

SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA



ITEM: 3.24
(ID # 17367)

MEETING DATE:

Tuesday, December 14, 2021

FROM : FIRE DEPARTMENT:

SUBJECT: FIRE DEPARTMENT: Riverside County Elsinore Front Country Fuel Break Project - Adoption of Project Specific Analysis (PSA)/Addendum, Mitigation Monitoring Reporting Program (MMRP) for Environmental Assessment Number 2021PSA01, District 1 and 2. [California Climate Investment Grant - 100%] (County Fire Staff to File Notice of Determination)

RECOMMENDED MOTION: That the Board of Supervisors:

1. Adopt the PSA/Addendum to the California Board of Forestry and Fire Protection California Vegetation Treatment Program Programmatic Environmental Impact Report (CalFire VTP PEIR), Findings of Fact, Standard Project Requirements and Mitigation Measures (SPR/MM) identified in the MMRP for Environmental Assessment Number 2021PSA01, based on the findings incorporated in the PSA/Addendum and the conclusion that the Elsinore Front Country Fuel Break Project will not have a significant effect on the environment with implementation of the Project requirements and mitigation measures contained therein, and the PSA/Addendum reflects the Board's independent judgment and analysis; and
2. Approve the Elsinore Front Country Fuel Break Project.


ACTION:


Bill Weiser, Fire Department Chief 12/1/2021

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Washington, seconded by Supervisor Spiegel and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended

Ayes: Jeffries, Spiegel, Washington, Perez and Hewitt
Nays: None
Absent: None
Date: December 14, 2021
xc: Fire

Kecia R. Harper
Clerk of the Board
By: 
Deputy

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,
STATE OF CALIFORNIA**

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	\$0	\$0	\$0	\$0
NET COUNTY COST	\$0	\$0	\$0	\$0
SOURCE OF FUNDS: California Climate Investment Grant – 100%			Budget Adjustment: No	
			For Fiscal Year: 21/22	

C.E.O. RECOMMENDATION: Approve

BACKGROUND:

Summary

The Riverside County Fire Department (RCFD) was awarded funding in the amount of \$1,898,303 for the Elsinore Front Country Fuel Break project agreement as approved via MO#3.20 on November 6, 2018. The project intends to establish a fuel break at the base of the slope of the Santa Ana Mountains, where it is situated directly west of community areas in Riverside County, California. A critical component to completion of this project is the California Environmental Quality Act (CEQA) process and documentation. As a part of this process, a Registered Professional Forester, along with an Archeologist and Biologist, complete environmental surveys on the proposed project area which will result in a document outlining the prescribed treatment plan for the fuel break project as well as identifying any mitigation needs to avoid impacts to cultural resources.

In accordance with CEQA (Public Resources Code, §§ 21000-21177) and the State CEQA Guidelines (California Code of Regulations, title 14, sections 15000 et seq.), including Section 15063, RCFD has reviewed the project under CEQA compliance as a later activity covered by the 2019 California Board of Forestry and Fire Protection (CALFire) Vegetation Treatment Program (VTP) Programmatic Environmental Impact Report (PEIR).

RCFD's contracted project management firm, Blackfox Timber Management Group, has prepared a Project Specific Analysis (PSA)/Addendum to evaluate if the proposed project work is within the scope of the PEIR, consider revisions or changes to the PEIR that would expand its coverage to include all project areas, and provide environmental information to RCFD to aid in its consideration of subgrant funding allocations for work to be funded by the CAL FIRE grant and project work to be performed. The project is described in more detail in the PSA/Addendum.

The County is required to adopt a Mitigation Monitoring Reporting Program (MMRP) for the Standard Project Requirements and Mitigation Measures (SPR/MM) identified in the PSA/Addendum to mitigate or avoid significant effects on the environment. The PSA/Addendum demonstrated that the project would not have any significant impacts on the environment with the implementation of the mitigation measures identified. The Notice of

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,
STATE OF CALIFORNIA**

Determination will be filed by Riverside County Fire Department staff with the County Clerk within five days of Board of Supervisors approval.

