CalVTP Project-Specific Analysis and Addendum to the Program EIR

McKinleyville Vegetation Treatment Project

CalVTP Project ID: 2024-10

Prepared for:

Humboldt County RESOURCE CONSERVATION DISTRICT

December 2024

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December 2024

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LIST OF ABBREVIATIONS

Board	California Board of Forestry and Fire Protection
CAAQS	California Ambient Air Quality Standard
CalEPA	California Environmental Protection Agency
CalVTP	California Vegetation Treatment Program
CARI	California Aquatic Resources Inventory
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
CRHR	California Register of Historical Resources
db	decibels
DBH	diameter at breast height
DPR	Department of Pesticide Regulation
DPS	Distinct Population Segment
EPA	US Environmental Protection Agency
ESA	Endangered Species Act
ESU	Evolutionary Significant Unit
EVEG	Existing Vegetation
GHG	greenhouse gas
GPS	geographic positioning system
HCRCD	Humboldt County Resource Conservation District
LRA	Local Responsibility Area
MCSD	McKinleyville Community Services District
MMRP	mitigation monitoring and reporting program
NAAQS	National Ambient Air Quality Standard
NAHC	Native American Heritage Commission
NCCP	natural community conservation plan
NCUAQMD	North Coast Unified Air Quality Management District
NWI	National Wetlands Inventory
Program EIR	Program Environmental Impact Report
PSA	Project-Specific Analysis
PSA/Addendum	Addendum to the Program EIR
RPF	registered professional forester
SPR	standard project requirement
SR 299	State Route 299
SRA	State Responsibility Area
TAC	toxic air contaminant
US 101	US Highway 101
USFS	US Forest Service
USGS	US Geological Survey
VMT	vehicle miles traveled
WLPZ	watercourse and lake protection zone
WUI	wildland-urban interface

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1 INTRODUCTION

1.1 PROJECT OVERVIEW AND DOCUMENT PURPOSE

The California Board of Forestry and Fire Protection (Board) certified the Program Environmental Impact Report (Program EIR) for the California Vegetation Treatment Program (CalVTP) in December 2019. The Program EIR evaluates the potential environmental effects of implementing vegetation treatments throughout the State Responsibility Area (SRA) and adjacent portions of the Local Responsibility Area (LRA) in California. This document is a Project-Specific Analysis (PSA) and Addendum to the Program EIR (PSA/Addendum). The PSA process was designed during Program EIR preparation for use by State agencies, special districts, and local agencies to help increase the pace and scale of vegetation treatment by employing California Environmental Quality Act (CEQA) efficiency tools (i.e., a within-the-scope finding based on the PSA). An Addendum to the Program EIR is another CEQA efficiency tool designed to address those project components that are not within the scope of the Program EIR but have similar environmental effects. This PSA/Addendum comprises the joint implementation of these CEQA tools in a single document.

To facilitate an increase in the pace and scale of vegetation treatment through an efficient CEQA process, the Board is supporting the preparation of PSAs to create a library of example projects that help guide state and local agencies in preparing their own PSAs under the CalVTP Program EIR, as well as to achieve CEQA compliance for the proposed project. This PSA serves as one of the Board's examples for other agencies seeking to use the CalVTP Program EIR.

1.1.1 Proposed Project

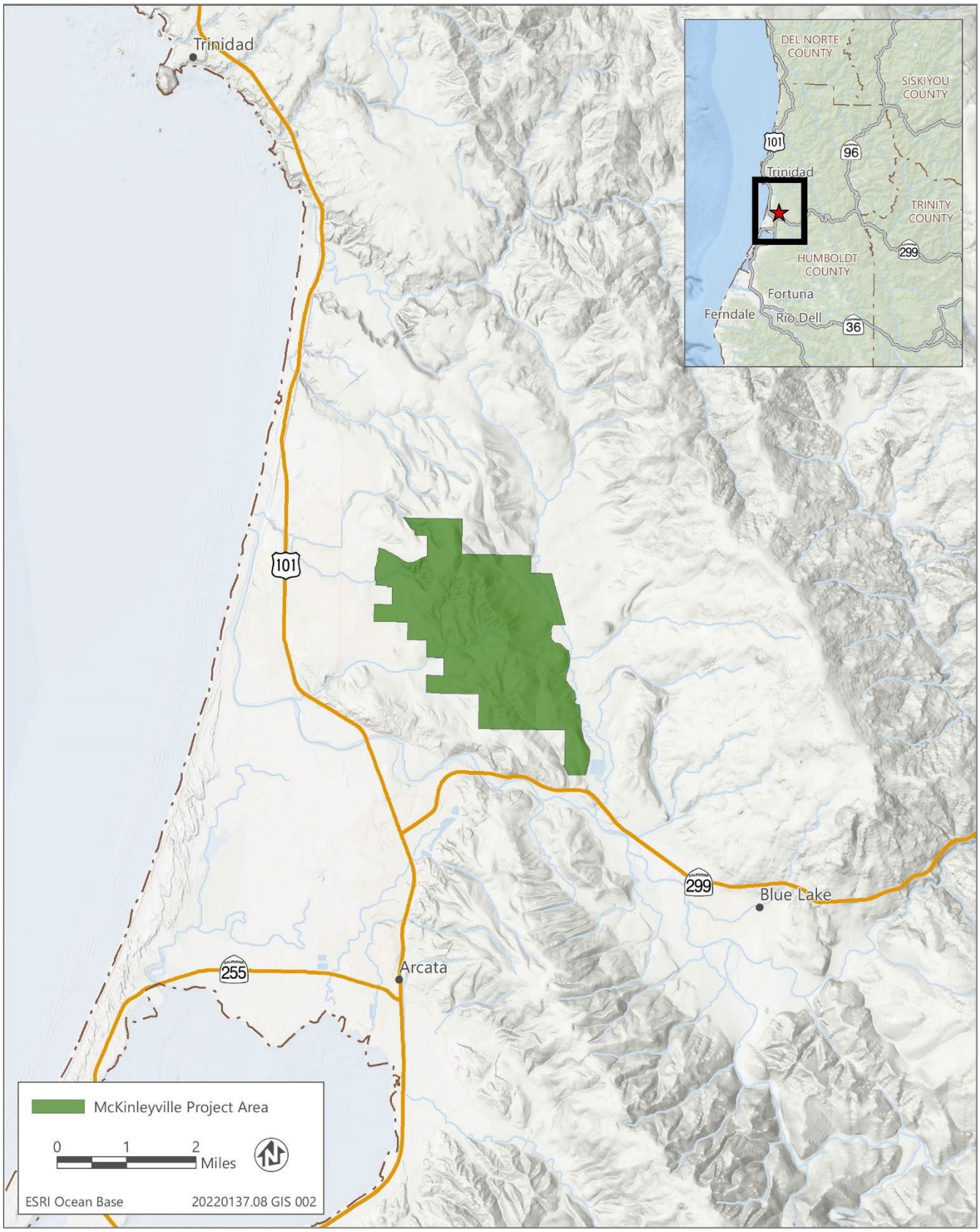
The McKinleyville Vegetation Treatment Project (project or proposed project) consists of vegetation treatments for wildfire risk reduction and forest health improvement on approximately 3,641 acres, encompassing 3,043 acres of land owned by Green Diamond Resource Company (Green Diamond) and approximately 598 acres of land owned by the McKinleyville Community Services District (MCSD) in western Humboldt County, between McKinleyville and Fieldbrook, two communities north of Arcata, California (Figure 1-1). The Green Diamond property is privately owned commercial forest land and the MCSD land is a publicly owned, community forest.

The proposed treatment types (i.e., shaded fuel breaks and wildland-urban interface [WUI] fuel reduction) and the treatment activities (i.e., mechanical vegetation treatment, manual vegetation treatment, prescribed burning, and targeted herbicide application) are consistent with those evaluated in the CalVTP Program EIR. Maintenance treatments are included as part of the project and would involve the same vegetation treatment types and activities used in the initial treatments.

1.1.2 Agency Roles

For the purposes of the CalVTP Program EIR and this PSA/Addendum, a project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. This document is being prepared for the Humboldt County Resource Conservation District (HCRCD) to comply with CEQA in the implementation of vegetation treatments that require a discretionary action by a public agency. HCRCD is the CEQA lead agency, and Green Diamond is partnering with the HCRCD to implement the project on Green Diamond land. MCSD is a CEQA responsible agency for authorization of project implementation on land owned by MCSD within the McKinleyville Community Forest.

The HCRCD would support Green Diamond and MCSD in the pursuit of grant funding and administration of funds received through the HCRCD or other organizations to implement the proposed treatments. HCRCD staff would also support the monitoring of Green Diamond's implementation of CalVTP standard project requirements (SPRs) and mitigation measures in accordance with the mitigation monitoring and reporting program (MMRP). The HCRCD Board of Directors would approve a resolution establishing the partnership. In this PSA, Green Diamond and MCSD are referred to as the "implementing entities," reflecting their roles as the lead implementers of treatments and landowners and managers of the land within the treatment area.



Source: Adapted by Ascent in 2024.

Figure 1-1 Project Vicinity

1.1.3 Purpose of This PSA/Addendum

This document serves as a PSA to evaluate whether the proposed treatments would be within the scope of the CalVTP Program EIR. As stated above, the treatment types and treatment activities are consistent with the CalVTP. Among the other criteria for determining whether a treatment project is within the scope of the CalVTP Program EIR is whether it is within the CalVTP treatable landscape (i.e., the geographic extent of analysis covered in the Program EIR). If a proposed vegetation treatment project is covered by the evaluation of environmental effects in the Program EIR, it may be approved using a finding that the project is within the scope of the Program EIR for its CEQA compliance, consistent with CEQA Guidelines Section 15168(c)(2).

A portion of the project area extends outside of the treatable landscape described in the CalVTP Program EIR. In total, the area outside the treatable landscape encompasses approximately 3.4 acres of the 3,641-acre project area (refer to Chapter 2, "Treatment Description"). The scattered array of acres outside of the mapped CalVTP treatable landscape is due to the digital expression of the CalVTP treatable landscape that resulted in a pixelated mapping resolution. Using desktop applications to apply buffers around geographic and topographic features and demarcate jurisdictional boundaries (i.e., SRA and Local Responsibility Area [LRA]), the method resulted in some treatable landscape areas that are shown on maps to be disjoined and scattered and some that are inheld areas surrounded by the mapped treatable landscape. If the areas of the proposed project outside of the CalVTP treatable landscape have essentially the same, or at least substantially similar, landscape conditions as the adjacent areas within the treatable landscape, the environmental analysis in the Program EIR would be applicable to the adjacent areas.

An Addendum to an EIR is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts, consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In this case, there are no changed circumstances, but the proposed revision or change in the project, compared to the Program EIR, is the inclusion of areas outside of and adjacent to the CalVTP treatable landscape. The PSA checklist (refer to Chapter 4, "Project-Specific Analysis/Addendum") includes the criteria to support an Addendum to the CalVTP Program EIR for the inclusion of treatment areas outside the CalVTP treatable landscape. The checklist evaluates each resource in terms of whether the later treatment project, including the "changed condition" of additional geographic area, would result in significant impacts that would be substantially more severe than those covered in the Program EIR or would result in any new impacts that were not covered in the Program EIR. If a new impact arises, the checklist analysis would provide substantial evidence about whether it would be a significant or potentially significant impact. If the new impact would not be significant, it could be addressed in the addendum to the Program EIR.

This document serves as both a PSA and an Addendum to the CalVTP Program EIR for HCRCD review and analysis under CEQA regarding the proposed McKinleyville Vegetation Treatment Project within and outside the treatable landscape covered by the Program EIR. It provides environmental information supported by substantial evidence to HCRCD in its consideration of approving grant funding allocations and implementation of the work by Green Diamond and MCSD. Attachment A provides the project-specific MMRPs that were prepared for each implementing entity (Green Diamond and MCSD). These MMRPs identify the CalVTP SPRs and mitigation measures applicable to the proposed project. The MMRPs include minor and non-substantive changes to the SPRs and mitigation measures presented in the CalVTP Program EIR. The SPRs identified in the MMRP have been incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation.

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2 TREATMENT DESCRIPTION

The proposed project consists of vegetation treatments for wildfire risk reduction and forest health improvement on approximately 3,641 acres, encompassing 3,043 acres of land owned by Green Diamond Resource Company (Green Diamond) and approximately 598 acres of land owned by the McKinleyville Community Services District (MCSD) in western Humboldt County, between McKinleyville and Fieldbrook, two communities north of Arcata, California (Figure 1-1). The land has been managed for timber production by Green Diamond and its predecessors. MCSD recently purchased its portion of the property from Green Diamond for the purpose of providing forested community open space. Planning for the community area is forthcoming and would include trail improvements, watershed restoration, and tree planting.

HCRCD is the CEQA lead agency, and Green Diamond is partnering with the HCRCD to implement the project on Green Diamond land. MCSD is a CEQA responsible agency for authorization of project implementation on land owned by MCSD within the McKinleyville Community Forest.

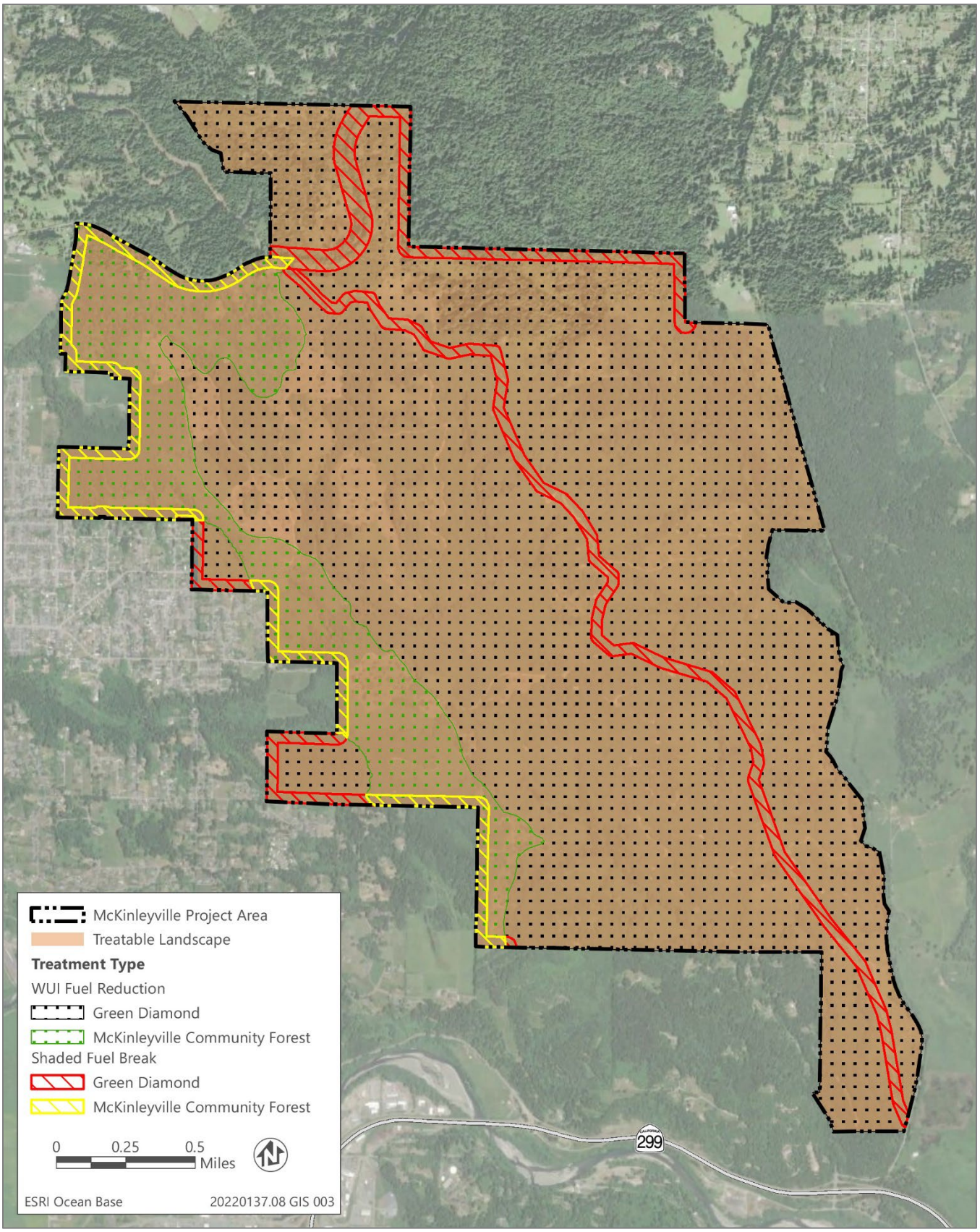
The project area includes some land that, due to site-specific conditions, may be left untreated or treatments would be limited because of expected or unforeseen restrictions, such as operational considerations (e.g., steep slopes, road limitations), economic feasibility, or the presence of sensitive resources, including cultural sites, special-status species, or sensitive habitats. For the purposes of the McKinleyville Vegetation Treatment Project PSA/Addendum, the term "project area" refers to the entire area, and "treatment areas" refer to discrete locations within the project area where treatments would be implemented.

The CalVTP treatment types that would be implemented are shaded fuel breaks and wildland-urban interface (WUI) fuel reduction. The proposed CalVTP treatment activities are mechanical vegetation treatment, manual vegetation treatment, prescribed burning, and targeted herbicide application. Locations of treatment types are shown in Figure 2-1. Table 2-1 summarizes the proposed project treatment areas and treatment types, and Table 2-2 summarizes the proposed treatment activities.

2.1 SITE DESCRIPTION

The project area consists of privately owned, commercial forest land and a publicly owned, community forest encompassing approximately 3,641 acres ranging in elevation from about 100 feet to about 600 feet near McKinleyville in western Humboldt County, California. The geomorphology of the project area is principally related to uplifted marine sedimentary deposits with downcutting near watercourses on upper slopes and alluvium in the lowlands.

Nearby fault systems seem to influence landforms. Major watercourses on the south and east sides of the project area, such as Tory and Lindsay Creeks, appear to exploit weakened rock parallel to major faults; the creeks trend northwest/southeast and flow to the south into the Mad River. Watercourses on the west side of the project area flow westward into Mill Creek and then into Mad River, except for one minor watercourse, Duke Creek, which flows into Strawberry Creek then westward into the Pacific Ocean. The seasonal and perennial watercourses that traverse the project area support diverse riparian habitat communities, and perennial watercourses (i.e., Essex Gulch, Lindsay Creek, Mill Creek, and Widow White Creek) are known to support populations of special-status salmonids. Approximately 1,099 acres within the project area occur in riparian management zones, as defined in Green Diamond's Aquatic Habitat Management Plan (NMFS and USFWS 2006).



Source: Adapted by Ascent in 2024.

Figure 2-1 Treatment Types

Based on information from the US Department of Agriculture Natural Resource Conservation Service Web Soil Survey, soils in the project area are generally Lepoil-Candymountain Complex, Lepoil-Espa-Candymountain Complex, and Coppercreek-Slidecreek-Tectah Complex with minor inclusions. These are productive timber soils that are well drained sand and clay loams with a restrictive layer occurring around 80 inches deep. Topography is generally moderate with slopes ranging from flat to about 40 percent, with steep slopes up to 65 percent occurring near watercourses and on the slopes above the headwaters of Mill Creek on the west and Tory and Lindsay Creeks on the east.

Timber stands consist of coast redwood (*Sequoia sempervirens*), Douglas-fir (*Psuedotsuga menziesii*), Grand fir (*Abies grandis*), sitka spruce (*Picea sitchensis*), and isolated Port Orford cedar (*Chamaecyparis lawsoniana*). Associated hardwood species include tanoak (*Notholithocarpus densiflorus*), big leaf maple (*Acer macrophyllum*), and red alder (*Alnus rubra*), which generally occur near watercourses or where high soil moisture persists.

Conifer stands occur in discrete management units tied to topography and road locations bisected by riparian management zones. Overall, young age classes are present with most stands 45 years or younger. A small portion of the project area consists of stands up to 90 years old. The stands are vigorously growing.

Sitka spruce is endemic to the site and reproduces prevalently. Where forest management techniques that favor redwood and Douglas-fir have been employed, spruce and grand fir are less prevalent. In general, spruce occurs near established stands on the north and western edges of the project area, and less in the interior and southern portions of the project area. Grand fir appears limited to the northern portion of the project area in limited occurrences. Port Orford cedar occurs individually or in small groups mostly in the northwest portion of the project area.

Dense brush occurs on site, typical for the region, consisting of a mix of salal (*Gaultheria shallon*) and huckleberry (*Vaccinium ovatum* and *V. parvifolium*), among others. Sword fern (*Polystichum munitum*) occurs in older stands with more open understories and bracken fern (*Pteridium aquilinum*) tends to appear in open areas. Pampas grass (*Cortaderia selloana*) is prevalent in recently harvested areas and stands under 20 years of age. There are occasional occurrences of knobcone pine (*Pinus attenuata)*/radiata pine (*Pinus radiata*) hybrid trees that have been planted in the early 1980s; the occurrences appear to be isolated and the trees are not thriving.

2.1.1 Post-Settlement Management

Post-European settlement, the project area has been historically managed for timber production with early harvests likely associated with the California Barrel Company, an Arcata-based barrel making company that made spruce barrels for the Spreckles Sugar Company and other dry goods merchants (The Times-Standard 2020).

Subsequently, redwood from the project area was logged in the 1930-1940s. Intensive forest management activities, including timber harvest, vegetation control (herbicide application), forest thinning, and stand improvement, have occurred since the 1980s. Timber harvest in the project area is conducted with ground-based and short-span yarding equipment. Although the vegetation types historically have co-existed ecologically with fire, the project area has not been subject to a wildfire event within the last 50 years.

Logging roads occur throughout the project area. Legacy roads near watercourses have been closed in some locations and preference has been given to using mid-slope and ridgetop roads where practicable. Encroachment from members of the public using the lands for recreational purposes, such as mountain biking, motorcycle and off-road vehicle use, and trail running, is apparent on legacy roads. Roads currently are used for forest management.

Lands owned by MCSD are located along the western and northern portions of the project area and are intended for general public use, although periodic timber harvest could occur in these areas. Green Diamond lands would continue to be managed for timber production with regular commercial timber harvests. With the proposed project, non-commercial fuel reduction and wildfire risk reduction activities would occur throughout the project area.

2.2 TREATMENT TYPES

Each treatment type (i.e., shaded fuel breaks and WUI fuel reduction) is described in more detail below and is consistent with the treatment types described in the CalVTP. Refer to Figure 2-1 for the location of each treatment type. Table 2-1 provides a summary of the proposed treatment areas and associated treatment types and activities.

Table 2-1 Proposed CalVTP Treatment Areas and Treatment Type

Treatment Type	Treatment Description	CalVTP Treatment Activity	Treatment Area Size by Land Ownership (acres)	
			Green Diamond Resource Company	McKinleyville Community Services District
Shaded Fuel Break	Implement shaded fuel breaks to reduce wildfire risk and aid in fire control and applying prescribed burning	Mechanical treatments (slopes less than 45%)	201	101
		Manual treatments (slopes greater than 45% and within riparian management zones where machinery is excluded)	223	11
		Targeted herbicide application	92	0
		Prescribed burning using piling and burning or broadcast burning	223	0
WUI Fuel Reduction	Reduce forest fuels by thinning understory and increasing the spacing between tree canopy, and applying prescribed burning	Mechanical treatments (slopes less than 45%)	2,098	384
		Manual treatments (slopes greater than 45% and within riparian management zones where machinery is excluded)	2,820	102
		Prescribed burning using piling and burning or broadcast burning	2,820	0
		Targeted herbicide application	2,110	0
Total Project Area			**3,043**	**598**

[1] In total, up to 3,641 acres may be treated, consisting of 3,043 acres on Green Diamond Resource Company land and 598 acres on McKinleyville Community Services District land. However, site-specific landscape conditions and implementation factors may preclude treatment within limited parts of the project area because of expected or unforeseen restrictions, such as operational considerations (e.g., steep slopes, road limitations), economic feasibility, or the presence of sensitive resources, including cultural sites, special-status species, or sensitive habitats.

2.2.1 Shaded Fuel Breaks

Fuel breaks are zones where vegetation (fire fuel) is modified in strategic locations, often in a linear layout, which reduces wildfire risk and supports fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. Fuel breaks also reduce the likelihood that a severe fire would occur within the fuel break by implementing maintenance treatments to manage regrowth over the long term. Additionally, fuel breaks may provide safe emergency egress during wildfires. Shaded fuel breaks retain a reduced portion of the canopy for its habitat and aesthetic values.

Shaded fuel breaks are proposed on up to 335 total acres of the project area (223 acres on Green Diamond lands and 112 acres on MCSD lands) with maximum widths of 200 feet. The fuel breaks are proposed along the western perimeter of the project area, along both sides of Murray Road, a public road along the northern perimeter of the project area, and along a north-south trending ridge that bisects the property from a gate at Murray Road to a gate at Timmons Lane. (Figure 2-1). The fuel breaks are intended to slow encroachment of a fire into or out of the project area and address fire risk associated with adjacent residences and public roads.

Within shaded fuel breaks, distances between vegetation would vary based on baseline conditions and feasibility of treatment. Trees would be spaced approximately 10 to 40 feet apart depending on stand age, and shrubs would typically be separated by 10 to 20 feet, depending on the size class of vegetation; where conditions vary, trees would be spaced consistent with basal area requirements of the California Forest Practice Rules. The remaining trees would be limbed approximately 10-15 feet in height to reduce the vertical continuity of fuels. Distances between retained vegetation may vary from this standard when safety or equipment limitations make access infeasible, or when vegetation retention conditions vary to protect sensitive resources. For example, retention of at least 75 percent surface cover is required within any watercourse and lake protection zone (WLPZ) pursuant to SPR HYD-4 where fuel breaks overlap the WLPZ.

In forested areas of the shaded fuel breaks, trees would be thinned, and some shrubs would be removed mechanically and/or manually to establish spacing between vegetation, both vertically and horizontally. The increased space between vegetation would decrease the likelihood of fire spread and intensity of fires. Meanwhile, retained vegetation would provide shade and reduce growth rates of the understory by blocking sunlight and keeping the microclimate cool and relative humidity high for longer periods of time. Fuel breaks also reduce the likelihood that a severe fire would occur within the treated area by managing regrowth over the long-term.

On Green Diamond lands, manual and mechanical treatments, prescribed burning, and targeted herbicide application (as appropriate) would be conducted within shaded fuel breaks. Understory fuel not removed by manual or mechanical treatments would be treated with herbicides shortly after establishing the fuel break. The fuel breaks would require retreatment over time to maintain the desired fuel levels and distribution. To maintain the fuel breaks, mechanical and manual treatments, targeted herbicide application and prescribed burning would likely be used to prevent and manage shrub and tree regrowth. On MCSD lands, only manual and mechanical treatments would be conducted to establish and maintain fuel breaks. Prescribed burning and herbicide application would not occur on MCSD lands.

2.2.2 WUI Fuel Reduction

The WUI is the geographic overlap of wildland and nearby structures or infrastructure. Infrastructure and wildland vegetation in the WUI are close enough that an ignition puts nearby infrastructure at risk, complicates wildland firefighting, and threatens human life and private property. Land uses immediately west of the project area include a golf course, single-family residential neighborhoods and scattered rural homes, and various industrial and commercial businesses within the community of McKinleyville. The proposed WUI fuel reduction treatments would strategically reduce vegetation density and remove fuel in the project area to directly protect nearby communities, which are at risk from wildfires originating in the adjacent wildlands. Additionally, treatment would protect the wildlands from fire ignitions which may start from human activities in developed areas. Where existing habitat within the WUI is degraded, such as by infestation of nonnative plant species, as well as needing fuel reduction, WUI treatments would also help enhance habitat quality.

WUI fuel reduction treatments encompass approximately 3,296 acres of the project area. Treatment methods proposed in the WUI fuel reduction areas are mechanical and manual treatment, prescribed burning, and herbicide application. Mechanical treatment methods would generally be restricted to slopes of less than about 45 percent. Manual treatment methods would generally be employed on slopes greater than 45 percent and within riparian management zones where the use of machinery is excluded. Prescribed burning and herbicide treatments would not be implemented on MCSD lands.

The objective of WUI fuel reduction treatment is to prepare the landscape for the occurrence of a fire so that fire behavior is ecologically beneficial rather than destructive. The prescription would reduce vegetative fuels so that vegetation is less connected, less dense, and is distributed evenly on the landscape. With the desired outcome, wildlife habitat function would be maintained through the retention standards described below. Soil and watershed processes would improve by reducing sources of ground-level fuels and overstory, which can lead to excessive adverse heat-related soil impacts when fire occurs under those conditions.

WUI fuel reduction treatments would occur in coastal mixed redwood, Douglas-fir, and spruce forests and minor other vegetation communities present in the project area. Tree species that would be retained would vary, but in general, would include redwood, Douglas-fir, and in discrete locations, grand fir and spruce. Within riparian areas, there would be retention of at least 75 percent of the overstory including alders and big leaf maple, and 50 percent of the understory canopy of native riparian vegetation.

Mechanical, manual, prescribed burning, and herbicide treatments would target invasive species (e.g., bromes [*Bromus* spp.]) that may occupy treatment areas, reduce vegetation in the overstocked understory, increase the average distance to the bottom of live crowns, and increase the spacing between canopy trees. Treatments would vary slightly depending on the vegetation type being treated and specific prescriptions would be reviewed by a registered professional forester (RPF) to maintain tree age class diversity and a sufficient number of young understory trees to facilitate forest regeneration and long-term maintenance of habitat function.

To maintain habitat function for special-status wildlife, WUI fuel reduction treatments would retain the following:

- hardwoods greater than 10 inches diameter at breast height (DBH) (e.g., alder, big-leaf maple) up to 5 percent of residual basal area;
- hardwoods greater than 12 inches DBH with basal hollows or other complex structural features;
- conifers greater than 14 inches DBH;
- up to three softwood snags per acre that are greater than 12 inches DBH and are more than 100 feet from structures and/or public roads;
- 50 percent of understory (i.e., shrubs, herbs) in WLPZs;
- downed woody debris larger than 18 inches diameter and 12 feet long; and
- canopy cover within forest habitats occupied or potentially occupied by northern spotted owl would be maintained at 60 percent or greater.

2.3 PROPOSED TREATMENT ACTIVITIES

The proposed vegetation treatment activities are mechanical treatments, manual treatments, targeted herbicide application, and prescribed burning (see Table 2-2). Each of these treatment activities is described in more detail below and is consistent with the treatment activities described in the CalVTP.

Treatment activities could occur during any time of year, although the nesting bird season (February 1 – August 31 or extended limited operating period for raptors as determined by a RPF or biologist) would be avoided when feasible. Treatment activities would generally occur Monday through Friday between 4:00 a.m. and 5:30 p.m. and when relative humidity is above 25 percent to increase fire safety during operation of mechanical equipment.

Table 2-2 Proposed CalVTP Treatment Activities

CalVTP Treatment Activity	Equipment Used for Treatments	Typical Duration of an Individual Treatment[1]	Maximum Treatment Size by Land Ownership (acres)		
			Green Diamond Resource Company	McKinleyville Community Services District	Total
Mechanical Treatments	Tracked feller-bunchers, wheeled skidding machines, skid steers, excavators, bulldozers, track or wheel mounted chippers, and/or track mounted masticators to implement treatments	3 days to 6 months	2,299	485	2,784
Manual Treatments	Chainsaws, hand saws, brush cutters, weed wrenches, chippers and loppers	3 months to 6 months	744	113	857
Herbicide Application[2]	Batch truck, passenger vehicle, back-pack spray equipment, and all-terrain vehicles	1 week to 6 months	2,202	0	2,202
Prescribed Burning[2]	Water truck, fire-truck, passenger vehicles, drip torch or propane torch, skidgine, fire hoses, bulldozers, skid steers & track mounted equipment to create fire line and other equipment suitable for fire suppression.	1 day to 7 days	3,043	0	3,043

[1] The duration of an individual treatment effort is based on the typical treatment effort conducted in a discreet treatment area, as described in the Program EIR. Many individual treatment efforts would occur over the course of the proposed project as a part of initial and maintenance treatment.

[2] Herbicide application and prescribed burning would not be used on McKinleyville Community Services District lands.

2.3.1 Mechanical Vegetation Treatment

Mechanical vegetation treatments are proposed on up to 2,784 acres of the project area. Mechanical treatments may include mechanical tree removal (i.e., felling and skidding), mowing, masticating, and piling. Depending on conditions, up to four crews may operate at the same time across the project area. Typically, one crew (i.e., 3-6 workers) would use tracked feller-bunchers, wheeled skidding machines, skid steers, excavators, bulldozers, track or wheel mounted chippers, and/or track mounted masticators to implement treatments. Typically, treatments would require several days to several months to complete. Equipment would be operated on appropriate slopes subject to operational restrictions near sensitive resources (e.g., watercourses). Mechanical treatments would occur on slopes generally up to 45 percent or as appropriate.

Mechanical treatment activities would include three categories: heavy, moderate, and light.

- Heavy Conditions: targets dense hardwoods and/or conifers (e.g., high tonnage of fuels per acre, such as saplings, poles, and small saw logs) and includes shrubs.
- Moderate Conditions: includes treating shrubs, small hardwoods, and small conifers (e.g., saplings and small poles).
- Light Conditions: typically occurs in previously treated areas and the vegetation that would be removed would include small trees (e.g., seedlings, saplings), grasses, and shrubs.

The overall vegetation retention standards provided under "WUI Fuel Reduction" above would apply to mechanical and manual treatment activities. Cut vegetation would be left on-site by lopping or chipping and scattering on the landscape. There are currently no feasible options to move non-commercial biomass off-site at this time. To reduce soil impacts and erosion, equipment-mounted brush rakes would be used to pile residual surface fuels, shrubs, and overstocked understory hardwoods and conifers, as appropriate.

2.3.2 Manual Vegetation Treatment

Manual vegetation treatments are proposed on up to 857 acres of the project area and would generally be confined to riparian management zones near watercourse areas and on slopes over 45 percent. Manual treatments would be implemented with hand crews of approximately eight to 20 members using hand tools and hand-operated power tools, such as chainsaws, hand saws, pole saws, chippers, brush cutters, weed wrenches and loppers or other hand tools, to cut, clear, and prune trees, herbaceous vegetation, and woody shrubs and increase space between trees. Trees would be limbed up to 10-15 feet in height to reduce the vertical continuity of fuels.

Typically, individual treatments would require 1 to 3 months to complete, depending on the treatment size, steepness of terrain, and type and density of vegetation. Manual treatment activities may occur within 100 feet of Class I or II streams to improve habitat and reduce undesirable wildfire hazards. Manual treatment within 100 feet of Class I or II streams would occur outside of bird nesting season, if feasible.

Cut vegetation would be left on-site by lopping or chipping and scattering on the landscape. In some areas, removed vegetation would be hauled off-site. The same general guidelines for tree and vegetation removal and retention would be followed as described above for WUI Fuel Reduction.

Proposed manual treatment activities are:

- Thinning and limbing trees with chainsaws, pole saws, loppers, chippers, brush cutters, weed wrenches, pruners or other hand tools; and
- cutting shrubs to restore characteristic densities for the vegetation community present.

2.3.3 Prescribed Burning

Prescribed burning is proposed on up to 3,043 acres of Green Diamond lands within the project area. No prescribed burning is proposed on MCSD lands. Prescribed burning consists of two general types: pile burning and broadcast burning. Both types of prescribed burning would be used to implement the project.

While pile burning is proposed to occur on up to 3,043 acres of the project area, the total acreage of pile burning would likely be much less, given limitations due to slope and proximity to watercourses. Biomass from manual and mechanical treatment would be piled using equipment (e.g., skid steer, tractor, bulldozer, or excavator) or hand crews and left on site to dry out before burning. If mechanical equipment is used, bulldozers equipped with a brush rake would be used to reduce soil displacement and create dirt-free piles for burning. Pile burning requires fewer crew members (2 to 10) than broadcast burning, and a nearby water source. A hand-held drip torch and/or propane torch would be used to ignite burn piles. Pile burning would take place under the overstory or in areas with little to no live overstory, including areas that have experienced previous vegetation treatment or prescribed burning.

Broadcast burning would use low-intensity, ground-level fire within specific, managed burn areas and could occur over time on up to 3,043 acres of the project area. Initial broadcast burn units would typically be 30 contiguous acres or less. Broadcast burning could occur in the existing and proposed fuel breaks or in the WUI fuel reduction treatment area. It would be used to promote forest health and native flora and reduce biomass and fuel loading in woodland and forest vegetation in areas that have not burned recently. It would also promote a more natural, sustainable, and wildfire-resilient native landscape. Pretreatment of vegetation using mechanical and manual activities or targeted herbicide application would occur in areas proposed for broadcast burning to create safe conditions for burning. The goal of broadcast burning is to consume targeted ground-level vegetation and forest litter fuels. Generally, not all fuel is consumed during broadcast burns and substantial portions of the groundcover and understory typically remain in a mosaic pattern.

Understory broadcast burning would be implemented using patterned lighting techniques during appropriate conditions and under the supervision of a qualified technician. Generally, appropriate conditions are those that occur during periods of high humidity and moderate-to-high fuel moisture content and/or in advance of an incoming wet weather event. Broadcast burning requires the construction of control lines using manual or mechanical methods or

wet lines using a fire hose. Control lines are linear lengths of bare soil that help stop the horizontal progression of a fire. Dense patches of vegetation may be trimmed or removed manually or mechanically in advance of burning. Vegetation could also be pretreated with herbicides to kill the aboveground plant parts and cause them to dry out so they would be better consumed by fire. Prescribed broadcast burning would require approximately 10 and 50 crew members, depending on the size and site characteristics of the burn unit, water trucks, fire engines, skidgine, rubber tire skidders, and excavators, mowers or dozers to clear control lines. Typically, each burn would last 1 day to 1 week.

Burning would occur throughout the year and in accordance with regulations regarding the use of prescribed burning, including limitations to suitable weather and vegetation moisture conditions. This would include the preparation and implementation of a burn plan that includes a smoke management plan.

2.3.4 Herbicide Application

Targeted herbicide application may occur over 2,202 acres of Green Diamond lands within the project area, as allowed by standard project requirements and application instructions. No herbicide application is proposed on MCSD lands. Actual treated acres would be highly dependent on crew size, ground conditions, and topography. Herbicide application operations would comply with all US Environmental Protection Agency (EPA) label directions, as well as California Environmental Protection Agency (CalEPA) and California Department of Pesticide Regulation (DPR) label standards. All herbicide applications would be performed by certified and licensed pesticide applicators in accordance with all local, State, and federal regulations. Only targeted, ground-level application would occur; there would be no aerial spraying of herbicides. Herbicide application would also comply with all requirements of SPR HYD-5 to protect non-target vegetation and special-status species from herbicides (Attachment A). Several herbicide application methods would be used, including paint-on stems, backpack hand-applicator, or hack and squirt.

Herbicide treatments would typically require a multiple-person crew(s) ranging from three to 16 people, a batch truck, a passenger vehicle to transport the crew, backpack sprayers, and all-terrain vehicles to move materials to treatment sites. All-terrain vehicles would only be driven on established roads and skid trails. Ground-based application would occur throughout the year, approximately 9 to 15 months following vegetation cutting. However, hack and squirt application may occur at least 3 months prior to cutting of hardwoods, and stump treatment immediately following cutting of hardwoods may also be implemented.

The application method chosen for a specific site would depend on the written recommendations of an independent Pest Control Advisor licensed by DPR. The application of herbicides would be widely and effectively used in the project area to help maintain a manageable understory for fuel breaks and to reduce fuel connectivity.

To restore characteristic herbaceous species composition for the vegetation community, pre-emergent herbicides may also be used. Herbicides would also be used to reduce the spread of invasive species such as bromes. Herbicides may also be used to restore characteristic shrub densities for the vegetation community.

Herbicides that may be applied include those listed below, consistent with those considered for use in the CalVTP Program EIR:

- Clopyralid (monoethanolamine salt);
- Glyphosate (isopropylamine salt, potassium salt, dimethylamine salt & diammonium salt);
- Velpar (hexazinone);
- Imazapyr (isopropylamine salt);
- Sulfometuron methyl;
- Triclopyr (butoxyethyl ester & triethylamine salt);
- Nonylphenol 9 Ethoxylates (NP9E); and
- Esplanade (Indaziflam)

2.3.5 Biomass Disposal

The vegetative biomass generated by the proposed project would be disposed by several methods:

- hauling off-site to a biomass facility as biomass utilization product,
- lopping and scattering within treatment boundaries,
- piling and pile burning,
- broadcast burning
- leaving piles for wildlife habitat, or
- chipping and scattering chips onto the ground as mulch, not exceeding 18 inches in depth.

Invasive plant and noxious weed biomass would be treated on-site to eliminate seeds and propagules or would be disposed off-site at an appropriate waste collection facility to prevent reestablishment or spread of invasive plants and noxious weeds. Invasive plants and noxious weeds would not be chipped and spread, scattered, or mulched on site.

2.4 TREATMENT MAINTENANCE

Maintenance, or retreatment, of the areas treated as part of the proposed project would be conducted to control vegetative regrowth and remove invasive species. Maintenance would use the same treatment activities as the initial treatments: mechanical treatments, manual treatments, prescribed burning, and targeted herbicide application. Like the initial treatments, prescribed burning and herbicide application are not proposed for maintenance of MCSD lands. Maintenance treatments would occur as needed and would generally treat smaller acreages and use less equipment than the initial treatments. The interval between initial treatments and subsequent maintenance would be based on site monitoring for the effectiveness of the initial treatment, available funding, and other factors. Maintenance cycles would be dependent on regrowth conditions and would differ by location.

Maintenance prescriptions would be developed with consideration of the location's vegetation type and its rates of regrowth; fire return intervals vary by vegetation type and disturbance intensity. Manual treatments could also occur, such as hand pulling of invasive plants or hand thinning.

Prior to implementing a maintenance treatment, the implementing entity (Green Diamond or MCSD) would verify that the expected site conditions as described in the PSA/Addendum are present in the treatment area. As time passes, the continued relevance of the PSA/Addendum would be considered by the project proponent and agencies seeking to use this PSA for later discretionary approvals in light of potentially changed conditions or circumstances. If environmental conditions evolve or project approaches change to the degree that the project proponent finds new significant or substantially more severe significant impacts may occur, Green Diamond or MCSD would determine whether a new PSA/Addendum or other environmental analysis is warranted. In addition to verifying that the PSA/Addendum continues to provide relevant CEQA coverage for treatment maintenance, the PSA/Addendum would be updated at the time a maintenance treatment is needed when more than 10 years have passed since the approval of the PSA/Addendum or the latest PSA/Addendum update. For example, a reconnaissance survey may be conducted to verify conditions are substantially similar to those anticipated in the PSA/Addendum. Updated information would be documented.

3 ENVIRONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

1.	**Project Title:**	McKinleyville Vegetation Treatment Project
2.	**CalVTP I.D. Number:**	2024-10
3.	**Implementing Entity's Name and Address:**	Green Diamond Resource Company (Green Diamond) PO Box 68 Korbel, CA 95550-0068 McKinleyville Community Services District (MCSD) 1656 Sutter Road McKinleyville, CA 95519 707-839-3251
4.	**Contact Person Information and Phone Number:**	James H. Hawkins, RPF #2557 Senior Planning Forester – California Timberlands Division Green Diamond Resource Company 707-668-4464 Patrick Kaspari, P.E. General Manager McKinleyville Community Services District 707-839-3251
5.	**Project Proponent Name and Address:**	Humboldt County Resource Conservation District 5630 South Broadway Eureka, CA 95503
6.	**Contact Person Information and Phone Number:**	Jill Demers, Executive Director Humboldt County Resource Conservation District 707-442-6058 Ext. 5
7.	**Project Location:**	The project is located generally between the communities of McKinleyville and Fieldbrook in Humboldt County, California.
8.	**Total Area to Be Treated (acres)**	Up to 3,641 acres

9. **Description of Project**:

The following discussion includes a summary of the proposed project. See Chapter 2, "Project Description," above for a detailed description of the proposed project.

The McKinleyville Vegetation Treatment Project (project or proposed project) consists of vegetation treatments for wildfire risk reduction and forest health improvement on approximately 3,641 acres, encompassing 3,043 acres of land owned by Green Diamond Resource Company (Green Diamond) and approximately 598 acres of land owned by the McKinleyville Community Services District (MCSD) in western Humboldt County, between McKinleyville and Fieldbrook, two communities north of Arcata, California.

The project area consists of privately owned commercial forest land and a publicly owned, community forest. The CalVTP treatment types that would be implemented are shaded fuel breaks and wildland-urban interface (WUI) fuel reduction. The proposed CalVTP treatment activities are mechanical vegetation treatment, manual vegetation treatment, prescribed burning, and targeted herbicide application. Prescribed burning and herbicide application are not proposed on MCSD lands. Biomass would be hauled off-site to a biomass facility or would be processed on-site

in the form of pile burning or broadcast burning or vegetation that would be cut and piled, chipped, or lopped and scattered.

Equipment used to implement fuel breaks and WUI fuel reduction would consist of:

- Mechanical Treatments: tracked feller-bunchers, wheeled skidding machines, skid steers, excavators, bulldozers, track or wheel mounted chippers, and/or track mounted masticators.
- Manual Treatments: chainsaws, hand saws, brush cutters, pole saws, weed wrenches, chippers and loppers or other hand tools.
- Herbicide Application: batch truck, passenger vehicle, back-pack spray equipment, and all-terrain vehicles.
- Prescribed burning: water truck, fire-truck, passenger vehicles, drip torch or propane torch, skidgine, fire hoses, bulldozers, skid steers, track mounted equipment and hand tools such as Pulaskis, McLouds, shovels to create fire line and other equipment suitable for fire suppression.

