft no-disturbance buffer will be established per the requirements in the Coastal VTS. Only treatment activities that would restore ecological benefits to the wetland may be allowed within the buffer.

Impact BIO-5

Project treatments for this project may have the potential to impact wildlife movement corridors and nurseries because potential suitable habitat occurs with the project area. The potential for treatment activities to have an impact to wildlife corridors and nurseries was assessed in the CalVTP PEIR (CalVTP Final PEIR Volume II Section 3.6.3, pg. 193-197). Wildlife movement corridors and nurseries will be identified during the reconnaissance-level surveys outlined in SPRs BIO-1 and BIO-7 prior to treatment activities.

This potential for impact to wildlife movement corridors and nurseries is within the scope of activities addressed in the PEIR and proposed project activities and their relative level of impact are consistent with those analyzed in the PEIR. Proposed treatment activities, in places, will result in reduction of understory densities therefore having potential benefits to wildlife movement. The project area may contain movement corridors for ungulate species and mountain lions. The use of mechanical equipment will be consistent with overstory cover requirements in riparian habitats (SPR BIO-4). Mitigation Measure BIO-5 will be used to protect any detected nurseries, including woodrat nests, by applying appropriate avoidance buffers. Provided the SPRs and mitigation measure listed, it is anticipated impacts to wildlife movement and nurseries will be less than significant and consistent with potential disturbances addressed in the CalVTP PEIR.

Impact BIO-6

Proposed project treatments including mechanical and manual treatments could have the potential for impact on wildlife habitat or abundance of common wildlife since suitable habitat occurs in the project area including nesting bird habitat. Treatment activities consistent with those proposed for the project were assessed in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, pg. 197-199). The implementation of SPR BIO-1 (reconnaissance-level surveys), BIO-2 (worker trainings), BIO-3 (sensitive natural communities), BIO-4 (riparian habitat) and BIO-12 (nesting birds) will reduce, or even eliminate, potential negative impacts to habitat and the common wildlife as a result of the proposed project activities.

A preliminary 5-mile radius CNDDB review conducted on June 9, 2022 did not yield any results for special-status birds within the project area, however there are CNDDB records for black swift within 5 miles and common native bird species are present within the project area. Project activity will ideally be timed to avoid active nesting bird season (February 1st to August 31st). However, if project implementation were to occur during nesting season, surveys

will be conducted prior to project activity (SPR BIO-12). Nesting bird surveys will be conducted no more than 7 days prior to project activity occurring February 1st to August 31st, following the standards listed below:

- A biologist or qualified RPF will apply a species appropriate buffer and all project activities will be implemented outside of the buffer.
- Project activities will be modified based on the presence of detected active nests and modifications will be determined by the RCD in consultation with a biologist or qualified RPF.

Impact BIO-7

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 County of Monterey was a critical partner in the development of the PWP for CalVTP projects occurring in Monterey County's Coastal Zone. Each Land Use Plan as part of the Local Coastal Program, in this case the Big Sur LUP, was reviewed with County and Commission Staff, flagging important and relevant land use policies specific to Monterey County's Coastal Zone. These polices were then assessed and used to establish new Coastal Vegetation Treatment Standards (Coastal VTS) that prohibit the use of heavy equipment in redwood habitat on slopes greater than 25 percent.

In addition to the requirements of the CalVTP PEIR, the following standards associated with County policies and ordinances included in the PWP Coastal VTS will be in effect for the proposed project:

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; 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.

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).

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.

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 some snags should be retained to provide wildlife shelter, dens, etc.); (2) removal of invasive species; and (3) removal of native

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

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%.

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

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.

Impact BIO-8

The proposed project area is located outside of any Habitat Conservation Plans (HCP) or Natural Community Conservation Plans (NCCP). With this, the proposed project activities will not conflict with any HCP's or NCCP's.

**New Biological Resource Impacts**

The proposed project activities are consistent with the treatment types and activities assessed in the CalVTP PEIR. There will not be any new significant impacts to biological resources as a result of the proposed project activities.