During the early stages of project development, initial Tribal Consultation was sent to relevant tribes on February 5, 2020. Four tribes responded, two of which were interested in project development and two declined. As project development continued, it was determined that the project would be within the scope of the CalFire VTP PEIR. Tribal Consultation under Assembly Bill 52 was completed during the preparation of the CalFire VTP PEIR. In accordance with the terms of the SPR/MM for the CalFire VTP PEIR which require notification to geographically affiliated Tribes, additional Tribal coordination occurred during preparation of the PSA/Addendum to the CalFire VTP PEIR. The Tribes were again notified about the project on June 17, 2021. One Tribe (Rincon Band of Luiseño Indians) requested consultation, which took place on August 5, and August 18, 2021. As this Tribe does not have Tribal monitors, the Rincon Band requested that Pechanga Band monitors be incorporated on their behalf and an agreement covering these services will be forthcoming prior to project work starting. No other Tribes requested consultation within the 30-day notification period.

SPR/MM were revised/developed in coordination with Tribes and based on Tribal input to address concerns related to the accidental discovery of cultural resources. Compliance with these design and mitigation measures will provide a redundancy mechanism to ensure that potential impacts from inadvertent discoveries of archeological resources do not occur and remain less than significant.

Construction of the Project is anticipated to begin in December of 2021.

The Licensed Timber Operator Agreement Approval Form 11 for this Grant Program is concurrently being heard on the Dec. 14, 2021 Board of Supervisors hearing as Item No. 17350.

Impact on Residents and Businesses

The Elsinore Front Country Fuel Break Project will provide additional protection from wildfire threat to adjacent residents in Wildomar, Lakeland Village, Lake Elsinore, Horsethief Canyon Ranch, Temescal Valley, and Trilogy communities in Riverside County.

Additional Fiscal Information

The Board previously approved the costs associated with the Project on November 6, 2018 (Item 3.20). This Board action will have no financial impact to the Project.

Attachments:

- PSA/Addendum and MMRP
- Findings of Fact
- Notice of Determination

SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,
STATE OF CALIFORNIA


Rebecca S. Cortez, Principal Management Analyst

12/6/2021


Juan C. Perez, Chief Operating Officer

12/8/2021


Gregory L. Priamos, Director County Counsel

12/1/2021

November 15, 2021

Elsinore Front Country Fuel Break Riverside County Fire Department



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Contents

1. INTRODUCTION.....	1
2. PROPOSED PROJECT.....	4
3. ENVIRONMENTAL CHECKLIST	12
4. DETERMINATION STATEMENT	16
5. PROJECT SPECIFIC ANALYSIS/ADDENDUM.....	17
5.1 Aesthetics and Visual Resources	17
5.2 Agriculture and Forestry Resources	20
5.3 Air Quality	22
5.4 Archaeological, Historical, and Tribal Cultural Resources	26
5.5 Biological Resources	30
5.6 Geology, Soils, Paleontology, and Mineral Resources	60
5.7 Greenhouse Gas Emissions (GHG)	63
5.8 Energy Resources	65
5.9 Hazardous Materials, Public Health and Safety	66
5.10 Hydrology and Water Quality.....	69
5.11 Land Use and Planning, Population and Housing.....	74
5.12 Noise.....	77
5.13 Recreation	79
5.14 Transportation	80
5.15 Public Services, Utilities and Service Systems	83
5.16 Wildfire.....	86
6. CUMULATIVE EFFECTS ANALYSIS.....	88
7. MAPS.....	89
8. PROJECT PARTICIPANTS.....	96
9. PROJECT TEAM MEMBERS AND LIST OF PREPARERS	105
10. REFERENCES.....	106
11. ATTACHMENTS.....	107
A. Mitigation Monitoring and Reporting Program	107
B. Project Specific CEQA Findings and Statement of Overriding Consideration.....	107
C. Biological Resources Report.....	107
D. Cultural Resources Inventory Report - Confidential	107
E. Soils Report.....	107