Treatment activities would range from 3 days to 6 months for mechanical and manual treatments, 1 week to 6 months for herbicide application, and 1 day to 7 days for prescribed burns.

Retreatment for maintenance of desired vegetation conditions in the areas initially treated for the proposed project would be ongoing and continuous in the treatment area, as funding and land management authorizations allow.

a. Initial Treatment

Initial treatments would include would involve Wildland Urban Interface (WUI) fuel reduction and shaded fuel break treatment types using mechanical treatment, manual treatment, targeted herbicide application, and prescribed burning. See Chapter 2, "Project Description," for additional details.

Treatment Types *[See description in CalVTP Program EIR Section 2.5.1.]*

☒ Wildland-Urban Interface Fuel Reduction

☒ Fuel Break

☐ Ecological Restoration

Treatment Activities *[See description in CalVTP Program EIR Section 2.5.2.]*

☒ Prescribed Burning (Broadcast), up to 3,043 acres

☒ Prescribed Burning (Pile Burning), up to 3,043 acres

☒ Mechanical Treatment, up to 2,784 acres

☒ Manual Treatment, up to 857 acres

☐ Prescribed Herbivory, _____ acres

☒ Herbicide Application, up to 2,202 acres

Fuel Type *[See description in CalVTP Program EIR Section 2.5.2.]*

☐ Grass Fuel Type

☐ Shrub Fuel Type

☒ Tree Fuel Type

b. Treatment Maintenance

Maintenance, or retreatment, of the areas treated as part of the proposed project would be conducted to control vegetative regrowth and remove invasive species. Maintenance treatments would involve the same treatment activities as the initial treatments (i.e., mechanical treatment, manual treatment, targeted herbicide application, and prescribed burning). The interval between initial treatments and subsequent maintenance would be based on site monitoring for the effectiveness of the initial treatment, available funding, and other factors. Maintenance

cycles would be dependent on regrowth conditions and would differ by location. See Section 2.3, "Treatment Maintenance," above for additional details.

Treatment Types *[See description in CalVTP Program EIR Section 2.5.1, check every applicable category, and provide detail in description of initial treatment.]*

☒ Wildland-Urban Interface Fuel Reduction

☒ Fuel Break

☐ Ecological Restoration

Treatment Activities *[See description in CalVTP Program EIR Section 2.5.2.]*

☒ Prescribed Burning (Broadcast), up to 3,043 acres

☒ Prescribed Burning (Pile Burning), up to 3,043 acres

☒ Mechanical Treatment, up to 2,784 acres

☒ Manual Treatment, up to 857 acres

☐ Prescribed Herbivory, _____ acres

☒ Herbicide Application, up to 2,202 acres

Fuel Type *[See description in CalVTP Program EIR Section 2.5.2.]*

☐ Grass Fuel Type

☐ Shrub Fuel Type

☒ Tree Fuel Type

Use of the PSA/Addendum for Treatment Maintenance

Prior to implementing a maintenance treatment, either Green Diamond or MCSD would verify that the expected site conditions as described in the PSA/Addendum are present in portions of the project area that each entity owns. As time passes, Green Diamond and MCSD would consider the continued relevance of the PSA/Addendum in light of potentially changed conditions or circumstances. Where Green Diamond or MCSD determines the PSA/Addendum is no longer sufficiently relevant, the entities would determine whether a new PSA or other environmental analysis is warranted.

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

10. Regional Setting and Surrounding Land Uses:

The project area is situated east of McKinleyville in western Humboldt County, and is surrounded by private landowners. Surrounding land uses include private timberland, wildland-urban interface, rural small farmland, grazing land and suburban uses.

11. Other Public Agencies Whose Approval Is Required: (e.g., permits)

- Pesticide application permit from Humboldt County Agricultural Commissioner

Coastal Act Compliance

☒ The proposed project is NOT within the Coastal Zone.

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

☐ A coastal development permit has been applied for or obtained from the local Coastal Commission district office or local government with a certified Local Coastal Plan, as applicable.

☐ The local Coastal Commission district office or local government with a certified Local Coastal Plan (in consultation with the local Coastal Commission district office) has determined that a coastal development permit is not required.

12. Native American Consultation. *The Board of Forestry and Fire Protection completed consultation pursuant to Public Resources Code Section 21080.3.1 during preparation of the Program EIR; however, CalVTP SPR CUL-2 requires further tribal coordination during PSA preparation.*

Pursuant to SPR CUL-2, a list of geographically affiliated Native American representatives was obtained from the Native American Heritage Commission (NAHC) on February 21, 2024. On July 31, 2024, HCRCD sent letters and emails inviting the following tribes to consult on the proposed project: Bear River Band of Rohnerville Rancheria, Blue Lake Rancheria, Cher-Ae Heights Indian Community of the Trinidad Rancheria, Hoopa Valley Tribe, Shasta Nation, Tsnungwe Council, Wiyot Tribe, and Yurok Tribe. HCRCD received a response from Blue Lake Rancheria, on August 1, 2024, requesting that inadvertent discovery protocols are in place and that the Tribe is notified of any inadvertent discoveries. No other responses from other tribes were received.

DETERMINATION

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

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

☒ I find that the presence of proposed project areas outside the CalVTP treatable landscape will not result in substantial changes in the project, no substantial changes in circumstances have occurred, and no new information of substantial importance has been identified. The inclusion of project areas outside the CalVTP treatable landscape will not result in any new or substantially more severe significant impacts. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred; therefore, an ADDENDUM is adopted to address the project areas outside the geographic extent presented in the Program EIR.

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

☐ I find that the proposed project will have effects that were not covered in the CalVTP Program EIR or will have effects that are substantially more severe than those covered in the CalVTP Program EIR. Although these effects may be significant in the absence of additional mitigation beyond the CalVTP Program EIR's measures, revisions to the proposed project or additional mitigation measures have been agreed to by the project partners 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 Program EIR and/or (b) substantially more severe than those covered in the CalVTP Program EIR. 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	

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4 PROJECT-SPECIFIC ANALYSIS/ADDENDUM

4.1 AESTHETICS AND VISUAL RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities	LTS	Impact AES-1, pp. 3.2-16 – 3.2-19	Yes	AD-3 AD-4 AES-2 AQ-2 AQ-3 REC-1	NA	LTS	No	Yes
Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Wildland-Urban Interface Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	LTS	Impact AES-2, pp. 3.2-20 – 3.2-25	Yes	AD-3 AES-1 AES-3	NA	LTS	No	Yes
Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Nonshaded Fuel Break Treatment Type	SU	Impact AES-3, pp. 3.2-25 – 3.2-27	No	--	--	--	--	--

Notes: LTS = less than significant; SU = significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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 Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

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

Discussion

IMPACT AES-1

Initial and maintenance treatments would include mechanical treatment, manual treatment, prescribed burning, and targeted ground application of herbicides. No prescribed burning or herbicide application is proposed on MCSD lands. The potential for these treatment activities to result in short-term degradation of the visual character of a treatment area was examined in the Program EIR. The nearest eligible state scenic highways to the project area are US Highway 101 (US 101) located approximately 1.3 miles west of the project area and State Route 299 (SR 299), located approximately 0.2 mile south of the project area (Caltrans 2018). The proposed treatments would occur on lands owned by Green Diamond and MCSD. The project area includes land managed for timber production by Green Diamond and its predecessors. However, MCSD recently purchased its portion of the property from Green Diamond for the purpose of providing community open space. Planning for the community area is forthcoming and would include trail improvements, watershed restoration, and tree planting.

Public viewpoints within and near the project area from which treatments would be visible include public trails and recreation areas within the McKinleyville Community Forest, residences, US 101, SR 299, and other public roadways. Although portions of the project area are visible from public viewpoints and two eligible state scenic highways, the project area is densely vegetated with mature trees and varied topography, which would substantially reduce the visibility of treatments from public viewpoints. Furthermore, manual and mechanical treatments would remove shrubs and trees smaller than 14 inches DBH, leaving mature overstory vegetation in much of the project area. Although in the short-term after treatment, the absence of treated vegetation could be noticeable, mature vegetation would remain to provide partial screening of treatment areas. Equipment, crews, and smoke from prescribed burning could be visible from public viewpoints and an eligible state scenic highways (US 101, SR 299) in the short term. However, per SPR AD-4, public notification prior to prescribed burning would occur, and a smoke management plan (SPR AQ-2) and burn plan (SPR AQ-3) would be prepared, which would help to reduce excess smoke by requiring certain conditions be met prior to burning. In addition, the project proponent would avoid staging vehicles and equipment within the viewshed of public trails, recreation areas, and roadways (SPR AES-2). The project proponent would post notices informing the public of upcoming treatment activities and any upcoming trail closures at trailheads, prior to treatments in the vicinity of trails and public recreation areas (SPR REC-1). SPR AD-4 was not included in the Program EIR for this impact (Impact AES-1); however, it is included here to address short-term degradation of public views from prescribed burning.

The potential for the project to result in short-term substantial degradation of the visual character of the project area is within the scope of the Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing scenic resources are essentially the same within and outside the treatable landscape (i.e., located on 3.4 acres adjacent to treated landscape evaluated in the Program EIR); therefore, the short-term aesthetic impact is also the same, as described above, which is consistent with that described in the Program EIR. SPRs applicable to this impact are AD-4, AES-2, AQ-2, AQ-3, and REC-1. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AES-2

Initial and maintenance treatments would include WUI fuel reduction and shaded fuel break treatment types. The potential for WUI fuel reduction and shaded fuel break treatment types to result in long-term degradation of the visual character of an area was examined in the Program EIR. Public viewpoints of the treatment areas include public trails and recreation areas within and adjacent to the project area, residences, US 101, SR 299, and other public roadways. Manual and mechanical treatments would remove shrubs and trees smaller than 14 inches DBH, leaving mature overstory vegetation in much of the project area. Therefore, mature vegetation would remain to provide partial screening of treatment areas. In addition, fuel breaks are proposed along the western perimeter of the project

area, along both sides of Murray Road, a public road along the northern perimeter of the project area, and along a north-south trending ridge that bisects the property from a gate at Murray Road to a gate at Timmons Lane (Figure 2-1). Because the fuel breaks would be along existing roadways and along the existing north-south trending ridge, they would not result in a substantial change to the visual character of the project area. The project area has been managed for timber production by Green Diamond and its predecessors, which has set the baseline aesthetic value of the area to a similar condition as what we would expect after proposed treatments. The long-term visual character of the treatment areas after implementation of the proposed WUI fuel reduction and shaded fuel break treatments would remain consistent with the current natural, vegetated landscape and would not constitute a substantial adverse change or degrade the visual character of the landscape.

The potential for the project to result in long-term substantial degradation of the visual character of the project area is within the scope of the Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing visual character is essentially the same within and outside of the treatable landscape (i.e., located on 3.4 acres adjacent to treated landscape evaluated in the Program EIR); therefore, the long-term aesthetic impact is also the same, as described above, which is consistent with that described in the Program EIR. SPRs applicable to the proposed treatments are AD-3, AES-1, and AES-3. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AES-3

This impact does not apply to the proposed project because no nonshaded fuel breaks are proposed.

NEW AESTHETIC AND VISUAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to aesthetics and visual resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape (i.e., located on 3.4 acres adjacent to treated landscape evaluated in the Program EIR); therefore, the types and severity of impacts on aesthetic and visual resources are the same as those described in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to aesthetics and visual resources would occur.

4.2 AGRICULTURE AND FORESTRY RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
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	AD-3	NA	LTS	No	Yes

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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 Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

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

Discussion

IMPACT AG-1

Vegetation treatment activities implemented within the project area would include mechanical treatment, manual treatment, prescribed burning, and targeted ground application of herbicides to conduct WUI fuel reduction and shaded fuel break treatments. No prescribed burning or herbicide application is proposed on MCSD lands. The project area consists of privately owned commercial forest land and a publicly owned community forest consisting of coast redwood, Douglas-fir, Grand fir, sitka spruce, and isolated Port Orford cedar. Associated hardwood species include tanoak, big leaf maple, and red alder, which generally occur near watercourses or where high soil moisture persists.

Shaded fuel breaks would be implemented on up to 335 total acres of the project area (223 acres on Green Diamond lands and 112 acres on MCSD lands) with maximum widths of 200 feet. In forested areas of the shaded fuel breaks, trees would be thinned and some shrubs would be removed mechanically and/or manually to establish spacing between vegetation, both vertically and horizontally. WUI fuel reduction treatments would occur in coastal mixed redwood, Douglas-fir, and spruce forests and minor other vegetation communities present in the project area. Tree species that would be retained would vary, but in general, would include redwood, Douglas-fir, and in discrete locations, grand fir and spruce. Within riparian areas, there would be retention of at least 75 percent of the overstory including alders and big leaf maple, and 50 percent of the understory canopy of native riparian vegetation. Mechanical, manual, and herbicide treatments would target invasive species (e.g., bromes [*Bromus* spp.]) that may

occupy treatment areas, reduce vegetation in the overstocked understory, increase the average distance to the bottom of live crowns, and increase the spacing between canopy trees.

Although WUI fuel reduction treatments would vary slightly depending on the vegetation type being treated, specific prescriptions would be reviewed by an RPF to maintain tree age class diversity and a sufficient number of young understory trees to facilitate forest regeneration and long-term maintenance of habitat function. These treatments would not result in the loss of forest land or conversion of forestland into non-forest use because treatment is designed to maintain habitat function and promote wildfire resilience of the existing forestland.

The potential for these treatment types and treatment activities to result in the loss of forestland or conversion of forestland to non-forest use was examined in the Program EIR. The treatment types and activities described above would occur in forested lands. Consistent with the Program EIR, the vegetation remaining after treatments would meet the definition of forestland as defined in PRC Section 12220(g), which defines "forest land" as land that can support 10-percent native tree cover of any species under natural conditions. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the composition of forested land as defined in PRC Section 12220(g) is essentially the same within and outside the treatable landscape; therefore, the impact to forest land is also the same, as described above, which is consistent with that described in the Program EIR. SPR AD-3 is applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW AGRICULTURE AND FORESTRY RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatment project are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.3.1, "Environmental Setting," and Section 3.3.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. The inclusion of areas outside of the CalVTP treatable landscape, within the project area, would not give rise to new significant impacts not addressed in the Program EIR or impacts of greater severity than described in the Program EIR. Therefore, no new impact related to agriculture and forestry resources would occur that is not covered in the Program EIR.

4.3 AIR QUALITY

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	PSU	Impact AQ-1, pp. 3.4-26 – 3.4-32; Appendix AQ-1	Yes	AD-4 AQ-1 AQ-2 AQ-3 AQ-4 AQ-6	AQ-1	SU	No	Yes
Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk	LTS	Impact AQ-2, pp. 3.4-33 – 3.4-34; Appendix AQ-1	Yes	AQ-1 HAZ-1 NOI-4 NOI-5	NA	LTS	No	Yes
Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	LTS	Impact AQ-3, pp. 3.4-34 – 3.4-35	No	--	--	--	--	--
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	PSU	Impact AQ-4, pp. 3.4-35 – 3.4-37	Yes	AD-4 AQ-1 AQ-2 AQ-6	NA (No feasible mitigation available)	SU	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	AQ-1 HAZ-1 NOI-4 NOI-5	NA	LTS	No	Yes
Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	PSU	Impact AQ-6; pp. 3.4-38	Yes	AD-4 AQ-1 AQ-2 AQ-6	NA (No feasible mitigation available)	SU	No	Yes

Notes: LTS = less than significant; PSU = potentially significant and unavoidable; SU = significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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

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

Discussion

Humboldt County is in the jurisdiction of the North Coast Unified Air Quality Management District (NCUAQMD). Pursuant to SPR AQ-1, the implementing entity would comply with the applicable air quality requirements of the NCUAQMD. Pursuant to SPR AQ-2, Green Diamond would also prepare a smoke management plan and submit it to NCUAQMD prior to implementing any prescribed burning treatment on Green Diamond lands. In addition, Green Diamond would prepare a burn plan as required by SPR AQ-3, which would include fire behavior modeling. Also, SPR AQ-6 requires the implementation of an Incident Action Plan, which identifies burn dates, burn hours, weather limitations, specific burn prescription, communication plan, medical plan, traffic plan, and other special instructions required by NCUAQMD for all proposed prescribed burning. Incident Action Plans would also identify the contact personnel with NCUAQMD to coordinate on-site briefings, posting notifications, and weather monitoring during burning. No prescribed burning is proposed on MCSD lands.

IMPACT AQ-1

Use of vehicles, mechanical equipment, and prescribed burning on Green Diamond lands during initial and ongoing maintenance treatments would result in emissions of criteria pollutants. No prescribed is proposed on MCSD lands. The potential for emissions of criteria pollutants to exceed California Ambient Air Quality Standard (CAAQS) or National Ambient Air Quality Standard (NAAQS) thresholds was examined in the Program EIR.

Emissions of criteria air pollutants from the proposed project are within the scope of the Program EIR because the associated worker vehicle trips, equipment types, and duration of use are consistent with those analyzed in the Program EIR. Emission reduction techniques included in Mitigation Measure AQ-1 would be implemented, to the extent feasible. The implementing entity (Green Diamond or MCSD) would primarily use new and efficient forestry equipment (mostly 2016 or later) compliant with current regulatory standards, which helps to reduce the emissions of criteria air pollutants from equipment use. While the project's emissions of criteria pollutants is not expected to exceed CAAQS or NAAQS thresholds, because the project would generate emissions, it would contribute to the environmental significance conclusion in the Program EIR; therefore, for the purposes of CEQA compliance, this PSA/Addendum notes the impact as potentially significant and unavoidable.

The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the air quality conditions present and air basins in the areas outside the treatable landscape are the same as those within the treatable landscape. Additionally, the area outside of the treatable landscape, within the project area, consists of 3.4 acres, which is not substantial in comparison to expected annual statewide treatment area of 250,000 acres; thus, the increase in the use of vehicles and mechanical equipment, and related emissions, would not be substantially greater than that analyzed in the Program EIR (i.e., within the treatable landscape). Therefore, the air quality impact is not substantially greater than described in the Program EIR. SPRs applicable to this impact are AD-4, and AQ-1 through AQ-6. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-2

Use of mechanical equipment during initial and ongoing maintenance treatments could expose people, such as hikers and recreationalists using trails near the project area, to diesel particulate matter emissions. However, treatment activities would not take place near the same people for an extended period such that prolonged exposure would occur. The potential to expose people to diesel particulate matter emissions was examined in the Program EIR. Diesel particulate matter emissions from the proposed treatments are within the scope of the Program EIR because the exposure potential is the same as analyzed in the Program EIR, 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 Program EIR.

The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project site, the air quality

conditions and sensitive receptors (i.e., exposure potential) present in the areas outside the treatable landscape are the same as those within the treatable landscape (i.e., the area located outside of the treatable landscape, within the project area, consists of 3.4 acres that run adjacent to the treatable landscape); therefore, the air quality impact is also the same, as described above. SPRs applicable to this impact are AQ-1, HAZ-1, NOI-4, and NOI-5. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-3

This impact does not apply to the project because no naturally occurring asbestos is mapped in the project area (DOC 2000; USGS 2011).

IMPACT AQ-4

Prescribed burning on Green Diamond lands during initial and ongoing maintenance treatments could expose people to toxic air contaminants (TACs), which were examined in the Program EIR. No prescribed burning is proposed on MCSD lands. SPRs applicable to prescribed burning are designed to minimize the risk of exposing people to smoke, which includes TACs; however, prescribed burning during initial and ongoing maintenance treatments could still expose people to TACs. This potential exposure risk was examined as an impact in the Program EIR and found to be significant and unavoidable after the application of the SPRs and all feasible mitigation measures because unpredictable changes in weather can occur during prescribed burns resulting in short-term exposure of people to concentrations of TAC and associated levels of acute health risk with a Hazard Index greater than 1.0. The duration and parameters of the proposed prescribed burns are within the scope of the activities addressed in the Program EIR, and within the NCUAQMD, air quality conditions are consistent with those analyzed in the Program EIR for Humboldt County. Therefore, the potential for exposure to toxic air contaminants is also within the scope the Program EIR.

The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the air quality conditions present and air basins in the areas outside the treatable landscape are the same as those within the treatable landscape (i.e., the area located outside of the treatable landscape, within the project area, consists of 3.4 acres that run adjacent to the treatable landscape); therefore, the air quality impact is also the same, as described above.

SPRs applicable to this impact are AD-4, AQ-1, AQ-2, and AQ-6. All feasible measures to prevent and minimize smoke emissions, as well as exposure to smoke, are included in these SPRs. No additional mitigation measures are feasible, and this impact would remain significant and unavoidable, as explained in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-5

Use of diesel-powered equipment during vegetation treatments could expose people to objectionable odors from diesel exhaust. The potential to expose people to objectionable odors from diesel exhaust was examined in the Program EIR. Consistent with the Program EIR, diesel exhaust emissions would be temporary, would not be generated at any one location for an extended period of time, and would dissipate rapidly from the source with an increase in distance. This impact is within the scope of the Program EIR because the equipment that would be used and the duration of use under the proposed project are consistent with what was analyzed in the Program EIR.

The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project site, the air quality conditions, and sensitive receptors present in the areas outside the treatable landscape are the same as those within the treatable landscape (i.e., the area located outside of the treatable landscape, within the project area, consists of 3.4 acres that runs adjacent to the treatable landscape). Additionally, the area outside of the treatable landscape, 3.5

acres, is not substantial in comparison to expected annual statewide treatment area of 250,000 acres; thus, the increase in the use of vehicles and mechanical equipment, and related emissions, would not be substantially greater than that analyzed in the Program EIR (i.e., within the treatable landscape). Therefore, the air quality impact is not substantially greater than described in the PEIR. SPRs applicable to this impact are AQ-1, HAZ-1, NOI-4, and NOI-5. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-6

Prescribed burning on Green Diamond lands during initial and ongoing maintenance treatments could expose people to objectionable odors. No prescribed burning or herbicide application is proposed on MCSD lands. SPRs applicable to prescribed burning are designed to minimize the risk of exposing people to smoke, which includes objectionable odors; however, prescribed burning during initial and ongoing maintenance treatments could still expose people to objectionable odors. Use of diesel-powered equipment during vegetation treatments could expose people to objectionable odors from diesel exhaust. Consistent with the Program EIR, diesel exhaust emissions would be temporary, would not be generated at any one location for an extended period of time, and would dissipate rapidly from the source with an increase in distance. Prescribed burning during initial and ongoing maintenance treatments could expose people to objectionable odors. SPRs applicable to prescribed burning are designed to minimize the risk of exposing people to smoke, which includes objectionable odors; however, prescribed burning during initial and ongoing maintenance treatments could still expose people to objectionable odors. The potential to expose people to objectionable odors was examined in the Program EIR and was found to be significant and unavoidable after the application of all feasible mitigation measures because short-term exposure to odorous smoke emissions from unpredictable weather changes could occur. This impact is within the scope of the Program EIR because the equipment that would be used and the duration of use under the proposed project are consistent with what was analyzed in the Program EIR.

The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the air quality conditions, and sensitive receptors present in the areas outside the treatable landscape are the same as those within the treatable landscape (i.e., the area located outside of the treatable landscape, within the project area, consists of 3.4 acres that run adjacent to the treatable landscape); therefore, the air quality impact is also the same, as described in the Program EIR. SPRs applicable to this impact are AD-4, AQ-1, AQ-2, and AQ-6. 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 significant and unavoidable, as explained in the Program EIR. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW AIR QUALITY IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to air quality outside the treatable landscape are the same as those within the treatable landscape (i.e., the area located outside of the treatable landscape, within the project area, consists of 3.4 acres that run adjacent to the treatable landscape); therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the Program EIR. The inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to air quality would occur.

4.4 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources	LTS	Impact CUL-1, pp. 3.5-14 – 3.5-15	Yes	AD-3 CUL-1 CUL-7 CUL-8	NA	LTS	No	Yes
Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources	SU	Impact CUL-2, pp. 3.5-15 – 3.5-16	Yes	AD-3 CUL-1 CUL-2 CUL-3 CUL-4 CUL-5 CUL-8	CUL-2	SU	No	Yes
Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	LTS	Impact CUL-3, p. 3.5-17	Yes	AD-3 CUL-1 CUL-2 CUL-3 CUL-4 CUL-5 CUL-6 CUL-8	NA	LTS	No	Yes
Impact CUL-4: Disturb Human Remains	LTS	Impact CUL-4, p. 3.5-18	Yes	AD-3	NA	LTS	No	Yes

Notes: LTS = less than significant; SU = significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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 Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
Completion of this row is not applicable because there would be no new impacts.	☐	☐	☐

Discussion

Consistent with SPR CUL-1, a records search of the approximately 3,641-acre project area was conducted at the Northwest Information Center (NWIC) in March 2024 (NWIC File No.: 23-1101). The records search revealed eight previously recorded resources within the project area. All eight resources are historic era. They comprise two railroad grade segments, a machinery piece, a trash scatter, a fence, two pieces of logging equipment, and a heavy

equipment bucket. Three of these eight historic era resources are isolates. None of the previously recorded sites have been evaluated for California Register of Historical Resources (CRHR) eligibility.

Consistent with SPR CUL-2, an updated Native American contact list was obtained from the Native American Heritage Commission (NAHC) on February 21, 2024. On July 31, 2024, letters and emails inviting the tribes to consult were sent to 16 tribal representatives from the Bear River Band of Rohnerville Rancheria, Blue Lake Rancheria, Cher-Ae Heights Indian Community of the Trinidad Rancheria, Hoopa Valley Tribe, Shasta Nation, Tsnungwe Council, Wiyot Tribe, and Yurok Tribe. Blue Lake Rancheria responded on August 1, 2024, that they wanted to ensure that inadvertent discovery protocol is in place, and to inform the tribe if any discoveries are made during project implementation. None of the other tribes responded. The search of NAHC's sacred lands file database returned negative results on February 21, 2024.

IMPACT CUL-1

Proposed treatment activities include prescribed burning on Green Diamond lands and mechanical treatments, which could damage historical resources if present in a treated area. No prescribed burning is proposed on MCSD lands. The NWIC records search did not reveal any built-environment features; nevertheless, structures (i.e., buildings, bridges, roadways) more than 50 years old that have not been recorded or evaluated for historical significance may be present in the project area. These structures would be identified and avoided pursuant to SPR CUL-7. The potential for these treatment activities to result in disturbance, damage, or destruction of built-environment structures that have not yet been evaluated for historical significance was examined in the Program EIR. This impact is within the scope of the Program EIR because treatment activities and the intensity of ground disturbance of the treatment project are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the potential to encounter built-environment structures that have not yet been evaluated for historical significance in areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on historical resources is also the same, as described above.

SPRs applicable to this impact are AD-3, CUL-1, CUL-7, and CUL-8. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT CUL-2

Vegetation treatment would include mechanical treatments using heavy equipment that could churn up the surface of the ground during treatment as vegetation is removed; these activities may result in damage to known or previously unknown archaeological resources. The NWIC records search revealed eight archaeological resources; however, none of these have been evaluated for eligibility for listing in the CRHR. Therefore, it is not known whether these sites are considered resources under CEQA. A survey would be conducted before treatment pursuant to SPR CUL-4 to identify any previously unrecorded archeological resources. Identified resources would be avoided according to the provisions of SPR CUL-5.

The potential for these treatment activities to result in inadvertent discovery and subsequent damage of unique archaeological resources or subsurface historical resources during vegetation treatment was examined in the Program EIR. This impact was identified as significant and unavoidable in the Program EIR because of the large geographic extent of the treatable landscape and the possibility that there could be some rare instances where inadvertent damage of unknown resources may be extensive. For the proposed treatment project, SPRs and Mitigation Measure CUL-2 would require identification and protection of resources, and it is reasonably expected that implementation of these measures would avoid a substantial adverse change in the significance of any unique archaeological resources or subsurface historical resources. However, because the project could result in inadvertent discovery and subsequent damage of unique archaeological resources or subsurface historical resources, it could contribute to the environmental significance conclusion in the Program EIR; therefore, for purposes of CEQA compliance, this PSA/Addendum notes the impact as potentially significant and unavoidable.

This impact is within the scope of the Program EIR, because treatment activities and intensity of ground disturbance of the treatment project are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the potential for discovery of archaeological resources is essentially the same within and outside the treatable landscape; therefore, the potential impact on unique archaeological resources or subsurface historical resources is also the same, as described above.

SPRs applicable to this impact include AD-3, CUL-1 through CUL-5 and CUL-8. Mitigation Measure CUL-2 would also apply to the proposed project to protect any inadvertent discovery. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT CUL-3

Native American contacts in Humboldt County were contacted on July 31, 2024, which included the Bear River Band of Rohnerville Rancheria, Blue Lake Rancheria, Cher-Ae Heights Indian Community of the Trinidad Rancheria, Hoopa Valley Tribe, Shasta Nation, Tsnungwe Council, Wiyot Tribe, and Yurok Tribe. HCRCD received a response from Blue Lake Rancheria, on August 1, 2024, requesting that inadvertent discovery protocols are in place and that the Tribe is notified of any inadvertent discoveries. No other responses from other tribes were received. Inadvertent discoveries are in place under Mitigation Measure CUL-2, which would protect in place, record, or otherwise treat the discovered resource appropriately to reduce impacts to a less than significant.

Vegetation treatment would include prescribed burning on Green Diamond lands, manual and mechanical treatment, biomass disposal, and the use of herbicides on Green Diamond lands that could inadvertently damage or destroy tribal cultural resources if they are present in treated areas. No prescribed burning or herbicide application is proposed on MCSD lands. The potential for the proposed treatment activities to cause a substantial adverse change in the significance of a tribal cultural resource during implementation of vegetation treatment was examined in the Program EIR. This impact is within the scope of the Program EIR because the treatment types and intensity of ground disturbance and other vegetation treatment activities proposed for this treatment project are consistent with those analyzed in the Program EIR. As explained in the Program EIR, while tribal cultural resources may be identified within the treatable landscape during development of later treatment projects, implementation of SPRs would avoid any substantial adverse change to any tribal cultural resource.

The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the tribal cultural affiliations present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on tribal cultural resources is also the same, as described above.

SPRs applicable to this impact include AD-3, CUL-1 through CUL-6, and CUL-8. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT CUL-4

Some vegetation treatment activities would require the use of heavy equipment, such as masticators and tracked chippers, which could uncover human remains if present in a treated area. The NWIC records search did not reveal any known burials or sites containing human remains, but an inadvertent discovery could occur. The potential for treatment activities to uncover human remains was examined in the Program EIR. This impact is within the scope of the Program EIR because the intensity of ground disturbance under the proposed project is consistent with what was analyzed in the Program EIR. In addition, consistent with the Program EIR, the proposed project would comply with California Health and Safety Code Sections 7050.5 and Public Resources Code Section 5097 in the event of a discovery.

The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the potential for uncovering human remains during implementation of the treatment project is essentially the same within and outside

the treatable landscape and treatment activities; therefore, the impact related to disturbance of human remains is also the same, as described above.

SPR AD-3 is applicable to this impact. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCE IMPACTS

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatment project are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to archaeological, historical, or tribal cultural resources outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. The inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to archaeological, historical, or tribal cultural resources would occur.

4.5 BIOLOGICAL RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTSM	Impact BIO-1, pp 3.6-131 – 3.6-138	Yes	AQ-3 AQ-4 BIO-1 BIO-2 BIO-7 BIO-9 GEO-1 GEO-3 GEO-4 GEO-5 GEO-7 HYD-5	BIO-1a BIO-1b BIO-1c	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTSM (all wildlife species except bumble bees) PSU (bumble bees)	Impact BIO-2, pp 3.6-138 – 3.6-184	Yes	BIO-1 BIO-2 BIO-3 BIO-4 BIO-10 HAZ-5 HAZ-6 HYD-1 HYD-3 HYD-4 HYD-5	BIO-2a BIO-2b BIO-3a BIO-3b BIO-3c BIO-4	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	LTSM	Impact BIO-3, pp 3.6-186 – 3.6-191	Yes	BIO-1 BIO-2 BIO-3 BIO-4 BIO-6 BIO-9 HYD-4 HYD-5	BIO-3a BIO-3b BIO-3c	LTSM	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTSM	Impact BIO-4, pp 3.6-191 – 3.6-192	Yes	BIO-1 HYD-1 HYD-4	BIO-4	LTSM	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTSM	Impact BIO-5, pp 3.6-192 – 3.6-196	Yes	BIO-1 BIO-4 BIO-10 BIO-11 HYD-1 HYD-4	BIO-5	LTSM	No	Yes

Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	a Substantially More Severe Significant Impact than Identified in the	Impact within the Scope of the Program
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife, Including Nesting Birds	LTS	Impact BIO-6, pp 3.6-197 – 3.6-198	Yes	AD-1 BIO-1 BIO-2 BIO-3 BIO-4 BIO-12	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	NI	Impact BIO-7, pp 3.6-198 – 3.6-199	Yes	AD-1 AD-3	NA	NI	No	Yes
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	NI	Impact BIO-8, pp 3.6-199 – 3.6-200	Yes	AD-1	NA	NI	No	Yes

Notes: LTS = less than significant; LTSM = less than significant with mitigation; NI = no impact; PSU = potentially significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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

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

Discussion

Pursuant to SPR BIO-1, Ascent biologists conducted a data review of project-specific biological resources, including habitat and vegetation types, special-status plants, special-status wildlife, and sensitive habitats (e.g., sensitive natural communities, wetlands) with potential to occur in the project area. The US Forest Service (USFS) Existing Vegetation (EVEG) mapping was used to identify the habitat/vegetation types including mature forest within the project area.

The project area is located within the Northern California Coast ecoregion. The project area ranges in elevation from approximately 100 feet to 600 feet. Habitat types within the project area and total acreage of each type are presented in Table 4.5-1. Habitat types were classified according to the California Wildlife Habitat Relationships classification system.

Table 4.5-1 Habitat Types in the Project Area

Habitat Type	Shaded Fuel Break Acreage	WUI Fuel Reduction Acreage	Total Acreage
Forest/Woodland			
Redwood	228.3	2,179.2	2,407.5
Montane Hardwood-Conifer	48.3	433.4	481.7
Forest/Woodland Total	—	—	*2,889.2*

Habitat Type	Shaded Fuel Break Acreage	WUI Fuel Reduction Acreage	Total Acreage
Shrub/Scrub			
Coastal Scrub	40.4	577.3	617.8
Shrub/Scrub Total	—	—	*617.8*
Herbaceous			
Annual Grassland	0.7	6.6	7.3
Pasture	—	0.05	0.05
Herbaceous Total	—	—	*7.35*
Riparian/Wetland/Water			
Montane Riparian	17.5	109.2	126.8
Riparian/Wetland Water Total	—	—	*126.8*
		All Habitat Types Total	3,641.4

Source: USFS EVEG vegetation data, compiled by Ascent in 2024.

A list of special-status plant and wildlife species with potential to occur in the project area and vicinity was compiled by reviewing the California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California database records for the US Geological Survey (USGS) quadrangles containing and surrounding the project area (9 quadrangles total; CNDDB 2024a; CNPS 2024) and Appendix BIO-3 (Table 9a, Table 9b, and Table 19) in the Program EIR (Volume II) for special-status plants and wildlife that could occur in the Northern California Coast ecoregion. A list of sensitive natural communities with potential to occur in the project area was compiled by completing a CNDDB search of the USGS quadrangles containing and surrounding the project area (CNDDB 2024a) and reviewing Table 3.6-16 (pages 3.6-65 – 3.6-66) in the Program EIR (Volume II) for sensitive natural communities that could occur in the Northern California Coast ecoregion in the habitat types mapped in the project area.

Ascent conducted reconnaissance surveys on February 13, 2024, to identify and document sensitive resources (e.g., aquatic habitat, riparian habitat, sensitive natural communities) and to assess the suitability of habitat in the project area for special-status plant and wildlife species. Mapped habitat types were verified where possible and incidental wildlife observations were recorded.

Based on implementation of SPR BIO-1 (including review of occurrence data, species ranges, habitat requirements for each species, results of reconnaissance-level surveys, and habitat present within the project area as assessed during reconnaissance surveys), a list of special-status species with potential to occur in the vicinity of the proposed project was assembled (Attachment B). These species are discussed in detail under Impact BIO-1 (special-status plants) and Impact BIO-2 (special-status wildlife).

IMPACT BIO-1

Initial vegetation treatments and ongoing maintenance treatments could result in direct or indirect adverse effects on 18 special-status plant species with suitable habitat in the project area (Attachment B) if present within treatment areas. Potential impacts resulting from maintenance activities would be generally the same as those resulting from initial vegetation treatments because the same treatment activities would occur. However, treatment frequency and intensity can determine whether effects on certain plant species are beneficial or adverse. Initial treatment that reduces overgrowth, opens the tree canopy to allow more light penetration, or removes invasive competitors can be beneficial for special-status plant populations; however, repeated treatments at too frequent intervals can have adverse effects on those same special-status plants. The potential for treatment activities to result in adverse effects on special-status plants was examined in the Program EIR.

SPR BIO-7 would apply to all treatment activities, including maintenance treatments, and protocol-level surveys for special-status plants would be conducted pursuant to *Protocols for Surveying and Evaluating Impacts to Special Status*

Native Plant Populations and Sensitive Natural Communities (CDFW 2018a) prior to implementing treatments in any habitat potentially suitable for special-status plants. Pursuant to SPR BIO-7, surveys would not be required for special-status plants not listed under the federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA) if the target special-status plant species is an herbaceous annual species, stump-sprouting species, or geophyte species. Additionally, the specific treatments would be carried out during the dormant season for that species or when the species has completed its annual life cycle, provided the treatment would not alter habitat in a way that would make it unsuitable for the special-status plants to reestablish following treatment, or destroy seedbanks, stumps, or roots, rhizomes, bulbs, and other underground parts of special-status plants.

This would require that either surveys are conducted to determine presence or absence of special-status plants, or treatments in habitat potentially suitable for these special-status plants are restricted to the dormant season for these species. If surveys are not conducted to determine presence or absence of special-status plants, treatments would also be limited to activities that do not cause disturbance below the soil surface (i.e., manual treatments, herbicide application on Green Diamond lands, prescribed broadcast burning on Green Diamond lands). In some portions of the project area where mechanical vegetation treatment is desirable, the presence of habitat for special-status plants may unnecessarily or infeasibly constrain treatment implementation. In this case, surveys could be conducted to determine presence or absence and, depending on the results, may provide greater flexibility with timing and types of treatments that may be implemented.

Eight of the 18 special-status plant species that may occur within the project area are herbaceous annual species or geophytes, and are not listed under CESA or ESA, as indicated in Attachment B. Impacts on these species would be avoided by implementing non-ground-disturbing treatment activities (i.e., manual treatments, herbicide application on Green Diamond lands) during the dormant season (i.e., when the plant has no living aboveground parts). This would typically occur after seed set and before germination. Typically, germination would occur after the first significant rainfall (approximately 0.5 inches) and cold snap, which generally takes place between October–December (Levine et al. 2008). Ground-disturbing treatment activities (i.e., mechanical treatments) and pile burning may result in impacts on these plant species even when dormant and would not be conducted without prior implementation of SPR BIO-7. If non-ground-disturbing treatments cannot be completed during the dormant season and would be implemented during the growing period of these annual and geophyte species, protocol surveys (per SPR BIO-7) and avoidance of any identified plants (per Mitigation Measures BIO-1a and BIO-1b) must be applied, as described below. Ten of the 18 special-status plant species that have potential to occur within the project area are perennial or moss species and could not be avoided in the same manner as herbaceous annual species or geophytes; therefore, protocol-level surveys under SPR BIO-7 would be necessary to identify and avoid these species prior to implementing treatment activities in habitat suitable for these species regardless of the timing of treatments.

Where protocol-level surveys are required (per SPR BIO-7) and special-status plants are identified during these surveys, Mitigation Measures BIO-1a and BIO-1b would be implemented to avoid loss of identified special-status plants. Per Mitigation Measures BIO-1a and BIO-1b, if special-status plants are identified during protocol-level surveys, a no-disturbance buffer of at least 50 feet would be established around the area occupied by the species. Within this buffer, no treatment activities would occur unless a qualified RPF or biologist determines, based on substantial evidence, that the species would benefit from treatment in the occupied habitat area. For example, some special-status plants may benefit from select manual treatment or herbicide to control intruding invasive vegetation, and other plants may benefit from the introduction of prescribed broadcast burning. In the case of plants listed under CESA or ESA, the determination of beneficial effects would need to be made in consultation with California Department of Fish and Wildlife (CDFW) and/or USFWS. If treatments are determined to be beneficial and would be implemented in areas occupied by special-status plants, per the specific conditions described under BIO-1a and BIO-1b, additional impact minimization and avoidance measures or design alternatives to reduce impacts would be identified. An evaluation of the appropriate treatment design and frequency to maintain habitat function for special-status plants would be carried out by a qualified RPF or botanist. Therefore, habitat function for special-status plants would be maintained because initial treatment activities and ongoing maintenance would be designed to ensure that treatments retain habitat conditions suitable for the special-status plant species such that these plants persist. If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided, then Mitigation Measure BIO-1c would apply and compensatory mitigation would be required.

The special-status species Howell's montia (*Montia howellii*) has been identified previously and is known to occur within the project area. If surveys pursuant to SPR BIO-7 determine this species is still present, implementation of Mitigation Measure BIO-1b would be required to avoid loss of individual plants. If plants are located on Green Diamond property, mitigation measures would follow measures in *Proposed Revisions to the June 2005 GDRCo Property-wide Consultation for Montia howellii (Howell's montia) – Growing Season Date Change November 2016* (CDFW 2016). If surveys pursuant to SPR BIO-7 determine special-status species coast fawn lily (*Erythronium revolutum*) is present on Green Diamond property, mitigation measures in *Property-wide Consultation for Erythronium revolutum (coast fawn lily) 18-R1-CTP_39* (CDFW 2018b) would be implemented. If surveys pursuant to SPR BIO-7 determine seaside bittercress (*Cardamine angulata*) is present on Green Diamond property, the mitigation measures in *Green Diamond Resource Company of Property-wide Consultation for Cardamine angulata* (Seaside bittercress) (Manji 2018) would be implemented.

In addition, pursuant to SPR HYD-5, nontarget vegetation and special-status species would be protected from herbicides. Only ground-level application would occur (no aerial spraying). Only herbicides labeled for use in aquatic environments would be used when working in areas where there is a possibility the herbicide could come into direct contact with water. Herbicides would be applied by hand and only during low-flow periods or when seasonal streams are dry. Herbicides, aquatic and terrestrial, would not be used within WLPZs or equipment limitation zones (established per SPR HYD-5). No herbicide application is proposed on MCSD lands.

Conclusion

The potential for treatment activities to result in adverse effects on special-status plants was examined in the Program EIR. This impact on special-status plants is within the scope of the Program EIR because the treatment activities and intensity of disturbance resulting from treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions and habitat characteristics present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on special-status plants is also the same, as described above and within the Program EIR.

SPRs that apply to this impact are AQ-3, AQ-4, BIO-1, BIO-2, BIO-7, BIO-9, GEO-1, GEO-3, GEO-4, GEO-5, GEO-7, and HYD-5. Biological resource mitigation measures that apply to project impacts under Impact BIO-1 are Mitigation Measure BIO-1a, BIO-1b, and BIO-1c. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT BIO-2

Initial vegetation treatments and follow-up maintenance treatments could result in direct or indirect adverse effects on special-status wildlife species and habitat suitable for these species within a treatment area, as described in the following sections. Potential impacts resulting from maintenance treatments would generally be the same as those resulting from initial vegetation treatments because the same activities would occur; however, maintenance treatments would generally treat smaller acreages and use less equipment than the initial treatments.

Special-Status Amphibians

Aquatic habitat (e.g., Mill Creek, Lindsay Creek) and upland habitat for foothill yellow-legged frog (*Rana boylii*), northern red-legged frog (*Rana aurora*), and Pacific tailed frog (*Ascaphus truei*) are present within the project area, and these species may occur within these aquatic and upland habitats. In addition, southern torrent salamander (*Rhyacotriton variegatus*) has been documented to occur within Lindsay Creek (Green Diamond 2023; NMFS and USFWS 2006). Habitat potentially suitable for special-status amphibians within the project area includes perennial and intermittent streams and associated uplands (e.g., forest habitat that contains shelter for these species within dense understory vegetation, leaf litter, and logs). Foothill yellow-legged frog is a highly aquatic species and generally not found farther than a few feet from streams; however, foothill yellow-legged frogs will follow wetted channels and

range farther into uplands (i.e., up to approximately 200 feet) during wet periods where they may shelter under logs and similar structures (CDFW 2018c). Northern red-legged frogs require permanent water for breeding but may use adjacent wet forest and meadow habitat in the non-breeding season. Pacific tailed frogs forage within streams and in adjacent uplands (NMFS and USFWS 2006). Southern torrent salamanders are highly aquatic and rarely found more than a few feet from water; however, they may disperse approximately 300 feet from streams during the wet season (NMFS and USFWS 2006).

Pacific tailed frog and southern torrent salamander are covered species under the Green Diamond Aquatic Habitat Conservation Plan (NMFS and USFWS 2006), and the implementation of that plan reduces the impacts to those species on Green Diamond managed portions of the project area. However, because foothill yellow legged frog and northern red-legged frog are not covered species under the Green Diamond Aquatic Habitat Conservation Plan the following measures would apply to those species on Green Diamond managed lands. In addition, the following measures are required for all special-status amphibians on MCSD lands within the project area.