# 3.6. GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

| Impact in the PEIR | | | Project-Specific Checklist | | | | | |
|---|---|---|---|---|---|---|---|---|
| Environmental Impact Covered In the PEIR | Identify Impact Significance in the PEIR | Identify Location of Impact Analysis in the PEIR | Does the Impact Apply to the Treatment Project? | List SPRs Applicable to the Treatment Project[1] | List MMs Applicable to the Treatment Project[1] | Identify Impact Significance for Treatment Project | Would this be a Substantially More Severe Significant Impact than Identified in the PEIR? | Is this Impact Within the Scope of the PEIR? |
| Would the project: | | | | | | | | |
| Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil | LTS | Impact GEO-1, pp. 3.7-26 – 3.7-29 | Yes | SPR 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 | SPR 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

**Impact GEO-1**

Initial and maintenance project treatments include manual treatment, mechanical treatment and prescribed burning (pile burning), and would result in vegetation removal and soil disturbance. Potential impacts related to soil erosion during implementation of the treatment project are within the scope of the of the activities and impacts addressed in the PEIR because the extent of vegetation removal, pile burning, and use of mastication equipment are consistent with those analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.7.3, 26-29). Treatment activities are consistent and

will comply with the applicable SPRs, including SPR GEO-1 through GEO-8, AQ-4, and HYD-3 and HYD-4. Additionally, in accordance with the Monterey County Public Works Plan, prescribed fire (pile burning) will only be implemented on slopes 25 percent or less and/or soils with a K-factor of 0.4 or less. In accordance with SPR GEO-7, mechanical treatment will not occur on slopes greater than 50 percent.

Impact GEO-2

Mechanical equipment may be utilized to mulch targeted vegetation and will only be operated from the road and vehicle trail prism at the top of the ridge for the roadside treatments in the Fuel Break Treatment Area on slopes less than 50 percent. Treatments in the Ecological Restoration Treatment Area would only include manual vegetation removal in steep areas greater than 50 percent slope, including those that contain Los Gatos Gravelly Loam, which has slopes of 50 to 75 percent (A soils map is included in Attachment D). Potential impacts related to landslides during implementation of the treatment project are within the scope of the of the activities and impacts addressed in the PEIR because the extent of vegetation removal, intensity of prescribed burning and pile burning, and adherence to work limitations on steep slopes are consistent with those analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.7.3, 29-30).

New Geology, Soils, Paleontology, and Mineral Resource Impacts

The proposed project activities are consistent with the treatment types and activities assessed in the CalVTP PEIR. There will not be any new significant impacts to geology, soils, paleontology, or mineral resources as a result of the proposed project activities.

# 3.7. GREENHOUSE GAS EMISSIONS

| Impact in the PEIR | | | Project-Specific Checklist | | | | | |
|---|---|---|---|---|---|---|---|---|
| Environmental Impact Covered In the PEIR | Identify Impact Significance in the PEIR | Identify Location of Impact Analysis in the PEIR | Does the Impact Apply to the Treatment Project? | List SPRs Applicable to the Treatment Project[1] | List MMs Applicable to the Treatment Project[1] | Identify Impact Significance for Treatment Project | Would this be a Substantially More Severe Significant Impact than Identified in the PEIR? | Is this Impact Within the Scope of the PEIR? |
| Would the project: | | | | | | | | |
| Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs | LTS | Impact GHG-1, pp. 3.8-10 – 3.8-11 | Yes | None | None | LTS | No | Yes |
| Impact GHG-2: Generate GHG Emissions through Treatment Activities | PSU | Impact GHG-2, pp. 3.8-11 – 3.8-17 | Yes | SPR AQ-3 | MM AQ-1 | LTSM | No | Yes |

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

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

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

## Discussion

Impact GHG-1

Use of vehicles and mechanical equipment during treatments would result in GHG emissions. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG were examined in the PEIR. This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment, duration of use, and resultant GHG emissions, are consistent with those analyzed in the PEIR. SPR GHG-1 is not applicable to the proposed project because this project is not a registered offset project under the Board's Assembly Bill 1504 Carbon Inventory Process. The impact is within the scope of the PEIR analysis and site-specific analysis.

Impact GHG-2

Use of vehicles and mechanical equipment during treatments would result in GHG emissions. The potential for treatments under the CalVTP to generate GHG emissions was examined in the PEIR.

The components of mitigation measure AQ-1 that have been determined to be feasible and would be implemented to reduce emissions include use of gasoline-powered equipment and encouraging carpooling to the project site. Equipment meeting Tier 4 emission standards, Best Available Control Technology for emission reductions of $NO_X$ and PM on equipment and the use of renewable fuel would be implemented to the extent feasible.

**New Impacts Related to GHG Emissions**

The proposed project activities are consistent with the treatment types and activities assessed in the CalVTP PEIR. There will not be any new significant impacts to greenhouse gas emissions as a result of the proposed project activities.