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Acronyms and Abbreviations

CAAQS	California Ambient Air Quality Standards
CDFW	California Department of Fish and Wildlife
CAL FIRE	California Department of Forestry and Fire Protection
CEQA	California Environmental Quality Act
CRM	Certified Rangeland Manager
CalVTP	California Vegetation Treatment Program
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRHS	California Register of Historical Resources
DPR	California Department of Pesticide Regulations
CNF	Cleveland National Forest
EPA	U.S. Environmental Protection Agency
FGC	Fish and Game Code
FRAP	Fire and Resource Assessment Program - CAL FIRE
GHG	Greenhouse Gases
GIS	Geographical Information System
LRA	Local Responsibility Areas
LTO	Licensed Timber Operator
MBTA	Migratory Bird Treaty Act
MSHCP	Western Riverside Multi-Species Habitat Conservation Plan
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NACL	Native American Contact List
NOA	Naturally Occurring Asbestos
NRHP	National Register of Historic Places
NWS	National Weather Service
PEIR	Programmatic Environmental Impact Report
PRC	Public Resources Code
PSA	Project Specific Analysis
RPA	Registered Professional Archaeologist
RPF	Registered Professional Forester
RVC	Riverside County Fire Department
SENL	Single Event Noise Level
SCAQMD	South Coast Air Quality Management District
SRA	State Responsibility Areas
USGS	U.S. Geological Survey
VMU	Vegetation Management Unit
VMT	Vehicle Miles Traveled
WLPZ	Watercourse and Lake Protection Zone
WUI	Wildland Urban Interface

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1. INTRODUCTION

A. Project Overview and Document Purpose

Riverside County Fire Department (RVC) received a California Climate Investment (CCI) – Fire Prevention Grant (5GG17197) from the California Department of Forestry and Fire Protection (CAL FIRE) to establish the Elsinore Front Country Fuel Break (EFCFB or proposed project). The original grant project proposed establishing a fuel break west of the Wildomar and Lake Elsinore communities to reduce the threat of wildfire directly impacting these communities. In 2020, RVC and CAL FIRE-Riverside Unit (RRU) discussed extending the fuel break northward to include Horsethief Canyon, Temescal Canyon, and Trilogy communities. RVC received approval from CAL FIRE to increase the project area, and the final amendment to include the additional area in the proposed project was approved in December 2020.

B. California Environmental Quality Act

In accordance with the California Environmental Quality Act (CEQA), a lead agency is required to demonstrate compliance with the environmental regulations before implementing a project. Serving as the lead agency, RVC (project proponent) considered several options to evaluate the proposed project to meet CEQA compliance and opted to evaluate the proposed project under the Programmatic Environment Impact Report for the California Vegetation Treatment Program.

In December 2019, the California Board of Forestry and Fire Protection certified a Programmatic Environmental Impact Report (PEIR) for the California Vegetation Treatment Program (CalVTP). According to the CalVTP, the program is:

"... a critical component of the state's multi-faceted strategy to address California's wildfire crisis. The CalVTP includes the use of prescribed burning, mechanical treatments, manual treatments, herbicides, and prescribed herbivory as tools to reduce hazardous vegetation around communities in the Wildland-Urban Interface (WUI), to construct fuel breaks, and to restore healthy ecological fire regimes."

The PEIR identifies those local, regional, and state agencies with land ownership or land management responsibilities in the State Responsibility Areas (SRA) that could use the CalVTP PEIR for their proposed vegetation treatment projects to meet CEQA compliance. The CalVTP PEIR identifies a complex set of environmental settings that covers the entire state. The PEIR describes the comprehensive regulatory settings applicable to the statewide program. In addition, the PEIR identifies a range of potential impacts associated with vegetation treatment projects and establishes Standard Project Requirements (SPRs) and Mitigation Measures (MMs) to address and minimize these impacts. Moreover, the PEIR sets forth a streamlining process to evaluate impacts from a project as a later activity and uses the Project Specific Analysis (PSA) checklist to document the process.