Pursuant to SPR BIO-1, if it is determined that adverse effects on foothill yellow-legged frog, northern red-legged frog, Pacific tailed frog, and southern torrent salamander would be avoided, then no mitigation would be required. Pursuant to SPR HYD-4, WLPZs ranging from 50 to 150 feet, based on slope, adjacent to all Class I and Class II streams within the project area would be implemented. SPR HYD-4 prohibits operating heavy equipment, equipment fueling, placement of burn piles, and fire ignition within these buffers, which would help avoid impacts on special-status amphibians. SPRs identified in other resource areas would also help avoid impacts, including development of a spill prevention and response plan for herbicides (SPR HAZ-5), requiring that herbicide application comply with all appropriate laws and regulations for use of pesticides (SPR HAZ-6), and limiting herbicide application during precipitation events or when precipitation is forecast within 24 hours of treatments (SPR HYD-5) on Green Diamond lands. Furthermore, herbicide use on Green Diamond lands would be limited to late summer and fall, and would occur on foot, with support vehicles only operating on existing roads and trails. No herbicide application is proposed on MCSD lands. Therefore, herbicide application on Green Diamond lands is not likely to adversely affect special-status amphibians.

Pursuant to SPR GEO-1, mechanical treatments would occur outside the wet season, which would avoid the period when special-status amphibians could be moving the farthest from aquatic habitat. Approximately, the wet season begins with the first frontal rain system depositing a minimum of 0.25 inch of rain after October 15 and ends on April 15. Additionally, mechanical treatments would be avoided 24 hours after a rain event defined as any precipitation resulting in 0.2 inch or greater throughout the year. Implementation of SPR GEO-1 would result in avoidance of treatments when special-status amphibians may be moving the farthest from aquatic habitat during the wet season; however, the species may be present within upland habitat greater than 50 to 150 feet from Class I and Class II streams in the project area year-round. These prohibitions would reduce the likelihood that injury or mortality of special-status amphibians would occur; however, full avoidance of special-status amphibians would not occur if these species are present further than 50 to 150 feet from stream habitat, or if manual treatments, or prescribed burning on Green Diamond lands is implemented within the WLPZ. No prescribed burning is proposed on MCSD lands. The potential for treatment activities and maintenance treatments to result in adverse effects on special-status amphibians was examined in the Program EIR.

After implementation of SPRs HYD-4 and GEO-1, adverse effects on foothill yellow-legged frog, northern red-legged frog, Pacific tailed frog, and southern torrent salamander may not be avoided by mechanical treatments, manual tree and snag removal, or prescribed burning because these species may be present relatively large distances (i.e., greater than 150 feet) from aquatic habitat throughout the forest habitat in the treatment areas during wet periods. Therefore, pursuant to SPR BIO-1, SPR BIO-10 would apply and focused surveys for foothill yellow-legged frog, northern red-legged frog, Pacific tailed frog, and southern torrent salamander would be conducted prior to implementation of mechanical treatments, manual tree and snag removal treatments, and prescribed burning.

If foothill yellow-legged frog, northern red-legged frog, Pacific tailed frog, and southern torrent salamander are not detected within the treatment areas during focused surveys, then no mitigation for the species would be required. If these species are detected during focused surveys, then Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, biological monitoring, stoppage of work if individual animals are found within the work

area, and relocation of individual animals by a qualified RPF or biologist with appropriate permits would be implemented to avoid injury to or mortality of these species.

Habitat function for foothill yellow-legged frog, northern red-legged frog, Pacific tailed frog, and southern torrent salamander would be maintained because treatment activities and maintenance treatments would retain large logs (i.e., greater than 18 inches), would not occur within aquatic habitat, and treatments within WLPZs would be limited pursuant to SPR HYD-4 (e.g., no mechanical treatment, retention of at least 75 percent canopy cover within riparian areas). This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Northern Spotted Owl

Northern spotted owl (*Strix occidentalis caurina*), a covered species under the Green Diamond Forest Habitat Conservation Plan (USFWS 2019a), has been documented to nest in the project area. However, the project area has been subject to annual surveys and no detections have been recorded since 2011 (CNDDB 2024a; USFWS 2019a). While these surveys indicate that northern spotted owl has not recently nested within the project area, the use of most of the project area by nesting northern spotted owls in the future cannot be ruled out based on these survey results because habitat suitable for the species is present in the project area. The portions of the project area that are located adjacent to existing residential development and roads are not likely to be used by nesting northern spotted owl due to the existing disturbance in those areas, which includes the shaded fuel breaks along the western and northern portions of the project area (Figure 2-1).

Treatment activities that include the use of heavy equipment, multiple vehicles, or loud hand tools (e.g., chainsaws) could result in disturbance of nesting northern spotted owls in adjacent occupied habitat, if these activities occur during the sensitive portion of the nesting season (February 1 through July 31) (USFWS 2020a). Herbicide treatment on Green Diamond lands, which would not involve the use of loud and continuous noise from equipment or tools, significant habitat modification, or substantial visual stimuli from human presence close enough to a northern spotted owl nest to result in disturbance of the nest, is not likely to result in nest disturbance. The potential for treatment activities to result in adverse effects on special-status birds was examined in the Program EIR.

For portions of the project area that are covered by the Green Diamond Forest Habitat Conservation Plan (USFWS 2019a), all measures to avoid and minimize impacts on individual northern spotted owl would be implemented, including pre-treatment surveys and avoidance of treatment areas where breeding northern spotted owls have been detected.

For the portion of the project area within MCSD lands, the following measures would be implemented. Per SPR BIO-1, if it is determined that adverse effects on habitat suitable for northern spotted owl would be avoided by conducting treatments outside of the season of sensitivity (i.e., nesting season), then further avoidance measures would not be required. Because there are past records of northern spotted owl nesting within and adjacent to the project area, a qualified RPF or biologist would review northern spotted owl occurrence data in the CNDDB and coordinate with Green Diamond to review any recent survey data for northern spotted owl to determine whether a documented northern spotted owl nesting occurrence is present within 0.25 mile of the treatment area but outside of the MCSD lands. In addition, pursuant to SPR BIO-10, surveys following the *USFWS Protocol for Surveying Proposed Management Activities that May Impact Northern Spotted Owls* (USFWS 2012) and *Northern Spotted Owl Take Avoidance Analysis and Guidance for Private lands in California, Attachment A: Take Avoidance Analysis Coast Redwood Region* (USFWS 2019b) would be conducted. If northern spotted owl nests are present, Mitigation Measure BIO-2a would be implemented and potential impacts on the nest resulting from loud and continuous noise would be avoided by implementing a limited operating period during the northern spotted owl nesting season (February 1 through July 31) for mechanical treatments and manual treatments, within up to 0.25 mile of the nest, depending on the type of disturbance (USFWS 2012; USFWS 2019b; USFWS 2020a). Potential impacts resulting from treatments within un-surveyed nest or roost habitat with a high probability of northern spotted owl occupancy would be avoided by implementing a limited operating period, from February 1 through July 9, within this habitat if habitat is expected to be modified (tree and understory removal), and a limited operating period for prescribed burning of February 1

through September 15 within 0.25 mile of un-surveyed nest or roost habitat with a high probability of northern spotted owl occupancy. No prescribed burning is proposed on MCSD lands.

Habitat function for northern spotted owl would be maintained on the Green Diamond portion of the project area through implementation of the Green Diamond Forest Habitat Conservation Plan (USFWS 2019a). Because vegetation retention standards for shaded fuel breaks are based on spacing and basal area (pursuant to the California Forest Practice Rules), shaded fuel break treatments may reduce suitability of habitat for northern spotted owl within the approximately 335 acres of the project area; however, this is not likely to be a substantial reduction in habitat function because these shaded fuel breaks would be maintained as forest habitat. WUI treatments, which make up 3,296 acres of the 3,641 acre project area, would not remove hardwoods greater than 12 inches DBH with basal hollows or other complex structural features, or conifers greater than 14 inches DBH, which would result in retention of larger trees that are the most likely features to provide nesting habitat for northern spotted owl. In addition, up to three softwood snags per acre that are greater than 12 inches DBH and are more than 100 feet from structures and/or public roads would be retained, along with downed woody debris larger than 18 inches diameter and 12 feet long. Furthermore, at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation would be retained (pursuant to SPR BIO-4), which would retain riparian habitat for foraging and nesting owls. Also, within MCSD lands, pursuant to Mitigation Measure BIO-2a, habitats determined to be suitable for northern spotted owl nesting and roosting (e.g., forests with canopy cover greater than 60 percent, complex understory structure, late seral characteristics), a minimum of 60 percent canopy cover would be retained. Mitigation Measure BIO-2a would require further retention of any occupied habitat as described in *Northern Spotted Owl Take Avoidance Analysis and Guidance for Private lands in California, Attachment A: Take Avoidance Analysis- Coast Redwood Region* (USFWS 2019b).

Pursuant to Mitigation Measure BIO-2a, HCRCD contacted the Arcata office of USFWS on November 7, 2024, to notify USFWS of their proposed avoidance measures and their determination that habitat function would be maintained for northern spotted owl. Based on this consultation, a refinement to Mitigation Measure BIO-2a was made to maintain 60 percent canopy cover in existing northern spotted owl nesting/roosting habitat regardless of occupancy on MCSD lands.

On November 7, 2024, the HCRCD sent a copy of the PSA/Addendum to CDFW Region 1 staff containing the measures that would be taken to avoid mortality, injury, and disturbance, and to maintain habitat function in compliance with Mitigation Measure BIO-2a for northern spotted owl. No refinements to the PSA/Addendum resulted from this consultation. Green Diamond has an adopted Habitat Conservation Plan that provides incidental take coverage for northern spotted owl on Green Diamond managed land (see Impact BIO-8, below). Therefore, formal consultation with USFWS for these parcels in the project area has already been completed through the ESA Section 10 process, and technical assistance from USFWS pursuant to Mitigation Measure BIO-2a would not be required for this portion of the project area. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

California Condor

The Yurok Tribe and National Park Service released California condors (*Gymnogyps californianus*) in the Bald Hills area of Redwood National Park and in prairie habitat on ancestral Yurok land in 2022 (USFWS 2023). Since that time, condors have been seen as far south as 52 miles from the release locations, both north and south of the project area, and into Humboldt County (Yurok Tribe 2023). The condors released by the Yurok Tribe and National Park Service are considered a nonessential experimental population as established by the *Final 10(j) Rule for the establishment of a nonessential experimental population of California Condor in northern California, northwest Nevada, and Oregon* (USFWS 2021). By adopting the 10(j) rule, USFWS has determined that most incidental take of California condors within the experimental population area is allowed, provided that the take is unintentional and not due to negligent conduct. CDFW issued a determination in November 2021 concluding that the federal rule package was consistent with CESA (CDFW 2021). The project area is within the nonessential experimental population range (USFWS 2021).

California condors are known to travel long distances to forage, and the large openings within the project area and presence of large animals such as Roosevelt elk (*Cervus elaphus nannodes*) (sign observed during SPR BIO-1 survey) in large forest openings, provide foraging habitat for the species. Also, large trees on the margins of forest openings may

provide temporary roosts during foraging. Portions of the project area in riparian management zones may also contain large broken top redwoods that could provide nesting habitat for the species (USFWS 2023). Although individual condors, which are monitored using radio and geographic positioning system (GPS) telemetry (USFWS 2021), have not been recorded nesting in the project area, California condor may nest in the project area in the future.

Treatment activities involving mechanical treatments, manual treatments, and prescribed burning conducted within the large forest openings in the project area may result in injury of foraging California condors. No prescribed burning is proposed on MCSD lands. Furthermore, if California condors are nesting within the project area, mechanical treatments, manual treatments, and prescribed burning conducted within 656 feet (200 meters) (USFWS 2021) of a nest could result in disturbance of nesting behavior and loss of eggs or chicks. Injury of adult condors or loss of eggs and chicks would be a substantial adverse effect.

Per SPR BIO-1, if it is determined that adverse effects on California condors would be mitigated by physically avoiding habitat suitable for the species or conducting treatments outside of a season of sensitivity (e.g., nesting season), then no further measures would be required. However, because California condors may forage in the project area year-round, and once a nest is active it may be a full year before juveniles are independent of adults, avoidance of the sensitive season is not feasible, and SPR BIO-10 would apply. Pursuant to SPR BIO-10, prior to mechanical treatments, manual treatments, and prescribed burning activities within 656 feet of riparian conservation zones or within large forest openings that may provide habitat for the species, Green Diamond or MCSD will contact the USFWS to determine if any California condors are located within or near the project area. If California condors are present within or near the project area, Mitigation Measure BIO-2a would apply. Mitigation Measure BIO-2a includes measures to avoid injury, mortality, or disturbance of California condors, including nest buffers, work stoppage, garbage removal, and storage of materials hazardous to California condors.

Treatments would not result in removal of foraging habitat for California condor because condors use a variety of open habitats and would be expected to continue to use foraging habitat within the project area post-treatment. Furthermore, Mitigation Measure BIO-2a would prohibit nesting habitat removal around active nests, and large broken top nest trees are not likely to be removed considering the 14-inch DBH limit on conifer removal within the WUI treatment areas that are the majority of the project area, the tree spacing and basal area requirements for shaded fuel breaks (pursuant to the California Forest Practice Rules), and the 75 percent canopy cover retention required within WLPZs pursuant to SPR BIO-4.

Pursuant to Mitigation Measure BIO-2a, HCRCD contacted the Arcata office of USFWS on November 7, 2024, to notify the USFWS of proposed avoidance measures and the determination that habitat function would be maintained for California condor. A refinement to SPR BIO-10 was made based on this consultation to require that the Yurok Wildlife Department be contacted no more than 14 days prior to all treatment activities to determine the location of an California condors near the project area.

On November 7, 2024, the HCRCD sent a copy of the PSA/Addendum to CDFW Region 1 staff containing the measures that would be taken to avoid mortality, injury, and disturbance, and to maintain habitat function in compliance with Mitigation Measure BIO-2a for California condor. No refinements to the PSA/Addendum resulted from this consultation. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Other Special-Status Birds

Other special-status bird species have potential to occur or are known to occur in the project area: bald eagle (*Haliaeetus leucocephalus*), great gay owl (*Strix nebulosa*), loggerhead shrike (*Lanius ludovicianus*), olive-sided flycatcher (*Contopus cooperi*), Vaux's swift (*Chaetura vauxi*), and white-tailed kite (*Elanus leucurus*) (Attachment B).

Treatment activities involving mechanical treatments, manual treatments, and prescribed burning conducted during the nesting bird season (February 1 - August 31) could result in direct loss of active nests of special-status birds if trees, snags, or shrubs containing nests are removed or burned. No prescribed burning is proposed on MCSD lands. For nests within vegetation that would not be removed, treatment activities including mechanical treatments, manual treatments, and prescribed burning, could result in disturbance to active nests from auditory and visual stimuli (e.g., heavy

equipment, chainsaws, vehicles, personnel), potentially resulting in abandonment and loss of eggs or chicks. Herbicide application on Green Diamond lands would occur in the late summer and fall and involve application on foot. No herbicide application is proposed on MCSD lands. The potential indirect disturbance from this activity would be limited and not likely to result in abandonment of the nests of any special-status species that may occur in the project area, given the nesting locations preferred by these species (see Appendix B). The potential for treatment activities to result in adverse effects on special-status birds was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on habitat suitable for nesting special-status birds would be mitigated by physically avoiding habitat suitable for the species or conducting treatments outside of a season of sensitivity (e.g., nesting bird season), then no further measures would be required. Adverse effects on nesting special-status birds would be avoided for treatments that occur outside of the nesting bird season (February 1–August 31).

If conducting some treatments outside of the nesting bird season is determined to be infeasible, then SPR BIO-10 would apply, and focused nesting bird surveys for bald eagle, great gray owl, loggerhead shrike, olive-sided flycatcher, Vaux's swift, and white-tailed kite would be conducted by a qualified RPF or biologist before implementation of treatment activities within habitat suitable for these species.

If no active special-status bird nests are observed during focused surveys, then additional avoidance measures for these species would not be required. If active special-status bird nests are observed during focused surveys, then Mitigation Measures BIO-2a (for bald eagle, great gray owl, and white-tailed kite) and BIO-2b (for loggerhead shrike, olive-sided flycatcher, and Vaux's swift) would be implemented.

Under Mitigation Measures BIO-2a or BIO-2b, a no-disturbance buffer of at least 0.5 mile would be established around active bald eagle nests, 0.25 mile for white-tailed kite and great gray owl, and at least 100 feet around the nests of other special-status birds. No treatment activities would occur within these buffers until the chicks have fledged as determined by a qualified RPF or biologist. Additionally, trees containing bald eagle nests would not be removed pursuant to the Bald and Golden Eagle Protection Act.

Because vegetation retention in shaded fuel break treatments (335 acres) is described in terms of spacing and basal area (pursuant to the California Forest Practice Rules), these treatments may remove trees larger than the limits in the WUI retention standards that could be used for nesting by special-status birds. In shaded fuel breaks, treatments would retain tree spacing of approximately 10 to 40 feet apart depending on stand age, and shrubs approximately 10 to 20 feet apart, and minimum basal area consistent with the California Forest Practice Rules, which together with the requirement to retain eagle nesting trees would maintain nesting and foraging habitat function for special-status birds in these areas. Habitat function for special-status birds would be further maintained because WUI treatments, which would be applied over approximately 3,296 acres of the project area would not remove hardwoods greater than 12 inches DBH with basal hollows or other complex structural features, or conifers greater than 14 inches DBH, which would result in retention of larger trees that are the most likely features to provide nesting habitat for special-status birds that nest in trees (i.e., bald eagle, olive-sided flycatcher, Vaux's swift, white-tailed kite). In addition, up to three softwood snags per acre that are greater than 12 inches DBH and are more than 100 feet from structures and/or public roads would be retained in WUI treatment areas, which would retain great gray owl nesting sites. In addition, treatments within WLPZ riparian habitat would be limited pursuant to SPR HYD-4 (e.g., no mechanical treatment, retention of at least 75 percent canopy cover). Furthermore, Mitigation Measures BIO-2a and BIO-2b require the avoidance and minimization of impacts to specific habitat features (e.g., nest platforms) that support special-status birds. On November 7, 2024, the HCRCD sent a copy of the PSA/Addendum to CDFW Region 1 staff describing the measures that would be taken to avoid mortality, injury, and disturbance to bald eagle and white-tailed kite, and to maintain habitat function in compliance with Mitigation Measure BIO-2a. The addition of great gray owl to the analysis, as well as species specific avoidance and minimization measures resulted from this consultation. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Special-Status Fishes

Several special-status fish are known to occur in the creeks within the project area: coast cutthroat trout (*Oncorhynchus clarkii clarkia*), Chinook salmon–California coastal Evolutionary Significant Unit (ESU) (*Oncorhynchus tshawytscha*), coho salmon–southern Oregon/northern California ESU (*Oncorhynchus kisutch*), eulachon (*Thaleichthys pacificus*), green sturgeon (*Acipenser medirostris*), Pacific lamprey (*Entosphenus tridentatus*), steelhead–northern California Distinct Population Segment (DPS) summer run (*Oncorhynchus mykiss irideus*), steelhead–northern California DPS winter run, and western brook lamprey (*Lampetra richardsoni*). Coast cutthroat trout, Chinook salmon–California coastal ESU, coho salmon–southern Oregon/northern California ESU, steelhead–northern California DPS summer run, and steelhead–northern California DPS winter run are covered species under the Green Diamond Aquatic Habitat Conservation Plan (NMFS and USFWS 2006). The potential for treatment activities and maintenance treatments to result in adverse effects on special-status fish was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on special-status fish would be avoided by physically avoiding habitat for these species, then mitigation would not be required. Treatments would not occur within aquatic habitat for these species. Also, WLPZs ranging from 50 to 150 feet adjacent to all Class I and Class II streams within the treatment areas would be implemented per SPR HYD-4, which prohibits operating heavy equipment, crossing watercourses unless dry, equipment fueling, placement of burn piles, and fire ignition within the WLPZ. In addition, SPR GEO-1 would require suspending mechanical treatments during periods of heavy precipitation. Furthermore, SPRs HAZ-5, HAZ-6, and HYD-5 would apply to herbicide application treatments on Green Diamond lands and would require implementing a spill response plan, complying with all herbicide application regulations, locating mixing sites away from waterways, restricting application during precipitation events, and other measures. These measures would reduce the likelihood of contaminated runoff reaching the streams that are habitat for special-status fish due to treatment activities. No herbicide application is proposed on MCSD lands. Therefore, adverse effects on special-status fish would be avoided through implementation of these SPRs and further measures would not be required.

Habitat function for special-status fish would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat. Furthermore, treatments within WLPZs adjacent to aquatic habitat would be limited pursuant to SPR HYD-4, which requires retention of at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation. This riparian vegetation standard would maintain stream shading and avoid increases in water temperature. In addition, contaminated runoff to aquatic habitat would be avoided because SPR GEO-1 would require suspending mechanical treatments during periods of heavy precipitation. Furthermore, the following additional SPRs would be implemented to avoid indirect adverse effects to habitat for special-status fish: SPR GEO-3 (requires stabilization of disturbed soil), SPR GEO-4 (requires erosion monitoring), SPR GEO-5 (requires use of water breaks to drain stormwater), SPR GEO-7 (limits heavy equipment on steep slopes), and HYD-1 (requires compliance with water quality regulations).This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

American Badger

Habitat potentially suitable for American badger (*Taxidea taxus*) is limited to the more recent multiple acre patch cuts that have created shrub and grassy openings within the project area. Treatment activities, including pile burning and mechanical treatments, could result in direct loss of active dens and potential loss of young, if present in treatment areas. Broadcast burning, manual treatments (including tree and snag removal), and herbicide application on Green Diamond lands would likely not result in adverse effects on American badger dens because personnel would conduct these activities on foot; the likelihood of a den being inadvertently crushed or otherwise destroyed (i.e., burned by low intensity broadcast burning) would be very low due to the typical depth of dens under the soil surface, which would support the weight of personnel walking above and serve to insulate the den from the heat of a broadcast burn. The potential for treatment activities to result in adverse effects on American badger was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on American badger would be avoided by conducting treatments outside of a season of sensitivity or physically avoiding habitat for these species, then mitigation would not be required. However, because American badgers may use a den year-round (i.e., there is no season of sensitivity), and because den collapse would result in injury or mortality to badgers, implementation of SPR BIO-10 would be required before pile burning and mechanical treatments. Under SPR BIO-10, focused surveys would be

conducted for American badger dens within habitat suitable for the species (i.e., large forest openings) by a qualified RPF or biologist prior to the start of pile burning and mechanical treatments. If American badger dens are not detected during focused surveys, then further mitigation for the species would not be required. If American badger dens are detected during focused surveys, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, a no-disturbance buffer of 50 feet would be established around the den, the size of which may be adjusted by the qualified RPF or biologist based on local conditions, and no treatment activities would occur within this buffer until the den is no longer occupied as determined by the qualified RPF or biologist.

Habitat function for American badger would be maintained because habitat suitable for the species (e.g., openings) would be maintained or enhanced by increasing spacing and reducing shrub density. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Fisher

Fisher (*Pekania pennanti*) is a CDFW species of special concern and is a covered species under the Green Diamond Resource Company Forest Habitat Conservation Plan (USFWS 2019a). The species has been documented to occur in the project area and vicinity (Attachment B). Habitat suitable for fisher within the project area includes stands with high canopy closure, large trees and snags, large woody debris, large hardwoods, and multiple canopy layers away from existing development (e.g., residential neighborhoods and highways). Fisher den habitat includes cavities within live trees or snags, or woody debris piles, and fishers typically choose the largest feature within an area for denning. Some removal of habitat features that provide den sites suitable for fisher would be avoided in WUI treatment areas by retaining live hardwoods greater than 12 inches DBH with basal hollows or other complex structural features as well as conifers greater than 14 inches DBH. Up to three softwood snags per acre that are greater than 12 inches DBH and downed woody debris larger than 18 inches diameter and 12 feet long would also be retained within WUI treatment areas.

Despite the retention standards described for WUI treatments above, which would retain many potential denning structures, trees greater than 12 inches DBH may be removed within fuel break treatments and large snags greater than 12 inches DBH may be removed in all treatment areas, which could result in the destruction of active fisher dens. Outside of the breeding season, fishers would likely flee due to the presence of equipment, vehicles, or personnel, which would reduce the risk of their injury or mortality. Herbicide application on Green Diamond lands would not result in adverse effects on fisher dens because the herbicide itself would not result in the removal or disturbance of potential den sites. No herbicide application is proposed on MCSD lands. However, mechanical treatments, manual snag and tree removal conducted during the fisher maternity season (i.e., the period during which young would be present in a den, approximately March 1–June 30) and within forest habitats suitable for fisher could result in destruction of maternity dens, or disturbance to active dens potentially resulting in abandonment and loss of young not yet capable of fleeing. Prescribed burning, which is not likely to result in physical destruction of maternity dens, but may result in disturbance of dens, could result in nest abandonment and loss of young during the most sensitive period (approximately March 1–May 1) (USFWS 2020b). The potential for treatment activities, including maintenance treatments, to result in adverse effects on fisher was examined in the Program EIR.

To avoid impacts on fisher on Green Diamond managed lands, the measures contained in the Green Diamond Resource Company Forest Habitat Conservation Plan (USFWS 2019a) would be implemented. These measures include a plan-wide monitoring program and avoidance of fisher dens should one be detected during monitoring or other means.

For treatments on MCSD lands, the following measures would apply for mechanical treatments and manual tree and snag removal; prescribed burning is not proposed for MCSD lands. Per SPR BIO-1, if it is determined that adverse effects on fisher would be avoided by conducting treatments outside of a season of sensitivity (e.g., maternity season), then mitigation would not be required. Adverse effects on fishers would be avoided for treatment activities that would occur outside of the fisher maternity season (March 1– May 31) (USFWS 2019a). If conducting treatments outside of the fisher maternity season is determined to be infeasible, then SPR BIO-10 would apply. Presence of fishers would be assumed, or focused surveys for fishers would be conducted within those treatment areas prior to implementation of mechanical treatments and manual tree and snag removal.

Focused surveys (conducted by a qualified RPF or biologist) for fisher would include an initial denning habitat assessment, and if denning habitat is present, the use of trail cameras, track plates, or other non-invasive survey methods to determine whether fishers are present within the treatment area, or presence of the species may be assumed. If baited trail cameras are used, the qualified RPF or biologist should obtain any required permits. If focused surveys are conducted and denning habitat is not present or fishers are not detected, then further mitigation for the species would not be required. If fishers are detected during focused surveys, or presence is assumed then Mitigation Measure BIO-2b would be implemented.

Under Mitigation Measure BIO-2b, the presence of an active fisher den site would be assumed, and a limited operating period would be applied that would prohibit mechanical treatments and manual tree and snag removal from March 1 through May 31. Alternatively, surveys of potential den sites would be conducted by a qualified RPF or biologist to determine if an active den or assumed active den is located within a treatment area. If an active den (or den assumed to be active) is identified, a no-disturbance buffer would be established at a minimum distance of 100 feet or larger as determined by the qualified RPF or biologist based on the treatment activities, topographical and vegetative screening, and existing disturbance in the area. No treatment activities would occur within this buffer until the den is no longer occupied as determined by the qualified RPF or biologist.

Habitat function for fisher would be maintained because WUI treatment activities, which make up approximately 3,296 acres of the 3,641-acre project area, would not result in removal of hardwood trees greater than 12 inches DBH with basal hollow or other complex structural features and conifers greater than 14 inches DBH, which are the most likely trees to provide den habitat for fishers. In addition, up to three softwood snags per acre that are greater than 12 inches DBH and are more than 100 feet from structures and/or public roads would be retained within WUI treatments. Furthermore, at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation would be retained per SPR HYD-4 which would continue to provide riparian habitat for fisher. Because vegetation retention in shaded fuel break treatments (335 acres) is described in terms of spacing and basal area (pursuant to the California Forest Practice Rules), these treatments may remove trees larger than the limits in the WUI retention standards. In shaded fuel breaks, treatments would retain tree spacing of approximately 10 to 40 feet apart depending on stand age and minimum basal area consistent with the California Forest Practice Rules, which would maintain habitat function for fisher in these areas, which are not likely to be used for denning due to the proximity to existing disturbance. Furthermore, Mitigation Measure BIO-2b would apply and retain high canopy habitat for fisher if the species is detected within the project area. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Northern California Ringtail

Northern California ringtail (*Bassariscus astutus raptor*) is primarily nocturnal, and typically occurs in riparian areas, forests (including stands of various ages), and shrub habitats (Attachment B). Potential denning habitat within the project area includes snags, large hardwoods, large conifers, and areas of dense shrubs within riparian areas and forest openings. The potential for treatment activities, including maintenance treatments, to result in adverse effects on ringtail was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on ringtail would be avoided by conducting treatments outside of a season of sensitivity (i.e., maternity season), then mitigation would not be required. Outside of the breeding season, resting ringtails would likely flee due to the presence of equipment, vehicles, or personnel, which would reduce the risk of their injury or mortality. Manual treatments (other than tree and snag removal), and herbicide application on Green Diamond lands would not result in adverse effects on ringtail dens because personnel would conduct these activities on foot, and the likelihood of a den being inadvertently destroyed would be very low. However, mechanical treatments, and manual tree and snag removal conducted within habitat suitable for ringtail during the maternity season (i.e., the period during which young would be present in a den, approximately April 15–June 30) could result in destruction of active dens potentially resulting in injury or mortality of female ringtails, which are less likely to flee from maternity dens, and loss of young not yet capable of fleeing. Adverse effects on ringtail would be avoided for mechanical treatments, and manual tree and snag removal in habitat suitable for ringtail that would occur outside of the ringtail maternity season (April 15–June 30) under SPR BIO-1.

If conducting prescribed burning, mechanical treatments, and manual tree and snag removal treatments within habitat suitable for ringtail outside of the ringtail maternity season is determined to be infeasible for certain treatment areas, then SPR BIO-10 would apply. No prescribed burning is proposed on MCSD lands. Presence of ringtail would be assumed, or focused surveys for ringtails would be conducted within suitable habitats in the treatment area before implementation of prescribed burning, mechanical treatments, or manual tree and snag removal. Surveys for ringtail would include the use of trail cameras, track plates, or other non-invasive survey methods to determine whether ringtails are present within the treatment area and would be conducted by a qualified RPF or biologist with any required permits. If focused surveys are conducted, and ringtails are not detected, then further mitigation for the species would not be required. If ringtails are detected during focused surveys, Mitigation Measure BIO-2a would be implemented. Under Mitigation Measure BIO-2a, surveys for ringtail dens would be conducted, and if active dens are found, a 0.25-mile no-disturbance buffer would be established around the den. The size of this buffer may be adjusted through consultation with CDFW. No treatment activities would occur within this buffer until the den is no longer occupied as determined by the qualified RPF or biologist.

If the presence of ringtail within the treatment area is assumed, then implementation of avoidance and minimization measures would be required pursuant to Mitigation Measure BIO-2a before and during implementation of prescribed burning, mechanical treatments and manual tree and snag removal in habitats suitable for ringtail between April 15 and June 30. Avoidance and minimization measures would include, but not be limited to, pre-treatment den surveys, daily sweeps of the treatment area, and biological monitoring.

Habitat function for ringtail would be maintained because WUI treatment activities, which make up approximately 3,296 acres of the 3,641 acre project area, would not result in removal of hardwood trees greater than 12 inches DBH with basal hollow or other complex structural features and conifers greater than 14 inches DBH, which are the most likely trees to provide den habitat for ringtails. In addition, up to three softwood snags per acre that are greater than 12 inches DBH and are more than 100 feet from structures and/or public roads would be retained within WUI treatments. Furthermore, at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation would be retained per SPR HYD-4 which would continue to provide habitat for ringtail. Because vegetation retention in shaded fuel break treatments (335 acres) is described in terms of spacing and basal area (pursuant to the California Forest Practice Rules), these treatments may remove trees larger than the limits in the WUI retention standards. In shaded fuel breaks, treatments would retain tree spacing of approximately 10 to 40 feet apart depending on stand age and minimum basal area consistent with the California Forest Practice Rules, which would maintain habitat function for ringtail in these areas, which are not likely to be used for denning due to the proximity to existing disturbance. On November 7, 2024, the HCRCD sent a copy of the PSA/Addendum to CDFW Region 1 staff describing the measures that would be taken to avoid mortality, injury, and disturbance to ringtail and to maintain habitat function in compliance with Mitigation Measure BIO-2a. No refinements to the measures for ringtail were made as a result of this consultation. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Special-Status Voles

Habitat for Sonoma tree vole (*Arborimus pomo*), a covered species under the Forest Habitat Conservation Plan (USFWS 2019a), is present within the older stands of trees in the riparian management zones (i.e., a zone at least 150 feet from Class I streams and 75 to 100 feet from Class II streams where additional canopy retention and other measures are required by the Green Diamond Aquatic Habitat Conservation Plan [NMFS and USFWS 2006]) within the project area. Sonoma tree voles prefer old growth or mixed old growth and mature forest habitat; however, the species can occur in other types of forests. The species nests most often in the canopy of live, large-diameter Douglas-fir trees (i.e., greater than approximately 20 inches DBH) (Dunk and Hawley 2009). White-footed voles (*Arborimus albipes*), which are not covered under the Forest Habitat Conservation Plan, nest under rocks, logs, and stumps and are highly associated with red alder and other hardwood stands along watercourses (Attachment B); therefore, habitat for white-footed vole would also be found exclusively in the riparian management zones within the project area.

Treatment activities within riparian management zones would not result in removal of living trees greater than 10 inches DBH. While some standing dead trees would be removed during treatments, dead trees would not provide sufficient cover for this species and likely would not be used as nest trees by Sonoma tree voles. Therefore, adverse

effects on Sonoma tree voles are unlikely to occur and mitigation would not be required. Similarly, mechanical treatments would not occur within the habitat for white-footed vole, and while manual treatments and prescribed burning could occur, these treatments are not likely to result in destruction of white-footed vole nests and injury or mortality of young because downed logs greater than 18 inches in diameter and 12 feet long where nests are most likely to be located would be retained by manual treatments, logs of this diameter are not likely to be consumed by low intensity prescribed burning, and would act as insulation for nests. No prescribed burning is proposed on MCSD lands. Therefore, adverse effects on white-footed voles are unlikely to occur and mitigation would not be required.

Habitat function for Sonoma tree vole and white-footed vole would be maintained because treatment activities and maintenance treatments within the riparian management zones where habitat for these species are located would not result in removal of hardwoods greater than 10 inches DBH (e.g., alder, big-leaf maple) up to 5 percent of residual basal area and conifers greater than 14 inches DBH. In addition, downed woody debris larger than 18 inches in diameter and greater than 12 feet in length would be retained. Furthermore, As required under SPR BIO-4, treatments in riparian habitats would retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation and would be limited to removal of uncharacteristic fuel loads (e.g., dead or dying vegetation, invasive plants). The potential for treatment activities and maintenance treatments to result in adverse effects on Sonoma tree vole and white-footed vole was examined in the Program EIR. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Special-Status Bats

Roosting habitat potentially suitable for three special-status bat species, pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), and western red bat (*Lasiurus frantzii*) is present within forest habitat in the project area. Within WUI treatment areas, hardwoods greater than 12 inches DBH and conifers greater than 14 inches DBH would not be removed by mechanical treatments or manual treatments, which would reduce direct loss of potential roosts for special-status bat species; however, because retention standards within shaded fuel break treatments are based on spacing and minimum basal area (pursuant to the California Forest Practice Rules), larger trees may be removed within shaded fuel break treatments than in WUI treatments. Large snags that could provide roosting habitat may be removed in both WUI and shaded fuel break treatment areas. Herbicide application on Green Diamond lands would not result in impacts on roosting special-status bats, because herbicide use would not remove trees that may serve as roosts or use loud equipment that may disturb roosts. Additionally, application of herbicides would occur in late summer or fall, outside of the maternity season for bats. However, the operation of mechanical equipment and loud hand tools (e.g., masticators, chainsaws) and prescribed burning near active roosts, and the removal of snags, may result in indirect and direct disturbance of roosting special-status bats potentially resulting in abandonment of the roost and loss of young. No prescribed burning is proposed on MCSD lands. The potential for treatment activities to result in adverse effects on special-status bats was examined in the Program EIR.

Pursuant to SPR BIO-1, if it is determined that adverse effects on special-status bats would be avoided by conducting treatments outside of the season of sensitivity (i.e., maternity season), then mitigation would not be required. Adverse effects on special-status bat maternity roosts would be avoided by conducting mechanical treatments, manual tree and snag removal treatments, and prescribed burning outside of the bat maternity season (April 1 through August 31; Caltrans 2004). If mechanical treatments, manual tree and snag removal treatments, or prescribed burning would occur during the bat maternity season, then SPR BIO-10 would apply, and focused surveys for these species would be conducted within habitat suitable for the species prior to initiation of these treatment activities. If special-status bat roosts are identified during focused surveys, Mitigation Measure BIO-2b for special-status bats would be implemented.

Under Mitigation Measure BIO-2b, a no-disturbance buffer of 250 feet would be established around active pallid bat, Townsend's big-eared bat, or western red bat roosts. Mechanical treatments, manual treatments, and prescribed burning would not occur within this buffer. If special-status bat roosts are identified in a treatment area where prescribed burning is planned, prescribed burning activities would be implemented outside of the bat maternity season, which is April 1 through August 31 (Caltrans 2004).

Habitat function for special-status bats would be maintained because WUI treatment activities, which make up approximately 3,296 acres of the 3,641 acre project area, and maintenance treatments would not result in removal of hardwood trees greater than 12 inches DBH with basal hollows or other complex structural features, and conifers greater than 14 inches DBH which are the most likely trees to provide roosting habitat for special-status bat species. In addition, up to three softwood snags per acre that are greater than 12 inches DBH and are more than 100 feet from structures and/or public roads would be retained to provide wildlife habitat in WUI treatment areas. Because vegetation retention in shaded fuel break treatments (335 acres) is described in terms of spacing and basal area (pursuant to the California Forest Practice Rules), these treatments may remove trees larger than the limits in the WUI retention standards that could be used for roosting by special-status bats. In shaded fuel breaks, treatments would retain tree spacing of approximately 10 to 40 feet apart depending on stand age, and shrubs approximately 10 to 20 feet apart, and minimum basal area consistent with the California Forest Practice Rules, which would maintain foraging habitat function for special-status birds in these areas. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Conclusion

The potential for treatment activities to result in adverse effects on special-status wildlife was examined in the Program EIR. This impact on special-status wildlife is within the scope of the Program EIR because the treatment activities and intensity of disturbance resulting from treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions and habitat characteristics present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on special-status wildlife is also the same, as described above and within the Program EIR.

SPRs that apply to this impact are BIO-1, BIO-2, BIO-3, BIO-4, BIO-10, HAZ-5, HAZ-6, HYD-1, HYD-3, HYD-4 and HYD-5. Biological resource mitigation measures that apply to project impacts under Impact BIO-2 are Mitigation Measure BIO-2a, BIO-2b, BIO-3a, BIO-3b, BIO-3c, and BIO-4. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT BIO-3

Initial vegetation treatments and ongoing maintenance treatments could result in direct or indirect adverse effects on sensitive habitats, including riparian habitat and sensitive natural communities as defined by CDFW (CDFW 2023). Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities are proposed; however, retreatment at too great a frequency could result in additional adverse effects. The potential for treatment activities, including maintenance treatments, to adversely affect sensitive habitats was examined in the Program EIR.

Based on review of the habitat types mapped in the project area by EVEG, the results of the reconnaissance-level survey conducted pursuant to SPR BIO-1, natural community ranges, and occurrence data, 11 sensitive natural communities (i.e., those with a rarity rank of S1, S2, or S3) may be present within the project area. The sensitive natural communities, the associated rarity rank, and the habitat type within which the communities may occur are presented in Table 4.5-2. Montane riparian sensitive habitat is known to occur in the project area (see Table 4.5-1).

During the reconnaissance-level survey conducted pursuant to SPR BIO-1, species associated with these sensitive natural communities were observed, including grand fir (*Abies grandis*), big leaf maple (*Acer macrophyllum*), tanoak (*Notholithocarpus densiflorus sp. densiflorus*), Sitka spruce (*Picea sitchensis*), Redwood (*Sequoia sempervirens*), Western hemlock (*Tsuga heterophylla*), small-flowered bulrush (*Scirpus microcarpus*), and salmonberry (*Rubus spectabilis*), as well as sedge (*Carex* spp.) genus associated with the Slough sedge - Water-parsley - Small-fruited bulrush marsh sensitive natural community. While all dominant species associated with sensitive natural communities included in Table 4.5-2 were not observed during the reconnaissance-level survey, these communities may be present. As a

result, before application of treatment activities, SPR BIO-3 would be implemented and a qualified RPF or biologist would identify sensitive natural communities in the project area to the alliance level pursuant to *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018a) and using the Manual of California Vegetation (including updated natural communities data at http://vegetation.cnps.org/).

Table 4.5-2 Sensitive Natural Communities Documented or with Potential to Occur in the Project Area

Sensitive Natural Community[1]	Rarity Rank[2]	California Wildlife Habitat Relationships Type
Grand fir forest (*Abies grandis*)	S2.1	Redwood
Bigleaf maple forest and woodland (*Acer macrophyllum*)	S3	Montane Hardwood-Conifer
Slough sedge - Water-parsley - Small-fruited bulrush marsh (*Carex obnupta - Oenanthe sarmentosa - Scirpus microcarpus*)	S3	Freshwater marsh
Hazelnut scrub (*Corylus cornuta var. californica*)	S2?	Coastal scrub
Tanoak forest (*Notholithocarpus densiflorus*)	S3.2	Montane Hardwood
Sitka spruce forest and woodland (*Picea sitchensis*)	S2	Redwood
Salmonberry – Wax myrtle scrub (*Rubus spectabilis – Morella californica*)	S3	Coastal scrub
Small-fruited bulrush marsh (*Scirpus microcarpus*)	S2	Fresh emergent wetland
Redwood forest and woodland (*Sequoia sempervirens*)	S3	Redwood
Western hemlock forest (*Tsuga heterophylla*)	S2	Douglas-fir
California bay forest and woodland (*Umbellularia californica*)	S3	Montane hardwood

[1] These are designated sensitive natural communities with a state rarity rank of S1 (critically imperiled), S2 (imperiled), or S3 (vulnerable).

[2] A question mark (?) denotes an inexact numeric rank because there are insufficient samples over the full expected range of the type, but existing information points to this rank. Older ranks, which need to be updated, may still contain a decimal "threat" rank of .1, .2, or .3, where .1 indicates very threatened status, .2 indicates moderate threat, and .3 indicates few or no current known threats.

Source: Manual of California Vegetation (CNPS 2024). Compiled by Ascent in 2024.

Riparian habitats are present within the project area. Riparian-associated species observed in the project area during the reconnaissance-level survey include alder, willow, sedge, and rush. EVEG data for the project area includes 126.8 acres of montane riparian habitat (Table 4.5-1). Under SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented for all treatment activities, which would limit the extent of treatment activities within riparian habitat. While these SPRs would reduce potential impacts on riparian habitat, the extent of riparian habitat within the treatment area has not been mapped and riparian habitat may be present outside of the areas encompassed within WLPZs. As a result, before application of treatment activities, SPR BIO-3 would be implemented to identify and map the extent of riparian habitat within a treatment area. As required under SPR BIO-4, treatments in riparian habitats would retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation and would be limited to removal of uncharacteristic fuel loads (e.g., dead or dying vegetation, invasive plants). Pursuant to SPR HYD-4, driving equipment and vehicles, and equipment servicing and fueling would be prohibited within the WLPZ. Herbicides, aquatic and terrestrial, would not be used within WLPZs of Class I and II watercourses (established per SPR HYD-5). No herbicide application is proposed on MCSD lands. In addition, before conducting any treatments in riparian habitat, the project proponent would notify CDFW pursuant to California Fish and Game Code 1602, when required.

Wetland delineations would be conducted to identify and map the extent of wetland habitats within treatment areas. Where wetland or other aquatic habitats are delineated, no-disturbance buffers of at least 25 feet would be established (per Mitigation Measure BIO-4, refer to Impact BIO-4 below). Therefore, there would be no impacts on sensitive natural communities associated with wetland habitats.

Green Diamond and MCSD would avoid impacts on sensitive natural communities by avoiding treatments in these communities. However, if avoiding treatment activities within identified sensitive natural communities would preclude achieving treatment objectives, then Mitigation Measure BIO-3a would apply in these areas so that the characteristics that qualify the communities as sensitive (e.g., dominant canopy species, canopy relative percentage of dominant species, species composition) are retained post-treatment to the extent feasible. Under Mitigation Measure BIO-3a, a qualified RPF or biologist would determine the natural fire regime, condition class, and fire return interval for each sensitive natural community. Initial and maintenance treatment activities in sensitive natural communities would be designed to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function. If habitat function of sensitive natural communities would not be maintained through implementation of Mitigation Measure BIO-3a, then Mitigation Measure BIO-3b and Mitigation Measure BIO-3c would apply, and unavoidable losses of these resources would be compensated through restoration or preservation of these vegetation types within or outside of the project areas.