# 3.8. ENERGY RESOURCES

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

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

The use of vehicles and mechanical equipment during treatment would result in the consumption of energy. Use of fossil fuels for equipment and vehicles was examined in the PEIR. The proposed project impact and scope of vehicle and equipment use is consistent with those uses analyzed in the PEIR. The impact is within the scope of the PEIR analysis and site-specific analysis.

New Energy Resource Impacts

The proposed project activities are consistent with the treatment types and activities assessed in the CalVTP PEIR. There will not be any new significant impacts to energy resources as a result of the proposed project activities.

# 3.9. HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

| Impact in the PEIR | | | Project-Specific Checklist | | | | | |
|---|---|---|---|---|---|---|---|---|
| Environmental Impact Covered In the PEIR | Identify Impact Significance in the PEIR | Identify Location of Impact Analysis in the PEIR | Does the Impact Apply to the Treatment Project? | List SPRs Applicable to the Treatment Project[1] | List MMs Applicable to the Treatment Project[1] | Identify Impact Significance for Treatment Project | Would this be a Substantially More Severe Significant Impact than Identified in the PEIR? | Is this Impact Within the Scope of the PEIR? |
| Would the project: | | | | | | | | |
| Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials | LTS | Impact HAZ-1, pp. 3.10-14 – 3.10-15 | Yes | SPR HAZ-1, HAZ-5 | NA | LTSM | 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 | NA | NA | NA | 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 | N/A | 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

The project will use fuels (gasoline and diesel) as well as oil for maintenance of equipment. Fueling will be done in designated areas within the road or vehicle trail prisms on level ground. In addition, bleach will be used to clean equipment in areas that potentially contain Sudden Oak Death. A spill prevention plan will be used on site to prevent bleach, gasoline, diesel and oil from impacting natural resources nearby (SPR HAZ-5). The impact is within the scope of the PEIR analysis and site-specific analysis.

### Impact HAZ-2

Herbicide will not be used for project implementation or maintenance activities; therefore, there will not be any impacts associated with use of herbicides under the project activities.

Impact HAZ-3

This impact does not apply to the treatment project or because there are no known hazardous material sites in the project area.

New Hazardous Materials, Public Health and Safety Impacts

The proposed project activities are consistent with the treatment types and activities assessed in the CalVTP PEIR. There will not be any new significant impacts to hazardous materials, public health and safety as a result of the proposed project activities.

# 3.10. HYDROLOGY AND WATER QUALITY

| Impact in the PEIR | | | Project-Specific Checklist | | | | | |
|---|---|---|---|---|---|---|---|---|
| Environmental Impact Covered In the PEIR | Identify Impact Significance in the PEIR | Identify Location of Impact Analysis in the PEIR | Does the Impact Apply to the Treatment Project? | List SPRs Applicable to the Treatment Project[1] | List MMs Applicable to the Treatment Project[1] | Identify Impact Significance for Treatment Project | Would this be a Substantially More Severe Significant Impact than Identified in the PEIR? | Is this Impact Within the Scope of the PEIR? |
| Would the project: | | | | | | | | |
| Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning | LTS | Impact HYD-1, pp. 3.11-25 – 3.11-27 | Yes | SPR HYD-4 SPR BIO-4 SPR GEO-4,6 | MM BIO-3b | 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 Implementation of Manual or Mechanical Treatment Activities | LTS | Impact HYD-2, pp. 3.11-27 – 3.11-29 | Yes | SPR HYD-1, 2, 4, 5 SPR BIO-1,4 SPR GEO-1, 2, 3, 4, 7 SPR HAZ-1, 5 | NA | LTS | No | Yes |
| Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory | LTS | Impact HYD-3, p. 3.11-29 | No | None | NA | 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 | NA | No | Yes |
| Impact HYD-5: Substantially Alter the Existing Drainage | LTS | Impact HYD-5, p. 3.11-31 | Yes | SPR HYD-4, 6 | NA | LTS | No | Yes |

| Environmental Impact Covered In the PEIR | Identify Impact Significance in the PEIR | Identify Location of Impact Analysis in the PEIR | Does the Impact Apply to the Treatment Project? | List SPRs Applicable to the Treatment Project[1] | List MMs Applicable to the Treatment Project[1] | Identify Impact Significance for Treatment Project | Would this be a Substantially More Severe Significant Impact than Identified in the PEIR? | Is this Impact Within the Scope of the PEIR? |
|---|---|---|---|---|---|---|---|---|
| Would the project: | | | | | | | | |
| Pattern of a Treatment Site or Area | | | | SPR GEO-5 | | | | |