A proposed project within the scope of the PEIR needs to be consistent within the environmental and regulatory settings described in the PEIR. All relevant SPRs and MMs specific to a proposed project must be incorporated into the PSA. CEQA Guidelines Section 15168(c)(2) indicates that if the potential environmental impacts of a proposed project are determined to be covered by the environmental impacts analyzed in the PEIR, the project may be approved using a finding statement that indicates the proposed project is within the scope of the PEIR. Such a finding would constitute CEQA compliance under the PEIR. Furthermore, a project consistent with and within the scope of the PEIR would likely require no additional review.

C. Proposed Project: Treatment Type and Activities

RVC proposes establishing a fuel break directly adjacent to a WUI area. Located directly west of the Wildomar, Lake Elsinore, Horsethief Canyon, Temescal Canyon, and Trilogy communities, and east of the Cleveland National Forest (CNF) boundary, the fuel break would be situated at the base of the slope between community areas and wildland areas (Map-1). This treatment prescription results in a shaded fuel break. The proposed project is approximately 300 feet wide and spans a linear distance of 21.5 miles, covering 1,056.7 acres. Moreover, the

proposed project involves 523 parcels (private and non-federal properties). Treatment activities include manual treatment, mechanical treatment, prescribed fire (burn piles), prescribed herbivory and herbicides. Both the treatment type and the treatment activities are consistent with the scope of the CalVTP. The proposed project includes treatment areas within the CalVTP treatable landscape and treatment areas outside the treatable landscape, but site conditions are consistent with the CalVTP treatable landscape.

D. Project Specific Analysis

The CalVTP offers local agencies the ability to utilize the PEIR for their vegetation treatment projects. The PSA is the environmental evaluation process to assess if a proposed project is consistent with and within the scope of the CalVTP PEIR. As a streamlined process, the PSA evaluates the potential environmental effects of a proposed project's treatment type and treatment activities and evaluates if those impacts are consistent with the environmental impacts identified in the PEIR. The proposed project was evaluated according to the parameters of the PEIR. The analysis of the potential environmental effects from the proposed indicates that those environmental effects were sufficiently evaluated and consistent with the analysis identified in the PEIR. Further, the analysis identified and applied both the SPR and the MM, reflecting that the proposed project addresses and minimizes those impacts and is consistent with the PEIR.

E. Treatable Landscape

Besides the above criteria, the evaluation process includes determining if the proposed project is within the "treatable landscape." The treatable landscape is a specialized map produced by a computer model based on the SRA and likely vegetation types vulnerable to wildfires. For the most part, the model did not include Local Responsibility Areas (LRA), except for potential isolated ridge fuel break locations. Given the complex nature of the SRA across California, the computer model generated a mix of homogenous units and heterogeneous units or pixelated map areas. For a project to be within the scope of the PEIR, the proposed project must be within the boundary (scope) of the treatable landscape. However, when a proposed project includes areas outside the treatable landscape, an additional review is necessary to determine consistency with the PEIR.

Under limited conditions, a proposed project with portions of the project area outside the treatable landscape can be evaluated for consistency with the PEIR if site conditions for these areas are essentially similar to the neighboring areas under the treatable landscape. It is reasonable to assert that if the site conditions outside the treatable landscape are similar to site conditions within the treatable landscape, then the proposed project is entirely within the scope of the CalVTP, and it is reasonable to conduct the environmental review utilizing the PEIR for the entire proposed project area.

The placement of the proposed project was digitized utilizing a Geographic Information System (GIS) platform and aerial imagery. The proposed project focused on maximizing community protection by aligning the fuel break closest to developed areas. The location of the fuel break is influenced by parcel map information, developed areas (WUI), infrastructure, roads, watercourses, and other natural or man-made barriers. The proposed project does not include federal lands (CNF). Most of the proposed project is within SRA jurisdiction and the treatable landscape (Map-2). Several short segments of the proposed project are within SRA jurisdiction but are outside the treatable landscape. Segments that are outside the treatable landscape are similar to those within the treatable landscape. There are three segments in the southern portion of the proposed project located within the LRA jurisdiction. Portions of these segments are within the treatable landscape map (ridge areas), and portions of the segments are outside the treatable landscape. While the LRA areas are governed by the cities of Wildomar and Lake Elsinore, the fire protection services are provided by RVC and administered by CAL FIRE – Riverside Unit. Site conditions for these segments that are outside the treatable landscape are essentially the same as those included in the treatable landscape.