The potential for treatment activities to result in adverse effects on sensitive habitats and designated sensitive natural communities, as described above, was examined in the Program EIR. This impact on sensitive habitats is within the scope of the Program EIR because the treatment activities and intensity of disturbance from implementing treatments would be consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the existing environmental conditions and habitat characteristics present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on sensitive habitats is also the same. SPRs that apply to this impact are BIO-1 through BIO-4, BIO-6, BIO-9, HYD-4, and HYD-5. The mitigation measures that apply to this impact are Mitigation Measure BIO-3a, Mitigation Measure BIO-3b, and Mitigation Measure BIO-3c. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT BIO-4

Initial vegetation treatments and ongoing maintenance treatments could result in direct or indirect adverse effects on state or federally protected wetlands. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities are proposed. The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the Program EIR.

Aquatic habitats that have been mapped in the project area by the National Wetlands Inventory (NWI) consist of freshwater emergent wetlands (5.71 acres), freshwater forested/shrub wetlands (9.69 acres), and riverine features (18.32 acres). Aquatic habitats that have been mapped in the project area by the California Aquatic Resources Inventory (CARI) consist of freshwater emergent wetlands (3.45 acres), freshwater forested/shrub wetlands (8.71 acres), and riverine features (8.81 miles). Resources mapped in these databases are identified primarily through aerial imagery and are not ground verified. During the reconnaissance-level survey, riverine features were observed in the project area, including Mill Creek and Lindsay Creek, and both freshwater emergent wetlands and freshwater forested/shrub wetlands were observed in the Lindsay Creek drainage.

Additional wetlands may be present throughout the project area that have not been identified or mapped, as well as ponds smaller than 1 acre (i.e., not considered a lake under Forest Practice Rules), seasonal wetlands, springs, and seeps. Pursuant to SPR HYD-4, a WLPZ of 50 to 100 feet adjacent to Class II streams and 75 to 150 feet adjacent to Class I streams within the treatment area would be implemented, and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV streams for all treatment activities. Establishment of WLPZs would result in avoidance of all stream and pond habitat during treatments; however, wetlands may be present outside of the WLPZs.

Mitigation Measure BIO-4 would apply to all treatment activities and would require that prior to beginning treatment in a treatment area, a qualified RPF or biologist would delineate the boundaries of wetland features; establish an appropriate buffer (with a minimum of 25 feet) around seasonal wetlands, springs, seeps, and other wetlands; and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). A larger buffer (e.g., 50 feet) may be required if wetlands or other aquatic habitats contain habitat potentially suitable for special-status plants or special-status wildlife (e.g., seaside watercress, northern clustered sedge, Northern red-legged frog, foothill yellow-legged frog, western pond turtle, special-status fish; see Impact BIO-1 and Impact BIO-2).

The potential for treatment activities to adversely affect state or federally protected wetlands was examined in the Program EIR. This impact on wetlands is within the scope of the Program EIR because the treatment activities and intensity of disturbance resulting from treatment activities would be consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, because the existing environmental conditions and habitat characteristics present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape) the potential impact on wetlands is also the same, as described above. SPRs that apply to this impact are BIO-1, HYD-1, and HYD-4. The biological resource mitigation measure that applies to this impact is Mitigation Measure BIO-4. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT BIO-5

Initial vegetation treatments and ongoing maintenance treatments could result in direct or indirect adverse effects on wildlife movement corridors and nurseries. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities are proposed. The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the Program EIR.

There are no essential connectivity areas mapped in the project area (CNDDB 2024b), and the area has been subject to regular timber harvest and recreational activities. However, based on the reconnaissance level-survey of the project area (i.e., pursuant to SPR BIO-1) and a review of relevant datasets, portions of the project area are likely used for local wildlife movement and nursery sites. During the reconnaissance level-survey, signs of elk (i.e., tracks and scat) using the roads within the project area for movement and use of existing openings by deer (i.e., tracks and scat) were observed.

Treatment activities are not likely to result in permanent impacts on wildlife movement through the project area, because habitat function would be maintained for wildlife. WUI treatments, which make up approximately 3,296 acres of the 3,641 acre project area, would not result in removal of hardwood trees greater than 12 inches DBH with basal hollow or other complex structural features and conifers greater than 14 inches DBH, which are the most likely trees to provide denning, nesting, and roosting habitat for wildlife species. In addition, up to three softwood snags per acre that are greater than 12 inches DBH and are more than 100 feet from structures and/or public roads would be retained in WUI treatment areas. While shaded fuel break treatments (335 acres) may remove some larger diameter trees, these treatments would retain tree spacing of approximately 10 to 40 feet apart depending on stand age, and shrubs approximately 10 to 20 feet apart, and minimum basal area consistent with the California Forest Practice Rules, which would maintain forested habitat for wildlife movement. Furthermore, at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation would be retained per SPR HYD-4 which would continue to provide riparian habitat for movement. If, during surveys conducted pursuant to SPR BIO-10, wildlife nursery sites (e.g., heron rookeries, deer fawning areas, common bat roosts) are detected, Mitigation Measure BIO-5 would apply to all treatment activities and a no-disturbance buffer would be established around these features, the size of which would be determined by a qualified RPF or biologist.

The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries is within the scope of the Program EIR, because the proposed treatment activities are consistent with those analyzed in the

Program EIR. The inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on wildlife movement corridors is also the same, as described above. Biological resource SPRs that apply to this impact are SPRs BIO-1, BIO-4, BIO-10, BIO-11, HYD-1, and HYD-4. The biological resource mitigation measure that applies to this impact is Mitigation Measure BIO-5. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT BIO-6

Common wildlife species that are known to occur within the project area and adjacent lands include mule deer (*Odocoileus hemionus*), Roosevelt elk, Steller's jay (*Cyanocitta stelleri*), chestnut-backed chickadee (*Poecile rufescens*), and dark-eyed junco (*Junco hyemalis*). Initial treatments and ongoing maintenance treatments could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds. Nesting habitat suitable for birds is present throughout the project area. Proposed treatment activities of all types conducted during the nesting bird season (February 1–August 31) could result in direct loss of active nests or disturbance to active nests from auditory and visual stimuli (e.g., heavy equipment, chainsaws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks. The potential for treatment activities to result in the reduction of habitat or abundance of common wildlife, including nesting birds, was examined in the Program EIR.

Common wildlife would benefit from implementation of SPR BIO-1 because this SPR requires that the project area be reviewed for potentially sensitive resources, including sensitive habitats and wildlife nursery sites. Pursuant to SPR BIO-2, all crew members and contractors would receive training prior to beginning work, which would describe the SPRs and mitigation measures designed to protect sensitive resources including common wildlife. The training would include guidance on when to stop work and what to do when wildlife is encountered during treatment activities. SPR BIO-3 requires surveys for sensitive natural communities and other sensitive habitats, which provide essential habitat for many common wildlife species. Implementation of SPR BIO-4 would require that the project is designed to avoid loss or degradation of riparian habitat function, which also serves as essential breeding and dispersal habitat for many common wildlife species. SPR BIO-12 would also apply, and for treatments implemented during the nesting bird season, a survey for common nesting birds would be conducted within the project area by a qualified RPF or biologist before treatment activities begin. If no active bird nests are observed during focused surveys, then additional mitigation would not be required. If active nests of common birds or raptors are observed during focused surveys, disturbance to the nests would be avoided by establishing an appropriate buffer around the nests, modifying treatments to avoid disturbance to the nests, or deferring treatment until the nests are no longer active as determined by a qualified RPF or biologist.

The potential for adverse effects on common wildlife, including nesting birds, is within the scope of the Program EIR because the treatment activities and extent of expected disturbance related to implementing treatment activities would be consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, because the existing environmental conditions and habitat characteristics present in areas outside the treatable landscape are essentially the same as those within the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape), the potential impact on common wildlife, including nesting birds, is also the same, as described above. SPRs that apply to this impact are SPR AD-1, BIO-1, BIO-2, BIO-3, BIO-4, and BIO-12. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT BIO-7

The project area is zoned by the Humboldt County General Plan as a Timber Production Zone, Agricultural Exclusion Zone, and Agricultural General, and is located outside of the Coastal Zone. The proposed treatment activities are consistent with the zoning of the project area and consistent with the Humboldt County General Plan policies for those zones (Chapter 4 Section A Part 1). The Humboldt County General Plan includes policies designed to protect rare, threatened, and endangered species; sensitive habitats (including sensitive fish and wildlife habitat); federally designated critical habitat; stream channels; wetlands; oak woodlands; Roosevelt elk habitat; migratory deer habitat; avian rookeries; and special-status plants; and to manage and control invasive plant species. CalVTP SPRs and mitigation measures would be consistent with most of these general plan policies.

The potential for treatment activities to conflict with local policies or ordinances was examined in the Program EIR. The potential for the treatment project to conflict is within the scope of the Program EIR because vegetation treatment projects implemented under the CalVTP that are subject to local policies or ordinances would be required to comply with any applicable county, city, or other local policies, ordinances, and permitting procedures related to protection of biological resources, per SPR AD-3. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the project area boundary, the existing regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential for conflicts with local policies or ordinances is also the same, as described above. The SPRs that applies to this impact are SPR AD-1, AD-3. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT BIO-8

A portion of the project area is within the plan area for the Forest Habitat Conservation Plan (USFWS 2019a), and the Aquatic Habitat Conservation Plan and Candidate Conservation Agreement with Assurances (NMFS and USFWS 2006). These plans would apply only to land managed by Green Diamond and for covered activities implemented by Green Diamond and would not apply to the portion of the project area managed by the MCSD. The proposed treatment activities in this PSA/Addendum are covered activities under these habitat conservation plans, with the exception of herbicide application, which is not a covered activity under either plan. The impacts from the proposed treatment activities on covered species from these habitat conservation plans are disclosed in Impact BIO-2.

The Forest Habitat Conservation Plan provides Green Diamond with incidental take coverage for northern spotted owl, and future take coverage for fisher and Sonoma tree vole should these species be listed in the future. These covered species could be affected by Green Diamond's treatment activities as part of this project. Red tree vole (*Arborimus longicaudus*) is also a covered species under the plan; however, the project area is outside of the range of this species. The Aquatic Habitat Conservation Plan provides incidental take coverage to Green Diamond for coho salmon, Chinook salmon, and steelhead. In addition, the plan provides incidental take coverage for coast cutthroat trout, Pacific tailed frog, and southern torrent salamander, if those species are listed in the future.

Covered activities under the Forest Habitat Conservation Plan and Aquatic Habitat Conservation Plan applicable to the project would be felling and bucking timber, yarding timber, timber salvage, site preparation (e.g., chipping, mastication [mechanical cutting], prescribed burning) (USFWS 2019a). In addition, the construction of shaded fuel breaks for the project, while not referenced in the plan, is analogous to precommercial thinning addressed in the plan as a covered activity. Precommercial thinning and shaded fuel break construction both involve thinning dense young forest trees by mechanical or manual treatments. The Forest Habitat Conservation Plan does not include herbicide application as a covered activity. However, as described above, under Impact BIO-2, herbicide application on Green Diamond lands would not result in adverse effects on nesting northern spotted owls, fisher, or Sonoma tree voles, because herbicide treatments would not involve the use of loud and continuous noise from equipment or tools, result in loss of nesting or denning sites, or substantial visual stimuli from human presence that would result in disturbance of maternity dens or nests. Similarly, the Aquatic Habitat Conservation Plan also does not include herbicide application as a covered activity; however, impacts on covered species would be avoided through the application of SPRs HAZ-5,

HAZ-6, and HYD-5, which would require a spill response plan, compliance with all herbicide application regulations, locating mixing sites away from waterways, restricting application during precipitation events, and other measures.

Incidental take coverage under both the Aquatic Habitat Conservation Plan and Forest Habitat Conservation Plan is contingent upon implementation of Conservation Measures outlined in those plans. These Conservation Measures include promoting a habitat mosaic across the plan area; retaining and recruiting of targeted habitat elements; minimizing harm to individual northern spotted owls, fishers, and Sonoma tree voles; maintaining cool water temperatures; minimizing human-caused sediment inputs; and maintaining or increasing populations of amphibian covered species. Green Diamond is required to comply with terms of the Aquatic Habitat Conservation Plan and Forest Habitat Conservation Plan, including the Conservation Measures, for all treatment activities implemented as part of the project.

Therefore, Green Diamond's participation in the project would not result in a conflict with implementation of the Aquatic Habitat Conservation Plan and the Forest Habitat Conservation Plan. Additionally, these plans would apply only to land managed by Green Diamond and for covered activities implemented by Green Diamond and would not apply to the portion of the project area managed by the MCSD. The project area is not within the plan area of any other adopted Habitat Conservation Plan or natural community conservation plans (NCCP). Therefore, treatments implemented in the portion of the project area managed by the MCSD would not conflict with any adopted Habitat Conservation Plan or NCCP. The SPR that applies to this impact is SPR AD-1.

As explained in the CalVTP Program EIR, project consistency with an adopted Habitat Conservation Plan is a legal requirement. Therefore, and consistent with the determination in the Program EIR, there would be no impact. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the project area boundary, the existing regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential for conflicts with NCCPs and Habitat Conservation Plans is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW BIOLOGICAL RESOURCE IMPACTS

The proposed project is consistent with the treatment types and activities considered in the CalVTP Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to biological resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape.

Therefore, the impacts of the proposed treatment project are also consistent with those considered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape, and changes to SPRs and Mitigation Measures would not give rise to any new significant impacts not addressed in the Program EIR as described above. Therefore, no new impact related to biological resources would occur that is not covered in the Program EIR.

4.6 GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
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	AQ-3 AQ-4 GEO-1 GEO-2 GEO-3 GEO-4 GEO-5 GEO-6 GEO-7 GEO-8	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	AD-3 AQ-3 GEO-3 GEO-4 GEO-7 GEO-8	NA	LTS	No	Yes

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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 Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

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

Discussion

The project area is located in western Humboldt County, approximately 2 miles from the California coast. This area is within the California Coast Ranges geomorphic province. As discussed in Section 3.7.1, "Environmental Setting," of the CalVTP Program EIR, the California Coast Ranges are primarily composed of Jurassic- to Cretaceous-age (about 65–150 million years old) marine sedimentary and volcanic rocks of the Franciscan assemblage. The Franciscan assemblage consists of partially metamorphosed greenstone, basalt, chert, and graywacke that originated as sea floor sediments. The coastline along this province is uplifted, wave-cut, and terraced.

Based on information from the US Department of Agriculture Natural Resource Conservation Service Web Soil Survey, soils in the project area are generally Lepoil-Candymountain Complex, Lepoil-Espa-Candymountain Complex, and Coppercreek-Slidecreek-Tectah Complex with minor inclusions. These are productive timber soils that are well drained sand and clay loams with a restrictive layer occurring around 80 inches deep. Topography is generally

moderate with slopes ranging from flat to about 40 percent, with steep slopes up to 65 percent occurring near watercourses and on the slopes above the headwaters of Mill Creek on the west and Tory and Lindsay Creeks on the east. As discussed in Section 4.3, "Air Quality," of this PSA/Addendum, no portions of the project area contain naturally occurring asbestos (DOC 2000; USGS 2011).

IMPACT GEO-1

Vegetation treatment activities implemented within the project area would include mechanical treatment, manual treatment, prescribed burning (pile burning and broadcast burning), and targeted ground application of herbicides to conduct WUI fuel reduction and shaded fuel break treatments. No prescribed burning or herbicide application is proposed on MCSD lands. These activities could result in varying levels of soil disturbance and have the potential to increase the rates of erosion and loss of topsoil. As discussed in Section 4.5, "Biological Resources," a portion of the project area is within the plan area for the Forest Habitat Conservation Plan (USFWS 2019a) and the Aquatic Habitat Conservation Plan and Candidate Conservation Agreement with Assurances (NMFS and USFWS 2006). These plans include measures to avoid the potential for erosion caused by management activities. Examples of measures include retaining canopy coverage within riparian management zones, establishing equipment exclusion zones, applying treatments after ground disturbance (e.g., seeding and mulching), adhering to seasonal restrictions for ground disturbance, implementing slope stability measures, and complying with site preparation standards. These measures would only apply to land managed by Green Diamond and for covered activities implemented by Green Diamond.

The potential for these treatment activities to cause substantial erosion or loss of topsoil was examined in the Program EIR. Mechanical treatments using heavy machinery are the most likely to cause soil disturbance that could lead to substantial erosion or loss of topsoil, especially in areas that contain steep slopes, or in areas that previously experienced fire. This impact is within the scope of the Program EIR because the use and type of equipment and extent of vegetation removal, and intensity of prescribed burning are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project site, the existing environmental conditions present in the areas outside of the treatable landscape are essentially the same within and outside the treatable landscape (i.e., the area located outside of the treatable landscape, within the project area, consists of 3.4 acres that run adjacent to the treatable landscape); therefore, the potential impact related to soil erosion is also the same as described in the Program EIR. SPRs applicable to this impact are AQ-3, AQ-4, and GEO-1 through GEO-8. Impacts related to soil erosion resulting from the proposed project would not constitute a new or substantially more severe significant impact than what was covered in the Program EIR.

IMPACT GEO-2

Treatment activities would include mechanical treatment, manual treatment, prescribed burning (pile burning and broadcast burning), and targeted ground application of herbicides. No prescribed burning or herbicide application is proposed on MCSD lands. Areas with likely landslide activity are identified within the project area (USGS 2024). Given the history of landslides in the area as well as the variable topography and wet winter conditions, there is the potential for landslides in the project area. The potential for treatment activities to increase landslide risk was examined in the Program EIR.

Although most mechanical treatment would occur from existing roads or skid trails or on flat to moderate slopes (generally up to 45 percent or as appropriate), and manual treatment methods would generally be employed on slopes greater than 45 percent, SPR GEO-8 would apply if a treatment area contains steep slopes (i.e., slopes greater than 50 percent). SPR GEO-8 would require that an RPF or licensed geologist evaluate steep slopes for unstable areas/soils and identify measures to avoid landslides, erosion, or loss of topsoil during treatment activities. Furthermore, because the treatments would reduce overall wildfire risk, they would also decrease post-wildfire landslide risks. In addition, as discussed in Section 4.5, "Biological Resources," a portion of the project area is within the plan area for the Forest Habitat Conservation Plan (USFWS 2019a) and the Aquatic Habitat Conservation Plan and Candidate Conservation Agreement with Assurances (NMFS and USFWS 2006). These plans include measures, such as stream

buffer prescriptions, land management restrictions, slope stability analyses, and stream monitoring, to avoid adverse effects from landslides caused by management activities. The measures from these plans would only apply to land managed by Green Diamond and for covered activities implemented by Green Diamond.

This impact is within the scope of the Program EIR because the extent of vegetation removal, intensity of prescribed burning, and characteristics of the geographical terrain are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the range of slopes and landslide conditions present in the areas outside of the treatable landscape are the same within and outside the treatable landscape (i.e., the area located outside of the treatable landscape, within the project area, consists of 3.4 acres that run adjacent to the treatable landscape); therefore, the potential impact related to landslide risk is also the same as described in the Program EIR. SPRs applicable to this impact are AQ-3 and GEO-3, GEO-4, GEO-7, and GEO-8. As explained above, impacts related to landslide risk resulting from the proposed project would not constitute new or substantially more severe significant impact than what was covered in the Program EIR.

NEW GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatment project are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.7.1, "Environmental Setting," and Section 3.7.2, "Regulatory Setting," in Volume II of the Final Program EIR). Within the boundary of the project area, the existing environmental and regulatory conditions pertinent to geology and soils that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. Therefore, no new impact related to geology, soils, paleontology, or mineral resources would occur that is not covered in the Program EIR.

4.7 GREENHOUSE GAS EMISSIONS

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
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	AD-3	NA	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	PSU	Impact GHG-2, pp. 3.8-11 – 3.8-17	Yes	AD-3 AQ-3	GHG-2	SU	No	Yes

Notes: LTS = less than significant; PSU = potentially significant and unavoidable; SU = significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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

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

Discussion

IMPACT GHG-1

Use of vehicles and mechanical equipment and prescribed burning during initial and maintenance treatments would result in greenhouse gas (GHG) emissions. No prescribed burning is proposed on MCSD lands. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the Program EIR. Consistent with the Program EIR, although GHG emissions would occur from equipment and vehicles used to implement treatments, the purpose of the proposed project is to reduce wildfire risk, which could reduce GHG emissions and increase carbon sequestration over the long term. This impact is within the scope of the Program EIR because the proposed activities, as well as the associated equipment, duration of use, and resulting GHG emissions, are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the same plans, policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape, as well as areas within the treatable landscape; therefore, the GHG impact is also the same, as described above. SPR AD-3, which requires consistency with local plans, policies, and ordinances, is applicable to this impact. 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. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT GHG-2

Use of vehicles and mechanical equipment and prescribed burning during initial and maintenance treatments would result in GHG emissions. No prescribed burning is proposed on MCSD lands. The potential for treatments under the CalVTP to generate GHG emissions was examined in the Program EIR. This impact is within the scope of the Program EIR because the proposed activities, as well as the associated equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions related to wildfire are consistent with those analyzed in the Program EIR. Mitigation Measure GHG-2 would be implemented and would reduce GHG emissions associated with prescribed burning. However, emissions generated by the proposed treatments would still contribute to the annual emissions generated by the CalVTP, and this impact would remain significant and unavoidable, consistent with, and for the same reasons described in, the Program EIR. SPR AD-3 is applicable to this impact. SPR AQ-3 is also applicable to this treatment and would document in a Burn Plan that includes methods for reducing GHG emissions can feasibly be integrated into the treatment design. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the climate conditions present in the areas outside the treatable landscape are the same as those within the treatable landscape; therefore, the GHG impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW IMPACTS RELATED TO GHG EMISSIONS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatments are consistent with the applicable regulatory and environmental conditions presented in the CalVTP Program EIR (refer to Section 3.8.1, "Regulatory Setting," and Section 3.8.2, "Environmental Setting," in Volume II of the Final Program EIR). Including land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to the climate conditions that are present in the areas outside the treatable landscape are the same as those within the treatable landscape (i.e., the area located outside of the treatable landscape, within the project area, consists of 3.4 acres that run adjacent to the treatable landscape); therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to GHG emissions would occur.

4.8 ENERGY RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
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

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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

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

Discussion

IMPACT ENG-1

Use of vehicles, mechanical equipment, and some manual equipment (e.g., chainsaws) during initial treatment and treatment maintenance activities would result in energy consumption through fossil fuels. The use of fossil fuels for equipment and vehicles was examined in the Program EIR. The consumption of energy during implementation of the treatment project is within the scope of the Program EIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, inclusion of the 3.4 acre portion of the project area outside the treatable landscape would not result in a substantially greater level of energy consumption than the remaining approximately 3,638 acres of the project area within the treatable land. Therefore, the energy impact is also the same, as described above, which is consistent with that described in the Program EIR. No SPRs are applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

NEW ENERGY RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR.

However, within the boundary of the project area, the existing environmental conditions pertinent to energy resources outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the Program EIR. The inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to energy resources would occur.

4.9 HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

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

Notes: LTS = less than significant; LTSM = less than significant with mitigation; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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 Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

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

Discussion

IMPACT HAZ-1

Initial vegetation treatments and ongoing maintenance treatments would include manual treatments, mechanical treatments, prescribed burning, and targeted ground application of herbicides. No prescribed burning or herbicide application is proposed on MCSD lands. These treatment activities would require the use of fuels and related accelerants, which are hazardous materials. The potential for treatment activities to cause a significant health hazard from the use of hazardous materials was examined in the Program EIR. This impact is within the scope of the Program

EIR because the types of treatments and associated equipment and types of hazardous materials that would be used are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the exposure potential and regulatory conditions are the same within and outside the treatable landscape; therefore, the hazard material impact is also the same as described in the Program EIR. SPR HAZ-1 and HYD-4 are applicable to the project. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HAZ-2

Initial vegetation treatments and ongoing maintenance treatments on Green Diamond lands would include the application of herbicides using ground-based methods, such as using a backpack hand-applicator or painting herbicide onto cut stems. No herbicide application is proposed on MCSD lands. No aerial spraying of herbicides would occur. All herbicide application would comply with EPA and California Department of Pesticide Regulation label standards. In addition, herbicides would be applied by licensed applicators in compliance with all laws, regulations, and herbicide label instructions, consistent with herbicide use described in the Program EIR. The potential for treatment activities to cause a significant health hazard from the use of herbicides was examined in the Program EIR. This impact is within the scope of the Program EIR because the types of herbicides (i.e., clopyralid, glyphosate, velpar, imazapyr, sulfomenturon methyl, triclopyr, nonylphenol 9 ethoxylates, esplanade) and application methods that would be used, which are limited to ground-based applications, are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the exposure potential is the same within and outside the treatable landscape; therefore, the hazardous materials impact is also the same; therefore, the potential to cause a significant health hazard from the use of herbicides is not substantially greater than described in the PEIR. SPRs HAZ-5 through HAZ-9 are applicable to the project. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HAZ-3

Initial and maintenance treatments would include soil disturbance and prescribed burning on Green Diamond lands, which could expose workers, the public, or the environment to hazardous materials if a contaminated site is present within the project area. No prescribed burning is proposed on MCSD lands. The potential for workers participating in treatment activities to encounter contamination that could expose them, the public, or the environment to hazardous materials was examined in the Program EIR. This impact was identified as potentially significant in the Program EIR because hazardous materials sites could be present within treatment sites throughout the large geographic extent of the treatable landscape, and the feasibility of implementing mitigation for exposure of people or the environment to hazards resulting from soil disturbance or burning in a hazardous materials site was uncertain.

As directed by Mitigation Measure HAZ-3, database searches for hazardous materials sites within the project area have been conducted. One leaking underground storage tank site (Draut Residence [T0602300304]) was identified within 0.25 mile of the project area; however, the site has been remediated and closed (SWRCB 2024). No other hazardous materials sites were identified within 0.25 mile of any of the treatment areas (DTSC 2024; CalEPA 2024; SWRCB 2024). Therefore, after the implementation of Mitigation Measure HAZ-3, it was determined that no hazardous materials sites would be disturbed by treatments and this impact would be less than significant. This impact is within the scope of the Program EIR because the types of treatments and associated equipment that could potentially expose workers or the environment to hazardous materials are consistent with those analyzed in the Program EIR. The inclusion of land in the project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the potential to encounter hazardous materials and the regulatory conditions are the same within and outside of the treatable landscape; therefore, the hazardous materials impact is the same as described in the Program EIR. This impact of the proposed Project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions are within and outside of the treatable landscape identified in the Program EIR; therefore, the impacts are the same and are consistent with those covered in the Program EIR. The inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to hazardous materials or public health and safety would occur.

4.10 HYDROLOGY AND WATER QUALITY

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
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	AD-3 AQ-3 BIO-4 GEO-4 GEO-6 HYD-2 HYD-4	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	AD-3 BIO-1 GEO-1 GEO-2 GEO-3 GEO-4 GEO-5 GEO-7 GEO-8 HYD-1 HYD-2 HYD-4 HYD-5 HAZ-1 HAZ-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	--	--	--	--	--
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	LTS	Impact HYD-4, pp. 3.11-30 – 3.11-31	Yes	AD-3 BIO-4 HAZ-5 HAZ-7 HYD-2 HYD-5	NA	LTS	No	Yes

Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
the Ground Application of Herbicides								
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-31	Yes	AD-3 GEO-5 HYD-2 HYD-4 HYD-6	NA	LTS	No	Yes

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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 Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

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

Discussion

The project area is within the Mad River watershed. Major watercourses on the south and east sides of the project area, such as Tory and Lindsay Creeks trend northwest/southeast and flow to the south into the Mad River. Watercourses on the west side of the project area flow westward into Mill Creek and then into Mad River, except for one minor watercourse, Duke Creek, which flows into Strawberry Creek then westward into the Pacific Ocean. The seasonal and perennial watercourses that traverse the project area support diverse riparian habitat communities, and perennial watercourses (i.e., Essex Gulch, Lindsay Creek, Mill Creek, and Widow White Creek) are known to support populations of special-status salmonids. Approximately 1,099 acres within the project area occur in riparian management zones, as defined in Green Diamond's Aquatic Habitat Management Plan (NMFS and USFWS 2006).

Several of the impacts below (i.e., HYD-1 through 4) evaluate compliance with water quality standards or waste discharge requirements. All impacts include implementation of SPR HYD-1, which requires compliance with such water quality regulations. The State Water Resources Control Board is requiring all projects using the CalVTP Program EIR to follow the requirements of their Vegetation Treatment General Order, which would meet the requirements of SPR HYD-1. Users of the CalVTP PSA process are automatically enrolled in the General Order and are required to implement all applicable SPRs and mitigation measures from the Program EIR. The General Order requires implementing entities to comply with any applicable Basin Plan prohibitions.

IMPACT HYD-1

Initial and maintenance treatments would include prescribed burning on Green Diamond lands. No prescribed burning is proposed on MCSD lands. Ash and debris from treatment areas could be washed by runoff into adjacent drainages and streams. Although most treatment areas would avoid streams and watercourses, WLPZs ranging from 50 to 150 feet would be implemented for Class I and Class II streams that are within treatment areas pursuant to SPR HYD-4. Further, as discussed in Section 4.5, "Biological Resources," a portion of the project area is within the plan area for the Forest

Habitat Conservation Plan (USFWS 2019a) and the Aquatic Habitat Conservation Plan and Candidate Conservation Agreement with Assurances (NMFS and USFWS 2006). These plans include measures to reduce sediment delivery to watercourses from prescribed burning. Examples of measures include designing prescribed burning operations to produce low intensity burns; limiting fireline construction, reconstruction, and use within riparian management and equipment exclusion zones; and requiring that firelines not in riparian management or equipment exclusion zones have drainage facilities adequate to prevent the delivery of sediments. The measures from these plans would only apply to land managed by Green Diamond and for covered activities implemented by Green Diamond.

The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of low-intensity prescribed burns and associated impacts to water quality are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the portion of the project area outside of the treatable landscape covers a small amount of land (3.4 acres) and is located adjacent to treatable land defined in the Program EIR and within the same watershed (i.e., Mad River); thus. because the treatment types and activities proposed for the project are consistent with those included in the Program EIR, the water quality impact from prescribed burning is also the same, as described above, which is consistent with that described in the Program EIR. SPRs applicable to this impact are AQ-3, BIO-4, GEO-4, GEO-6, HYD-2, and HYD-4. Mitigation Measure BIO-3b would minimize streamside vegetation loss and require restoration where loss is unavoidable. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HYD-2

Initial treatments would include mechanical and manual treatment activities. Although most treatment areas would avoid streams and watercourses, WLPZs ranging from 50 to 150 feet would be implemented for any watercourses that are within treatment areas pursuant to SPR HYD-4. Further, as discussed in Section 4.5, "Biological Resources," a portion of the project area is within the plan area for the Forest Habitat Conservation Plan (USFWS 2019a) and the Aquatic Habitat Conservation Plan and Candidate Conservation Agreement with Assurances (NMFS and USFWS 2006). These plans include measures to reduce sediment delivery to watercourses from management activities. Examples of measures include retaining canopy coverage within riparian management zones, establishing equipment exclusion zones, applying treatments after ground disturbance (e.g., seeding and mulching), adhering to seasonal restrictions for ground disturbance, implementing slope stability measures, and complying with site preparation standards. These measures would only apply to land managed by Green Diamond and for covered activities implemented by Green Diamond.

The potential for mechanical and manual treatment activities to violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of heavy equipment and hand-held tools to remove vegetation and associated impacts to water quality are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the portion of the project area outside of the treatable landscape covers a small amount of land (3.4 acres), and is located adjacent to treatable land defined in the Program EIR and within the same watershed (i.e., Mad River); thus. because the treatment types and activities proposed for the project are consistent with those included in the Program EIR, the water quality impact from manual and mechanical treatments is also the same, as described above, which is consistent with that described in the Program EIR. SPRs applicable to this impact are BIO-1, GEO-1, GEO-2, GEO-3, GEO-4, GEO-5, GEO-7, GEO-8, HYD-1, HYD-4, HYD-5, HAZ-1, and HAZ-5. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HYD-3

This impact does not apply to the proposed project because prescribed herbivory is not a proposed treatment activity.

IMPACT HYD-4

Initial and maintenance treatments would include the use of herbicides on Green Diamond lands to maintain native species composition and to prevent the growth and spread of invasive species within the treatment areas when other treatment methods are not effective, feasible, or would result in greater potential impacts. No herbicide application is proposed on MCSD lands. Herbicide application would be limited to ground-based methods, such as painting herbicide onto cut stems, a backpack hand-applicator, or hack and squirt. All herbicide application would comply with EPA and California Department of Pesticide Regulation label standards. The potential for the use of herbicides to violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of herbicides to remove vegetation and associated impacts to water quality are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the portion of the project area outside of the treatable landscape covers a small amount of land (3.4 acres), and is located adjacent to treatable land defined in the Program EIR and within the same watershed (i.e., Mad River); thus. because the treatment types and activities proposed for the project are consistent with those included in the Program, the water quality impact from use of herbicides is also the same, as described above, which is consistent with that described in the Program EIR. SPRs applicable to this impact are BIO-4, HAZ-5, HAZ-7, and HYD-5. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HYD-5

Initial and maintenance treatments could cause ground disturbance and erosion, which could directly or indirectly modify existing drainage patterns. The potential for treatment activities to substantially alter the existing drainage pattern of a project treatment site was examined in the Program EIR. This impact to site drainage is within the scope of the Program EIR because the types of treatments and treatment intensity are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the portion of the project area outside of the treatable landscape covers a small amount of land (3.4 acres), and is located adjacent to treatable land defined in the Program EIR and within the same watershed (i.e., Mad River); thus, because the treatment types and activities proposed for the project are consistent with those included in the Program, the impact related to alteration of site drainage patterns is also the same, as described above, which is consistent with that described in the Program EIR. SPRs applicable to this impact are HYD-4, HYD-6, and GEO-5. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW HYDROLOGY AND WATER QUALITY IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatment project are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.11.1, "Environmental Setting," and Section 3.11.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR constitute a revision to the Program. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to hydrology and water quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to hydrology and water quality would occur.

4.11 LAND USE AND PLANNING, POPULATION AND HOUSING

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

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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 Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

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

Discussion

IMPACT LU-1

Initial and maintenance treatment activities would occur within Humboldt County on land owned by Green Diamond and MCSD. As noted in Section 4.12, "Noise," below, the Humboldt County Code does not contain any noise standards or noise-exemption time periods related to construction activity. As noted in Section 4.12, "Noise," below, treatment activities would primarily take place during daytime hours and the short-term noise levels identified in the Humboldt County General Plan would not apply to the treatment activities (Humboldt County 2017). Treatment activities using mechanized equipment would occur intermittently between approximately 4:00 a.m. and 5:30 p.m., Monday through Friday. On lands owned by Green Diamond, treatment activities involving the use of mechanized equipment would be prohibited within 500 feet of residences between 4:00 a.m. and 7 a.m. On lands owned by MCSD, treatment activities would occur between 7 a.m. and 5:30 p.m. Therefore, treatment activities would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours.

The potential for vegetation treatment activities to cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation was examined in the Program EIR. This impact is within the scope of the Program EIR because the treatment types and activities are consistent with those analyzed in the Program EIR. Green Diamond and MCSD would adhere to SPR AD-3 and no conflicts with County ordinances or any other land use plan, policy, or regulation would occur. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent considered in the Program EIR. However, the portion of the project

area outside of the treatable landscape is limited to 3.4 acres and is not subject to land use plans, policies, or regulations additional to application to portions of the project area within the treatable landscape. Therefore, the land use impact is also the same, as described above, which is consistent with that described in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

IMPACT LU-2

The potential for initial treatments and maintenance treatments to result in substantial population growth as a result of increases in demand for employees was examined in the Program EIR. Impacts associated with short-term increases in the demand for workers during implementation of the treatment project are within the scope of the Program EIR because the overall number of workers required for implementation of the treatments is consistent with (less than) the crew size analyzed in the Program EIR for the types of treatments proposed (i.e., one crew of 3-6 workers for mechanical treatments, and hand crews of 8-20 members for manual treatments, 2-10 crew members for pile burning, 10-50 crew members for broadcast burning, and 3-16 workers for herbicide treatments). No prescribed burning or herbicide application is proposed on MCSD lands.

The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the portion of the project area outside of the treatable landscape is limited to 3.4 acres and is adjacent to the treatable landscape. The inclusion of this area would not change the number of employees needed to support the project. Therefore, the impacts associated with unplanned population growth are also the same, as described above, which is consistent with that described in the Program EIR. No SPRs are applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

NEW LAND USE AND PLANNING, POPULATION AND HOUSING IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.3.1, "Environmental Setting," and Section 3.3.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed treatment areas constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to new significant impacts not addressed in the Program EIR. Therefore, no new impact related to land use and planning would occur that is not covered in the Program EIR.

4.12 NOISE

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation	LTS	Impact NOI-1, pp. 3.13-9 – 3.13-12; Appendix NOI-1	Yes	AD-3 NOI-1 NO1-2 NOI-3 NOI-4 NOI-5 NOI-6	NA	LTS	No	Yes
Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated Single-Event Noise Levels During Treatment Activities	LTS	Impact NOI-2, p. 3.13-12	Yes	NOI-1	NA	LTS	No	Yes

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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

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

Discussion

IMPACT NOI-1

Initial vegetation treatments and ongoing maintenance treatments would require the use of heavy, noise-generating equipment. Manual, mechanical, and prescribed burning treatment activities as well as chipping/mastication and pile and broadcast burning occurring adjacent to sensitive land uses could temporarily expose those receptors to noise levels that exceed local standards. No prescribed burning is proposed on MCSD lands. The potential for a substantial short-term increase in ambient noise levels from the use of heavy equipment was examined in the Program EIR. This impact is within the scope of the Program EIR because the number and types of equipment proposed, and equipment use being temporary and sporadic, are consistent with the assumptions analyzed in the Program EIR. The proposed treatments would not require the use of helicopters, which was the loudest type of equipment, and therefore the most severe noise impact, evaluated in the Program EIR.

Humboldt County Code does not contain any noise standards or noise-exemption time periods related to treatment activities and the short-term noise standards identified in the Humboldt County General Plan would not apply to the treatment activities (Humboldt County 2017).

As discussed in the Program EIR, noise levels generated by the types of individual equipment that would be used for the project would range from 75 to 85 decibels (dB) at 50 feet from the noise source. Though multiple pieces of heavy equipment would be operated simultaneously to implement a treatment, they would typically be spread out (i.e., usually more than 100 feet apart) rather than operating next to each other. This is particularly true of larger, heavy-duty off-road equipment, such as masticators and chippers. Noise-generating equipment would be used intermittently between approximately 4:00 a.m. and 5:30 p.m., Monday through Friday. On lands owned by Green Diamond, treatment activities involving the use of mechanized equipment would be prohibited within 500 feet of residences between 4:00 a.m. and 7 a.m. On lands owned by MCSD, treatment activities would occur between 7 a.m. and 5:30 p.m. Therefore, treatment activities would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. The equipment noise levels discussed above are expected at 50 feet from the noise source. Therefore, there would be additional attenuation for distance, vegetation, and building materials that would result in interior noise levels being lower than the 75 to 85 dB levels estimated for equipment. Treatments would also be dispersed throughout the 3,641-acre project area, distributed across distinct treatment areas, so that short-term noise increases at any one sensitive receptor would be limited.

SPRs AD-3 and NOI-1 through NOI-6 are applicable to this treatment. With implementation of SPR AD-3, noise levels associated with vegetation treatment activities under the CalVTP would not exceed local land use/noise compatibility standards, and noise exposure attributed to vegetation treatment activities under the CalVTP would not generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of local standards. For any sensitive receptors (e.g., residential land uses, schools, places of worship) that are within 1,500 feet of a treatment area, SPR NOI-6 would also apply. Sensitive receptors are located immediately west of the project area that could be within 1,500 feet of proposed treatments. There are also recreational uses (i.e., trails) within the project area (i.e., within 1,500 feet of proposed treatments). Per SPR NOI-6, established recreational areas within 1,500 feet of the project would be notified prior to mechanical treatments.

The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the portion of the project area outside of the treatable landscape is limited to 3.4 acres and is adjacent to the treatable landscape. As noted above, on lands owned by Green Diamond, treatment activities involving the use of mechanized equipment would be prohibited within 500 feet of residences between 4:00 a.m. and 7 a.m. On lands owned by MCSD, treatment activities would occur between 7 a.m. and 5:30 p.m. Therefore, treatment activities would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. Thus, because the timing of treatment activities would be limited to normal waking hours, within close proximity to sensitive receptors, the noise impact would also be the same, as described above, which is consistent with that described in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT NOI-2

Initial and maintenance treatments would involve large trucks hauling heavy equipment to the project area. These haul truck trips would be dispersed on area roadways providing access to the project area including, but not limited to Murray Road, US 101, and SR 299. Vehicle traffic on area highways is not expected to generate a noticeable increase in traffic-related noise because it would be dispersed and infrequent and would not represent a substantial increase over existing conditions.

Haul truck trips on the local roadways would pass by residential receptors and the event of each truck passing by could increase single-event noise levels. The potential for a substantial short-term increase in single-event noise levels was examined in the Program EIR. This impact is within the scope of the Program EIR because the number and types of equipment proposed are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the portion of the project area outside of the treatable landscape is limited to 3.4 acres and is adjacent to the treatable landscape, such exposure potential is essentially the same within and outside the treatable landscape; therefore, the noise impact is also the same, as described above, which is consistent with that described in

the Program EIR. SPR NOI-1 is applicable to the project. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW NOISE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.13.1, "Environmental Setting," and Section 3.13.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to noise that are present in the areas outside the treatable landscape are the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to noise would occur.

4.13 RECREATION

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

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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

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

Discussion

The project area is located within western Humboldt County and consists of privately owned commercial forest land and a publicly owned community forest encompassing approximately 3,641 acres. Encroachment from members of the public using the lands for recreational purposes, such as mountain biking, motorcycle and off-road vehicle use, and trail running, is apparent on legacy roads and roads currently used for forest management.

As described in Section 2, "Project Description," approximately 598 acres of the project area is on land owned by MCSD and consists of the McKinleyville Community Forest. This publicly owned land largely occurs along the western and northern portions of the project area and is intended for general public use, including trails for hiking. Other recreational areas located near the project area include the Azalea State Natural Reserve, located approximately 0.8 miles southwest of the project area, and steelhead fishing access located at the Mad River approximately 0.7 miles south of the project area.

IMPACT REC-1

Vegetation treatment activities have the potential to disrupt recreational activities within the project area through temporary trail closures during active treatments and by degrading the experience of recreationists through the creation of noise, dust, degradation of scenic views, or increased haul truck trips. The potential for vegetation treatment activities to disrupt recreation activities was examined in the Program EIR. Recreational users at the McKinleyville Community Forest would be notified of temporary closures of any area in advance of treatment activities per SPR REC-1. Nuisance impacts related to noise, air quality, aesthetics, and transportation would be avoided or minimized as explained in the discussion for those respective resource areas throughout this PSA/Addendum.

This impact is within the scope of the Program EIR because the availability of recreational resources and the treatment activities and intensity are consistent with those analyzed in the Program EIR. The inclusion of land in the

proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, inclusion of the 3.4 acres within the project area that are not within the treatable landscape would not introduce additional recreation resources in addition to those described above. The SPR applicable to this treatment is REC-1. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

NEW RECREATION IMPACTS

The proposed project is consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatment project are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.14.1, "Environmental Setting," and Section 3.14.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land in the proposed project area outside the treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, inclusion of the 3.4 acres within the project area that are not within the treatable landscape would not introduce additional recreation resources in addition to those described above.; therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to recreation would occur.

4.14 TRANSPORTATION

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
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	Impact TRAN-1, pp. 3.15-9 – 3.15-10	Yes	AD-3 TRAN-1	NA	LTS	No	Yes
Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses	LTS	Impact TRAN-2, pp. 3.15-10 – 3.15-11	Yes	AD-3 HYD-2 TRAN-1	NA	LTS	No	Yes
Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP	PSU	Impact TRAN-3, pp. 3.15-11 – 3.15-13	Yes	NA	AQ-1	SU	No	Yes

Notes: LTS = less than significant; PSU = potentially significant and unavoidable; SU = significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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

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

Discussion

IMPACT TRAN-1

Initial and maintenance treatments would temporarily increase vehicular traffic along roadways throughout the project area, including Murray Road, US 101, SR 299, and various other public and private roadways. 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 Program EIR. The proposed treatments would be short term, and temporary increases in traffic related to treatments are within the scope of the Program EIR because the treatment duration and limited number of vehicles (i.e., heavy equipment transport, crew vehicles for crew members) associated with the proposed treatments are consistent with those analyzed in the Program EIR. In addition, the proposed treatments would not all occur concurrently, and increases in vehicle trips associated with the treatments would be dispersed on multiple roadways. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, inclusion of the 3.4 acres of the project area outside the treatable landscape would not add any additional roadways or road uses beyond those in the project area that are within the treatable

landscape; therefore, the transportation impact is also the same, as described above. The SPRs applicable to this treatment are AD-3 and TRAN-1. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT TRAN-2

Initial and maintenance treatments would not require the construction or alteration of any roadways. However, the proposed treatments would include prescribed burning on Green Diamond lands, which would produce smoke and could potentially affect visibility along nearby roadways such that a transportation hazard could occur. No prescribed burning is proposed on MCSD lands. The potential for smoke to affect visibility along roadways during implementation of the treatment project was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the burn duration is consistent with that analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, inclusion of the 3.4 acres of the project area outside the treatable landscape would not add any additional roadways or road uses beyond those in the project area that are within the treatable landscape. Therefore, the transportation impact is also the same, as described above. SPRs applicable to this treatment are AD-3, HYD-2, and TRAN-1. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT TRAN-3

Treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the proposed project would require vehicle trips to transport crew members and equipment to the treatment areas. This impact was identified as potentially significant and unavoidable in the Program EIR because implementation of the CalVTP would result in a net increase in VMT.