[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

The project area is bordered by Sycamore Creek, a Class II watercourse, on its northern side. Although the project is proposing to treat fuels through prescribed burning by pile burning, with burn piles not exceeding 4 feet in height, width or depth, located in relatively flat areas (less than 30 percent slopes) atop a ridge, more than 1,000 ft from Sycamore Creek. Vegetative cover will remain around the piles after they are burned to help filter runoff. Per SPR HYD-4, there will also be at least a 50-foot buffer between pile burns at the top of the ridge along Rancho Rico Road and the Class III watercourses within the project area to capture any potential sediment or runoff created and to prevent it from entering the Class III watercourses.

Impact HYD-2

The project's initial treatment will reduce fuels on moderate to steep slopes by manual and mechanical fuel treatment. The northern part of the Ecological Restoration Treatment Area is steeply sloped and bordered by Sycamore Creek. Per SPR HYD-4, at least a 100-ft avoidance buffer will be established between any treatment activities and Sycamore Creek. Although there is a potential for impact to surface water from ground disturbance, the project design has minimized the risk of substantial degradation to surface and groundwater quality from manual or mechanical fuel treatment activities by leaving at least 4 inches of vegetation height from the ground's surface, maintaining adequate vegetative buffers to act as filter strips, and prohibiting the operation or servicing of heavy equipment in WLPZs.

Impact HYD-3

Prescribed herbivory will not be a component of this project; therefore, there will not be any impacts associated with the use of grazing animals.

Impact HYD-4

Herbicide application will not be used as a treatment activity; therefore, there will not be any impacts associated with use of herbicides under the project activities.

Impact HYD-5

The initial and maintenance treatments include the use of mechanical treatment, which would result in ground disturbance. The potential for mechanical treatment to substantially alter existing drainage patterns of a project site was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.11.3, page 29-31). The potential impacts are within the scope of the activities and impacts addressed in the PEIR because the use of equipment and treatment activities are consistent with those analyzed in the PEIR. Sycamore Creek, a Class II watercourse, will be flagged in areas in proximity to treatment areas with a 100-ft avoidance buffer prior to operations. All Class III watercourses will be flagged prior to operations in areas where equipment could potentially cross the watercourses. Woodchips will not be placed in watercourses or near culverts. The implementation of SPR HYD-1, HYD-2, HYD-4, and HYD-6 would avoid and minimize the risk of substantially altering the existing drainage pattern of the treatment area through compliance to water quality regulations, avoiding construction of new roads, identifying and protecting the WLPZ, and protecting existing drainage systems. Therefore, any impact would be less than significant.

New Hydrology and Water Quality Impacts

The proposed project activities are consistent with the treatment types and activities assessed in the CalVTP PEIR. There will not be any new significant impacts to hydrology and/or water quality as a result of the proposed project activities.

# 3.11. LAND USE AND PLANNING, POPULATION AND HOUSING

| Impact in the PEIR | | | Project-Specific Checklist | | | | | |
|---|---|---|---|---|---|---|---|---|
| Environmental Impact Covered In the PEIR | Identify Impact Significance in the PEIR | Identify Location of Impact Analysis in the PEIR | Does the Impact Apply to the Treatment Project? | List SPRs Applicable to the Treatment Project[1] | List MMs Applicable to the Treatment Project[1] | Identify Impact Significance for Treatment Project | Would this be a Substantially More Severe Significant Impact than Identified in the PEIR? | Is this Impact Within the Scope of the PEIR? |
| Would the project: | | | | | | | | |
| Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation | LTS | Impact LU-1, pp. 3.12-13 – 3.12-14 | Yes | SPR AD-3, 9 | NA | LTS | No | Yes |
| Impact LU-2: Induce Substantial Unplanned Population Growth | LTS | Impact LU-2, pp. 3.12-14 – 3.12-15 | Yes | NA | NA | LTS | No | Yes |

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

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

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

## Discussion

Impact LU-1

Treatments for this project will adhere to local land use plans and policies. Vegetation treatments as described in this project were examined in the PEIR and because these treatments are consistent with the types and activities analyzed in the PEIR, impacts to land use or regulations are within the scope of the analysis. All of the treatments fall within the CalVTP Treatable Landscape. The project will obtain a Notice of Impending Development through the submission of this Project Specific Analysis. This determination is consistent with the PEIR and does not create a more severe impact than analyzed in the PEIR.