F. Addendum – Treatable Landscape Consistency

Although portions of the proposed project are outside the treatable landscape, as identified above (Section 1.E), site conditions indicate these areas are similar to areas within the treatable landscape. Further, the site conditions with the SRA and LRA jurisdictional boundaries are essentially similar as well. Given the general understanding that site conditions with the proposed project are consistent with concepts of treatable landscape, then it is

reasonable to assert that the proposed project is consistent with the scope of the CalVTP, and it is reasonable to conduct the environmental review utilizing the PEIR for the entire proposed project area.

G. Use of the CalVTP and PEIR by other state agencies or public agencies

The PEIR indicates that using the CalVTP and the PEIR is permissible by other state agencies or public agencies with land ownership, land management, or other regulatory responsibilities for a proposed vegetation treatment project consistent with the PEIR and treatable landscape. The PEIR further directs that if an agency opts to utilize the PEIR, the agency may process the review and approval process through their CEQA implementation process, including filing the Notice of Determination through the State Clearinghouse or applicable County Clerk's office. As the grant and project manager for the proposed project, RVC has opted to use the CalVTP PEIR for this proposed project and submitted this PSA documentation through the County's CEQA procedures.

H. Project Specific CEQA Findings and Overriding Considerations

As the lead agency, the County has the responsibility to approve the specific proposed project within the scope of the PEIR. Additionally, the County is responsible for adopting CEQA findings (under Section 15091 of the State CEQA Guidelines), and if needed, adopting a statement of overriding considerations (under Section 15093 of the State CEQA Guidelines). While the County must adopt findings (see CEQA Guidelines section 15096(h)), the County has the option of reusing, incorporating, or adapting all or part of the findings adopted by the Board for the CalVTP PEIR to meet the County's requirements to the extent the findings apply to the proposed vegetation treatment project. The findings are attached to this PSA and found in the Attachment Section – Attachment B.

2. PROPOSED PROJECT

A. Background and Project Description

The concept of the proposed project is identified in the Riverside Unit Fire Plan (CAL FIRE – Riverside Unit). RVC and CAL FIRE have been contractual partners in fire services for 100 years. RVC has assumed the leadership to establish a fuel break directly adjacent to a WUI area. Located directly west of the Wildomar, Lake Elsinore, Horsethief Canyon, Temescal Canyon, Trilogy communities, and east of the Cleveland National Forest boundary, the fuel break is situated at the base of the slope between community areas and wildland areas. Nearly 6,000 homes, businesses, governmental buildings, schools, and other structures are within a quarter of a mile to the proposed project. In the event of a wildfire, the purpose of the shaded fuel break allows firefighters to conduct fire suppression operations to defend the community from wildfires or reduce the threat of a wildfire spreading into the wildlands. In turn, the shaded fuel break reduces risk to firefighters, reduces cost and losses from destructive wildfires, and reduces the potential loss of lives.

Hundreds of small and large wildfires have burned throughout the Santa Ana Mountain region, including the proposed project area. As a recent example, the Holy Fire started on August 6, 2021, in Trabuco Canyon, Orange County, and quickly spread over the Santa Ana Mountains and into Riverside County (Map-3). The fire threatened Lake Elsinore, Horsethief Canyon, McVicker, and El Cariso Village communities, burned 23,136 acres, destroyed 24 structures, and injured three firefighters. The following winter, post-fire flooding occurred, causing landslides and debris flow. The fire-flood cycle costs taxpayers millions of dollars.

In January 2019, RVC received a CCI grant from CAL FIRE to fund the environmental review and implement the proposed project. The proposed project starts north of the Bear Creek Golf Course in Wildomar, near Clinton Keith Road, and continues north towards the Trilogy Golf Course, just south of Corona near the Bedford Motor Parkway Road. The fuel break is approximately 21 miles in length and 300 feet wide. The proposed project involves 523 parcels mostly held as private properties, with a few non-federal land holdings (water district and county flood control parcels), for a total of 1,056.7 acres. The fuel break is relatively continuous, although in places where there are natural barriers, such as the clay pit area, where the fuel break ties into these areas, and no treatment is required. The proposed project considered including lands owned or managed by conservation organizations; however, these lands are designated as "conserved" lands and are excluded from the proposed project. Thus, the fuel break is relatively continuous in the southern treatment units and discontinuous in the northern units, see Map-1.