Manual treatments, mechanical treatments, prescribed burning on Green Diamond lands, and targeted ground application of herbicides on Green Diamond lands under the proposed treatment project would typically require between two and 50 crew members depending on the treatment. No prescribed burning or herbicide application is proposed on MCSD lands. The potential for an increase in VMT on affected roadways during implementation of the treatment project was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the size and number of crews is consistent with that analyzed in the Program EIR. The increase in vehicle trips over existing conditions would be small, temporary, and dispersed over multiple roadways. A temporary increase in VMT is within the scope of the activities and impacts addressed in the Program EIR because the number and duration of increased vehicle trips attributable to the project are consistent with those analyzed in the Program EIR. The proposed project would contribute to the cumulative increase in VMT attributable to implementation of the CalVTP. For these reasons, and as explained in the Program EIR, this impact would remain significant and unavoidable.

The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, inclusion of the 3.4 acres of the project area outside the treatable landscape would not add any additional roadways or road uses beyond those in the project area that are within the treatable landscape; therefore, the transportation impact is also the same, as described above, which is consistent with that described in the Program EIR. No SPRs are applicable to this project. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW IMPACTS ON TRANSPORTATION

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.15.1, "Environmental Setting," and Section 3.15.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, inclusion of the 3.4 acres of the project area outside the treatable landscape would not add any additional roadways or road uses beyond those in the project area that are within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to transportation would occur.

4.15 PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is this Impact Within the Scope of the Program EIR?
Would the project:								
Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs	LTS	Impact UTIL-1, p. 3.16-9	Yes	AD-3	NA	LTS	No	Yes
Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	PSU	Impact UTIL-2, pp. 3.16-10 – 3.16-12	Yes	AD-3 UTIL-1	NA	SU	No	Yes
Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste	LTS	Impact UTIL-2, p. 3.16-12	Yes	AD-3 UTIL-1	NA	LTS	No	Yes

Notes: LTS = less than significant; PSU = potentially significant and unavoidable; SU = significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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 Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

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

Discussion

IMPACT UTIL-1

Initial and maintenance treatment would include mechanical treatment, manual treatment, prescribed burning on Green Diamond lands, and targeted ground application of herbicides on Green Diamond lands. No prescribed burning or herbicide application is proposed on MCSD lands. Prescribed burning would require an on-site water supply (i.e., water trucks) to be available as a safety precaution. If needed to extinguish a burn, water would be supplied from water trucks. The potential increased demand for water was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the size of the area proposed for prescribed burning treatments, amount of water required for prescribed burning, and water source type are consistent with those analyzed

in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the water supply impact is also the same, as described above, which is consistent with that described in the Program EIR. SPR AD-3 is applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT UTIL-2

Initial and maintenance treatments would generate biomass as a result of vegetation removal within the treatment areas. Biomass generated by mechanical and manual treatments would be disposed by several methods, including by pile and broadcast burning, as well as being chipped or lopped and scattered debris that may be left on-site, removed to a biomass facility, or piled for wildlife habitat. This impact was identified as potentially significant and unavoidable in the Program EIR because biomass hauled off-site in some parts of the treatable landscape could exceed the capacity of existing infrastructure for handling biomass. For the proposed treatment project, some plant biomass could be hauled off-site to an appropriate waste collection facility. While the amount of biomass generated is not expected to exceed the capacity of existing local infrastructure in Humboldt County, because the project would generate biomass that could be hauled off-site for disposal, it would contribute to the environmental significance conclusion in the Program EIR; therefore, the purposes of CEQA compliance, this PSA/Addendum notes the impact as potentially significant and unavoidable. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, conditions related to biomass in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, impacts related to biomass are also the same, as described above, which is consistent with that described in the Program EIR. SPR AD-3 is applicable to this impact. SPR UTIL-1 would be applicable to the proposed treatments if biomass is hauled off-site. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT UTIL-3

As discussed above, initial and maintenance treatments would generate biomass as a result of vegetation removal within the project area, which would be disposed by several methods, but primarily through prescribed burning on Green Diamond lands. No prescribed burning is proposed on MCSD lands. However, there is the potential for a small amount to be disposed off-site at an appropriate waste collection facility. The implementing entity would comply with all federal, state, and local management and reduction goals, statutes, and regulations related to solid waste. Compliance with reduction goals, statutes, and regulations related to solid waste was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the types and amount of biomass that may need to be hauled off-site are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the biomass conditions in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, impacts related to biomass are also the same, as described above, which is consistent with that described in the Program EIR. SPR AD-3 is applicable to this impact. SPR UTIL-1 would be applicable to the proposed treatments if biomass is hauled off-site. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW IMPACTS ON PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.16.1, "Environmental Setting," and Section 3.16.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to public services, utilities, and service systems that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the Program EIR. Therefore, no new impact related to public services, utilities, or service systems would occur that is not covered in the Program EIR.

4.16 WILDFIRE

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Impact WIL-1, pp. 3.17-14 – 3.17-15	Yes	AD-3 HAZ-2 HAZ-3 HAZ-4	NA	LTS	No	Yes
Impact WIL-2: Expose People or Structures to Substantial Risks Related to Postfire Flooding or Landslides	LTS	Impact WIL-2, pp. 3.17-15 – 3.17-16	Yes	AD-3 AQ-3 GEO-3 GEO-4 GEO-5 GEO-8	NA	LTS	No	Yes

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact.

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

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

Discussion

IMPACT WIL-1

Proposed vegetation treatments would include shaded fuel breaks and WUI fuel reduction through use of mechanical treatment, manual treatment, prescribed burning on Green Diamond lands, and targeted herbicide application on Green Diamond lands. No prescribed burning or herbicide application is proposed on MCSD lands. Vegetation treatment involving motorized equipment could pose a risk of accidental ignition. Temporary increases in risk associated with uncontrolled fire from prescribed burns could also occur. As discussed in Section 3.17.1, "Environmental Setting," in Volume II of the Final Program EIR, under "Prescribed Burn Planning and Implementation," implementing a prescribed burn requires extensive planning, including the preparation of prescription burn plans, smoke management plans, site-specific weather forecasting, public notifications, safety considerations, and ultimately favorable weather conditions so a burn can occur on a given day. Prior to implementing a prescribed burn, fire containment lines would be established by clearing vegetation surrounding the designated burn area to help prevent the accidental escape of fire. Water trucks and safety equipment would be staged on-site as necessary.

The potential increase in exposure to wildfire during implementation of treatments was examined in the Program EIR. Increased wildfire risk associated with the use of heavy equipment in vegetated areas and during prescribed burns is within the scope of the Program EIR because the types of equipment and treatment duration and the types of

prescribed burn methods proposed as part of the project are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the wildfire risk is essentially the same within and outside the treatable landscape (within forested areas near to residential uses); therefore, the wildfire impact is also the same as described in the Program EIR. SPRs applicable to this treatment are AD-3, HAZ-2, HAZ-3, and HAZ-4. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT WIL-2

Vegetation treatment activities include mechanical treatment, manual treatment, prescribed burning on Green Diamond lands, and targeted herbicide application on Green Diamond lands, which could exacerbate fire risk as described in Impact WIL-1 above. No prescribed burning or herbicide application is proposed on MCSD lands. The potential for post-fire landslides and flooding was evaluated in the Program EIR. The potential exposure of people or structures to post-fire landslides and flooding are within the scope of the activities and impacts covered in the Program EIR because the equipment types and duration, and methods of prescribed burn implementation are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the wildfire risk of the project area is essentially the same within and outside the treatable landscape (within forested areas near to residential uses); therefore, the wildfire impact is also the same, as described above. SPRs applicable to this impact are AD-3, AQ-3, GEO-3 through GEO-5, and GEO-8. Although most mechanical treatment would occur from existing roads or skid trails or on flat to moderate slopes, SPR GEO-8 would apply if a treatment area contains steep slopes. Furthermore, because the treatments reduce wildfire risk, they would also decrease post wildfire landslide and flooding risk in areas that could otherwise burn in a high-severity wildfire without treatment. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW IMPACTS ON WILDFIRE

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatment project are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.17.1, "Environmental Setting," and Section 3.17.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to wildfire that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape (within forested areas near to residential uses); therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances would give rise to new significant impacts not addressed in the Program EIR. Therefore, no new impact related to wildfire would occur that is not covered in the Program EIR.

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6 REFERENCES

California Department of Conservation. 2000. *A General Location Guide for Ultramafic Rocks In California - Areas More Likely To Contain Naturally Occurring Asbestos*. Available: https://www.conservation.ca.gov/cgs/minerals/mineral-hazards/asbestos. Accessed June 4, 2024.

California Department of Fish and Wildlife. 2016. Attachment 1: Proposed Revisions to the June 2005 GDRCo Property-wide Consultation for Montia howellii (*Howell's montia*) – Growing Season Date Change November 2016.

_____. 2018a. *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline. Accessed February 22, 2023.

_____.2018b. *Property-wide Consultation for Erythronium revolutum (coast fawn lily) 18-R1-CTP_39*. Department of Fish and Wildlife, Northern Region – Timberland Conservation Program. September, 2018.

_____.2018c. Considerations for Conserving the Foothill Yellow-Legged Frog. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157562&inline. Accessed February 20, 2023.

_____. 2021. *Pacific Northwest California Condor Determination. Department of Fish and Wildlife*, Director's Office. Sacramento, CA. November. 2021.

_____. 2023. California Natural Community List. Available: https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive%20natural%20communities. Accessed January 18, 2024.

California Department of Toxic Substances Control. 2024. EnviroStor. Available: www.envirostor.dtsc.ca.gov. Retrieved July 8, 2024.

California Department of Transportation. 2004 (December). *California Bat Mitigation Techniques, Solutions, and Effectiveness*. Prepared by H. T. Harvey & Associates, Sacramento, CA.

_____. 2018. California State Scenic Highway System Map. Available: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Retrieved May 30, 2024.

California Environmental Protection Agency. 2024. Cortese List Database. Available: https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf. Accessed July 8, 2024.

California Native Plant Society. 2024. *Inventory of Rare and Endangered Plants of California* (online edition, v9-01 1.5). Available: http://www.rareplants.cnps.org. Retrieved July, 2024.

California Natural Diversity Database. 2024a. Results of electronic records search. Sacramento: California Department of Fish and Wildlife, Biogeographic Data Branch. Retrieved July, 2024.

_____. 2024b. *Essential Connectivity Areas – California Essential Habitat Connectivity (CEHC) [ds620]*. Accessed April 24, 2024.

CalEPA. *See* California Environmental Protection Agency.

Caltrans. *See* California Department of Transportation.

CDFW. *See* California Department of Fish and Wildlife.

CNDDB. *See* California Natural Diversity Database.

CNPS. *See* California Native Plant Society.

DOC. *See* California Department of Conservation.

DTSC. *See* California Department of Toxic Substances Control.

Dunk, J. R. and J. J. V. G. Hawley. 2009. "Red-Tree Vole Habitat Suitability Modeling: Implications for Conservation and Management." Forest Ecology and Management 258: 626-634.

Green Diamond. 2023 (March 15). 8th Biennial Report Aquatic Habitat Conservation Plan. Submitted to National Marine Fisheries Service and United States Fish and Wildlife Service.

Levine, Jonathan, A. Kathryn McEachern, and Clark Cowan. 2008. Rainfall Effects on rare annual plants. Journal of Ecology. Volume 96: 795-806.

Manji, Neil. 2018 (August 9). Property-Wide Consultation for *Cardamine angulate* (seaside bittercress).

National Marine Fisheries Service and US Fish and Wildlife Service. 2006. *Green Diamond Resource Company. Final Aquatic Habitat Conservation Plan and Candidate Conservation Agreement with Assurances. Volume 1 Prepared by Green Diamond Resource Company.* Available: https://www.greendiamond.com/resources/#responsible-forestry.

NMFS and USFWS. *See* National Marine Fisheries Service and US Fish and Wildlife Service.

Humboldt County. 2017. *General Plan. Noise Element*. Available: https://humboldtgov.org/DocumentCenter/View/61989/Chapter-13-Noise-Element-PDF. Accessed June 4, 2024.

State Water Resources Control Board. 2024. GeoTracker database. Available: https://geotracker.waterboards.ca.gov/map. Retrieved July 8, 2024

SWRCB. *See* State Water Resources Control Board.

The Times-Standard. 2020 (February). *Looking back at Arcata's barrel company.* Available: https://www.times-standard.com/2020/02/20/looking-back-at-arcatas-barrel-company/. Accessed March 7, 2024.

US Fish and Wildlife Service. 2012 (January 9). *Protocol for Surveying Proposed Management Activities that Impact Northern Spotted Owls. 2012 Revision*. Available: https://www.fws.gov/media/protocol-surveying-proposed-management-activities-may-impact-northern-spotted-owls. Accessed April 2024.

_____. 2019a. *Forest Habitat Conservation Plan on the California Timberlands of Green Diamond Resource Company. Final.* Prepared by Green Diamond Resource Company. Available: https://www.greendiamond.com/resources/index. Accessed April 2024.

_____. 2019b. *Northern Spotted Owl Take Avoidance Analysis and Guidance for Private lands in California, Attachment A: Take Avoidance Analysis- Coast Redwood Region.* US Fish and Wildlife Service, Pacific Southwest Region, Sacramento, CA.

_____. 2020a. (October). *Revised Transmittal of Guidance: Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California*. Arcata Fish and Wildlife Office.

_____. 2020b. *Programmatic Biological Opinion on the Proposed US Forest Service Management Programs for the Endangered Southern Sierra Nevada Distinct Population Segment of the Fisher in Four Southern Sierra Nevada National Forests, California*. (08ESMF00-2020-F-2007). Sacramento Fish and Wildlife Office.

_____. 2021. "Endangered and Threatened Wildlife and Plants; Establishment of a Nonessential Experimental Population of the California Condor in the Pacific Northwest." Final Rule. *Federal Register* 86: 15602 – 15623.

_____. 2023. *5_year Review of California Condor/Gymnogyps californianus*. Pacific Southwest Region 8, US Fish and Wildlife Service.

USFWS. *See* US Fish and Wildlife Service.

US Geological Survey. 2011. Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California. Available: https://www.conservation.ca.gov/cgs/minerals/mineral-hazards/asbestos. Accessed on June 4, 2024.

_____. 2024. US Landslide Inventory. USGS Landslide Hazard Program, ScienceBase Data Download. US Department of the Interior. Available: https://usgs.maps.arcgis.com/apps/webappviewer/index.html?id=ae120962f459434b8c904b456c82669d. Retrieved June 4, 2024

Yurok Tribe. 2023. *NCCRP Prepares to Release Three More Condors, Young Birds Will Join Eight Free-Flying Birds in Yurok Ancestral Territory*. Available: https://www.yuroktribe.org/post/nccrp-prepares-to-release-three-more-condors. Accessed: February 27, 2024.

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Attachment A1

Mitigation Monitoring and Reporting Program for the McKinleyville Vegetation Treatment Project – Green Diamond

TABLE OF CONTENTS

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MITIGATION MONITORING AND REPORTING PROGRAM

INTRODUCTION

The California Environmental Quality Act (CEQA) and the State CEQA Guidelines (PRC Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies "to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment." A Mitigation Monitoring and Reporting Program (MMRP) is required for approval of the proposed project because the Project-Specific Analysis/Addendum to the California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (Program EIR) (PSA/Addendum) identifies potential significant adverse impacts and all feasible mitigation measures have been adopted. Standard project requirements (SPRs), which are part of the project description, have been incorporated to avoid or minimize adverse effects. Where potentially significant impacts remain after application of SPRs, mitigation measures have been identified to further reduce and/or compensate for those impacts. While only mitigation measures are required to be covered in an MMRP, both SPRs and mitigation are included in this MMRP to assist in implementation of all environmental protection features of later activities consistent with the CalVTP Program EIR.

PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

This MMRP has been prepared to facilitate the implementation of SPRs and mitigation measures. The McKinleyville Vegetation Treatment Project (project) consists of vegetation treatments on up to 3,641 acres, encompassing 3,043 acres of land owned by Green Diamond Resource Company (Green Diamond) and approximately 598 acres of land owned by the McKinleyville Community Services District. Two MMRPs have been prepared to help facilitate the implementation of SPRs and mitigation measures for each implementing entity; the measures in this MMRP are only applicable to the vegetation treatments implemented by Green Diamond.

The attached table presents the text of each SPR and mitigation measure from the CalVTP Program EIR that is applicable to the portion of the project implemented by Green Diamond, the timing of its planned implementation, the implementing entity, and the entity with monitoring responsibility. The numbering of SPRs and mitigation measures follows the numbering used in the Program EIR. SPRs and mitigation measures that are referenced more than once in the PSA are not duplicated in the MMRP. Instructions for project-specific guidance to implement certain SPRs and Mitigation Measures has been added to tailor the specific impact avoidance and minimization actions relevant to the proposed treatments, agency standard practices, and the conditions and resources present within each treatment site. In addition, non-substantive clarifying edits to mitigation measures in the Program EIR are shown in underline and strikethrough. In all cases, the additional project-specific implementation instruction and clarifying edits to mitigation measures maintain the SPRs and mitigation measures as equivalent or more effective than those presented in the Program EIR.

The proposed treatment activities for the project are mechanical vegetation treatment, manual vegetation treatment, prescribed burning, and targeted herbicide application. Prescribed herbivory is included in the MMRP because it is part of the CalVTP SPRs and mitigation measures; however, this project does not propose prescribed herbivory as a treatment activity.

ROLES AND RESPONSIBILITIES

The Humboldt County Resource Conservation District (HCRCD) is the project proponent and lead agency under CEQA. HCRCD will enter into a partnership with Green Diamond to implement the proposed treatments. The District Board will approve a resolution establishing the partnership and delegating implementation of the MMRP to Green Diamond. The partnership may entail the provision of resources to Green Diamond, including equipment, staffing, and technical input.

Unless otherwise specified herein, Green Diamond (the implementing entity) is responsible for implementing the SPRs and mitigation measures according to the specifications provided for each measure and for demonstrating that the action has been successfully completed. As the CEQA lead agency, HCRCD will be responsible for ensuring that implementation of mitigation measures occurs in accordance with the MMRP pursuant to Section 15097(a) of the State CEQA Guidelines.

As defined in the CalVTP Program EIR and the PSA, the project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. The SPRs and mitigation measures in this MMRP direct the project proponent to implement actions to avoid, minimize and mitigate impacts. As the implementing entity and reflecting delegation by HCRCD, the "project proponent" as identified in the SPRs and mitigation measures refers to Green Diamond.

REPORTING

HCRCD shall document and describe the compliance of the project treatment work with the required SPRs and mitigation measures either by adapting the project-specific MMRP table or preparing a separate post-project implementation report pursuant to the requirements of SPR AD-7.

MITIGATION MONITORING AND REPORTING PROGRAM TABLE

The categories identified in the attached MMRP table are described below.

- SPRs and Mitigation Measures – This column provides the text of the applicable SPR or adopted mitigation measure.
- Timing – This column identifies the time frame in which the SPR or mitigation measure will be implemented.
- Implementing Entity – This column identifies the party responsible for implementing the SPR or mitigation measure.
- Verifying/Monitoring Entity – This column identifies the party responsible for verifying and monitoring implementation of the SPR or mitigation measure.

QUALIFICATION REQUIREMENTS FOR BIOLOGICAL AND CULTURAL RESOURCE MEASURES

The biological and cultural resource SPRs and mitigation measures in the attached MMRP table require that qualified individuals implement components of the measures. The CalVTP Program EIR requirements listed below will be met to be considered qualified and may be performed by individuals of various titles (including biologist, botanist, ecologist, Registered Professional Forester [RPF], biological technician, or supervised designees working under the direction of a qualified professional) as long as they are qualified for the task at hand.

Archaeologically Trained Resource Professional: To be qualified, an archaeologically-trained resource professional would hold a valid Archaeological Training Certificate issued by CAL FIRE and the Board of Forestry and Fire Protection or equivalent state or local agency training or certification. Work performed by an archaeologically-trained resource professional must be reviewed and approved by a qualified archaeologist.

Qualified Archaeologist: To be qualified, an archaeologist would hold a Prehistoric Archeology, Historic Archeology, Conservation, Cultural Anthropology, or Curation degree from an accredited university and meet the Secretary of Interior's Qualifications Standards (36 CFR Part 61). The project proponent will review the resume and approve the qualifications of the archaeologists.

Qualified RPF or Biological Technician: To be qualified, an RPF or biological technician would 1) be knowledgeable in relevant species life histories and ecology, 2) be able to correctly identify relevant species and habitats, 3) have experience conducting biological monitoring of relevant species or resources, and 4) be knowledgeable about state and federal laws regarding the protection of special-status species. The project proponent will review the resume and approve the qualifications of RPFs or biological technicians.

Qualified RPF or Biologist: To be qualified, an RPF or biologist would hold a wildlife biology, botany, ecology, forestry, or other relevant degree from an accredited university and: 1) be knowledgeable in relevant species life histories and ecology, 2) be able to correctly identify relevant species and habitats, 3) have experience conducting field surveys of relevant species or resources, 4) be knowledgeable about survey protocols, 5) be knowledgeable about state and federal laws regarding the protection of special-status species, and 6) have experience with CDFW's California Natural Diversity Database (CNDDB) and Biogeographic Information and Observation System (BIOS). The project proponent will review the resume and approve the qualifications of RPFs or biologists. If species-specific protocol surveys are performed, surveys would be conducted by qualified RPFs or biologists with the minimum qualifications required by the appropriate protocols, including having CDFW or USFWS approval to conduct such surveys, if required by certain protocols.

Qualified RPF or Botanist: To be qualified, an RPF or botanist would 1) be knowledgeable about plant taxonomy, 2) be familiar with plants of the region, including special-status plants and sensitive natural communities, 3) have experience conducting floristic botanical field surveys as described in CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018), or experience conducting such botanical field surveys under the direction of an experienced botanical field surveyor, 4) be familiar with the *California Manual of Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/), and 5) be familiar with federal, state, and local statutes and regulations related to plants and plant collecting. The project proponent will review the resume and approve the qualifications of RPFs or botanists.

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Administrative Standard Project Requirements			
SPR AD-1: Project Proponent Coordination For treatments coordinated with CAL FIRE, CAL FIRE will meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable mitigation measures; identify any sensitive resources onsite; and discuss resource protection measures. For any prescribed burn treatments, CAL FIRE will also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to treatment activities.	Green Diamond	HCRCD
SPR AD-2: Delineate Protected Resources: The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to treatment activities.	Green Diamond	HCRCD
SPR AD-3: Consistency with Local Plans, Policies, and Ordinances: The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	Green Diamond	HCRCD
SPR AD-4: Public Notifications for Prescribed Burning: At least one day prior to the commencement of prescribed burning operations, the project proponent will: 1) post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or smoke concerns; 2) publish a public interest notification in a local newspapers or other widely distributed media source describing the activity, timing, and contact information; 3) send the local county supervisor and county administrative officer (or equivalent official responsible for distribution of public information) a notification letter describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.	At least one day prior to the commencement of prescribed burning operations.	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR AD-5: Maintain Site Cleanliness: If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	During treatment activities.	Green Diamond	HCRCD
SPR AD-6: Public Notifications for Treatment Projects One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.	One to three days prior to the commencement of a treatment activity.	Green Diamond	HCRCD
SPR AD-7: Provide Information on Proposed, Approved, and Completed Treatment Projects For any vegetation treatment project using the CalVTP Program EIR for CEQA compliance, the project proponent will provide the information listed below to the Board of Forestry and Fire Protection (Board) or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. Information on proposed projects (PSA in progress): ▶ GIS data that include project location (as a point), or project latitude/longitude; ▶ project size (typically acres); ▶ treatment types and activities; and ▶ contact information for a representative of the project proponent. The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public at least two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent's own website). Information on approved projects (PSA complete): ▶ A completed PSA Environmental Checklist; ▶ A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); ▶ GIS data that include a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction) Information on completed projects (following initial treatment):	During the proposed, approved, and completed stages of the project. **Information on the proposed project (PSA in progress) was submitted to the Board on June 13, 2024.**	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction) ▶ A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes ▪ Size of treated area (typically acres); ▪ Treatment types and activities; ▪ Dates of work; ▪ A list of the SPRs and mitigation measures that were implemented ▪ Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). This SPR applies to all treatment activities and all treatment types, including treatment maintenance.			
SPR AD-8: Request Access for Post-Treatment Assessment For CAL FIRE projects, during contract development, CAL FIRE will include access to the treated area over a prescribed period (usually up to three years) to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance, as a contract term for consideration by the landowner. For public landowners, access to the treated area over a prescribed period will be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	During contract development.	Green Diamond	HCRCD
Aesthetic and Visual Resource Standard Project Requirements			
SPR AES-1: Vegetation Thinning and Edge Feathering The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	During mechanical and manual treatment activities.	Green Diamond	HCRCD
SPR AES-2: Avoid Staging within Viewsheds The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	During all treatment activities.	Green Diamond	HCRCD

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

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
exposed areas such that the water results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations. ▶ Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113. ▶ Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property," per Health and Safety Code Section 41700. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
SPR AQ-6: Prescribed Burn Safety Procedures Prescribed burns planned and managed by non-CAL FIRE crews will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP). The IAP will include the burn dates; burn hours; weather limitations; the specific burn prescription; a communications plan; a medical plan; a traffic plan; and special instructions such as minimizing smoke impacts to specific local roadways. The IAP will also assign responsibilities for coordination with the appropriate air district, such as conducting onsite briefings, posting notifications, weather monitoring during burning, and other burn related preparations. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	During prescribed burn treatment activities.	Green Diamond	HCRCD
Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements			
SPR CUL-1: Conduct Record Search An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to all initial treatment activities. Not required prior to maintenance treatments if records search remains valid. **A complete record search of the 3,641-acre project area was conducted in March 2024; see PSA/Addendum for a summary of results. Compliance with this SPR is complete.**	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR CUL-2: Contact Geographically Affiliated Native American Tribes The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the project proponent will notify the California Native American Tribes in the counties where the treatment activity is located. The notification will contain the following: ▶ A written description of the treatment location and boundaries. ▶ Brief narrative of the treatment objectives. ▶ A description of the activities used (e.g., prescribed burning, mastication) and associated acreages. ▶ A map of the treatment area at a sufficient scale to indicate the spatial extent of activities. ▶ A request for information regarding potential impacts to cultural resources from the proposed treatment. ▶ A detailed description of the depth of excavation, if ground disturbance is expected. In addition, the project proponent will contact the NAHC for a review of their Sacred Lands File. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to all initial treatment activities. Not required prior to maintenance treatments if records search remains valid. **Outreach to the NAHC has occurred, Tribes have been contacted and a SLF query has been completed; see PSA for a summary of consultation and Sacred Lands File query results.**	Green Diamond	HCRCD
SPR-CUL-3: Pre-field Research The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. The purpose of this research is to properly inform survey design, based on the types of resources likely to be encountered within the treatment area, and to be prepared to interpret, record, and evaluate these findings within the context of local history and prehistory. The qualified archaeologist and/or archaeologically-trained resource professional will review records, study maps, read pertinent ethnographic, archaeological, and historical literature specific to the area being studied, and conduct other tasks to maximize the effectiveness of the survey. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to all initial treatment activities. Not required prior to maintenance treatments if research remains valid.	Green Diamond	HCRCD
SPR CUL-4: Archaeological Surveys The project proponent will coordinate with an archaeologically-trained resource professional and/or qualified archaeologist to conduct a site-specific survey of the treatment area. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search, pre-field research, and/or Native American consultation identifies archaeological or historical resources near or within the treatment area. A survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to all initial treatment activities. Not required prior to maintenance treatments if initial surveys remain valid.	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR CUL-5: Treatment of Archaeological Resources If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. The project proponent, in consultation with culturally affiliated tribe(s), will develop effective protection measures for important cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. These protection measures will be written in clear, enforceable language, and will be included in the survey report in accordance with applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	Green Diamond	HCRCD
SPR CUL-6: Treatment of Tribal Cultural Resources The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity to submit comments and participate in consultation to resolve issues of concern. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	Green Diamond	HCRCD
SPR CUL-7: Avoid Built Historical Resources If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. Within a buffer of 100 feet of the built historical resource, there will be no prescribed burning or mechanical treatment activities. Buffers less than 100 feet for built historical resources will only be used after consultation with and receipt of written approval from a qualified archaeologist. If the records search does not identify known historical resources in the treatment area, but structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historic significance are present in the treatment area, they will similarly be avoided. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	Green Diamond	HCRCD
SPR CUL-8: Cultural Resource Training The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Biological Resources Standard Project Requirements			
SPR BIO-1: Review and Survey Project-Specific Biological Resources The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this Program EIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified RPF or biologist, will determine which one of the following best characterizes the treatment:	Prior to treatment **Biological reconnaissance survey conducted on February 13, 2024**	Green Diamond	HCRCD
1. **Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided**. If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment: a. by physically avoiding the suitable habitat, or b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites). Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist.	Prior to and during treatment	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Project-Specific Guidance to Implement SPR BIO-1 Special-Status Wildlife ▶ To avoid impact on Pacific tailed frog and southern torrent salamander, Green Diamond will follow the measures for these species required by the Green Diamond Aquatic Habitat Conservation Plan (NMFS and USFWS 2006). ▶ To avoid impacts on northern spotted owls, Green Diamond will follow the measures required in the Green Diamond Foerst Habitat Conservation Plan (USFWS 2019). To avoid impacts on other special-status birds (bald eagle, great gray owl, loggerhead shrike, olive-sided flycatcher, Vaux's swift, and white-tailed kite) mechanical treatments, manual treatments, and prescribed burning will be conducted outside of the nesting season (February 1–August 31) within nesting habitat suitable for these species. If it is not feasible to avoid treatment areas during the nesting bird season, then SPR BIO-10 will be implemented. ▶ To avoid impacts on fisher, Green Diamond will follow the measures required in the Green Diamond Foerst Habitat Conservation Plan (USFWS 2019). ▶ To avoid impacts on northern California ringtail, mechanical treatments, manual tree and snag removal, and prescribed burning will be conducted within habitat suitable for ringtail outside of the ringtail maternity season (April 15–June 30). If conducting prescribed burning, mechanical treatments, and manual tree and snag removal outside of the ringtail maternity season is determined to be infeasible for certain treatment areas, then SPR BIO-10 will be implemented. ▶ To avoid impacts on special-status bats, mechanical treatments, manual tree and snag removal, and prescribed burning will be conducted within habitat suitable for bat roosting outside of the bat maternity season (April 1–August 31). If conducting mechanical treatments, manual tree and snag removal, and prescribed burning outside of the bat maternity season is determined to be infeasible for certain treatment areas, then SPR BIO-10 will be implemented. 2. **Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided**. Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-Protocols. Specific survey requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7). This SPR applies to all treatment activities and treatment types, including treatment maintenance.			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Project-Specific Guidance to Implement SPR BIO-1 Special-Status Wildlife Because there is no reliable season during which all impacts on foothill yellow-legged frog, northern red-legged frog, California condor, and American badger could be avoided and avoidance of habitat is not feasible for these species, implementation of SPR BIO-10 would be required.			
SPR BIO-2: Require Biological Resource Training for Workers The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during treatment	Green Diamond	HCRCD
Sensitive Natural Communities and Other Sensitive Habitats			
SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, the project proponent will: ▶ require a qualified RPF or biologist to perform a protocol-level survey following the CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of *A Manual of California Vegetation* (including updated natural communities data at http://vegetation.cnps.org/), or referring to relevant reports (e.g., reports found on the VegCAMP website). ▶ map and digitally record, using a Global Positioning System (GPS), the limits of any potential sensitive habitat and sensitive natural community identified in the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to treatment	Green Diamond	HCRCD
SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions by implementing the following within riparian habitats:	Prior to and during treatment	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within the limits of riparian habitat identified and mapped during surveys conducted pursuant to SPR BIO-3. Native riparian vegetation will be retained in a well distributed multi-storied stand composed of a diversity of species similar to that found before the start of treatment activities. ▶ Treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the riparian vegetation types characteristic of the region. This includes hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. ▶ Removal of large, native riparian hardwood trees (e.g., willow, ash, maple, oak, alder, sycamore, cottonwood) will be minimized to the extent feasible and 75 percent of the pretreatment native riparian hardwood tree canopy will be retained. Because tree size varies depending on vegetation type present and site conditions, the tree size retention parameter will be determined on a site-specific basis depending on vegetation type present and setting; however, live, healthy, native trees that are considered large for that type of tree and large relative to other trees in that location will be retained. A scientifically based, project-specific explanation substantiating the retention size parameter for native riparian hardwood tree removal will be provided in the Biological Resources Discussion of the PSA. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, presence of sufficient seed trees, light availability, and changes in stream shading may inform the tree size retention requirements. ▶ Removed trees will be felled away from adjacent streams or waterbodies and piled outside of the riparian vegetation zone (unless there is an ecological reason to do otherwise that is approved by applicable regulatory agencies, such as adding large woody material to a stream to enhance fish habitat, e.g., see *Accelerated Wood Recruitment and Timber Operations: Process Guidance from the California Timber Harvest Review Team Agencies and National Marine Fisheries Service*). ▶ Vegetation removal that could reduce stream shading and increase stream temperatures will be avoided. ▶ Ground disturbance within riparian habitats will be limited to the minimum necessary to implement effective treatments. This will consist of the minimum disturbance area necessary to reduce hazardous fuels and return the riparian community to a natural fire regime (i.e., Condition Class 1) considering historic fire return intervals, climate change, and land use constraints. ▶ Only hand application of herbicides approved for use in aquatic environments will be allowed and only during low-flow periods or when seasonal streams are dry. ▶ The project proponent will notify CDFW pursuant to California Fish and Game Code Section 1602 prior to implementing any treatment activities in riparian habitats. Notification will identify the treatment activities, map the vegetation to be removed, identify the impact avoidance identification methods to be used (e.g., flagging), and appropriate protections for the retention of shaded riverine habitat, including buffers and other applicable measures to prevent erosion into the waterway.			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, different protection measures and design standards will only be approved when the treatment plan incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
SPR BIO-6: Prevent Spread of Plant Pathogens When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., Ione chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (*Fusarium*), goldspotted oak borer, shot hole borer, bark beetle): ▶ clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk; ▶ include training on *Phytopthora* diseases and other plant pathogens in the worker awareness training; ▶ minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment; ▶ minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination; ▶ clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low risk areas or between widely separated portions of a treatment area; and ▶ follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (Working Group for *Phytoptheras* in Native Habitats 2016) This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during treatment	Green Diamond	HCRCD
SPR BIO-7: Survey for Special-Status Plants If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities." Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate	Prior to treatments	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status. If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS. For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this Program EIR, surveys will not be required under the following circumstances: ▶ If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. ▶ If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
Invasive Plants and Wildlife			
SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail): ▶ clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, or invasive wildlife; ▶ for all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species; ▶ inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas; ▶ stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area; ▶ identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys	Prior to and during treatment	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include herbicide application, manual or mechanical treatments, prescribed burning, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles; ▶ treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and ▶ implement Fire and Fuel Management BMPs outlined in the "Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers" (Cal-IPC 2012, or current version). This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
Wildlife			
SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries, monarch overwintering sites) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. The qualified RPF or biologist will determine if following an established protocol is required, and the project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed. This SPR applies to all treatment activities and treatment types, including treatment maintenance. **Project-Specific Guidance to Implement SPR BIO-10** ▶ For mechanical treatments, manual tree and snag removal, and prescribed burning in habitat suitable for foothill yellow-legged frog, and northern red-legged frog, as determined by a qualified RPF or biologist, focused visual encounter surveys for these species will be conducted prior to treatment activities. If foothill yellow-legged frog or northern red-legged frog, are not detected within the treatment area during focused surveys, then no mitigation for the species would be required. If foothill yellow-legged frog or northern red-legged frog, are identified during focused surveys, Mitigation Measure BIO-2b would be implemented. ▶ Prior to conducting mechanical treatments, manual treatments, and prescribed burning activities in California condor habitat (e.g., large forest openings, in and within 656 feet of riparian management zones), Green Diamond will contact Yurok Tribe Wildlife Department to determine if any individual California condors may	No more than 14 days prior to all treatment activities.	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
be present within or adjacent to the project area. If California condors are present, Mitigation Measure BIO-2a will be implemented. If California condors are determined not to be present within the project area, then no further measures are required. ▶ If conducting treatment activities outside the sensitive season for nesting birds (pursuant to SPR BIO-1) is determined to be infeasible, to avoid impacts on special-status birds (i.e., bald eagle, great gray owl, loggerhead shrike, olive-sided flycatcher, Vaux's swift, white-tailed kite), focused surveys (i.e., nest searches) for nests of these species will be conducted prior to implementing any mechanical treatments, manual treatments, and prescribed burning during the nesting bird season (February 1–August 31). If active special-status bird nests are observed during focused surveys, then mitigation measures BIO-2a (for bald eagle, great gray owl, and white-tailed kite) and BIO-2b (for loggerhead shrike, olive-sided flycatcher, and Vaux's swift) will be implemented. ▶ Prior to conducting mechanical treatments within open habitats suitable for denning by American badger, focused surveys for American badger dens will be conducted by a qualified RPF or biologist no more than 14 days prior to the start of mechanical treatments and pile burning activities. If American badger dens are detected during focused surveys, Mitigation Measure BIO-2b will be implemented. ▶ If conducting mechanical treatments, manual tree and snag removal, and prescribed burning activities outside the sensitive season for special-status bats (pursuant to SPR BIO-1) is determined to be infeasible, to avoid impacts on these species, focal surveys for bat maternity roosts will be conducted prior to treatment activities. If bat maternity roosts are not detected during surveys, no further mitigation is required. If bat maternity roosts are detected during surveys, Mitigation Measure BIO-2b will be implemented. If the limited operating period for ringtail is determined to be infeasible, to avoid impacts on the species, focused surveys for ringtail, including non-invasive survey methods (e.g., trail cameras, track plates), will be conducted prior to implementing mechanical treatments, manual tree and snag removal, and prescribed burning during the ringtail maternity season (April 15–June 30). If ringtails are not detected during focused surveys, no further mitigation is required. If presence of ringtail is assumed or an active den is identified during focused surveys by a qualified RPF or biologist, Mitigation Measure BIO-2a will be implemented.			
SPR BIO-12: Protect Common Nesting Birds, Including Raptors The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP Program EIR. The active nesting season will be defined by the qualified RPF or biologist. If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identity the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a	Conduct a survey for common nesting birds (if needed) at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies (typically, up to 3 weeks before	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following: ▶ **Establish Buffer.** The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. Treatment activities will be implemented outside of the buffer. The buffer location will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. ▶ **Modify Treatment.** The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment methods). Treatment modifications will be determined by the project proponent in coordination with the qualified RPF or biologist. ▶ **Defer Treatment.** The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of	treatment). If an active nest is observed, implement avoidance strategies prior to and during all treatment activities.		