Impact LU-2

Treatment activities as planned in this document were analyzed for their impact to substantially impact short-term population growth. The project is within the scope of the PEIR as the planned implementation of the project will not exceed the thresholds of 2 to 10 workers for mechanical treatments and up to 10 workers for manual treatments. This determination is consistent with the PEIR and does not create a substantially more severe impact than analyzed in the PEIR.

New Land Use and Planning, Population and Housing Impacts

The proposed project activities are consistent with the treatment types and activities assessed in the CalVTP PEIR. There will not be any new significant impacts to land us and planning, population, and/or housing as a result of the proposed project activities.

# 3.12. NOISE

| Impact in the PEIR | | | Project-Specific Checklist | | | | | |
|---|---|---|---|---|---|---|---|---|
| Environmental Impact Covered In the PEIR | Identify Impact Significance in the PEIR | Identify Location of Impact Analysis in the PEIR | Does the Impact Apply to the Treatment Project? | List SPRs Applicable to the Treatment Project[1] | List MMs Applicable to the Treatment Project[1] | Identify Impact Significance for Treatment Project | Would this be a Substantially More Severe Significant Impact than Identified in the PEIR? | Is this Impact Within the Scope of the PEIR? |
| Would the project: | | | | | | | | |
| Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation | LTS | Impact NOI-1, pp. 3.13-9 – 3.13-12; Appendix NOI-1 | Yes | SPR NOI-1, 4, 5, 6 | NA | LTS | No | Yes |
| Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities | LTS | Impact NOI-2, p. 3.13-12 | Yes | SPR NOI-1, 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

Initial and maintenance treatments would require heavy, noise-generating equipment. The potential for a substantial short-term increase in ambient noise levels from use of heavy equipment was examined in the PEIR. This impact is within the scope of the PEIR because the number and types of equipment proposed, and the duration of equipment use, are consistent with those analyzed in the PEIR. The proposed treatments would not require the use of helicopters, which was the loudest type of equipment evaluated in the PEIR. This determination is consistent with the PEIR and does not create a substantially more severe impact than analyzed in the PEIR.

Impact NOI-2

Initial and maintenance treatments would involve large trucks hauling heavy equipment to the project area. These truck trips would be briefly on rural residential roads, creating some minor impact. However, the potential for a substantial short-term increase in Single-Event Noise Levels was examined in the PEIR. This impact is within the scope of the PEIR because the number and types of equipment proposed are consistent with those analyzed in the PEIR. The haul trips associated with the treatment would occur during daytime hours, which would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. SPR NOI-1 and NOI-6 are

applicable to the proposed treatments. This determination is consistent with the PEIR and does not create a substantially more severe impact than analyzed in the PEIR.

New Noise Impacts

The proposed project activities are consistent with the treatment types and activities assessed in the CalVTP PEIR. There will not be any new significant impacts to noise as a result of the proposed project activities.

# 3.13. RECREATION

| Impact in the PEIR | | | Project-Specific Checklist | | | | | |
|---|---|---|---|---|---|---|---|---|
| Environmental Impact Covered In the PEIR | Identify Impact Significance in the PEIR | Identify Location of Impact Analysis in the PEIR | Does the Impact Apply to the Treatment Project? | List SPRs Applicable to the Treatment Project[1] | List MMs Applicable to the Treatment Project[1] | Identify Impact Significance for Treatment Project | Would this be a Substantially More Severe Significant Impact than Identified in the PEIR? | Is this Impact Within the Scope of the PEIR? |
| Would the project: | | | | | | | | |
| Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas | LTS | Impact REC-1 pp. 3.14-6 – 3.14-7 | No | None | NA | NA | 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 no designated recreational areas within the project boundaries; the treatment areas are fully contained within private property. This impact is not applicable.

New Recreation Impacts

The proposed project activities are consistent with the treatment types and activities assessed in the CalVTP PEIR. There will not be any new significant impacts to recreation because of the proposed project activities.

# 3.14. TRANSPORTATION

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

Treatments may temporarily increase vehicular traffic along Sycamore Canyon Road by implementation workers. Traffic control will be used when operations utilize Sycamore Canyon Road. The potential for a temporary increase in traffic to conflict with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures was examined in the PEIR. The proposed treatment project would be short-term, and temporary increases in traffic related to treatments are within the scope of the activities and impacts addressed in the PEIR. The impact is within the scope of the PEIR analysis and site-specific analysis.