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests: ▶ **Monitor Active Raptor Nest During Treatment**. A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases. ▶ **Retention of Raptor Nest Trees**. Trees with visible raptor nests, whether occupied or not, will be retained. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
Geology, Soils, Paleontology, and Mineral Resource Standard Project Requirements			
SPR GEO-1: Suspend Disturbance during Heavy Precipitation The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types, including treatment maintenance. **Project-Specific Implementation** To prevent herbicides from being mobilized and soil from being compacted which increases runoff and erosion risk, the project proponent will suspend mechanical and herbicide treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to mobilize herbicides or be compacted by mechanical activities. The project proponent will be prepared to completely suspend mechanical and herbicide treatment activities prior to the initiation of the rain event. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer very wet or saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of very wet or saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, (5) inadequate traction without blading wet soil or surfacing materials, or (6) tire track imprints or hoof marks in the soil. This SPR applies only to mechanical and herbicide treatment activities and all treatment types, including treatment maintenance.	During mechanical and herbicide treatment activities.	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR GEO-2: Limit High Ground Pressure Vehicles The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	During mechanical treatment activities.	Green Diamond	HCRCD
SPR GEO-3: Stabilize Disturbed Soil Areas The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments, and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, prescribed herbivory, or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery, animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical, prescribed herbivory, and prescribed burns that result in exposure of bare soil over 50 percent of the project area treatment activities and all treatment types, including treatment maintenance.	During mechanical and prescribed burn activities that result in exposure of bare soil over 50 percent or more of the treatment area.	Green Diamond	HCRCD
SPR GEO-4: Erosion Monitoring The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Prior to and during treatment activities.	Green Diamond	HCRCD
SPR GEO-5: Drain Stormwater via Water Breaks The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (February 2019 version). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types, including treatment maintenance.	During mechanical, manual, and prescribed burn treatment activities.	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR GEO-6: Minimize Burn Pile Size The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15 percent of the total treatment area (Busse et al. 2014). The project proponent will not locate burn piles in a Watercourse and Lake Protection Zone as defined in SPR HYD-4. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	During mechanical, manual, and prescribed burn treatment activities.	Green Diamond	HCRCD
SPR GEO-7: Minimize Erosion To minimize erosion, the project proponent will: (1) Prohibit use of heavy equipment where any of the following conditions are present: (i) Slopes steeper than 65 percent. (ii) Slopes steeper than 50 percent where the erosion hazard rating is high or extreme. (iii) Slopes steeper than 50 percent that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake. (2) On slopes between 50 percent and 65 percent where the erosion hazard rating is moderate, and all slope percentages are for average slope steepness based on sample areas that are 20 acres, or less, heavy equipment will be limited to: (i) Existing tractor roads that do not require reconstruction, or (ii) New tractor roads flagged by the project proponent prior to the treatment activity. (3) Prescribed herbivory treatments will not be used in areas with over 50 percent slope. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	During all treatment activities.	Green Diamond	HCRCD
SPR GEO-8: Steep Slopes The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). If unstable areas or soils are identified within the treatment area, are unavoidable, and will be potentially directly or indirectly affected by the treatment, a licensed geologist (P.G. or C.E.G.) will determine the potential for landslide, erosion, of other issue related to unstable soils and identity measures (e.g., those in SPR GEO-7) that will be implemented by the project proponent such that substantial erosion or loss of topsoil would not occur. This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types, including treatment maintenance.	Prior to and during mechanical treatment activities on slopes greater than 50 percent.	Green Diamond	HCRCD
Hazardous Material and Public Health and Safety Standard Project Requirements			
SPR HAZ-1: Maintain All Equipment The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and	Prior to and during treatment activities.	Green Diamond	HCRCD

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

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Be applied by an applicator appropriately licensed by the State. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.			
SPR HAZ-7: Triple Rinse Herbicide Containers The project proponent will triple rinse all herbicide and adjuvant containers with clean water at an approved site, and dispose of rinsate by placing it in the batch tank for application per 3 CCR Section 6684. The project proponent will puncture used containers on the top and bottom to render them unusable, unless said containers are part of a manufacturer's container recycling program, in which case the manufacturer's instructions will be followed. Disposal of non-recyclable containers will be at legal dumpsites. Equipment will not be cleaned, and personnel will not be washed in a manner that would allow contaminated water to directly enter any body of water within the treatment area or adjacent watersheds. Disposal of all herbicides will follow label requirements and waste disposal regulations. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	During herbicide treatment activities.	Green Diamond	HCRCD
SPR HAZ-8: Minimize Herbicide Drift to Public Areas The project proponent will employ the following herbicide application parameters during herbicide application to minimize drift into public areas: ▶ application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ▶ spray nozzles will be configured to produce the largest appropriate droplet size to minimize drift; ▶ low nozzle pressures (30-70 pounds per square inch) will be utilized to minimize drift; and ▶ spray nozzles will be kept within 24 inches of vegetation during spraying. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	During herbicide treatment activities.	Green Diamond	HCRCD
SPR HAZ-9: Notification of Herbicide Use in the Vicinity of Public Areas For herbicide applications occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet, the project proponent will post signs at each end of herbicide treatment areas and any intersecting trails notifying the public of the use of herbicides. The signs will include the signal word (i.e., Danger, Warning or Caution), product name, and manufacturer; active ingredient; EPA registration number; target pest; treatment location; date and time of application; restricted entry interval, if applicable per the label requirements; date which notification sign may be removed; and a contact person with a telephone number. Signs will be posted prior to the start of treatment and notification will remain in place for at least 72 hours after treatment ceases. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Post signs prior to the start of herbicide treatment activities and maintain the signs in place through at least 72 hours after treatment ceases.	Green Diamond	HCRCD
Hydrology and Water Quality Standard Project Requirements			
SPR HYD-1: Comply with Water Quality Regulations Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related	During all treatment activities.	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or vegetation management activities. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types, including treatment maintenance. **Project-Specific Guidance to Implement SPR HYD-1** Vegetation treatment activities may result in discharges to waters of the state; therefore; compliance with Water Code sections 13260(a)(1) and 13264 are required. The project proponent will use the State Water Board's Vegetation Treatment General Order, which provides a mechanism for Water Code compliance for projects that prepare a CalVTP PSA or PSA/Addendum. The project will be automatically enrolled (through implementation of SPR AD-7) in the State Water Board's Vegetation Treatment General Order. The project's automatic enrollment satisfies the requirements of SPR HYD-1.			
SPR HYD-2: Avoid Construction of New Roads The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to treatment activities.	Green Diamond	HCRCD
SPR HYD-4: Identify and Protect Watercourse and Lake Protection Zones The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916.5 of the California Forest Practice Rules (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.	Establish WLPZs during design of treatment project; implement WLPZ protections during treatment.	Green Diamond	HCRCD

Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths

Water Class	Class I	Class II	Class III	Class IV
Water Class Characteristics or Key Indicator Beneficial Use	1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or 2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning.	1) Fish always or seasonally present offsite within 1000 feet downstream and/or 2) Aquatic habitat for nonfish aquatic species. 3) Excludes Class III waters that are tributary to Class I waters.	No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations.	Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.
WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ				
< 30 % Slope	75	50	Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.	
30-50 % Slope	100	75		
>50 % Slope	150	100		

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

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
The following WLPZ protections will be applied for all treatments: ▶ Treatment activities with WLPZs will retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced, a qualified RPF will provide the project proponent with a site- and/or treatment activity-specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version). ▶ Equipment, including tractors and vehicles, must not be driven in wet areas or WLPZs, except over existing roads or watercourse crossings where vehicle tires or tracks remain dry. ▶ Equipment used in vegetation removal operations will not be serviced in WLPZs, within wet meadows or other wet areas, or in locations that would allow grease, oil, or fuel to pass into lakes, watercourses, or wet areas. ▶ WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately. ▶ Burn piles will be located outside of WLPZs. ▶ No fire ignition (nor use of associated accelerants) will occur within WLPZs; however low intensity backing fires may be allowed to enter or spread into WLPZs. ▶ Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of soil into water bodies and may include but are not limited to mulching, rip-rap, grass seeding, or chemical soil stabilizers. ▶ Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse. ▶ Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes. ▶ Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR HYD-5: Protect Non-Target Vegetation and Special-status Species from Herbicides The project proponent will implement the following measures when applying herbicides: ▶ Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway. ▶ Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry. ▶ No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ provided that the project proponent notifies the applicable regional water quality control board no fewer than 15 days prior to herbicide application. The feasibility of avoiding herbicide application within WLPZ of Class I and II watercourses will be determined by the project proponent and may be based on whether doing so will preclude achieving CalVTP program objectives, including, but not limited to, protection of vulnerable communities. The reasons for infeasibility will be documented in the PSA. ▶ No herbicides will be applied within a 50-foot buffer of ESA or CESA listed plant species or within 50 feet of dry vernal pools. ▶ For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray. ▶ Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative). ▶ No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities. This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.	During herbicide treatment.	Green Diamond	HCRCD
SPR HYD-6: Protect Existing Drainage Systems If a treatment activity is adjacent to a roadway with stormwater drainage infrastructure, the existing stormwater drainage infrastructure will be marked prior to ground disturbing activities. If a drainage structure or infiltration system is inadvertently disturbed or modified during project activities, the project proponent will coordinate with owner of the system or feature to repair any damage and restore pre-project drainage conditions. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to ground disturbing activities; after ground disturbing activities if required.	Green Diamond	HCRCD
Noise Standard Project Requirements			
SPR NOI-1: Limit Heavy Equipment Use to Daytime Hours The project proponent will require that operation of heavy equipment associated with treatment activities (heavy off-road equipment, tools, and delivery of equipment and materials) will occur during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship). Cities and	During all treatment activities.	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
counties in the treatable landscape typically restrict construction-noise (which would apply to vegetation treatment noise) to particular daytime hours. If the project proponent is subject to local noise ordinance, it will adhere to those to the extent the project is subject to them. If the applicable jurisdiction does not have a noise ordinance or policy restricting the time-of-day when noise-generating activity can occur noise-generating vegetation treatment activity will be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday and federal holidays. If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance. **Project-Specific Guidance to Implement SPR NOI-1** On lands owned by Green Diamond, treatment activities involving the use of mechanized equipment would be prohibited within 500 feet of residences between 4:00 a.m. and 7 a.m.			
SPR NOI-2: Equipment Maintenance The project proponent will require that all powered treatment equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. This SPR applies to all activities and all treatment types, including treatment maintenance.	Prior to and during all treatment activities.	Green Diamond	HCRCD
SPR NOI-3: Engine Shroud Closure The project proponent will require that engine shrouds be closed during equipment operation. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	During all mechanical treatment activities.	Green Diamond	HCRCD
SPR NOI-4: Locate Staging Areas Away from Noise-Sensitive Land Uses The project proponent will locate treatment activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible, to minimize noise exposure. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	During all treatment activities.	Green Diamond	HCRCD
SPR NOI-5: Restrict Equipment Idle Time The project proponent will require that all motorized equipment be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	During all treatment activities.	Green Diamond	HCRCD
SPR NOI-6: Notify Nearby Off-Site Noise-Sensitive Receptors For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. Notification will include anticipated dates and hours during which treatment activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations	Prior to mechanical treatment activities occurring within 1,500 feet of noise-sensitive receptors.	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.			
Recreation Standard Project Requirements			
SPR REC-1: Notify Recreational Users of Temporary Closures If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent will coordinate with the owner/manager of that recreation area or facility. If temporary closure of a recreation area or facility is required, the project proponent will work with the owner/manager to post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. Additionally, notification of the treatment activity will be provided to the Administrative Officer (or equivalent official responsible for distribution of public information) of the county(ies) in which the affected recreation area or facility is located. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during treatment.	Green Diamond	HCRCD
Transportation Standard Project Requirements			
SPR TRAN-1: Implement Traffic Control during Treatments Prior to initiating vegetation treatment activities, the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. A TMP will be needed if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments. If needed, a TMP will be prepared to provide measures to reduce potential traffic obstructions, hazards, and service level degradation along affected roadway facilities. The scope of the TMP will depend on the type, intensity, and duration of the specific treatment activities under the CalVTP. Measures included in the TMP could include (but are not be limited to) construction signage to provide motorists with notification and information when approaching or traveling along the affected roadway facilities, flaggers for lane closures to provide temporary traffic control along affected roadway facilities, treatment schedule restrictions to avoid seasons or time periods of peak vehicle traffic, haul-trip, delivery, and/or commute time restrictions that would be implemented to avoid peak traffic days and times along affected roadway facilities. If the TMP identifies impacts on transportation facilities outside of the jurisdiction of the project proponent, the TMP will be submitted to the agency with jurisdiction over the affected roadways prior to commencement of vegetation treatment projects. This SPR applies to all treatment activities and treatment types, including treatment maintenance. Smoke generated during prescribed burn operations could potentially affect driver visibility and traffic operations along nearby roadways. Direct smoke impacts to roadway visibility and indirect impacts related to driver distraction will be considered during the planning phase of burning operations. Smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations will be identified and addressed within the TMP. The TMP will include measures to monitor smoke dispersion onto public roadways, and traffic control operations will be initiated in the event burning operations could affect traffic safety along any roadways. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.	Prepare TMP prior to treatment and implement TMP during treatment activities.	Green Diamond	HCRCD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Public Services and Utilities Standard Project Requirements			
SPR UTIL-1: Solid Organic Waste Disposition Plan For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. The Solid Organic Waste Disposition Plan will include the amount (e.g., tons) of solid organic waste to be managed onsite (i.e., scattering of wood materials, generating unburned piles, and pile burning) and transported offsite for processing (i.e., biomass power plant, wood product processing facility, composting). If the project proponent intends to transport solid organic waste offsite, the Solid Organic Waste Disposition Plan will clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials. This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Prior to and during mechanical and manual treatment activities.	Green Diamond	HCRCD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Air Quality			
Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment. It is acknowledged that due to cost, availability, and the limits of current technology, there may be circumstances where implementation of certain emission reduction techniques will not be feasible. The project proponent will document the emission reduction techniques that will be applied and will explain the reasons other techniques that could reduce emissions are infeasible. Techniques for reducing emissions may include, but are not limited to, the following: ▶ Diesel-powered off-road equipment used in construction will meet EPA's Tier 4 emission standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. Tier 3 models can be used if a Tier 4 version of the equipment type is not yet produced by manufacturers. This measure can also be achieved by using battery-electric off-road equipment as it becomes available. Prior to implementation of treatment activities, the project proponent will demonstrate the ability to supply the compliant equipment. A copy of each unit's certified tier specification or model year specification and operating permit (if applicable) will be available upon request at the time of mobilization of each unit of equipment. ▶ Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria: ▪ meet California's Low Carbon Fuel Standards and be certified by CARB Executive Officer; ▪ be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables; ▪ contain no fatty acids or functionalized fatty acid esters; and ▪ have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines. ▶ Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment. ▶ Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes. Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NO_X and PM.	During all treatment activities.	Green Diamond	HCRCD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Archaeological, Historical, and Tribal Cultural Resources			
Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist will assess the significance of the find. The qualified archaeologist will work with the project proponent to develop a primary records report that will comply with applicable state or local agency procedures. If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan will be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or tribal cultural resource), the archaeologist will work with the project proponent to develop appropriate procedures to protect the integrity of the resource. Procedures could include preservation in place (which is the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or recovery of scientifically consequential information from and about the resource. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center.	During ground-disturbing activities.	Green Diamond	HCRCD
Biological Resources			
Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway), exceptions to this requirement are listed later in this measure. The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report	Prior to and during treatment activities.	Green Diamond	HCRCD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
(referred to by CAL FIRE as a Completion Report) with a science-based justification for the deviation. No fire ignition (and associated use of accelerants) will occur within 50 feet of listed plants. For species listed under ESA or CESA, if the project proponent cannot avoid loss by implementing no-disturbance buffers, the project proponent will implement Mitigation Measure BIO-1c. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist, in consultation with CDFW and USFWS, as appropriate depending on species status and location, that the listed plants would benefit from treatment in the occupied habitat area even though some of the listed plants may be lost during treatment activities. For a treatment to be considered beneficial to listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to listed plants, no compensatory mitigation for loss of individuals will be required.			
Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement the following measures to avoid loss of individuals and maintain habitat function of occupied habitat: ▶ Physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape. ▶ Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank.	Prior to and during treatment activities.	Green Diamond	HCRCD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the special-status plant itself, habitat function would be diminished and the treatment would need to be modified or precluded from implementation. ▶ No fire ignition (and associated use of accelerants) will occur within the special-status plant buffer. A qualified RPF or botanist with knowledge of the special-status plant species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment would not maintain habitat function of the special-status plant habitat (i.e., the habitat would be rendered unsuitable) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If the project proponent determines the impact on special-status plants would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required. **Project-Specific Guidance to Implement Mitigation Measure BIO-1b:** <u>Seaside Bittercress</u> ▶ If surveys pursuant to SPR BIO-7 determine seaside bittercress is present on Green Diamond Resource Company property, implement the mitigation measures in *Green Diamond Resource Company of Property-wide Consultation for Cardamine angulata (Seaside bittercress)* (Manji 2018). <u>Coast Fawn Lily</u> ▶ If surveys pursuant to SPR BIO-7 determine coast fawn lily is present on Green Diamond Resource Company property, implement the mitigation measures in *Property-wide Consultation for Erythronium revolutum (coast fawn lily) 18-R1-CTP_39* (Croteau 2018).			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Howell's Montia ▶ If surveys pursuant to SPR BIO-7 determine Howell's montia is present on Green Diamond Resource Company property, implement the mitigation measures in *Proposed Revisions to the June 2005 GDRCo Property-wide Consultation for Montia howellii (Howell's montia) – Growing Season Date Change November 2016* (CDFW 2016).			
Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment. The first priority for compensatory mitigation will be preserving and enhancing existing populations outside of the treatment area in perpetuity, or if that is not an option because existing populations that can be preserved in perpetuity are not available, one of the following mitigation options will be implemented by the project proponent instead: ▶ creating populations on mitigation sites outside of the treatment area through seed collection and dispersal (annual species) or transplantation (perennial species); ▶ purchasing mitigation credits from a CDFW- or USFWS-approved conservation or mitigation bank in sufficient quantities to offset the loss of occupied habitat; and ▶ if the affected special-status plants are not listed under ESA or CESA, compensatory mitigation may include restoring or enhancing degraded habitats so that they are made suitable to support special-status plant species in the future. If relocation efforts are part of the Compensatory Mitigation Plan, the plan will include details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements. The following performance standards will be applied for relocation: ▶ the extent of occupied area will be substantially similar to the affected occupied habitat and will be suitable for self-producing populations. Re-located/re-established populations will be considered suitable for self-producing when: ▶ habitat conditions allow for plants to reestablish annually for a minimum of 5 years with no human intervention, such as supplemental seeding; and	Prior to and during treatment activities.	Green Diamond	HCRCD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ reestablished habitats contain an occupied area comparable to existing occupied habitat areas in similar habitat types in the region. If preservation of existing populations or creation of new populations is part of the mitigation plan, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands and actions (e.g., the number and type of credits, location of mitigation bank or easement, restoration or enhancement actions), parties responsible for the long-term management of the land, and the legal and funding mechanisms (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. If mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, funding assurances, and success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations. If mitigation includes restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. If the loss of occupied habitat cannot be offset (e.g., if preservation of existing populations or creation of new populations through relocation efforts are not available for a certain species), and as a result treatment activities would substantially reduce the number or restrict the range of listed plant species, then the treatment will not qualify as within the scope of this Program EIR. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above.			
Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities) If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species by implementing the following. <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> The project proponent will implement one of the following two measures to avoid mortality, injury, or disturbance of individuals: 1. Treatment will not be implemented within the occupied habitat. Any treatment activities outside occupied habitat will be a sufficient distance from the occupied habitat such that mortality, injury, or disturbance of the	Prior to and during all treatment activities.	Green Diamond	HCRCD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
species will not occur, as determined by a qualified RPF or biologist using the most current and commonly-accepted science and considering published agency guidance; OR 2. Treatment will be implemented outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, CDFW and/or USFWS/NOAA Fisheries will be consulted to determine if there is a period of time within which treatment could occur that would avoid mortality, injury, or disturbance of the species. ▶ For species listed under ESA or CESA, if the project proponent cannot avoid mortality, injury or disturbance by implementing one of the two options listed above, the project proponent will implement Mitigation Measure BIO-2c. Injury or mortality of California Fully Protected Species is prohibited pursuant to Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code and will be avoided. <u>Maintain Habitat Function</u> ▶ The project proponent will design treatment activities to maintain the habitat function, by implementing the following: ▪ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; dens; tree snags; large raptor nests [including inactive nests]; downed woody debris; food sources). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. ▪ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that listed or fully protected wildlife with specific requirements for high canopy cover (e.g., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted [e.g., 50 percent for coastal California gnatcatcher]) such that habitat function is maintained. A qualified RPF or biologist of the lead agency will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. If the lead agency determines after consultation that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c.			

Project-Specific Guidance to Implement Mitigation Measure BIO-2a California Condor ▶ Treatment activities will temporarily halt as soon as possible if any California condors are observed within the project area prior to the start of or during treatment activities. California condors will be allowed to depart on their own before project activities resume or the Yurok Tribe Wildlife Department, USFWS, and CDFW will be contacted to determine if other measures can be applied. Green Diamond employees or their contractors will inform the qualified biologist or RPF should any California condor-related work stoppages take place. ▶ Green Diamond employees or their contractors involved in all project activities will remove all trash associated with this project and ensure that it is disposed of properly. ▶ All personnel involved in implementing the project will be briefed on the importance of not leaving hazardous materials exposed and daily removal of all garbage fragments to maintain condor health. ▶ Green Diamond employees or their contractors will store all project materials, tools, hardware, equipment, and all loose items in a manner that will prevent their removal or ingestion by California condors and other wildlife. ▶ Green Diamond employees or their contractors will place all materials that are liquid, granular, or powder in sealed leak-proof containers and store in a manner that prevents access by California condors and other wildlife. ▶ Green Diamond employees or their contractors will keep all parked vehicles and equipment free of leaks. ▶ If an occupied condor nest site (nest attended by a breeding pair, occupied by a condor egg, or occupied or attended by a less than 1-year-old condor) is located through contact with the Yurok Tribe Wildlife Department or observation by Green Diamond, no mechanical treatments, manual treatments, and prescribed burning will occur within 656 feet of the occupied nest until a qualified biologist or RPF in consultation with USFWS and CDFW determines that the condor nest is no longer occupied. Other Special-Status Birds ▶ If active bald eagle nests are detected within treatment areas during focused surveys (pursuant to SPR BIO-10), a no-disturbance buffer of 0.5 mile will be established around the nest, and no treatment activities will occur within this buffer until chicks have fledged as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW. In addition, the nest tree will be retained even once chicks have fledged. ▶ If active white-tailed kite or great gray owl nests are detected within treatment areas during focused surveys (pursuant to SPR BIO-10), a no-disturbance buffer of 0.25 mile will be established around the nest, and no treatment activities will occur within this buffer until chicks have fledged as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW. Northern California Ringtail ▶ If the limited operating period for ringtail (pursuant to SPR BIO-1) is determined to be infeasible and presence of ringtail is assumed or the species is detected during focused surveys (pursuant to SPR BIO-10), then the following avoidance and minimization measures would be required: ▪ Den Surveys. Within 7 days prior to the start of mechanical treatments, manual snag and large tree (i.e., greater than 12 inches DBH) removal, and prescribed burning treatments during the ringtail maternity			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
season, a qualified RPF or biologist will conduct a den search in the treatment area to be treated the next week. The qualified RPF or biologist will search for areas of dense shrubs showing signs of ringtail, and large snags and trees (i.e., greater than 12 inches DBH) with appropriate cavities (i.e., holes larger than 3 inches in diameter, cavities extending approximately 12 inches down from the cavity hole). If found, the qualified RPF or biologist will inspect the cavity using a cell phone with a flash or other tools (e.g., borescopes) to determine whether ringtails are present. Areas (e.g., large trees) with appropriate den habitat, occupied or not, will be marked (i.e., with flagging, spray paint), for inspection during future sweeps (as described below). The qualified RPF or biologist will also search for dens in dense shrub habitat and will note any sightings of fleeing adult ringtails. ▪ Active Dens. If active ringtail dens are discovered during a den survey or daily sweep (described below), a no-disturbance buffer of at least 0.25 mile will be implemented around the den; and mechanical treatments, manual treatments using power equipment, and prescribed burning will not proceed within the buffer until at least the end of the ringtail maternity season (June 30). The qualified RPF or biologist will confirm that the den is unoccupied before treatment activities resume. The 0.25-mile buffer would incorporate the den and an area greater than the typical ringtail home range in northern California (Wyatt, pers. comm., 2021). If an active den is discovered, the Northern Region of CDFW (R1Timber@wildlife.ca.gov) will be notified of the den and buffer location. CDFW will be provided an opportunity to visit the site and provide technical information on the size and shape of the den buffer. ▪ Daily Sweeps, Training, and Monitoring. If active ringtail dens are not discovered, the following measures will be implemented to avoid inadvertent destruction of active dens that eluded detection during the den search as well as take of adult ringtails and kits. • **Daily Sweeps**. On the first morning of work for mechanical treatments, manual snag or large tree (i.e., greater than 12 inches DBH) removal, or prescribed burning, a qualified RPF or biologist will conduct a sweep of the area to be treated that day and will search all habitat suitable for ringtail where manual snag or large tree (i.e., greater than 12 inches DBH) removal, prescribed burning, or mechanical treatment (e.g., mastication) will occur that day (i.e., larger trees, dense shrubs, rock piles) for active dens or adults, including the trees with cavities previously marked by the qualified RPF or biologist, unless work has occurred continuously since the initial den survey. On following days, a trained contractor will search all areas previously marked by the qualified RPF or biologist for active dens (see training requirements below under "Training and Monitoring"). If an active den is discovered during a daily sweep, the qualified RPF or biologist will be notified, all work will stop, a no-disturbance buffer of at least 0.25 mile will be implemented around the den, and the requirements described above under "Active Dens" will be followed. • **Training and Monitoring**. On the first morning of work for mechanical treatments, manual snag and tree removal, and prescribed burning, the qualified RPF or biologist will provide biological resource training (as required under SPR BIO-2) for all contractors. In addition to standard biological resource training,			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
the qualified RPF or biologist will provide additional training specific to ringtail that will include the following elements: o Description of ringtail appearance (i.e., physical features, typical size), typical ringtail behavior, and denning habitat suitable for ringtail, particularly in that week's treatment area. The approximate location of large trees with cavities that were previously marked will be noted; o Measures required during operation, including daily sweeps of habitat suitable for ringtail where manual treatment using power equipment, prescribed burning, or mechanical treatment (e.g., mastication) will occur that day (i.e., dense shrub habitat, previously marked tree cavities), year-round take avoidance measures, and required increased vigilance when operating in dense shrubs; o Measures required if a ringtail is spotted (i.e., all work halts until a qualified RPF or biologist can conduct a den search and sweep; if the qualified RPF or biologist observes a ringtail or confirms the contractor's observation, the occurrence will be reported to the Northern Region of CDFW at R1Timber@wildlife.ca.gov); o Measures required if a ringtail den is found (i.e., 0.25-mile no-disturbance buffer and requirements described above under "Active Dens" will be followed); o Definition of and legal consequences for take of ringtail (i.e., fine for each take and/or jail sentence); and Requirements for contacting the Northern Region of CDFW, (R1Timber@wildlife.ca.gov), which include the following circumstances: ringtail observed during treatment activities (notify within 3 business days); active ringtail den discovered (notify within 24 hours); and take of ringtail occurs (notify within 24 hours).			
Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities) If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following. Avoid Mortality, Injury, or Disturbance of Individuals ▶ The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include, but not be limited to, the species' tolerance to disturbance; the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; baseline levels	Prior to and during all treatment activities.	Green Diamond	HCRCD

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

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained. ▶ A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function. A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If the project proponent determines the impact on special-status wildlife would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the non-listed special-status wildlife would benefit from treatment in the occupied habitat area even though some of the non-listed special-status wildlife may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding the determination that a non-listed special-status species would benefit from the treatment. **Project-Specific Guidance to Implement Mitigation Measure BIO-2b** ▶ If foothill yellow-legged frog or northern red-legged frog are detected during focused visual encounter surveys or if presence is assumed (pursuant to SPR BIO-10), biological monitoring by a qualified RPF, qualified biologist, or biological technician during mechanical treatments, manual tree and snag removal treatments, or prescribed burning within or adjacent to sensitive habitat areas (e.g., streams, seeps, springs, talus slopes) will be implemented to avoid injury to or mortality of individual frogs. If the qualified RPF, qualified biologist, or biological technician			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
detects a special-status frog during treatments, treatment activities will cease until the individual has left the area or has been moved out of harm's way and to other nearby habitat suitable for the species. ▶ If active loggerhead shrike, olive-sided flycatcher, or Vaux's swift nests are detected within treatment areas during focused surveys (pursuant to SPR BIO-10), a no-disturbance buffer of 100 feet will be established around the nest, and no treatment activities will occur within this buffer until chicks have fledged as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW. ▶ If an American badger den is detected within a treatment area during focused surveys (pursuant to SPR BIO-10), a no-disturbance buffer of 50 feet will be established around the den, the size of which may be adjusted by the qualified RPF or biologist based on local conditions, and no treatment activities would occur within this buffer until the den is no longer occupied as determined by the qualified RPF or biologist. ▶ If a special-status bat roost is detected during focused surveys (pursuant to BIO-10), a no-disturbance buffer of 250 feet will be established around the roost, and no mechanical treatments or manual tree and snag removal treatments will occur within this buffer until the roost is no longer being used, as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW. If special-status bat roosts are identified in a treatment area where prescribed burning is planned, prescribed burning activities would be implemented outside of the bat breeding season, which is April 1 through August 31.			
Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3: ▶ Reference the *Manual of California Vegetation*, Appendix 2, Table A2, *Fire Characteristics* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class and fire return interval departure of the vegetation alliances present will also be determined. ▶ Design treatments in sensitive natural communities and oak woodlands to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function of the affected sensitive natural community. Treatments will be designed to replicate the fire regime attributes for the affected sensitive natural community or oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fireline intensity, severity, and fire type as described in *Fire in California's Ecosystems* (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval (i.e., time since last burn is less than the average time required for that vegetation type to recover from fire) or within Condition Class 1.	During treatment activities in areas that contain sensitive natural communities.	Green Diamond	HCRCD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled). ▶ To the extent feasible, fuel breaks will not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in sensitive natural communities with a rarity rank of S3 (vulnerable) or in oak woodlands. In forest and woodland sensitive natural communities with a rarity rank of S3, and in oak woodlands, only shaded fuel breaks will be installed, and they will not be installed in more than 20 percent of the stand of sensitive natural community or oak woodland vegetation (i.e., if the sensitive natural community covers 100 acres, no more than 20 acres will be converted to create the fuel break). ▶ Use prescribed burning as the primary treatment activity in sensitive natural communities that are fire dependent (e.g., closed-cone forest and woodland alliances, chaparral alliances characterized by fire-stimulated, obligate seeders), to the extent feasible and appropriate based on the fire regime attributes as described in *Fire in California's Ecosystems* (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). ▶ Time prescribed herbivory to occur when non-target vegetation is not susceptible to damage (e.g., non-target vegetation is dormant or has completed its reproductive cycle for the year). For example, use herbivores to control invasive plants growing in sensitive habitats or sensitive natural communities when sensitive vegetation is dormant but invasive plants are growing. Timing of herbivory to avoid non-target vegetation will be determined by a qualified botanist, RPF, or biologist based on the specific vegetation alliance being treated, the life forms and life conditions of its characteristic plant species, and the sensitivity of the non-target vegetation to the effects of herbivory. The feasibility of implementing the avoidance measures will be determined by the project proponent based on whether implementation of this mitigation measure will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. If the avoidance measures are determined by the project proponent to be infeasible, the project proponent will document the reasons implementation of the avoidance strategies are infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). A qualified RPF or botanist with knowledge of the affected sensitive natural community will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat functions of the sensitive natural community or oak woodland. If the project proponent determines the impact on sensitive natural communities or oak woodlands would be less than significant, no further mitigation will be required. If the project proponent determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-3b will be implemented.			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the occupied habitat area even though some loss may occur during treatment activities. For a treatment to be considered beneficial to a sensitive natural community or oak woodland, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the community (or similar community) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.			
Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will implement the following actions: ▶ Compensate for unavoidable losses of sensitive natural community and oak woodland acreage and function by: ▪ restoring sensitive natural community or oak woodland functions and acreage within the treatment area; ▪ restoring degraded sensitive natural communities or oak woodlands outside of the treatment area at a sufficient ratio to offset the loss of acreage and habitat function; or ▪ preserving existing sensitive natural communities or oak woodlands of equal or better value to the sensitive natural community lost through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function. ▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. 2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat.	Prior to and during treatment activities.	Green Diamond	HCRCD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan.			

Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
If, after implementation of SPR BIO-4, impacts to riparian habitat remain significant under CEQA, the project proponent will implement the following:
▶ Compensate for unavoidable losses of riparian habitat acreage and function by:
  ▪ restoring riparian habitat functions and acreage within the treatment area;
  ▪ restoring degraded riparian habitat outside of the treatment area;
  ▪ purchasing riparian habitat credits at a CDFW-approved mitigation bank; or
  ▪ preserving existing riparian habitat of equal or better value to the riparian habitat lost through a conservation easement at a sufficient ratio to offset the loss of riparian habitat function and value.
▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on riparian habitat that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and:
  1. For preserving existing riparian habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity.
  2. For restoring or enhancing riparian habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat.
The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., Lake and Streambed Alteration Agreement), if these requirements are equally or more effective than the mitigation identified above.
	Prior to and during treatment activities.	Green Diamond	HCRCD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands Impacts to wetlands will be avoided using the following measures: ▶ The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented. ▶ The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures). ▶ A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified RPF or biologist and will depend on the type of wetland present (e.g., seasonal wetland, wet meadow, freshwater marsh, vernal pool), the timing of treatment (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the species' vulnerability to the treatment activities, environmental conditions and terrain, and the treatment activity being implemented. ▶ A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. ▶ Within this buffer, herbicide application is prohibited. ▶ Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical treatments, prescribed herbivory, equipment and vehicle access or staging. ▶ Only prescribed (broadcast) burning may be implemented in wetland habitats if it is determined by a qualified RPF or biologist that: ▪ No special-status species are present in the wetland habitat ▪ The wetland habitat function would be maintained. ▪ The prescribed burn is within the normal fire return interval for the wetland vegetation types present ▪ Fire containment lines and pile burning are prohibited within the buffer No fire ignition (and associated use of accelerants) will occur within the wetland buffer	Prior to and during all treatment activities.	Green Diamond	HCRCD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites The project proponent will implement the following measures while working in treatment areas that contain nursery sites identified in surveys conducted pursuant to SPR BIO-10: ▶ **Retain Known Nursery Sites.** A qualified RPF or biologist will identify the important habitat features of the wildlife nursery and, prior to treatment activities, will mark these features for avoidance and retention during treatment. **Establish Avoidance Buffers.** The project proponent will establish a non-disturbance buffer around the nursery site if activities are required while the nursery site is active/occupied. The appropriate size and shape of the buffer will be determined by a qualified RPF or biologist, based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors. No treatment activity will commence within the buffer area until a qualified RPF or biologist confirms that the nursery site is no longer active/occupied. Monitoring of the effectiveness of the non-disturbance buffer around the nursery site by a qualified RPF, biologist, or biological technician during and after treatment activities will be required. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to special-status species.	During treatment activities in areas that contain nursery sites (if nursery sites are identified during surveys).	Green Diamond	HCRCD
Greenhouse Gas Emissions			
Mitigation Measure GHG-2: Implement GHG Emission Reduction Techniques During Prescribed Burns When planning for and conducting a prescribed burn, project proponents implementing a prescribed burn will incorporate feasible methods for reducing GHG emissions, including the following, which are identified in the *National Wildfire Coordinating Group Smoke Management Guide for Prescribed Fire* (NWCG 2018): ▶ reduce the total area burned by isolating and leaving large fuels (e.g., large logs, snags) unburned; ▶ reduce the total area burned through mosaic burning; ▶ burn when fuels have a higher fuel moisture content; ▶ reduce fuel loading by removing fuels before ignition. Methods to remove fuels include mechanical treatments, manual treatments, prescribed herbivory, and biomass utilization; and ▶ schedule burns before new fuels appear. As the science evolves, other feasible methods or technologies to sequester carbon could be incorporated, such as conservation burning, a technique for burning woody material that reduces the production of smoke particulates and carbon released into the atmosphere and generates more biochar. Biochar is produced from the material left over after the burn and spread with compost to increase soil organic matter and soil carbon sequestration. Technologies to reduce greenhouse gas emissions may also include portable units that perform gasification to produce electricity or pyrolysis that produces biooil that can be used as liquid fuel and/or syngas that can be used to generate electricity. The project proponent will document in the Burn Plan required pursuant to SPR AQ-3 which methods for reducing GHG emissions can feasibly be integrated into the treatment design.	Prior to and during prescribed burning treatments.	Green Diamond	HCRCD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Hazardous Materials, Public Health and Safety			
Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments) or prescribed burning, CAL FIRE and other project proponents will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials. If it is determined that hazardous materials sites could be located within the boundary of a treatment site, the project proponent will conduct a DTSC EnviroStor web search (https://www.envirostor.dtsc.ca.gov/public/) and consult DTSC's Cortese List to identify any known contamination sites within the project site. If a proposed mechanical treatment or prescribed burn is located on a site included on the DTSC Cortese List as containing potential soil contamination that has not been cleaned up and deemed closed by DTSC, the area will be marked and no prescribed burning or soil disturbing treatment activities will occur within 100 feet of the site boundaries. If it is determined through coordination with landowners or after review of the Cortese List that no potential or known contamination is located on a project site, the project may proceed as planned.	During PSA preparation **Database searches are complete; see PSA/Addendum for results.**	Green Diamond	HCRCD

Notes: BIOS = Biogeographic Information and Observation System; CAL FIRE = California Department of Forestry and Fire Protection; Cal-IPC = California Invasive Plant Council; CalVTP = California Vegetation Treatment Program; CARB = California Air Resources Board; CCR = California Code of Regulations; CDFW = California Department of Fish and Wildlife; CEQA = California Environmental Quality Act; CESA = California Endangered Species Act; CFR = Code of Federal Regulations; CNDDB = California Natural Diversity Database; CNPS = California Native Plant Society; DBH = diameter at breast height; DPR = California Department of Pesticide Regulation; DPR = California Department of Parks and Recreation; EIR = environmental impact report; ELZ = equipment limitation zone; EPA = US Environmental Protection Agency; ESA = Federal Endangered Species Act; DTSC = Department of Toxic Substances Control; GHG = greenhouse gas; GIS = geographic information systems; GPS = Global Positioning System; Green Diamond = Green Diamond Resource Company; HCRCD = Humboldt County Resource Conservation District; IAP = Incident Action Plan; NAHC = Native American Heritage Commission; NOAA = National Oceanic and Atmospheric Administration; NOX = nitrous oxide; PCA = Pest Control Advisor; PM = particulate matter; PRC = Public Resources Code; PSA = project-specific analysis; RPF = Registered Professional Forester; RWQCB = Regional Water Quality Control Board; SPR = standard project requirement; SPRP = Spill Prevention and Response Plan; SWRCB = State Water Resources Control Board; TMP = Traffic Management Plan; USACE = US Army Corps of Engineers; USFWS = US Fish and Wildlife Service; VegCAMP = Vegetation Classification and Mapping Program; WDR = waste discharge requirements; WLPZ = Watercourse and Lake Protection Zones; WUI = wildland urban interface

REFERENCES

Busse, Matt D; Hubbert, Ken R.; Moghaddas, Emily E. Y. 2014. Fuel reduction practices and their effects on soil quality. Gen. Tech. Rep. PSW-GTR-241. Albany, CA: U.S. Department of Agriculture, Forest Service, Pacific Southwest Research Station. 156 p.

California Department of Fish and Wildlife. 2016. Attachment 1: Proposed Revisions to the June 2005 GDRCo Property-wide Consultation for Montia howellii (Howell's montia) – Growing Season Date Change November 2016. Consultation Letter to Dominik Schwab of Green Diamond Resource Company, Korbel, CA

California Invasive Plant Council. 2012 Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers (3rd Edition). Cal-IPC Publication 2012-03. California Invasive Plant Council. Berkeley, CA.

California Water Boards. 2019 (March 22). *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State*. Available: https://www.waterboards.ca.gov/water_issues/programs/cwa401/state_wetland_def_procedures.html. Accessed October 2019.

Croteau, J. 2018. *Property-wide Consultation for Erythronium revolutum (coast fawn lily) 18-R1-CTP_39.* California Department of Fish and Wildlife, Redding, CA. Consultation Letter to Neal Edward of Green Diamond Resource Company, Korbel, CA

Environmental Laboratory. 1987. U.S. Army Corps of Engineers Wetlands Delineation Manual. (Technical Report Y-87-1.) U.S. Army Corps of Engineers Waterways Experiment Station. Vicksburg, MS.

Manji, N. 2018. *Green Diamond Resource Company Property-wide Consultation for Cardamine angulata (Seaside bittercress).* California Department of Fish and Wildlife, Redding, CA. Consultation Letter to Neal Edward of Green Diamond Resource Company, Korbel, CA

National Marine Fisheries Service and US Fish and Wildlife Service. 2006. *Green Diamond Resource Company. Final Aquatic Habitat Conservation Plan and Candidate Conservation Agreement with Assurances. Volume 1 Prepared by Green Diamond Resource Company.* Available: https://www.greendiamond.com/resources/#responsible-forestry.

NMFS and USFWS. *See* National Marine Fisheries Service and US Fish and Wildlife Service.

National Wildfire Coordinating Group. 2018. *NWCG Smoke Management Guide for Prescribed Fire*. Available: https://www.nwcg.gov/publications/420-2. Accessed May 20, 2022.

Sawyer, JO, T Keeler-Wolf, JM Evens. 2009. *A Manual of California Vegetation* (Second Edition). California Native Plant Society and California Department of Fish and Game.

US Fish and Wildlife Service. 2019. *Forest Habitat Conservation Plan on the California Timberlands of Green Diamond Resource Company*. *Final.* Prepared by Green Diamond Resource Company. Available: https://www.greendiamond.com/resources/index. Accessed April 2024.

Van Wagtendonk, J.W., N.G. Sugihara, S.L Stephens, A.E. Thode, K.E. Shaffer, J. A. Fites-Kaufman. 2018. Fire in California's Ecosystems. University of California Press.

Working Group for Phytophthoras in Native Habitats. 2016. Guidance for plant pathogen prevention when working at contaminated restoration sites or sites with rare plants and sensitive habitat. Available: Sensitive-contam-site-bmp-FINAL-111716.pdf (suddenoakdeath.org).

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Attachment A2

Mitigation Monitoring and Reporting Program for the McKinleyville Vegetation Treatment Project – McKinleyville Community Services District

TABLE OF CONTENTS

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MITIGATION MONITORING AND REPORTING PROGRAM

INTRODUCTION

The California Environmental Quality Act (CEQA) and the State CEQA Guidelines (PRC Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies "to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment." A Mitigation Monitoring and Reporting Program (MMRP) is required for approval of the proposed project because the Project-Specific Analysis/Addendum to the California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (Program EIR) (PSA/Addendum) identifies potential significant adverse impacts and all feasible mitigation measures have been adopted. Standard project requirements (SPRs), which are part of the project description, have been incorporated to avoid or minimize adverse effects. Where potentially significant impacts remain after application of SPRs, mitigation measures have been identified to further reduce and/or compensate for those impacts. While only mitigation measures are required to be covered in an MMRP, both SPRs and mitigation are included in this MMRP to assist in implementation of all environmental protection features of later activities consistent with the CalVTP Program EIR.

PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

This MMRP has been prepared to facilitate the implementation of SPRs and mitigation measures. The McKinleyville Vegetation Treatment Project (project) consists of vegetation treatments on up to 3,641 acres, encompassing 3,043 acres of land owned by Green Diamond Resource Company (Green Diamond) and approximately 598 acres of land owned by the McKinleyville Community Services District (MCSD). Two MMRPs have been prepared to help facilitate the implementation of SPRs and mitigation measures for each implementing entity; the measures in this MMRP are only applicable to the vegetation treatments implemented by MCSD.

The attached table presents the text of each SPR and mitigation measure from the CalVTP Program EIR that is applicable to the portion of the project implemented by MCSD, the timing of its planned implementation, the implementing entity, and the entity with monitoring responsibility. The numbering of SPRs and mitigation measures follows the numbering used in the Program EIR. SPRs and mitigation measures that are referenced more than once in the PSA are not duplicated in the MMRP. Instructions for project-specific guidance to implement certain SPRs and Mitigation Measures has been added to tailor the specific impact avoidance and minimization actions relevant to the proposed treatments, agency standard practices, and the conditions and resources present within each treatment site. In addition, non-substantive clarifying edits to mitigation measures in the Program EIR are shown in underline and strikethrough. In all cases, the additional project-specific implementation instruction and clarifying edits to mitigation measures maintain the SPRs and mitigation measures as equivalent or more effective than those presented in the Program EIR.

The proposed treatment activities for the project are mechanical vegetation treatment, manual vegetation treatment, prescribed burning, and targeted herbicide application. Prescribed herbivory is included in the PSA/Addendum because it is part of the CalVTP SPRs and mitigation measures; however, this project does not propose prescribed herbivory as a treatment activity, so no MMRP actions include herbivory. Prescribed burning and herbicide application are also included in the PSA/Addendum because these treatment types are part of the CalVTP SPRs and mitigation measures; however, prescribed burning and herbicide application would only be implemented on Green Diamond land and are not proposed as treatment activities on MCSD land, so no MMRP actions include them.

ROLES AND RESPONSIBILITIES

The Humboldt County Resource Conservation District (HCRCD) is the project proponent and lead agency under CEQA. HCRCD will enter into a partnership with MCSD to implement the proposed treatments. The District Board will

approve a resolution establishing the partnership and delegating implementation of the MMRP to MCSD. The partnership may entail the provision of resources to MCSD, including equipment, staffing, and technical input.

Unless otherwise specified herein, MCSD (the implementing entity) is responsible for implementing the SPRs and mitigation measures according to the specifications provided for each measure and for demonstrating that the action has been successfully completed. As the CEQA lead agency, HCRCD will be responsible for ensuring that implementation of mitigation measures occurs in accordance with the MMRP pursuant to Section 15097(a) of the State CEQA Guidelines.

As defined in the CalVTP Program EIR and the PSA, the project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. The SPRs and mitigation measures in this MMRP direct the project proponent to implement actions to avoid, minimize and mitigate impacts. As the implementing entity and reflecting delegation by HCRCD, the "project proponent" as identified in the SPRs and mitigation measures refers to MCSD.

REPORTING

HCRCD shall document and describe the compliance of the project treatment work with the required SPRs and mitigation measures either by adapting the project-specific MMRP table or preparing a separate post-project implementation report pursuant to the requirements of SPR AD-7.

MITIGATION MONITORING AND REPORTING PROGRAM TABLE

The categories identified in the attached MMRP table are described below.

- SPRs and Mitigation Measures – This column provides the text of the applicable SPR or adopted mitigation measure.
- Timing – This column identifies the time frame in which the SPR or mitigation measure will be implemented.
- Implementing Entity – This column identifies the party responsible for implementing the SPR or mitigation measure.
- Verifying/Monitoring Entity – This column identifies the party responsible for verifying and monitoring implementation of the SPR or mitigation measure.

QUALIFICATION REQUIREMENTS FOR BIOLOGICAL AND CULTURAL RESOURCE MEASURES

The biological and cultural resource SPRs and mitigation measures in the attached MMRP table require that qualified individuals implement components of the measures. The CalVTP Program EIR requirements listed below will be met to be considered qualified and may be performed by individuals of various titles (including biologist, botanist, ecologist, Registered Professional Forester [RPF], biological technician, or supervised designees working under the direction of a qualified professional) as long as they are qualified for the task at hand.

Archaeologically Trained Resource Professional: To be qualified, an archaeologically-trained resource professional would hold a valid Archaeological Training Certificate issued by CAL FIRE and the Board of Forestry and Fire Protection or equivalent state or local agency training or certification. Work performed by an archaeologically-trained resource professional must be reviewed and approved by a qualified archaeologist.

Qualified Archaeologist: To be qualified, an archaeologist would hold a Prehistoric Archeology, Historic Archeology, Conservation, Cultural Anthropology, or Curation degree from an accredited university and meet the Secretary of Interior's Qualifications Standards (36 CFR Part 61). The project proponent will review the resume and approve the qualifications of the archaeologists.

Qualified RPF or Biological Technician: To be qualified, an RPF or biological technician would 1) be knowledgeable in relevant species life histories and ecology, 2) be able to correctly identify relevant species and habitats, 3) have experience conducting biological monitoring of relevant species or resources, and 4) be knowledgeable about state and federal laws regarding the protection of special-status species. The project proponent will review the resume and approve the qualifications of RPFs or biological technicians.

Qualified RPF or Biologist: To be qualified, an RPF or biologist would hold a wildlife biology, botany, ecology, forestry, or other relevant degree from an accredited university and: 1) be knowledgeable in relevant species life histories and ecology, 2) be able to correctly identify relevant species and habitats, 3) have experience conducting field surveys of relevant species or resources, 4) be knowledgeable about survey protocols, 5) be knowledgeable about state and federal laws regarding the protection of special-status species, and 6) have experience with CDFW's California Natural Diversity Database (CNDDB) and Biogeographic Information and Observation System (BIOS). The project proponent will review the resume and approve the qualifications of RPFs or biologists. If species-specific protocol surveys are performed, surveys would be conducted by qualified RPFs or biologists with the minimum qualifications required by the appropriate protocols, including having CDFW or USFWS approval to conduct such surveys, if required by certain protocols.

Qualified RPF or Botanist: To be qualified, an RPF or botanist would 1) be knowledgeable about plant taxonomy, 2) be familiar with plants of the region, including special-status plants and sensitive natural communities, 3) have experience conducting floristic botanical field surveys as described in CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018), or experience conducting such botanical field surveys under the direction of an experienced botanical field surveyor, 4) be familiar with the *California Manual of Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/), and 5) be familiar with federal, state, and local statutes and regulations related to plants and plant collecting. The project proponent will review the resume and approve the qualifications of RPFs or botanists.

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Administrative Standard Project Requirements			
SPR AD-1: Project Proponent Coordination For treatments coordinated with CAL FIRE, CAL FIRE will meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable mitigation measures; identify any sensitive resources onsite; and discuss resource protection measures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to treatment activities.	MCSD	MCSD
SPR AD-2: Delineate Protected Resources: The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to treatment activities.	MCSD	MCSD
SPR AD-3: Consistency with Local Plans, Policies, and Ordinances: The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	MCSD	MCSD
SPR AD-5: Maintain Site Cleanliness: If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	During treatment activities.	MCSD	MCSD
SPR AD-6: Public Notifications for Treatment Projects One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	One to three days prior to the commencement of a treatment activity.	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR AD-7: Provide Information on Proposed, Approved, and Completed Treatment Projects For any vegetation treatment project using the CalVTP Program EIR for CEQA compliance, the project proponent will provide the information listed below to the Board of Forestry and Fire Protection (Board) or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. Information on proposed projects (PSA in progress): ▶ GIS data that include project location (as a point), or project latitude/longitude; ▶ project size (typically acres); ▶ treatment types and activities; and ▶ contact information for a representative of the project proponent. The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public at least two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent's own website). Information on approved projects (PSA complete): ▶ A completed PSA Environmental Checklist; ▶ A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); ▶ GIS data that include a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction) Information on completed projects (following initial treatment): ▶ GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction) ▶ A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes ▪ Size of treated area (typically acres); ▪ Treatment types and activities; ▪ Dates of work; ▪ A list of the SPRs and mitigation measures that were implemented ▪ Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	During the proposed, approved, and completed stages of the project. **Information on the proposed project (PSA in progress) was submitted to the Board on June 13, 2024.**	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR AD-8: Request Access for Post-Treatment Assessment For CAL FIRE projects, during contract development, CAL FIRE will include access to the treated area over a prescribed period (usually up to three years) to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance, as a contract term for consideration by the landowner. For public landowners, access to the treated area over a prescribed period will be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	During contract development.	MCSD	MCSD
Aesthetic and Visual Resource Standard Project Requirements			
SPR AES-1: Vegetation Thinning and Edge Feathering The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	During mechanical and manual treatment activities.	MCSD	MCSD
SPR AES-2: Avoid Staging within Viewsheds The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	During all treatment activities.	MCSD	MCSD
SPR AES-3: Provide Vegetation Screening The project proponent will preserve sufficient vegetation within, at the edge of, or adjacent to treatment areas to screen views from public trails, parks, recreation areas, and roadways as reasonable or appropriate for vegetation conditions. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	During all treatment activities.	MCSD	MCSD
Air Quality Standard Project Requirements			
SPR AQ-1: Comply with Air Quality Regulations The project proponent will comply with the applicable air quality requirements of air districts within whose jurisdiction the project is located. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	During all treatment activities.	MCSD	MCSD
SPR AQ-4: Minimize Dust To minimize dust during treatment activities, the project proponent will implement the following measures: ▶ Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol.	During all treatment activities.	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by ARB, EPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the water results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations. ▶ Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113. ▶ Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property," per Health and Safety Code Section 41700. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements			
SPR CUL-1: Conduct Record Search An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to all initial treatment activities. Not required prior to maintenance treatments if records search remains valid. **A complete record search of the 3,641-acre project area was conducted in March 2024; see PSA/Addendum for a summary of results. Compliance with this SPR is complete.**	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR CUL-2: Contact Geographically Affiliated Native American Tribes The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the project proponent will notify the California Native American Tribes in the counties where the treatment activity is located. The notification will contain the following: ▶ A written description of the treatment location and boundaries. ▶ Brief narrative of the treatment objectives. ▶ A description of the activities used (e.g., mastication) and associated acreages. ▶ A map of the treatment area at a sufficient scale to indicate the spatial extent of activities. ▶ A request for information regarding potential impacts to cultural resources from the proposed treatment. ▶ A detailed description of the depth of excavation, if ground disturbance is expected. In addition, the project proponent will contact the NAHC for a review of their Sacred Lands File. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to all initial treatment activities. Not required prior to maintenance treatments if records search remains valid. **Outreach to the NAHC has occurred, Tribes have been contacted and a SLF query has been completed; see PSA for a summary of consultation and Sacred Lands File query results.**	MCSD	MCSD
SPR-CUL-3: Pre-field Research The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. The purpose of this research is to properly inform survey design, based on the types of resources likely to be encountered within the treatment area, and to be prepared to interpret, record, and evaluate these findings within the context of local history and prehistory. The qualified archaeologist and/or archaeologically-trained resource professional will review records, study maps, read pertinent ethnographic, archaeological, and historical literature specific to the area being studied, and conduct other tasks to maximize the effectiveness of the survey. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to all initial treatment activities. Not required prior to maintenance treatments if research remains valid.	MCSD	MCSD
SPR CUL-4: Archaeological Surveys The project proponent will coordinate with an archaeologically-trained resource professional and/or qualified archaeologist to conduct a site-specific survey of the treatment area. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search, pre-field research, and/or Native American consultation identifies archaeological or historical resources near or within the treatment area. A survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to all initial treatment activities. Not required prior to maintenance treatments if initial surveys remain valid.	MCSD	MCSD
SPR CUL-5: Treatment of Archaeological Resources If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with	Prior to and during all treatment activities.	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
said tribe(s), as a tribal cultural resource. The project proponent, in consultation with culturally affiliated tribe(s), will develop effective protection measures for important cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. These protection measures will be written in clear, enforceable language, and will be included in the survey report in accordance with applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
SPR CUL-6: Treatment of Tribal Cultural Resources The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity to submit comments and participate in consultation to resolve issues of concern. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	MCSD	MCSD
SPR CUL-7: Avoid Built Historical Resources If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. Within a buffer of 100 feet of the built historical resource, there will be no mechanical treatment activities. Buffers less than 100 feet for built historical resources will only be used after consultation with and receipt of written approval from a qualified archaeologist. If the records search does not identify known historical resources in the treatment area, but structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historic significance are present in the treatment area, they will similarly be avoided. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	MCSD	MCSD
SPR CUL-8: Cultural Resource Training The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	MCSD	MCSD
Biological Resources Standard Project Requirements			
SPR BIO-1: Review and Survey Project-Specific Biological Resources The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year	Prior to treatment	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this Program EIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified RPF or biologist, will determine which one of the following best characterizes the treatment:	**Biological reconnaissance survey conducted on February 13, 2024**		
1. **Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided**. If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment: a. by physically avoiding the suitable habitat, or b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites). Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist. **Project-Specific Guidance to Implement SPR BIO-1** <u>Special-Status Wildlife</u> ► To avoid impacts on northern spotted owls, MCSD will implement the following:	Prior to and during treatment	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
o To avoid disturbance, injury, or mortality of nesting and fledgling northern spotted owls, prior to starting treatment activities, MCSD will conduct an additional data search (e.g., CNDDB) and coordinate with Green Diamond for recent northern spotted owl nesting detections within 0.25 mile of the treatment area on adjacent lands; and a qualified RPF or biologist will survey for suitable nesting/roosting habitat within the treatment area. o Treatment activities that include the use of heavy equipment, loud or multiple vehicles, or loud hand tools (e.g., chainsaws) will be avoided by a distance of 330 feet to 0.25 mile around habitat suitable for nesting within the Project area depending on the noise generated by the activity (following USFWS guidance [USFWS 2019; USFWS 2020a]), during the sensitive nesting season (February 1–July 31). o Treatment activities that include the use of heavy equipment, multiple vehicles, or loud hand tools (e.g., chainsaws) will be avoided by a distance of 330 feet to 0.25 mile of CNDDB nesting detections on adjacent lands (unless there is evidence that the documented nest is no longer present), following USFWS guidance (USFWS 2019; USFWS 2020a), during the sensitive nesting season (February 1–July 31). o If it is not feasible to avoid all treatments as described above, SPR BIO-10 will be implemented. ▶ To avoid impacts on other special-status birds (bald eagle, great gray owl, loggerhead shrike, olive-sided flycatcher, Vaux's swift, and white-tailed kite) mechanical treatments and manual treatments will be conducted outside of the nesting season (February 1–August 31) within nesting habitat suitable for these species. If it is not feasible to avoid treatment areas during the nesting bird season, then SPR BIO-10 will be implemented. ▶ To avoid impacts on fisher, MCSD will conduct mechanical treatments, and manual snag and tree removal within habitat for the species outside of the maternity season (March 1–June 30) (USFWS 2020b). If it is not feasible to avoid certain treatment areas during the fisher maternity season, then SPR BIO-10 will be implemented. ▶ To avoid impacts on northern California ringtail, mechanical treatments and manual tree and snag removal will be conducted within habitat suitable for ringtail outside of the ringtail maternity season (April 15–June 30). If conducting mechanical treatments and manual tree and snag removal outside of the ringtail maternity season is determined to be infeasible for certain treatment areas, then SPR BIO-10 will be implemented. ▶ To avoid impacts on special-status bats, mechanical treatments and manual tree and snag removal will be conducted within habitat suitable for bat roosting outside of the bat maternity season (April 1–August 31). If conducting mechanical treatments and manual tree and snag removal outside of the bat maternity season is determined to be infeasible for certain treatment areas, then SPR BIO-10 will be implemented. 2. **Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided**. Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Protocols. Specific survey requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7). This SPR applies to all treatment activities and treatment types, including treatment maintenance. **Project-Specific Guidance to Implement SPR BIO-1** Special-Status Wildlife Because there is no reliable season during which all impacts on foothill yellow-legged frog, northern red-legged frog, Pacific tailed frog, southern torrent salamander, California condor, and American badger could be avoided and avoidance of habitat is not feasible for these species, implementation of SPR BIO-10 would be required.			
SPR BIO-2: Require Biological Resource Training for Workers The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during treatment	MCSD	MCSD
Sensitive Natural Communities and Other Sensitive Habitats			
SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, the project proponent will: ▶ require a qualified RPF or biologist to perform a protocol-level survey following the CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of *A Manual of California Vegetation* (including updated natural communities data at http://vegetation.cnps.org/), or referring to relevant reports (e.g., reports found on the VegCAMP website).	Prior to treatment	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ map and digitally record, using a Global Positioning System (GPS), the limits of any potential sensitive habitat and sensitive natural community identified in the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions by implementing the following within riparian habitats: ▶ Retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within the limits of riparian habitat identified and mapped during surveys conducted pursuant to SPR BIO-3. Native riparian vegetation will be retained in a well distributed multi-storied stand composed of a diversity of species similar to that found before the start of treatment activities. ▶ Treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the riparian vegetation types characteristic of the region. This includes hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. ▶ Removal of large, native riparian hardwood trees (e.g., willow, ash, maple, oak, alder, sycamore, cottonwood) will be minimized to the extent feasible and 75 percent of the pretreatment native riparian hardwood tree canopy will be retained. Because tree size varies depending on vegetation type present and site conditions, the tree size retention parameter will be determined on a site-specific basis depending on vegetation type present and setting; however, live, healthy, native trees that are considered large for that type of tree and large relative to other trees in that location will be retained. A scientifically-based, project-specific explanation substantiating the retention size parameter for native riparian hardwood tree removal will be provided in the Biological Resources Discussion of the PSA. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, presence of sufficient seed trees, light availability, and changes in stream shading may inform the tree size retention requirements. ▶ Removed trees will be felled away from adjacent streams or waterbodies and piled outside of the riparian vegetation zone (unless there is an ecological reason to do otherwise that is approved by applicable regulatory agencies, such as adding large woody material to a stream to enhance fish habitat, e.g., see *Accelerated Wood Recruitment and Timber Operations: Process Guidance from the California Timber Harvest Review Team Agencies and National Marine Fisheries Service*). ▶ Vegetation removal that could reduce stream shading and increase stream temperatures will be avoided. ▶ Ground disturbance within riparian habitats will be limited to the minimum necessary to implement effective treatments. This will consist of the minimum disturbance area necessary to reduce hazardous fuels and return the riparian community to a natural fire regime (i.e., Condition Class 1) considering historic fire return intervals, climate change, and land use constraints.	Prior to and during treatment	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ The project proponent will notify CDFW pursuant to California Fish and Game Code Section 1602 prior to implementing any treatment activities in riparian habitats. Notification will identify the treatment activities, map the vegetation to be removed, identify the impact avoidance identification methods to be used (e.g., flagging), and appropriate protections for the retention of shaded riverine habitat, including buffers and other applicable measures to prevent erosion into the waterway. ▶ In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, different protection measures and design standards will only be approved when the treatment plan incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
SPR BIO-6: Prevent Spread of Plant Pathogens When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., Ione chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (*Fusarium*), goldspotted oak borer, shot hole borer, bark beetle): ▶ clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk; ▶ include training on *Phytopthora* diseases and other plant pathogens in the worker awareness training; ▶ minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment; ▶ minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination; ▶ clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low risk areas or between widely separated portions of a treatment area; and ▶ follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (Working Group for *Phytoptheras* in Native Habitats 2016) This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during treatment	MCSD	MCSD
SPR BIO-7: Survey for Special-Status Plants If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant	Prior to treatments	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities." Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status. If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS. For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this Program EIR, surveys will not be required under the following circumstances: ▶ If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. ▶ If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
Invasive Plants and Wildlife			
SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail): ▶ clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, or invasive wildlife; ▶ for all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species;	Prior to and during treatment	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas; ▶ stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area; ▶ identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include manual or mechanical treatments, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles; ▶ treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and ▶ implement Fire and Fuel Management BMPs outlined in the "Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers" (Cal-IPC 2012, or current version). This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
Wildlife			
SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries, monarch overwintering sites) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. The qualified RPF or biologist will determine if following an established protocol is required, and the project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed. This SPR applies to all treatment activities and treatment types, including treatment maintenance. **Project-Specific Guidance to Implement SPR BIO-10** ▶ For mechanical treatments and manual tree and snag removal in habitat suitable for foothill yellow-legged frog, northern red-legged frog, Pacific tailed frog, and southern torrent salamander as determined by a qualified RPF	No more than 14 days prior to all treatment activities.	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
or biologist, focused visual encounter surveys for these species will be conducted prior to treatment activities. If foothill yellow-legged frog, northern red-legged frog, Pacific tailed frog, or southern torrent salamander are not detected within the treatment area during focused surveys, then no mitigation for the species would be required. If foothill yellow-legged frog, northern red-legged frog, Pacific tailed frog, or southern torrent salamander are identified during focused surveys, Mitigation Measure BIO-2b would be implemented. ▶ If it is not feasible to avoid impacts on northern spotted owl pursuant to SPR BIO-1, then surveys following the *Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls* (USFWS 2012) and *Northern Spotted Owl Take Avoidance Analysis and Guidance for Private lands in California, Attachment A: Take Avoidance Analysis Coast Redwood Region* (USFWS 2019) will be conducted. If nesting northern spotted owls are detected during protocol surveys, or if nests on adjacent lands are identified within 0.25 mile of treatment areas using the CNDDB Spotted Owl Database, coordination with Green Diamond on survey results, or best available information, or if treatments occur within existing nesting/roosting habitat (e.g., canopy cover greater than 60 percent and other late seral characteristics), Mitigation Measure BIO-2a will be implemented. ▶ Prior to conducting mechanical treatments and manual treatments in California condor habitat (e.g., large forest openings, in and within 656 feet of riparian management zones) MCSD will contact the Yurok Tribe Wildlife Department to determine if any individual California condors may be present within or adjacent to the project area. If California condors are present, Mitigation Measure BIO-2a will be implemented. If California condors are determined not to be present in the project area, then no further measures are required. ▶ If conducting treatment activities outside the sensitive season for nesting birds (pursuant to SPR BIO-1) is determined to be infeasible, to avoid impacts on special-status birds (i.e., bald eagle, great gray owl, loggerhead shrike, olive-sided flycatcher, Vaux's swift, white-tailed kite), focused surveys (i.e., nest searches) for nests of these species will be conducted prior to implementing any mechanical treatments and manual treatments during the nesting bird season (February 1–August 31). If active special-status bird nests are observed during surveys, then mitigation measures BIO-2a (for bald eagle, great gray owl, and white-tailed kite) and BIO-2b (for loggerhead shrike, olive-sided flycatcher, and Vaux's swift) will be implemented. ▶ Prior to conducting mechanical treatments within open habitats suitable for denning by American badger, focused surveys for American badger dens will be conducted by a qualified RPF or biologist no more than 14 days prior to the start of mechanical treatments. If American badger dens are detected during focused surveys, Mitigation Measure BIO-2b will be implemented. ▶ If conducting mechanical treatments and manual tree and snag removal outside the sensitive season for fisher (pursuant to SPR BIO-1) is determined to be infeasible, prior to implementing these treatments within habitat suitable for the species, presence of the species will be assumed or focused surveys for fisher will be conducted. Focused surveys (conducted by a qualified RPF or biologist) for fisher would include an initial denning habitat assessment, and if denning habitat is present, the use of trail cameras, track plates, or other non-invasive survey methods to determine whether fishers are present within the treatment area, or presence of the species may be assumed. If baited trail cameras are used, the qualified RPF or biologist should obtain any required permits. If			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
denning habitat is not present in the treatment area or fishers are not detected during focused surveys, then further mitigation for the species will not be required. If presence of fisher is assumed or fisher is detected during focused surveys Mitigation Measure BIO-2b will be implemented. ▶ If conducting mechanical treatments and manual tree and snag removal outside the sensitive season for special-status bats (pursuant to SPR BIO-1) is determined to be infeasible, to avoid impacts on these species, focal surveys for bat maternity roosts will be conducted prior to treatment activities. If bat maternity roosts are not detected during surveys, no further mitigation is required. If bat maternity roosts are detected during surveys, Mitigation Measure BIO-2b will be implemented. If the limited operating period for ringtail is determined to be infeasible, to avoid impacts on the species, focused surveys for ringtail, including non-invasive survey methods (e.g., trail cameras, track plates), will be conducted prior to implementing mechanical treatments and manual tree and snag removal during the ringtail maternity season (April 15–June 30). If ringtails are not detected during focused surveys, no further mitigation is required. If presence of ringtail is assumed or an active den is identified during focused surveys by a qualified RPF or biologist, Mitigation Measure BIO-2a will be implemented.			
SPR BIO-12: Protect Common Nesting Birds, Including Raptors The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP Program EIR. The active nesting season will be defined by the qualified RPF or biologist. If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identity the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following:	Conduct a survey for common nesting birds (if needed) at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies (typically, up to 3 weeks before treatment). If an active nest is observed, implement avoidance strategies prior to and during all treatment activities.	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ **Establish Buffer.** The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. Treatment activities will be implemented outside of the buffer. The buffer location will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. ▶ **Modify Treatment.** The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment methods). Treatment modifications will be determined by the project proponent in coordination with the qualified RPF or biologist. ▶ **Defer Treatment.** The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions. If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests: ▶ **Monitor Active Raptor Nest During Treatment**. A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases. ▶ **Retention of Raptor Nest Trees**. Trees with visible raptor nests, whether occupied or not, will be retained. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Geology, Soils, Paleontology, and Mineral Resource Standard Project Requirements			
SPR GEO-1: Suspend Disturbance during Heavy Precipitation The project proponent will suspend mechanical treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance. **Project-Specific Implementation** To prevent soil from being compacted which increases runoff and erosion risk, the project proponent will suspend mechanical treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities. The project proponent will be prepared to completely suspend mechanical treatment activities prior to the initiation of the rain event. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer very wet or saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of very wet or saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, (5) inadequate traction without blading wet soil or surfacing materials, or (6) tire track imprints or hoof marks in the soil. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	During mechanical treatment activities.	MCSD	MCSD
SPR GEO-2: Limit High Ground Pressure Vehicles The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	During mechanical treatment activities.	MCSD	MCSD
SPR GEO-3: Stabilize Disturbed Soil Areas The project proponent will stabilize soil disturbed during mechanical treatments that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical treatment activities could result in substantial sediment discharge from soil disturbed by machinery, animal	During mechanical activities that result in exposure of bare soil over 50 percent or	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical treatments that result in exposure of bare soil over 50 percent of the project area treatment activities and all treatment types, including treatment maintenance.	more of the treatment area.		
SPR GEO-4: Erosion Monitoring The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Prior to and during treatment activities.	MCSD	MCSD
SPR GEO-5: Drain Stormwater via Water Breaks The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (February 2019 version). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	During mechanical and manual treatment activities.	MCSD	MCSD
SPR GEO-7: Minimize Erosion To minimize erosion, the project proponent will: (1) Prohibit use of heavy equipment where any of the following conditions are present: (i) Slopes steeper than 65 percent. (ii) Slopes steeper than 50 percent where the erosion hazard rating is high or extreme. (iii) Slopes steeper than 50 percent that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake. (2) On slopes between 50 percent and 65 percent where the erosion hazard rating is moderate, and all slope percentages are for average slope steepness based on sample areas that are 20 acres, or less, heavy equipment will be limited to: (i) Existing tractor roads that do not require reconstruction, or (ii) New tractor roads flagged by the project proponent prior to the treatment activity. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	During all treatment activities.	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR GEO-8: Steep Slopes The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). If unstable areas or soils are identified within the treatment area, are unavoidable, and will be potentially directly or indirectly affected by the treatment, a licensed geologist (P.G. or C.E.G.) will determine the potential for landslide, erosion, of other issue related to unstable soils and identity measures (e.g., those in SPR GEO-7) that will be implemented by the project proponent such that substantial erosion or loss of topsoil would not occur. This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types, including treatment maintenance.	Prior to and during mechanical treatment activities on slopes greater than 50 percent.	MCSD	MCSD
Hazardous Material and Public Health and Safety Standard Project Requirements			
SPR HAZ-1: Maintain All Equipment The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during treatment activities.	MCSD	MCSD
SPR HAZ-2: Require Spark Arrestors The project proponent will require mechanized hand tools to have federal- or state-approved spark arrestors. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	During manual treatment activities.	MCSD	MCSD
SPR HAZ-3: Require Fire Extinguishers The project proponent will require tree cutting crews to carry one fire extinguisher per chainsaw. Each vehicle would be equipped with one long-handled shovel and one axe or Pulaski consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	During manual treatment activities.	MCSD	MCSD
SPR HAZ-4 Prohibit Smoking in Vegetated Areas The project proponent will require that smoking is only permitted in designated smoking areas barren or cleared to mineral soil at least 3 feet in diameter (PRC Section 4423.4). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	During all treatment activities.	MCSD	MCSD
Hydrology and Water Quality Standard Project Requirements			
SPR HYD-1: Comply with Water Quality Regulations Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the	During all treatment activities.	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or vegetation management activities. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types, including treatment maintenance. **Project-Specific Guidance to Implement SPR HYD-1** Vegetation treatment activities may result in discharges to waters of the state; therefore; compliance with Water Code sections 13260(a)(1) and 13264 are required. The project proponent will use the State Water Board's Vegetation Treatment General Order, which provides a mechanism for Water Code compliance for projects that prepare a CalVTP PSA or PSA/Addendum. The project will be automatically enrolled (through implementation of SPR AD-7) in the State Water Board's Vegetation Treatment General Order. The project's automatic enrollment satisfies the requirements of SPR HYD-1.			
SPR HYD-2: Avoid Construction of New Roads The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to treatment activities.	MCSD	MCSD
SPR HYD-4: Identify and Protect Watercourse and Lake Protection Zones The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916.5 of the California Forest Practice Rules (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.	Establish WLPZs during design of treatment project; implement WLPZ protections during treatment.	MCSD	MCSD

Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths

Water Class	Class I	Class II	Class III	Class IV
Water Class Characteristics or Key Indicator Beneficial Use	1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or 2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning.	1) Fish always or seasonally present offsite within 1000 feet downstream and/or 2) Aquatic habitat for nonfish aquatic species. 3) Excludes Class III waters that are tributary to Class I waters.	No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations.	Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.
WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ				
< 30 % Slope	75	50	Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.	
30-50 % Slope	100	75		
>50 % Slope	150	100		

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

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
The following WLPZ protections will be applied for all treatments: ▶ Treatment activities with WLPZs will retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced, a qualified RPF will provide the project proponent with a site- and/or treatment activity-specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version). ▶ Equipment, including tractors and vehicles, must not be driven in wet areas or WLPZs, except over existing roads or watercourse crossings where vehicle tires or tracks remain dry. ▶ Equipment used in vegetation removal operations will not be serviced in WLPZs, within wet meadows or other wet areas, or in locations that would allow grease, oil, or fuel to pass into lakes, watercourses, or wet areas. ▶ WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately. ▶ No fire ignition (nor use of associated accelerants) will occur within WLPZs; however low intensity backing fires may be allowed to enter or spread into WLPZs. ▶ Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of soil into water bodies and may include but are not limited to mulching, rip-rap, grass seeding, or chemical soil stabilizers. ▶ Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse. ▶ Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes. ▶ Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR HYD-6: Protect Existing Drainage Systems If a treatment activity is adjacent to a roadway with stormwater drainage infrastructure, the existing stormwater drainage infrastructure will be marked prior to ground disturbing activities. If a drainage structure or infiltration system is inadvertently disturbed or modified during project activities, the project proponent will coordinate with owner of the system or feature to repair any damage and restore pre-project drainage conditions. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to ground disturbing activities; after ground disturbing activities if required.	MCSD	MCSD
Noise Standard Project Requirements			
SPR NOI-1: Limit Heavy Equipment Use to Daytime Hours The project proponent will require that operation of heavy equipment associated with treatment activities (heavy off-road equipment, tools, and delivery of equipment and materials) will occur during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship). Cities and counties in the treatable landscape typically restrict construction-noise (which would apply to vegetation treatment noise) to particular daytime hours. If the project proponent is subject to local noise ordinance, it will adhere to those to the extent the project is subject to them. If the applicable jurisdiction does not have a noise ordinance or policy restricting the time-of-day when noise-generating activity can occur noise-generating vegetation treatment activity will be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday and federal holidays. If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	During all treatment activities.	MCSD	MCSD
SPR NOI-2: Equipment Maintenance The project proponent will require that all powered treatment equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. This SPR applies to all activities and all treatment types, including treatment maintenance.	Prior to and during all treatment activities.	MCSD	MCSD
SPR NOI-3: Engine Shroud Closure The project proponent will require that engine shrouds be closed during equipment operation. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	During all mechanical treatment activities.	MCSD	MCSD
SPR NOI-4: Locate Staging Areas Away from Noise-Sensitive Land Uses The project proponent will locate treatment activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible, to minimize noise exposure. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	During all treatment activities.	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR NOI-5: Restrict Equipment Idle Time The project proponent will require that all motorized equipment be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	During all treatment activities.	MCSD	MCSD
SPR NOI-6: Notify Nearby Off-Site Noise-Sensitive Receptors For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. Notification will include anticipated dates and hours during which treatment activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	Prior to mechanical treatment activities occurring within 1,500 feet of noise-sensitive receptors.	MCSD	MCSD
Recreation Standard Project Requirements			
SPR REC-1: Notify Recreational Users of Temporary Closures If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent will coordinate with the owner/manager of that recreation area or facility. If temporary closure of a recreation area or facility is required, the project proponent will work with the owner/manager to post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. Additionally, notification of the treatment activity will be provided to the Administrative Officer (or equivalent official responsible for distribution of public information) of the county(ies) in which the affected recreation area or facility is located. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during treatment.	MCSD	MCSD
Transportation Standard Project Requirements			
SPR TRAN-1: Implement Traffic Control during Treatments Prior to initiating vegetation treatment activities, the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. A TMP will be needed if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments. If needed, a TMP will be prepared to provide measures to reduce potential traffic obstructions, hazards, and service level degradation along affected roadway facilities. The scope of the TMP will depend on the type, intensity, and duration of the specific treatment activities under the CalVTP. Measures included in the TMP could include (but are not be limited to) construction signage to provide motorists with notification and information when approaching or traveling along the affected roadway facilities, flaggers for lane closures to provide temporary traffic control along affected roadway facilities, treatment schedule restrictions to avoid seasons or time periods of peak vehicle traffic, haul-trip, delivery, and/or commute time restrictions that would be implemented to avoid peak traffic days and times along affected roadway facilities. If the TMP identifies impacts on transportation facilities outside of the	Prepare TMP prior to treatment and implement TMP during treatment activities.	MCSD	MCSD

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
jurisdiction of the project proponent, the TMP will be submitted to the agency with jurisdiction over the affected roadways prior to commencement of vegetation treatment projects. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
Public Services and Utilities Standard Project Requirements			
SPR UTIL-1: Solid Organic Waste Disposition Plan For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. The Solid Organic Waste Disposition Plan will include the amount (e.g., tons) of solid organic waste to be managed onsite (i.e., scattering of wood materials and generating unburned piles) and transported offsite for processing (i.e., biomass power plant, wood product processing facility, composting). If the project proponent intends to transport solid organic waste offsite, the Solid Organic Waste Disposition Plan will clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials. This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Prior to and during mechanical and manual treatment activities.	MCSD	MCSD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Air Quality			
Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment. It is acknowledged that due to cost, availability, and the limits of current technology, there may be circumstances where implementation of certain emission reduction techniques will not be feasible. The project proponent will document the emission reduction techniques that will be applied and will explain the reasons other techniques that could reduce emissions are infeasible. Techniques for reducing emissions may include, but are not limited to, the following: ▶ Diesel-powered off-road equipment used in construction will meet EPA's Tier 4 emission standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. Tier 3 models can be used if a Tier 4 version of the equipment type is not yet produced by manufacturers. This measure can also be achieved by using battery-electric off-road equipment as it becomes available. Prior to implementation of treatment activities, the project proponent will demonstrate the ability to supply the compliant equipment. A copy of each unit's certified tier specification or model year specification and operating permit (if applicable) will be available upon request at the time of mobilization of each unit of equipment. ▶ Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria: ▪ meet California's Low Carbon Fuel Standards and be certified by CARB Executive Officer; ▪ be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables; ▪ contain no fatty acids or functionalized fatty acid esters; and ▪ have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines. ▶ Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment. ▶ Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes. Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NO_X and PM.	During all treatment activities.	MCSD	MCSD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Archaeological, Historical, and Tribal Cultural Resources			
Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist will assess the significance of the find. The qualified archaeologist will work with the project proponent to develop a primary records report that will comply with applicable state or local agency procedures. If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan will be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or tribal cultural resource), the archaeologist will work with the project proponent to develop appropriate procedures to protect the integrity of the resource. Procedures could include preservation in place (which is the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or recovery of scientifically consequential information from and about the resource. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center.	During ground-disturbing activities.	MCSD	MCSD
Biological Resources			
Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway), exceptions to this requirement are listed later in this measure. The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report) with a science-based justification for the deviation. No fire ignition (and associated use of accelerants) will occur within 50 feet of listed plants.	Prior to and during treatment activities.	MCSD	MCSD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
For species listed under ESA or CESA, if the project proponent cannot avoid loss by implementing no-disturbance buffers, the project proponent will implement Mitigation Measure BIO-1c. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist, in consultation with CDFW and USFWS, as appropriate depending on species status and location, that the listed plants would benefit from treatment in the occupied habitat area even though some of the listed plants may be lost during treatment activities. For a treatment to be considered beneficial to listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to listed plants, no compensatory mitigation for loss of individuals will be required.			
Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement the following measures to avoid loss of individuals and maintain habitat function of occupied habitat: ▶ Physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape. ▶ Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank. ▶ Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the	Prior to and during treatment activities.	MCSD	MCSD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
special-status plant itself, habitat function would be diminished and the treatment would need to be modified or precluded from implementation. ▶ No fire ignition (and associated use of accelerants) will occur within the special-status plant buffer. A qualified RPF or botanist with knowledge of the special-status plant species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment would not maintain habitat function of the special-status plant habitat (i.e., the habitat would be rendered unsuitable) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If the project proponent determines the impact on special-status plants would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required.			
Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment. The first priority for compensatory mitigation will be preserving and enhancing existing populations outside of the treatment area in perpetuity, or if that is not an option because existing populations that can be preserved in perpetuity are not available, one of the following mitigation options will be implemented by the project proponent instead:	Prior to and during treatment activities.	MCSD	MCSD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ creating populations on mitigation sites outside of the treatment area through seed collection and dispersal (annual species) or transplantation (perennial species); ▶ purchasing mitigation credits from a CDFW- or USFWS-approved conservation or mitigation bank in sufficient quantities to offset the loss of occupied habitat; and ▶ if the affected special-status plants are not listed under ESA or CESA, compensatory mitigation may include restoring or enhancing degraded habitats so that they are made suitable to support special-status plant species in the future. If relocation efforts are part of the Compensatory Mitigation Plan, the plan will include details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements. The following performance standards will be applied for relocation: ▶ the extent of occupied area will be substantially similar to the affected occupied habitat and will be suitable for self-producing populations. Re-located/re-established populations will be considered suitable for self-producing when: ▶ habitat conditions allow for plants to reestablish annually for a minimum of 5 years with no human intervention, such as supplemental seeding; and ▶ reestablished habitats contain an occupied area comparable to existing occupied habitat areas in similar habitat types in the region. If preservation of existing populations or creation of new populations is part of the mitigation plan, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands and actions (e.g., the number and type of credits, location of mitigation bank or easement, restoration or enhancement actions), parties responsible for the long-term management of the land, and the legal and funding mechanisms (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. If mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, funding assurances, and success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations. If mitigation includes restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat.			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
If the loss of occupied habitat cannot be offset (e.g., if preservation of existing populations or creation of new populations through relocation efforts are not available for a certain species), and as a result treatment activities would substantially reduce the number or restrict the range of listed plant species, then the treatment will not qualify as within the scope of this Program EIR. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above.			
Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities) If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species by implementing the following. <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> The project proponent will implement one of the following two measures to avoid mortality, injury, or disturbance of individuals: 1. Treatment will not be implemented within the occupied habitat. Any treatment activities outside occupied habitat will be a sufficient distance from the occupied habitat such that mortality, injury, or disturbance of the species will not occur, as determined by a qualified RPF or biologist using the most current and commonly-accepted science and considering published agency guidance; OR 2. Treatment will be implemented outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, CDFW and/or USFWS/NOAA Fisheries will be consulted to determine if there is a period of time within which treatment could occur that would avoid mortality, injury, or disturbance of the species. ▶ For species listed under ESA or CESA, if the project proponent cannot avoid mortality, injury or disturbance by implementing one of the two options listed above, the project proponent will implement Mitigation Measure BIO-2c. Injury or mortality of California Fully Protected Species is prohibited pursuant to Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code and will be avoided. <u>Maintain Habitat Function</u> ▶ The project proponent will design treatment activities to maintain the habitat function, by implementing the following: ▪ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees	Prior to and during all treatment activities.	MCSD	MCSD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
with large cavities, trees with nesting platforms; dens; tree snags; large raptor nests [including inactive nests]; downed woody debris; food sources). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. ▪ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that listed or fully protected wildlife with specific requirements for high canopy cover (e.g., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted [e.g., 50 percent for coastal California gnatcatcher]) such that habitat function is maintained. A qualified RPF or biologist of the lead agency will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. If the lead agency determines after consultation that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c. **Project-Specific Guidance to Implement Mitigation Measure BIO-2a** <u>Northern Spotted Owl</u> ▶ To avoid mortality, injury, or disturbance to northern spotted owl the following measures will be implemented: ▪ If nests of the species have been detected during the data search (e.g., CNDDB) of adjacent lands (pursuant to SPR BIO-1 and SPR BIO-10), coordination with Green Diamond, or during protocol surveys (pursuant to SPR BIO-10), a no-disturbance buffer will be implemented for manual treatments and mechanical treatments from February 1–July 31 of 328 feet to 0.25 mile around the nest depending on the noise generated by the activity (following USFWS 2020a). ▶ If treatments occur within habitats determined to be suitable for northern spotted owl nesting/roosting habitat (e.g., forests with canopy cover greater than 60 percent, complex understory structure, late seral characteristics), a minimum of 60 percent canopy cover would be retained. In addition, if pursuant to SPR BIO-10, individual northern spotted owls have been detected during protocol surveys, or activity centers are identified using the CNDDB Spotted Owl Database or best available information within 0.7 mile of treatment areas, pursuant to the *Northern Spotted Owl Take Avoidance Analysis and Guidance for Private lands in California, Attachment A: Take Avoidance Analysis- Coast Redwood Region* (USFWS 2019), then to maintain habitat function for northern spotted owl, would be maintained through implementation of the habitat			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
maintenance provisions *of Northern Spotted Owl Take Avoidance Analysis and Guidance for Private lands in California, Attachment A: Take Avoidance Analysis- Coast Redwood Region* (USFWS 2019). California Condor ▶ Treatment activities will temporarily halt as soon as possible if any California condors are observed within the project area prior to the start of or during treatment activities. California condors will be allowed to depart on their own before project activities resume, or the Yurok Tribe Wildlife Department, USFWS, and CDFW will be contacted to determine if other measures can be applied. MCSD employees or their contractors will inform the qualified biologist or RPF should any California condor-related work stoppages take place. ▶ MCSD employees or their contractors involved in all project activities will remove all trash associated with this project and ensure that it is disposed of properly. ▶ All personnel involved in implementing the project will be briefed on the importance of not leaving hazardous materials exposed and daily removal of all garbage fragments to maintain condor health. ▶ MCSD employees or their contractors will store all project materials, tools, hardware, equipment, and all loose items in a manner that will prevent their removal or ingestion by California condors and other wildlife. ▶ MCSD employees or their contractors will place all materials that are liquid, granular, or powder in sealed leak-proof containers and store in a manner that prevents access by California condors and other wildlife. ▶ MCSD employees or their contractors will keep all parked vehicles and equipment free of leaks. ▶ If an occupied condor nest site (nest attended by a breeding pair, occupied by a condor egg, or occupied or attended by a less than 1-year-old condor) is located through contact with the Yurok Tribe Wildlife Department or observation by MCSD, no mechanical treatments or manual treatments will occur within 656 feet of the occupied nest until a qualified biologist or RPF in consultation with USFWS and CDFW determines that the condor nest is no longer occupied. Other Special-Status Birds ▶ If active bald eagle nests are detected within treatment areas during focused surveys (pursuant to SPR BIO-10), a no-disturbance buffer of 0.5 mile will be established around the nest, and no treatment activities will occur within this buffer until chicks have fledged as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW. In addition, the nest tree will be retained even once chicks have fledged. ▶ If active white-tailed kite or great gray owl nests are detected within treatment areas during focused surveys (pursuant to SPR BIO-10), a no-disturbance buffer of 0.25 mile will be established around the nest, and no treatment activities will occur within this buffer until chicks have fledged as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW.			

Northern California Ringtail ▶ If the limited operating period for ringtail (pursuant to SPR BIO-1) is determined to be infeasible and presence of ringtail is assumed or the species is detected during focused surveys (pursuant to SPR BIO-10), then the following avoidance and minimization measures would be required: ▪ Den Surveys. Within 7 days prior to the start of mechanical treatments and manual snag and large tree (i.e., greater than 12 inches DBH) removal during the ringtail maternity season, a qualified RPF or biologist will conduct a den search in the treatment area to be treated the next week. The qualified RPF or biologist will search for areas of dense shrubs showing signs of ringtail, and large snags and trees (i.e., greater than 12 inches DBH) with appropriate cavities (i.e., holes larger than 3 inches in diameter, cavities extending approximately 12 inches down from the cavity hole). If found, the qualified RPF or biologist will inspect the cavity using a cell phone with a flash or other tools (e.g., borescopes) to determine whether ringtails are present. Areas (e.g., large trees) with appropriate den habitat, occupied or not, will be marked (i.e., with flagging, spray paint), for inspection during future sweeps (as described below). The qualified RPF or biologist will also search for dens in dense shrub habitat and will note any sightings of fleeing adult ringtails. ▪ Active Dens. If active ringtail dens are discovered during a den survey or daily sweep (described below), a no-disturbance buffer of at least 0.25 mile will be implemented around the den; and mechanical treatments and manual treatments using power equipment will not proceed within the buffer until at least the end of the ringtail maternity season (June 30). The qualified RPF or biologist will confirm that the den is unoccupied before treatment activities resume. The 0.25-mile buffer would incorporate the den and an area greater than the typical ringtail home range in northern California (Wyatt, pers. comm., 2021). If an active den is discovered, the Northern Region of CDFW (R1Timber@wildlife.ca.gov) will be notified of the den and buffer location. CDFW will be provided an opportunity to visit the site and provide technical information on the size and shape of the den buffer. ▪ Daily Sweeps, Training, and Monitoring. If active ringtail dens are not discovered, the following measures will be implemented to avoid inadvertent destruction of active dens that eluded detection during the den search as well as take of adult ringtails and kits. • **Daily Sweeps**. On the first morning of work for mechanical treatments and manual snag or large tree (i.e., greater than 12 inches DBH) removal, a qualified RPF or biologist will conduct a sweep of the area to be treated that day and will search all habitat suitable for ringtail where manual snag or large tree (i.e., greater than 12 inches DBH) removal or mechanical treatment (e.g., mastication) will occur that day (i.e., larger trees, dense shrubs, rock piles) for active dens or adults, including the trees with cavities previously marked by the qualified RPF or biologist, unless work has occurred continuously since the initial den survey. On following days, a trained contractor will search all areas previously marked by the qualified RPF or biologist for active dens (see training requirements below under "Training and Monitoring"). If an active den is discovered during a daily sweep, the qualified RPF or biologist will be notified, all work will stop, a no-disturbance buffer of at least 0.25 mile will be implemented around the den, and the requirements described above under "Active Dens" will be followed. • **Training and Monitoring**. On the first morning of work for mechanical treatments and manual snag and tree removal, the qualified RPF or biologist will provide biological resource training (as required under			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR BIO-2) for all contractors. In addition to standard biological resource training, the qualified RPF or biologist will provide additional training specific to ringtail that will include the following elements: o Description of ringtail appearance (i.e., physical features, typical size), typical ringtail behavior, and denning habitat suitable for ringtail, particularly in that week's treatment area. The approximate location of large trees with cavities that were previously marked will be noted; o Measures required during operation, including daily sweeps of habitat suitable for ringtail where manual treatment using power equipment or mechanical treatment (e.g., mastication) will occur that day (i.e., dense shrub habitat, previously marked tree cavities), year-round take avoidance measures, and required increased vigilance when operating in dense shrubs; o Measures required if a ringtail is spotted (i.e., all work halts until a qualified RPF or biologist can conduct a den search and sweep; if the qualified RPF or biologist observes a ringtail or confirms the contractor's observation, the occurrence will be reported to the Northern Region of CDFW at R1Timber@wildlife.ca.gov); o Measures required if a ringtail den is found (i.e., 0.25-mile no-disturbance buffer and requirements described above under "Active Dens" will be followed); o Definition of and legal consequences for take of ringtail (i.e., fine for each take and/or jail sentence); and Requirements for contacting the Northern Region of CDFW, (R1Timber@wildlife.ca.gov), which include the following circumstances: ringtail observed during treatment activities (notify within 3 business days); active ringtail den discovered (notify within 24 hours); and take of ringtail occurs (notify within 24 hours).			
Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities) If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following. Avoid Mortality, Injury, or Disturbance of Individuals ▶ The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: For all treatment activities, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include, but not be limited to, the species' tolerance to disturbance; the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; baseline levels of noise and human	Prior to and during all treatment activities.	MCSD	MCSD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
activity; and treatment activity. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below 100 feet from an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). ▪ No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, or other occurrence is no longer active; or reducing the buffer would not likely result in disturbance, mortality, or injury. A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species. <u>Maintain Habitat Function</u> ▶ For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following: ▪ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; tree snags; large raptor nests [including inactive nests]; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. ▪ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained. ▶ A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. The			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function. A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If the project proponent determines the impact on special-status wildlife would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the non-listed special-status wildlife would benefit from treatment in the occupied habitat area even though some of the non-listed special-status wildlife may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding the determination that a non-listed special-status species would benefit from the treatment. **Project-Specific Guidance to Implement Mitigation Measure BIO-2b** ▶ If foothill yellow-legged frog, northern red-legged frog, Pacific tailed frog, or southern torrent salamander are detected during focused visual encounter surveys or if presence is assumed (pursuant to SPR BIO-10), biological monitoring by a qualified RPF, qualified biologist, or biological technician during mechanical treatments or manual tree and snag removal treatments within or adjacent to sensitive habitat areas (e.g., streams, seeps, springs, talus slopes) will be implemented to avoid injury to or mortality of individual salamanders or frogs. If the qualified RPF, qualified biologist, or biological technician detects a special-status salamander or frog during treatments, treatment activities will cease until the individual has left the area or has been moved out of harm's way and to other nearby habitat suitable for the species. ▶ If active loggerhead shrike, olive-sided flycatcher, or Vaux's swift nests are detected within treatment areas during focused surveys (pursuant to SPR BIO-10), a no-disturbance buffer of 100 feet will be established around the nest, and no treatment activities will occur within this buffer until chicks have fledged as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW.			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ If an American badger den is detected within a treatment area during focused surveys (pursuant to SPR BIO-10), a no-disturbance buffer of 50 feet will be established around the den, the size of which may be adjusted by the qualified RPF or biologist based on local conditions, and no treatment activities would occur within this buffer until the den is no longer occupied as determined by the qualified RPF or biologist. ▶ To avoid mortality or injury to fisher, if presence is assumed or focused surveys result in detection of fisher (pursuant to SPR BIO-10), the following will be implemented prior to mechanical treatments and manual snag and tree removal. ▪ A limited operating period prohibiting mechanical treatments and manual tree and snag removal that may physically remove dens will be applied from March 1 to June 30(USFWS 2020b); or ▪ Surveys will be conducted of potential den sites for signs of fisher activity. If an active den is identified, a no-disturbance buffer will be established around the den at a distance that avoids disturbance of the den; this distance would be a minimum of 100 feet or larger as determined by the qualified RPF or biologist based on the treatment activities, topographical and vegetative screening, and existing disturbance in the area. No treatment activities would occur within this buffer until the den is no longer occupied as determined by the qualified RPF or biologist. ▶ If a special-status bat roost is detected during focused surveys (pursuant to BIO-10), a no-disturbance buffer of 250 feet will be established around the roost, and no mechanical treatments or manual tree and snag removal treatments will occur within this buffer until the roost is no longer being used, as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW.			
Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3: ▶ Reference the *Manual of California Vegetation*, Appendix 2, Table A2, *Fire Characteristics* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class and fire return interval departure of the vegetation alliances present will also be determined. ▶ Design treatments in sensitive natural communities and oak woodlands to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function of the affected sensitive natural community. Treatments will be designed to replicate the fire regime attributes for the affected sensitive natural community or oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fireline intensity, severity, and fire type as described in *Fire in California's Ecosystems* (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/).	During treatment activities in areas that contain sensitive natural communities.	MCSD	MCSD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval (i.e., time since last burn is less than the average time required for that vegetation type to recover from fire) or within Condition Class 1. ▶ To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled). ▶ To the extent feasible, fuel breaks will not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in sensitive natural communities with a rarity rank of S3 (vulnerable) or in oak woodlands. In forest and woodland sensitive natural communities with a rarity rank of S3, and in oak woodlands, only shaded fuel breaks will be installed, and they will not be installed in more than 20 percent of the stand of sensitive natural community or oak woodland vegetation (i.e., if the sensitive natural community covers 100 acres, no more than 20 acres will be converted to create the fuel break). The feasibility of implementing the avoidance measures will be determined by the project proponent based on whether implementation of this mitigation measure will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. If the avoidance measures are determined by the project proponent to be infeasible, the project proponent will document the reasons implementation of the avoidance strategies are infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). A qualified RPF or botanist with knowledge of the affected sensitive natural community will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat functions of the sensitive natural community or oak woodland. If the project proponent determines the impact on sensitive natural communities or oak woodlands would be less than significant, no further mitigation will be required. If the project proponent determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-3b will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the occupied habitat area even though some loss may occur during treatment activities. For a treatment to be considered beneficial to a sensitive natural community or oak woodland, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the community (or similar community) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity

Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will implement the following actions:
▶ Compensate for unavoidable losses of sensitive natural community and oak woodland acreage and function by:
  ▪ restoring sensitive natural community or oak woodland functions and acreage within the treatment area;
  ▪ restoring degraded sensitive natural communities or oak woodlands outside of the treatment area at a sufficient ratio to offset the loss of acreage and habitat function; or
  ▪ preserving existing sensitive natural communities or oak woodlands of equal or better value to the sensitive natural community lost through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function.
▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and:
  1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity.
  2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat.
The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan.
	Prior to and during treatment activities.	MCSD	MCSD

Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
If, after implementation of SPR BIO-4, impacts to riparian habitat remain significant under CEQA, the project proponent will implement the following:
▶ Compensate for unavoidable losses of riparian habitat acreage and function by:
  ▪ restoring riparian habitat functions and acreage within the treatment area;
  ▪ restoring degraded riparian habitat outside of the treatment area;
	Prior to and during treatment activities.	MCSD	MCSD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ purchasing riparian habitat credits at a CDFW-approved mitigation bank; or ▪ preserving existing riparian habitat of equal or better value to the riparian habitat lost through a conservation easement at a sufficient ratio to offset the loss of riparian habitat function and value. ▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on riparian habitat that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing riparian habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. 2. For restoring or enhancing riparian habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., Lake and Streambed Alteration Agreement), if these requirements are equally or more effective than the mitigation identified above.			
Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands Impacts to wetlands will be avoided using the following measures: ▶ The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented. ▶ The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures). ▶ A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified RPF or biologist and will depend on the type of wetland present (e.g., seasonal wetland, wet meadow, freshwater marsh, vernal pool),	Prior to and during all treatment activities.	MCSD	MCSD

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
the timing of treatment (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the species' vulnerability to the treatment activities, environmental conditions and terrain, and the treatment activity being implemented. ▶ A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. ▶ Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical treatments and equipment and vehicle access or staging.			
Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites The project proponent will implement the following measures while working in treatment areas that contain nursery sites identified in surveys conducted pursuant to SPR BIO-10: ▶ **Retain Known Nursery Sites**. A qualified RPF or biologist will identify the important habitat features of the wildlife nursery and, prior to treatment activities, will mark these features for avoidance and retention during treatment. **Establish Avoidance Buffers.** The project proponent will establish a non-disturbance buffer around the nursery site if activities are required while the nursery site is active/occupied. The appropriate size and shape of the buffer will be determined by a qualified RPF or biologist, based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors. No treatment activity will commence within the buffer area until a qualified RPF or biologist confirms that the nursery site is no longer active/occupied. Monitoring of the effectiveness of the non-disturbance buffer around the nursery site by a qualified RPF, biologist, or biological technician during and after treatment activities will be required. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to special-status species.	During treatment activities in areas that contain nursery sites (if nursery sites are identified during surveys).	MCSD	MCSD
Hazardous Materials, Public Health and Safety			
Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments), CAL FIRE and other project proponents will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials. If it is determined that hazardous materials sites could be located within the boundary of a treatment site, the project proponent will conduct a DTSC EnviroStor web search (https://www.envirostor.dtsc.ca.gov/public/) and consult DTSC's Cortese List to identify any known contamination sites within the project site. If a proposed mechanical treatment is located on a site included on the DTSC Cortese List as containing potential soil contamination that has not been cleaned up and deemed closed by DTSC, the area will be marked and no soil disturbing treatment activities will occur within 100 feet of the site boundaries. If it is determined through coordination with landowners or after review of the Cortese List that no potential or known contamination is located on a project site, the project may proceed as planned.	During PSA preparation **Database searches are complete; see PSA/Addendum for results.**	MCSD	MCSD

Notes: BIOS = Biogeographic Information and Observation System; CAL FIRE = California Department of Forestry and Fire Protection; Cal-IPC = California Invasive Plant Council; CalVTP = California Vegetation Treatment Program; CARB = California Air Resources Board; CCR = California Code of Regulations; CDFW = California Department of Fish and Wildlife; CEQA = California Environmental Quality Act; CESA = California Endangered Species Act; CFR = Code of Federal Regulations; CNDDB = California Natural Diversity Database; CNPS = California Native Plant Society; DBH = diameter at breast height; DPR = California Department of Pesticide Regulation; DPR = California Department of Parks and Recreation; EIR = environmental impact report; ELZ = equipment limitation zone; EPA = US Environmental Protection Agency; ESA = Federal Endangered Species Act; DTSC = Department of Toxic Substances Control; GHG = greenhouse gas; GIS = geographic information systems; GPS = Global Positioning System; Green Diamond = Green Diamond Resource Company; HCRCD = Humboldt County Resource Conservation District; IAP = Incident Action Plan; MCSD = McKinleyville Community Services District; NAHC = Native American Heritage Commission; NOAA = National Oceanic and Atmospheric Administration; NOX = nitrous oxide; PCA = Pest Control Advisor; PM = particulate matter; PRC = Public Resources Code; PSA = project-specific analysis; RPF = Registered Professional Forester; RWQCB = Regional Water Quality Control Board; SPR = standard project requirement; SPRP = Spill Prevention and Response Plan; SWRCB = State Water Resources Control Board; TMP = Traffic Management Plan; USACE = US Army Corps of Engineers; USFWS = US Fish and Wildlife Service; VegCAMP = Vegetation Classification and Mapping Program; WDR = waste discharge requirements; WLPZ = Watercourse and Lake Protection Zones; WUI = wildland urban interface

REFERENCES

Busse, Matt D; Hubbert, Ken R.; Moghaddas, Emily E. Y. 2014. Fuel reduction practices and their effects on soil quality. Gen. Tech. Rep. PSW-GTR-241. Albany, CA: U.S. Department of Agriculture, Forest Service, Pacific Southwest Research Station. 156 p.