Impact TRAN-2

Treatments would not require the construction or alteration of any roadways. Any smoke impact from pile burning is considered insignificant, due to the location of expected pile burning areas and any potentially impacted roadways. The impact is within the scope of the PEIR analysis and site-specific analysis.

Impact TRAN-3

Treatments could temporarily increase vehicle miles travelled (VMT) for a short period as equipment enters the project location. It is not likely that traffic will increase what is normal for the local area. This impact was identified as potentially significant and unavoidable in the PEIR because implementation of the CalVTP could result in a net increase in VMT. However, as noted in impact TRAN-3 in the PEIR, individual vegetation treatment projects under the CalVTP are reasonably expected to generate fewer than 110 trips per day, which would cause a less-than-significant transportation impact for activities, described in the Technical Advisory on Evaluating Transportation Impacts, published by the Governor's Office of Planning and Research (OPR 2018). The estimated crew size for this project is expected to be around 20 people, which will not exceed the 110 trips per day threshold even with multiple trips in a day. Therefore, this impact is expected to be less than significant. The impact is within the scope of the PEIR analysis and site-specific analysis.

New Transportation Impacts

The proposed project activities are consistent with the treatment types and activities assessed in the CalVTP PEIR. There will not be any new significant impacts to transportation as a result of the proposed project activities.

# 3.15. PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

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

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

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

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

## Discussion

**Impact UTIL-1**

The potential increased demand for water was examined in the PEIR. This impact is within the scope of the activities and impacts addressed in the PEIR because the project activities need for water are limited to only fire-prevention and are consistent with those analyzed in the PEIR.

**Impact UTIL-2**

Treatments would generate biomass as a result of vegetation removal within the treatment areas. Biomass generated by mechanical and manual treatments would be disposed of by either chipping, mastication or lopping and scattering biomass in areas where material cannot safely be chipped. This impact was identified as potentially significant and unavoidable in the PEIR because biomass hauled off-site could exceed the capacity of existing infrastructure for handling biomass. For the proposed treatment project, no biomass would be hauled off-site; therefore, there is no potential to exceed the capacity of existing infrastructure, and this impact does not apply to the proposed project.

Impact UTIL-3

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

New Impacts to Public Services, Utilities and Service Systems

The proposed project activities are consistent with the treatment types and activities assessed in the CalVTP PEIR. There will not be any new significant impacts to public services, utilities and/or service systems as a result of the proposed project activities.

# 3.16. WILDFIRE

| Impact in the PEIR | | | Project-Specific Checklist | | | | | |
|---|---|---|---|---|---|---|---|---|
| Environmental Impact Covered In the PEIR | Identify Impact Significance in the PEIR | Identify Location of Impact Analysis in the PEIR | Does the Impact Apply to the Treatment Project? | List SPRs Applicable to the Treatment Project[1] | List MMs Applicable to the Treatment Project[1] | Identify Impact Significance for Treatment Project | Would this be a Substantially More Severe Significant Impact than Identified in the PEIR? | Is this Impact Within the Scope of the PEIR? |
| Would the project: | | | | | | | | |
| Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire | LTS | Section 3.17.1; Impact WIL-1 pp. 3.17-14 – 3.17-15 | Yes | SPR HAZ-2,3,4; SPR-GEO-6; SPR-AQ-3 | 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 | No | None | 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

Increase in exposure to wildfire during implementation of the treatment project was examined in the PEIR. Mechanical and manual treatments both pose a low risk for wildfire ignitions. Pile burning poses a higher risk but that risk will be minimized through the implementation of SPR AQ-3 and SPR GEO-6. Burn piles will not exceed four feet in length, height and width for piled material. The local CAL FIRE unit will be contacted ahead of burning to create a burn plan for the project area for the burn piles. The use of heavy equipment in vegetated areas are within the scope of the PEIR because the types of equipment and treatment duration of the proposed project are consistent with those analyzed in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

Impact WIL-2

The project will not expose people or structures to substantial risk resulting from post-fire flooding or landslides because the project will only implement pile burning at designated areas in the project near the top of the ridge. This use is low-intensity and small in scale and will not trigger landslides, flooding or other erosion-related risks that could occur from broadcast burning, which is not being implemented in this project. This determination is consistent with the PEIR and would not constitute a substantially significant impact than covered in the PEIR.

New Impacts to Wildfire

The proposed project activities are consistent with the treatment types and activities assessed in the CalVTP PEIR. There will not be any new significant impacts to wildfire as a result of the proposed project activities.