California Invasive Plant Council. 2012 Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers (3rd Edition). Cal-IPC Publication 2012-03. California Invasive Plant Council. Berkeley, CA.

California Water Boards. 2019 (March 22). *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State*. Available: https://www.waterboards.ca.gov/water_issues/programs/cwa401/state_wetland_def_procedures.html. Accessed October 2019.

Environmental Laboratory. 1987. U.S. Army Corps of Engineers Wetlands Delineation Manual. (Technical Report Y-87-1.) U.S. Army Corps of Engineers Waterways Experiment Station. Vicksburg, MS.

Manji, N. 2018. *Green Diamond Resource Company Property-wide Consultation for Cardamine angulata (Seaside bittercress).* California Department of Fish and Wildlife, Redding, CA. Consultation Letter to Neal Edward of Green Diamond Resource Company, Korbel, CA

National Wildfire Coordinating Group. 2018. *NWCG Smoke Management Guide for Prescribed Fire*. Available: https://www.nwcg.gov/publications/420-2. Accessed May 20, 2022.

Sawyer, JO, T Keeler-Wolf, JM Evens. 2009. *A Manual of California Vegetation* (Second Edition). California Native Plant Society and California Department of Fish and Game.

US Fish and Wildlife Service. 2012 (January). *Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls.* Available: https://www.fws.gov/sites/default/files/documents/2012RevisedNSOprotocol.2.15.12.pdf. Accessed August 6, 2024.

———. 2020a. (October). *Revised Transmittal of Guidance: Estimating the Effects of Auditory and Visual Disturbance to Northern Spotted Owls and Marbled Murrelets in Northwestern California*. Arcata Fish and Wildlife Office.

———. 2020b. *Programmatic Biological Opinion on the Proposed US Forest Service Management Programs for the Endangered Southern Sierra Nevada Distinct Population Segment of the Fisher in Four Southern Sierra Nevada National Forests, California*. (08ESMF00-2020-F-2007) June 2020.

Van Wagtendonk, J.W., N.G. Sugihara, S.L Stephens, A.E. Thode, K.E. Shaffer, J. A. Fites-Kaufman. 2018. Fire in California's Ecosystems. University of California Press.

Working Group for Phytophthoras in Native Habitats. 2016. Guidance for plant pathogen prevention when working at contaminated restoration sites or sites with rare plants and sensitive habitat. Available: Sensitive-contam-site-bmp-FINAL-111716.pdf (suddenoakdeath.org)

Wyatt, David. Professor. Biology Department, Sacramento City College, Sacramento, CA. April 2, 2021—telephone call with Lara Rachowicz and Allison Fuller of Ascent Environmental regarding ringtail biology in California.

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Attachment B

Biological Resources

Special-Status Plant Species Known to Occur in the Vicinity of the Project Area and Their Potential for Occurrence in the Project Area

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Pink sand-verbena *Abronia umbellata* var. *breviflora*	—	—	1B.1	Coastal dunes and coastal strand. Foredunes and interdunes with sparse cover. *Abronia umbellata* var. *breviflora* is usually the plant closest to the ocean. 0–35 feet in elevation. Blooms June–October. Perennial.	Not expected to occur. The project area lacks coastal dune and strand habitat suitable for this species.
Coastal marsh milk-vetch *Astragalus pycnostachyus* var. *pycnostachyus*	—	—	1B.2	Wetland. Coastal dunes, marshes and swamps, coastal scrub. Mesic sites in dunes or along streams or coastal salt marshes. 0–510 feet in elevation. Blooms April–October. Perennial.	Not expected to occur. The project area is outside the range for this species.
Seaside bittercress *Cardamine angulata*	—	—	2B.1	Wetland. North coast coniferous forest, lower montane coniferous forest. Wet areas, streambanks. 295–510 feet in elevation. Blooms March–July. Perennial.	May occur. The project area contains wet areas in north coast coniferous forests suitable for this species.
Northern clustered sedge *Carex arcta*	—	—	2B.2	Wetland. Bogs and fens, north coast coniferous forest. Mesic sites. 195–4,610 feet in elevation. Blooms June–September. Perennial.	May occur. The project area contains mesic areas in north coast coniferous forests suitable for this species.
Bristle-stalked sedge *Carex leptalea*	—	—	2B.2	Wetland. Bogs and fens, meadows and seeps, marshes, and swamps. Mostly known from bogs and wet meadows. 10–4,575 feet in elevation. Blooms March–July. Geophyte.	May occur. The project area contains wetland habitats suitable for this species.
Lyngbye's sedge *Carex lyngbyei*	—	—	2B.2	Wetland. Marshes and swamps (brackish or freshwater). 0–655 feet in elevation. Blooms April–August. Geophyte.	Not expected to occur. The project area lacks salt marshes suitable for this species.
Northern meadow sedge *Carex praticola*	—	—	2B.2	Wetland. Meadows and seeps. Moist to wet meadows, riparian edges and open forest. 50–10,500 feet in elevation. Blooms May–July. Perennial.	May occur. The project area contains wetland habitats suitable for this species.
Humboldt Bay owl's-clover *Castilleja ambigua* var. *humboldtiensis*	—	—	1B.2	Salt marsh, Wetland. Marshes and swamps. In coastal saltmarsh with *Spartina, Distichlis, Salicornia, Jaumea*. 0–65 feet in elevation. Blooms April–August. Annual.	Not expected to occur. The project area lacks salt marsh habitat suitable for this species.
Oregon coast paintbrush *Castilleja litoralis*	—	—	2B.2	Coastal bluff scrub, coastal dunes, coastal scrub. Sandy sites. 15–835 feet in elevation. Blooms June. Perennial.	Not expected to occur. The project area lacks sandy coastal bluff habitat suitable for this species.
Point Reyes salty bird's-beak *Chloropyron maritimum* ssp. *palustre*	—	—	1B.2	Salt marsh, Wetland. Coastal salt marsh. Usually in coastal salt marsh with *Salicornia, Distichlis, Jaumea, Spartina*, etc. 0–375 feet in elevation. Blooms June–October. Annual.	Not expected to occur. The project area lacks salt marsh habitat suitable for this species.
Round-headed collinsia *Collinsia corymbosa*	—	—	1B.2	Coastal dunes. 35–100 feet in elevation. Blooms April–June. Annual.	Not expected to occur. The project area lacks coastal dune habitat suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Menzies' wallflower *Erysimum menziesii*	FE	SE	1B.1	Coastal dunes. Localized on dunes and coastal strand. 5–80 feet in elevation. Blooms March–September. Perennial.	Not expected to occur. The project area lacks coastal dune habitat suitable for this species.
Giant fawn lily *Erythronium oregonum*	—	—	2B.2	Cismontane woodland, meadows, and seeps. Openings. Sometimes on serpentine; rocky sites. 985–4,710 feet in elevation. Blooms March–June. Perennial.	Not expected to occur. The project area is outside the range for this species.
Coast fawn lily *Erythronium revolutum*	—	—	2B.2	Wetland. Bogs and fens, broadleaf upland forest, north coast coniferous forest. Mesic sites; streambanks. 195–4,610 feet in elevation. Blooms March–July (August). Geophyte.	May occur. The project area contains mesic areas in north coast coniferous forests suitable for this species.
Minute pocket moss *Fissidens pauperculus*	—	—	1B.2	Redwood. North coast coniferous forest. Moss growing on damp soil along the coast. In dry streambeds and along stream banks. 35–3,360 feet in elevation. Perennial.	May occur. The project area contains damp soils within redwood forest.
Pacific gilia *Gilia capitata* ssp. *pacifica*	—	—	1B.2	Coastal bluff scrub, chaparral, coastal prairie, valley and foothill grassland. 15–4,415 feet in elevation. Blooms April–August. Annual.	May occur. The project area contains openings created by logging activities that may be suitable habitat for this species.
Dark-eyed gilia *Gilia millefoliata*	—	—	1B.2	Coastal dunes. 5–195 feet in elevation. Blooms April–July. Annual.	Not expected to occur. The project area lacks coastal dune habitat suitable for this species.
Short-leaved evax *Hesperevax sparsiflora* var. *brevifolia*	—	—	1B.2	Coastal bluff scrub, coastal dunes, coastal prairie. Sandy bluffs and flats. 0–705 feet in elevation. Blooms March–June. Annual.	Not expected to occur. The project area lacks coastal bluff and dune habitats suitable for this species.
California globe mallow *Iliamna latibracteata*	—	—	1B.2	North Coast coniferous forest, chaparral, lower montane coniferous forest, riparian scrub (streambanks). Seepage areas in silty clay loam. 195–6,560 feet in elevation. Blooms June–August. Perennial.	May occur. The project area contains riparian areas in north coast coniferous forest suitable for this species.
Perennial goldfields *Lasthenia californica* ssp. *macrantha*	—	—	1B.2	Coastal bluff scrub, coastal dunes, coastal scrub. 15–605 feet in elevation. Blooms January–November. Perennial.	Not expected to occur. The project area is not immediately along the coast with dune and bluff habitats suitable for this species.
Seaside pea *Lathyrus japonicus*	—	—	2B.1	Coastal dunes. 10–215 feet in elevation. Blooms May–August. Geophyte.	Not expected to occur. The project area lacks coastal dune habitat suitable for this species.
Marsh pea *Lathyrus palustris*	—	—	2B.2	Wetland. Bogs and fens, lower montane coniferous forest, marshes and swamps, north coast coniferous forest, coastal prairie, coastal scrub. Moist coastal areas. 5–460 feet in elevation. Blooms March–August. Perennial.	May occur. The project area contains mesic areas in north coast coniferous forests suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Beach layia *Layia carnosa*	FE	ST	1B.1	Coastal dunes, coastal scrub. On sparsely vegetated, semi-stabilized dunes, usually behind foredunes. 0–100 feet in elevation. Blooms March–July. Annual.	Not expected to occur. The project area lacks coastal dune habitat suitable for this species.
Western lily *Lilium occidentale*	FE	SE	1B.1	Wetland. Coastal scrub, freshwater marsh, bogs and fens, coastal bluff scrub, coastal prairie, north coast coniferous forest, marshes and swamps. Well-drained, old beach washes overlain with wind-blown alluvium and organic topsoil; usually near margins of Sitka spruce. 10–360 feet in elevation. Blooms June–July. Geophyte.	May occur. The project area contains coastal scrub and openings in north coast coniferous forest habitats suitable for this species.
Ghost-pipe *Monotropa uniflora*	—	—	2B.2	Broadleaved upland forest, north coast coniferous forest. Often under redwoods or western hemlock. 50–2,805 feet in elevation. Blooms June–August. Perennial.	May occur. The project area contains redwoods and western hemlocks in north coast coniferous forest suitable for this species.
Howell's montia *Montia howellii*	—	—	2B.2	Wetland. Meadows and seeps, north coast coniferous forest, vernal pools. Vernally wet sites; often on compacted soil. 35–3,295 feet in elevation. Blooms March–May. Annual.	Known to occur. There is a known occurrence of Howell's montia along Old Railroad Grade Road on the east side of the project area (CNDDB 2024). The project area contains vernally wet sites in north coast coniferous forest suitable for this species.
Wolf's evening-primrose *Oenothera wolfii*	—	—	1B.1	Coastal bluff scrub, coastal dunes, coastal prairie, lower montane coniferous forest. Sandy substrates; usually mesic sites. 0–410 feet in elevation. Blooms May–October. Perennial.	Not expected to occur. The project area lacks suitable habitat for this species.
Seacoast ragwort *Packera bolanderi* var. *bolanderi*	—	—	2B.2	Coastal scrub, north coast coniferous forest. Sometimes along roadsides. 100–3,000 feet in elevation. Blooms May–July. Geophyte.	May occur. The project area contains coastal scrub and north coast coniferous forest habitats suitable for this species.
White-flowered rein orchid *Piperia candida*	—	—	1B.2	North coast coniferous forest, lower montane coniferous forest, broadleaf upland forest. Sometimes on serpentine. Forest duff, mossy banks, rock outcrops, and muskeg. 150–5,300 feet in elevation. Blooms May–September. Perennial.	May occur. The project area contains north coast coniferous forest habitats suitable for this species.
Siskiyou checkerbloom *Sidalcea malviflora* ssp. *patula*	—	—	1B.2	Coastal bluff scrub, coastal prairie, north coast coniferous forest. Open coastal forest; roadcuts. 15–4,115 feet in elevation. Blooms May–August. Geophyte.	May occur. The project area contains north coast coniferous forest habitats suitable for this species.
Coast checkerbloom *Sidalcea oregana* ssp. *eximia*	—	—	1B.2	Wetland. Meadows and seeps, north coast coniferous forest, lower montane coniferous forest. Near meadows, in gravelly soil. 15–5,920 feet in elevation. Blooms June–August. Perennial.	May occur. The project area contains wet areas in north coast coniferous forest habitats suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Scouler's catchfly *Silene scouleri* ssp. *scouleri*	—	—	2B.2	Coastal bluff scrub, coastal prairie, valley and foothill grassland. 0–1,970 feet in elevation. Blooms June–August. Perennial.	Not expected to occur. The project area lacks suitable habitat for this species.
Western sand-spurrey *Spergularia canadensis* var. *occidentalis*	—	—	2B.1	Wetland. Marshes and swamps (coastal salt marshes). 0–10 feet in elevation. Blooms June–August. Annual.	Not expected to occur. The project area lacks salt marsh habitats suitable for this species.
Twisted horsehair lichen *Sulcaria spiralifera*	—	—	1B.2	Coastal dunes, North coast coniferous forest North Coast coniferous forest (immediate coast), coastal dunes. Usually on conifers. 0–295 feet in elevation. Perennial.	Not expected to occur. The project area contains north coast coniferous forests but is not immediately along the coast.
Cylindrical trichodon *Trichodon cylindricus*	—	—	2B.2	Broadleafed upland forest, upper montane coniferous forest. Grows in openings on sandy or clay soils on roadsides, stream banks, trails or in fields. 165–4,920 feet in elevation. Perennial.	May occur. The project area contains roadside, stream bank, and trail openings suitable for this species
Alpine marsh violet *Viola palustris*	—	—	2B.2	Wetland. Coastal scrub, bogs, and fens. Swampy, shrubby places in coastal scrub or coastal bogs. 0–490 feet in elevation. Blooms March–August. Geophyte.	May occur. The project area contains mesic areas in coastal scrub suitable for this species.

Notes: CRPR = California Rare Plant Rank; CEQA = California Environmental Quality Act; ESA = Endangered Species Act; NPPA = Native Plant Protection Act

1 Legal Status Definitions

Federal:

FE Federally Listed as Endangered (legally protected by ESA)

State:

SE State Listed as Endangered (legally protected by CESA)

ST State Listed as Threatened (legally protected by CESA)

California Rare Plant Ranks (CRPR):

1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA).

2B Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA).

CRPR Threat Ranks:

0.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)

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

2 Potential for Occurrence Definitions

Not expected to occur: Species is unlikely to be present because of poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.

May occur: Suitable habitat is available and there have been nearby recorded occurrences of the species.

Known to occur: The species has been observed within the treatment areas.

Sources: CNDDB 2024, CNPS 2024, Calflora 2024.

Special-Status Wildlife Species Known to Occur in the Vicinity of the Project Area and Their Potential for Occurrence in the Project Area

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Amphibians and Reptiles				
Foothill yellow-legged frog (North Coast DPS) *Rana boylii* pop. 1	—	SSC	Northern Coast Ranges north of San Francisco Bay Estuary, Klamath Mountains, and Cascade Range including watershed subbasins (HU 8) Lower Pit, Battle Creek, Thomes Creek, and Big Chico Creek in Lassen, Shasta, Tehama, and Butte Counties. Partly shaded shallow streams and riffles with a rocky substrate in a variety of habitats. Need at least some cobble-sized substrate for egg-laying. Need at least 15 weeks to attain metamorphosis.	May occur. Foothill yellow-legged frogs are known to occur in the Mad River and are likely to occur in associated tributaries (CNDDB 2024). Aquatic habitat potentially suitable for this species is present in streams on the project site (e.g., Mill Creek, Lindsay Creek).
Northern red-legged frog *Rana aurora*	—	SSC	Humid forests, woodlands, grasslands, and streambanks in northwestern California, usually near dense riparian cover. Generally near permanent water, but can be found far from water, in damp woods and meadows, during non-breeding season.	May occur. Northern red-legged frogs are known to occur in the Mad River and associated tributaries (CNDDB 2024). Aquatic habitat potentially suitable for this species is present in streams on the project site (e.g., Mill Creek, Lindsay Creek).
Pacific tailed frog[3] *Ascaphus truei*	—	SSC	Occurs in montane hardwood-conifer, redwood, Douglas fir, and ponderosa pine habitats. Restricted to perennial montane streams.	May occur. Pacific tailed frogs are known to occur in the Mad River and associated tributaries, including a tributary to Lindsay Creek (CNDDB 2024). Aquatic habitat potentially suitable for this species is present in streams on the project site (e.g., Mill Creek, Lindsay Creek). Although surveys in 1995, 2008, and 2019 within the project area did not detect tailed frogs (Green Diamond 2023a), there is the potential for the species to disperse into the project area during project implementation.
Southern torrent salamander[3] *Rhyacotriton variegatus*	—	SSC	Cold, well-shaded, permanent streams and seepages, or within splash zone or on moss-covered rock within trickling water.	Known to occur. There are many documented occurrences of southern torrent salamander within approximately 4 miles east of the project area (CNDDB 2024). Habitat potentially suitable for this species is present in and adjacent to streams on the project site (e.g., Mill Creek, Lindsay Creek), and the species has been documented to occur within Lindsay Creek within the project area (Green Diamond 2023a; NMFS and USFWS 2006).
Western pond turtle *Emys marmorata*	FP	SSC	Ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6,000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to approximately 0.3 mile (0.5 km) from water for egg-laying.	Not likely to occur. Western pond turtles have been documented in Lindsay Creek (CNDDB 2024) outside of the project area near the community of Fieldbrook where the creek passes through open habitat. Creeks within the project area (e.g., Mill Creek, Lindsay Creek) are not likely habitat for the species because the dense cover associated with riparian management zones limits basking sites along these waters.

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Birds				
Bald eagle *Haliaeetus leucocephalus*	FD	SE FP	Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests are within 1 mile of water. Nests in large, old-growth, or dominant live tree with open branches, especially ponderosa pine. Roosts communally in winter.	May occur. The southern half of the project area is located within 1 mile of the Mad River, which provides excellent foraging habitat for bald eagles. Large trees in the project area may provide nesting habitat for this species.
Bank swallow *Riparia riparia*	—	ST	Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, or ocean to dig nesting hole.	Not expected to occur. Streams in the project area do not contain banks or cliffs extensive enough to provide nesting habitat for bank swallows.
California condor *Gymnogyps californianus*	FE	SE FP	Require vast expanses of open savannah, grasslands, and foothill chaparral in mountain ranges of moderate altitude. Deep canyons containing clefts in the rocky walls provide nesting sites. Forages up to 100 miles from roost/nest.	May occur. California condors were released into Yurok tribal lands in 2023, and since have been seen as far south as 52 miles from the release location both north and south of the project site, and into Humboldt County (Yurok Tribe 2023). The species is known to travel long distances to forage. The large openings within the project area and presence of elk (sign observed during SPR BIO-1 survey), provide foraging habitat for the species. Also, trees on the margins of openings may provide temporary roosts during foraging. The project area does not contain nesting habitat for the species.
California Ridgway's rail *Rallus obsoletus obsoletus*	FE	SE FP	Salt-water and brackish marshes traversed by tidal sloughs in the vicinity of San Francisco Bay. Associated with abundant growths of pickleweed but feeds away from cover on invertebrates from mud-bottomed sloughs.	Not expected to occur. This species is associated with salt marsh habitats which are not present in the project area.
Fork-tailed storm-petrel *Hydrobates furcatus*	—	SSC	Colonial nester on small, offshore islets. Forages over the open ocean, usually well offshore. Birds choose offshore islets which provide nesting crannies beneath rocks or sod for burrowing.	Not expected to occur. This species is associated with marine environments which are not present in the project area.
Great gray owl *Strix nebulosa*	—	SE	Lower montane coniferous forest, old growth, subalpine coniferous forest, upper montane coniferous forest. Resident of mixed conifer or red fir forest habitat, in or on edge of meadows. Requires large diameter snags in a forest with high canopy closure, which provide a cool sub-canopy microclimate.	May occur. Annual grassland in forest openings and natural meadows within and adjacent to the project area provide openings for foraging, and mature tree stands within 660 feet of these openings, provide the large diameter trees and snags (greater or equal to 16 inches diameter at breast height) and high canopy closure required for nesting by this species. The species has been documented to occur in the vicinity of the project area (iNaturalist 2024).

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Loggerhead shrike *Lanius ludovicianus*	—	SSC	Prefers open country for hunting, with perches for scanning, and dense shrubs and brush for nesting.	May occur. The project area is within the winter range of loggerhead shrike. While the species is not expected to nest in the project area, shrikes may roost or forage within clearcuts in the project area. The project area also overlaps the winter range of northern shrike (*Lanius borealis*) which is a very similar-looking species, and not considered special-status.
Mountain plover *Charadrius montanus*	—	SSC	Short grasslands, freshly plowed fields, newly sprouting grain fields, and sometimes sod farms. Short vegetation, bare ground and flat topography. Prefers grazed areas and areas with burrowing rodents.	Not expected to occur. The project area is outside of the current range of this species.
Northern harrier *Circus hudsonius*	—	SSC	Nest and forage in grasslands, from salt grass in desert sink to mountain cienagas. Nests on ground in shrubby vegetation, usually at marsh edge; nest built of a large mound of sticks in wet areas.	Not expected to occur. Riparian areas in the project area are too dense to provide nesting habitat for this species, and there are no marshlands within the project area, or grassland or shrublands near the marshlands to the south of the project area.
Northern spotted owl[4] *Strix occidentalis caurina*	FT	ST SSC	Old-growth forests or mixed stands of old-growth and mature trees. Occasionally in younger forests with patches of big trees. High, multistory canopy dominated by big trees, many trees with cavities or broken tops, woody debris and space under canopy.	Known to occur. The species has been documented to occur within the project area (CNDDB 2024, USFWS 2019). However, the project area has been surveyed annually and there has not been a detection since 2011 (CNDDB 2024).
Olive-sided flycatcher *Contopus cooperi*	—	SSC	Nesting habitats are mixed conifer, montane hardwood-conifer, Douglas fir, redwood, red fir and lodgepole pine. Most numerous in montane conifer forests where tall trees overlook canyons, meadows, lakes or other open terrain.	May occur. Trees in the project area provide nesting habitat for this species.
Rhinoceros auklet *Cerorhinca monocerata*	—		Off-shore islands and rocks along the California coast. Nests in a burrow on undisturbed, forested and unforested islands, and probably in cliff caves on the mainland.	Not expected to occur. This species is associated with marine environments which are not present in the project area.
Tufted puffin *Fratercula cirrhata*	—	SSC	Open-ocean bird; nests along the coast on islands, islets, or (rarely) mainland cliffs. Requires sod or earth into which the birds can burrow, on island cliffs or grassy island slopes.	Not expected to occur. This species is associated with marine environments which are not present in the project area.
Vaux's swift *Chaetura vauxi*	—	SSC	Redwood, Douglas fir, and other coniferous forests. Nests in large hollow trees and snags. Often nests in flocks. Forages over most terrains and habitats but shows a preference for foraging over rivers and lakes.	May occur. Large trees in the project area may provide nesting habitat for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Western snowy plover *Charadrius nivosus nivosus*	FT	SSC	Sandy beaches, salt pond levees, and shores of large alkali lakes. Needs sandy, gravelly or friable soils for nesting.	Not expected to occur. This species is associated with beaches in Humboldt County, which are not present in the project area.
White-tailed kite *Elanus leucurus*	—	FP	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	May occur. Trees at the edges of open portions of the project area may provide nesting habitat for this species.
Yellow rail *Coturnicops noveboracensis*	—	SSC	Summer resident in eastern Sierra Nevada in Mono County. Fresh-water marshlands. Winter visitor to the coast of California.	Not expected to occur. While there are marshlands in the vicinity of the project, including Essex Pond, wetlands within the project area are not foraging habitat for this species, due to limited standing water, or location within mature forest stands.
Fish				
Coast cutthroat trout[3] *Oncorhynchus clarkii clarkii*	—	SSC	Small coastal streams from the Eel River to the Oregon border. Small, low gradient coastal streams and estuaries. Need shaded streams with water temperatures less than 18C, and small gravel for spawning	Known to occur. Coast cutthroat trout have been documented in Essex Gulch, Lindsay Creek, Mill Creek, and Widow White Creek in the project area (CNDDB 2024; NMFS and USFWS 2006).
Coho salmon - southern Oregon / northern California ESU[3] *Oncorhynchus kisutch* pop. 2	FT	ST	The Federal listing refers to populations between Cape Blanco, Oregon and Punta Gorda, Humboldt County, California. State listing refers to populations between the Oregon border and Punta Gorda, California.	Known to occur. The project area is within the current range of this species, and Coho salmon have been documented in the Mad River, which is hydrologically connected to streams in the project area (CNDDB 2024). In addition, the species has been documented to occur in Lindsay Creek, Mill Creek, and Widow White Creek (NMFS and USFWS 2006).
Chinook salmon - California coastal ESU[3] *Oncorhynchus tshawytscha* pop. 17	FT	—	Federal listing refers to wild spawned, coastal, spring and fall runs between Redwood Creek, Humboldt County and Russian River, Sonoma County.	Known to occur. The project area is within the current range of this species, and Chinook salmon have been documented in the Mad River, which is hydrologically connected to streams in the project area (California Fish 2024). In addition, the species has been documented to occur in Lindsay Creek, Mill Creek, and Widow White Creek (NMFS and USFWS 2006).
Eulachon *Thaleichthys pacificus*	FT	—	Found in Klamath River, Mad River, Redwood Creek, and in small numbers in Smith River and Humboldt Bay tributaries. Spawn in lower reaches of coastal rivers with moderate water velocities and bottom of pea-sized gravel, sand and woody debris	May occur. The project area is within the current range of this species, and eulachon have been documented in the Mad River, which is hydrologically connected to streams in the project area (CNDDB 2024).

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Green sturgeon *Acipenser medirostris*	FT	SSC	These are the most marine species of sturgeon. Abundance increases northward of Point Conception. Spawns in the Sacramento, Klamath, and Trinity rivers. Preferred spawning substrate is large cobble but can range from clean sand to bedrock.	May occur. The project area is within the current range of this species, and green sturgeon have been documented in the Mad River, which is hydrologically connected to streams in the project area (California Fish 2024).
Longfin smelt *Spirinchus thaleichthys*	FC	ST SSC	Found in open waters of estuaries, mostly in middle or bottom of water column. Prefer salinities of 15-30 parts per thousand but can be found in completely freshwater to almost pure seawater.	Not expected to occur. The project area is outside of the current range of this species.
Pacific lamprey *Entosphenus tridentatus*	—	SSC	Found in Pacific Coast streams north of San Luis Obispo County, however regular runs in Santa Clara River. The size of runs is declining. Swift-current gravel-bottomed areas for spawning with water temperatures between 12-18 degrees Celsius.	May occur. The project area is within the current range of this species, and Pacific lamprey have been documented in the Mad River, which is hydrologically connected to streams in the project area (California Fish 2024).
Steelhead - northern California DPS summer-run[3] *Oncorhynchus mykiss irideus* pop. 48	FT	SE	From Redwood Creek watershed south to and inclusive of Gualala River watershed. Distribution within range more limited. Require cool water (less than 23C); holding habitat to withstand higher temps; lower flows in summer/fall; require loose gravels at pool tails for redd construction. Favor cool, clear, fast-flowing riffles, ample riparian cover, undercut banks and diverse	May occur. The project area is within the current range of this species, and summer-run steelhead have been documented in the Mad River, which is hydrologically connected to streams in the project area (CNDDB 2024). In addition, the species has been documented to occur in Lindsay Creek, Mill Creek, and Widow White Creek (NMFs and USFWS 2006).
Steelhead - northern California DPS winter-run[3] *Oncorhynchus mykiss irideus* pop. 49	FT	—	Naturally spawning population of the ocean-maturing winter-run ecotype. From Redwood Creek watershed south to and inclusive of Gualala River watershed. Distribution throughout range. Adults require high flows of 18–20 cm for passage and loose gravels at pool tails for redd construction. Juveniles favor areas with cool (10-17 C), clear, fast-flowing riffles, ample riparian cover, undercut banks, and diverse prey.	Known to occur. Winter-run steelhead have been documented to occur in Lindsay Creek, Mill Creek, and Widow White Creek (CNDDB 2024; NMFS and USFWS 2006).
Tidewater goby *Eucyclogobius newberryi*	FE	SSC	Brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego County to the mouth of the Smith River, Del Norte County. Found in shallow lagoons and lower stream reaches, they need fairly still but not stagnant water and high oxygen levels.	Not expected to occur. Aquatic habitat for this species (e.g., lagoons, brackish river mouths) is not present in the project area.

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Western brook lamprey *Lampetra richardsoni*	—	SSC	Typically found in large coastal rivers and their tributaries. Spawning takes place in riffles in the early spring and may last up to six months depending upon the flow regime of the stream.	May occur. The project area is within the current range of this species, and western brook lamprey have been documented in the Mad River, which is hydrologically connected to streams in the project area (California Fish 2024).
Invertebrates				
Crotch bumble bee *Bombus crotchii*	—	SC	Found primarily in California: mediterranean, Pacific coast, western desert, Great Valley, and adjacent foothills through most of southwestern California. Habitat includes open grassland and scrub. Nests underground.	Not expected to occur. The project area is outside of the current range of crotch bumble bee (CDFW 2023).
Western bumble bee *Bombus occidentalis*	—	SC	Once common throughout much of its range, in California, this species is currently largely restricted to high elevation sites in the Sierra Nevada and the northern California coast. Habitat includes open grassy areas, chaparral, scrub, and meadows. Requires suitable nesting sites for the colonies, availability of nectar and pollen from floral resources throughout the duration of the colony period (spring, summer, and fall), and suitable overwintering sites for the queens.	Not expected to occur. The project area is outside of the current range of western bumble bee (CDFW 2023).
Mammals				
American badger *Taxidea taxus*	—	SSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	May occur. The project area is within the range of American badger and open areas present within the project area may provide habitat for the species.
Fisher[4] *Pekania pennanti*	—	SSC	North coast coniferous forest, old growth, riparian forest. Intermediate to large-tree stages of coniferous forests and deciduous-riparian areas with high percent canopy closure. Uses cavities, snags, logs and rocky areas for cover and denning. Needs large areas of mature, dense forest.	Known to occur. Fisher has been detected during surveys of the project area (USFWS 2019), and the species is known to occur within the vicinity of the project area on other Green Diamond Resource Company lands (Green Diamond 2023b).

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Humboldt marten[5] *Martes caurina humboldtensis*	FT	SE SSC	Typically associated with late-successional coniferous forests; prefers forests with low, overhead cover. Some studies have shown that old-growth forest structure characteristics are not required by this species and have found associations with dense ericaceous shrub cover (e.g., salal [*Gaultheria shallon*]) in the understory, mast producing trees like tanoak, and high proportion of pine species (Moriarty et al. 2021).	Not expected to occur. The project area is outside of the current range of Humboldt marten, and camera stations located within the project site and vicinity have not detected Humboldt martin in recent years (2018-2020) (Green Diamond 2023c).
Northern California ringtail *Bassariscus astutus raptor*	—	FP	Dens most often in rock crevices, boulder piles, or talus, but also tree hollows, root cavities, and rural buildings. Rarely use same den for more than a few days. Females with litters change dens within 10 days of birth and almost daily after 20 days.	May occur. The project area is within the range of northern California ringtail and large trees and riparian habitat in the project area may provide den habitat for ringtails.
Pallid bat *Antrozous pallidus*	—	SSC	Most common in open, dry habitats with rocky areas for roosting. Tree roosting has also been documented in large conifer snags, inside basal hollows of redwoods and giant sequoias, and bole cavities in oaks. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	May occur. The project area is within the range of pallid bat and large trees in the project area may provide roost habitat for pallid bats.
Red tree vole[4] *Arborimus longicaudus*			North coast fog belt from northern Oregon border to the Klamath River. In Douglas fir, redwood, and montane hardwood-conifer forests. Feeds almost exclusively on Douglas fir needles. Will occasionally take needles of grand fir, hemlock or spruce.	Not expected to occur. The project area is outside of the current range of the species, which does not occur south of the Klamath River.
Sonoma tree vole[4] *Arborimus pomo*	—	SSC	North coast fog belt from the Klamath River south to Somona County. In Douglas fir, redwood, and montane hardwood-conifer forests. Feeds almost exclusively on Douglas fir needles. Will occasionally take needles of grand fir, hemlock or spruce.	May occur. There are several documented occurrences of Sonoma tree vole within approximately 3 miles east of the project area (CNDDB 2024). Older stands within the riparian conservation areas in the project area may provide nesting habitat for this species.
Townsend's big-eared bat *Corynorhinus townsendii*	—	SSC	Throughout California in a wide variety of habitats. Most common in mesic sites. Requires large cavities for roosting, which may include abandoned buildings and mines, caves, and basal cavities of trees. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	May occur. Townsend's big-eared bats have been documented approximately 4 miles southeast of the project area (CNDDB 2024). Large trees in the project area may provide roost habitat for Townsend's big-eared bats.

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Western red bat *Lasiurus frantzii*	—	SSC	Roosts primarily in trees, 2–40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	May occur. The project area is within the range of western red bat and large broad-leaf trees in the project area may provide roost habitat for western red bats.
White-footed vole *Arborimus albipes*	—	SSC	Mature coastal forests in Humboldt and Del Norte counties. Most often found in association with Red alder (Bean et al. 2016) and other riparian hardwood species. Occupies the habitat from the ground surface to the canopy. Feeds in all layers and nests on the ground under logs or rock.	May occur. The project area is within the range of white-footed vole and red alder and other hardwood stands located along streams in the project area may provide habitat for this species.

Notes: CNDDB = California Natural Diversity Database; CEQA = California Environmental Quality Act

1 Legal Status Definitions

Federal:

FE Federally Listed as Endangered (legally protected)
FT Federally Listed as Threatened (legally protected)
FD Federally Delisted
FP Proposed for Listing under the federal Endangered Species Act

State:

FP Fully Protected (legally protected)
SSC Species of Special Concern (no formal protection other than CEQA consideration)
SE State Listed as Endangered (legally protected)
ST State Listed as Threatened (legally protected)
SC State Candidate for listing (legally protected)
SD State Delisted

2 Potential for Occurrence Definitions

Not expected to occur: Species is unlikely to be present because of poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.

May occur: Suitable habitat is available; however, there are little to no other indicators that the species might be present.

Known to occur: Species has been documented within the treatment site.

3 Covered Species under Green Diamond Resource Company Aquatic Habitat Conservation Plan/ Candidate Conservation Agreement with Assurances.

4 Covered Species under Green Diamond Resource Company Forest Habitat Conservation Plan.

5 Covered Species under Green Diamond Resource Company Safe Harbor Agreement

Sources: California Fish 2024; CDFW 2023; CNDDB 2024; Green Diamond 2023a; Grean Diamond 2023b; NMFS and USFWS 2006.

References

Bean, W. T., D. Tange, and S.D. Osborn. 2016. "A Suitability Model for White-Footed Voles with Insights into Habitat Associations at the Southern Boundary of Their Range." *Northwestern Naturalist* 97(2):105-112.

Calflora. 2024. The Calflora Database: Information on California plants for education, research, and conservation, with data contributed by public and private institutions and individuals. [web application]. Berkeley, California. Available: https://www.calflora.org/ (Accessed: 02/26/2024).

California Department of Fish and Wildlife. 2023 (June). *The Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species*. Sacramento, CA.

California Fish. 2024. *UC Davis California Fish Website.* Available: https://calfish.ucdavis.edu/. Accessed January 18, 2024.

California Natural Diversity Database. 2024. Results of electronic records search. Sacramento: California Department of Fish and Wildlife, Biogeographic Data Branch. Retrieved July 11, 2024.

California Native Plant Society. 2024. *Inventory of Rare and Endangered Plants of California* (online edition, v9-01 1.5). Available: http://www.rareplants.cnps.org. Retrieved July 11, 2024

CDFW. *See* California Department of Fish and Wildlife.

CNDDB. *See* California Natural Diversity Database.

CNPS. *See* California Native Plant Society.

Green Diamond. *See* Green Diamond Resource Company.

Green Diamond Resource Company. 2023a. *8Th Biennial Report, Aquatic Habitat Conservation Plan. Submitted to National Marine Fisheries Service and United States Fish and Wildlife Service. In fulfillment of requirements pursuant to NMFS Permit No. 1613, and USFWS Permit No. TE156839-0*. March.

_____.2023b. *3rd Annual Report submitted to the United States Fish and Wildlife Service and The California Department of Fish and Wildlife by Green Diamond Resource Company. In fulfillment of requirements specified in condition G. of permit # TE43702D-0, incidental date permit for northern spotted owls, under section 10(a)(1)(b) of the Endangered Species Act and the state consistency determination*. March.

_____. 2023c. *4th Annual Report submitted to The California Department of Fish and Wildlife by Green Diamond Resource Company. in fulfillment of requirements specified in the Marten Safe Harbor Agreement with the California Department of Fish and Wildlife, pursuant to the California State Safe Harbor Agreement Program Act (Fish & G. Code, 2089.2 et seq.) for incidental take of Humboldt marten.* March.

iNaturalist. 2024. Record of Great Gray Owl, Humboldt County. Available: https://www.inaturalist.org. Retrieved November 20, 2024.

Moriarty, K. M., J. Thompson, M. Delheimer, B. R. Barry, M. Linnell, T. Levi, K. Hamm, D. Early, H. Gamblin, M. S. Gunther, J. Ellison, J. S. Prevey, J. Hartman, and R. Davis. 2021. "Predicted Distribution of a Rare and Understudied Forest Carnivore: Humboldt Marten (*Martes caurina humboldtensis*)." *PeerJ* 10.7717/peerj.11670.

National Marine Fisheries Service and US Fish and Wildlife Service. 2006. *Green Diamond Resource Company. Final Aquatic Habitat Conservation Plan and Candidate Conservation Agreement with Assurances. Volume 1 Prepared by Green Diamond Resource Company.* Available: https://www.greendiamond.com/resources/#responsible-forestry.

NMFS and USFWS. *See*. National Marine Fisheries Service and US Fish and Wildlife Service.

US Fish and Wildlife Service. 2019. *Forest Habitat Conservation Plan on the California Timberlands of Green Diamond Resource Company*. *Final.* Prepared by Green Diamond Resource Company. September.

Yurok Tribe. 2023. *NCCRP Prepares to Release Three More Condors, Young Birds Will Join Eight Free-Flying Birds in Yurok Ancestral Territory*. Available: https://www.yuroktribe.org/post/nccrp-prepares-to-release-three-more-condors. Accessed: February 27, 2024.