The placement of the proposed project was digitized utilizing a GIS platform and aerial imagery. The treatment area layout focused on maximizing community protection by aligning the fuel break closest to developed areas. The fuel break layout is influenced by landowner interest, parcel map information, developed areas (WUI), infrastructure, roads, watercourses, and other natural or artificial barriers. The alignment of the fuel break may slightly vary within parcels with signed agreements with approved field surveys. The proposed project does not include federal lands (CNF).

Treatment Type and Activities

The proposed project integrates WUI fuel reduction as a fuel break. The fuel break, strategically located at the base of the slope, provides firefighters with a logistical location to defend communities from wildfires. The fuel break is relatively continuous as a linear treatment area next to community areas and would serve as a long-term project.

The proposed treatment activities include the following: manual treatment, mechanical treatment, herbivory, and prescribed fire (pile burning). In isolated sites, herbicides may be used to treat non-native or invasive species.

Vegetation Treatment Prescription

The dominant vegetation is a mixture of brush species (mixed chaparral, coastal sage scrub, and scrub oak). In a few open sites, grass and forbs occupy the area, while occasionally, trees or tall brush species stand above the brush and grass areas. Collectively, this vegetation adjacent to community areas constitutes the classification as hazardous fuel (refer to CalVTP 2.4.1 – Fuel Types).

The fuels reduction prescription would reduce, modify, and remove 40-60% vegetation based on slope, terrain conditions, habitat for sensitive biological species, cultural resources, soils, buffers for watercourse protection, and access. The retained vegetation expects to appear as a random mosaic pattern within the treatment area to create a shaded fuel break. The perimeter is scalloped or feathered to blend into the adjacent untreated vegetation to minimize blunt or sharp edges. Retained vegetation expects to be a mixture of young and mature vegetation. Where appropriate, pruning and limbing, consistent with industry-standard pruning practices, minimizes ladder fuels. Emphasis is placed on removing dead and dying brush and trees. Where appropriate, retention areas (untreated areas) are expected to be scattered throughout the proposed treatment, most likely associated with watercourse buffers, habitat areas, cultural resources, steep slopes, or aesthetics.

The proposed project consists of six management units: Wildomar Vegetation Management Unit (VMU), Lakeland VMU, Elsinore VMU, Horsethief Canyon VMU, Temescal Canyon VMU, and Trilogy VMU. The treatment unit maps are provided in Section 6-Maps. Wildomar, Lakeland, and Elsinore VMUs are the southern units of the project, while Horsethief, Temescal, and Trilogy VMU are the northern units of the project. The Holy Fire burned through most of the northern area of the proposed project, see Map-2. Since the fire, vegetation has regrown. Consistent with the maintenance cycle, treatment in this area should occur within a three to seven-year cycle to minimize hazardous fuel build-up in the fuel break.

The treatment methods primarily are manual and mechanical operations. Access, slope, soil conditions, and other site factors determine the treatment method. Most of the treatment area (70-80%) would occur through manual or hand treatment. Approximately 20-30% of the area is suitable for mechanical treatment. The steep slopes and soil conditions limit the size of mastication equipment to small or medium-sized masticators. Hand tools, such as chain saws, axes, shovels, weed eaters, are likely tools for manual or hand-treatment operations. Other support vehicles may be necessary to complete the job, such as dump trucks, loaders, and trailers. Access limits the use of these vehicles to paved or existing dirt or natural surfaced roads.

The proposed project includes using herbicides, herbivory, and prescribed pile burning to provide supplement or remote support to the project. Herbicide application would be used for targeted invasive/non-native species that contribute to hazardous fuel loading. Herbivory practices would be an option for initial treatment and maintenance in suitable locations. Prescribed burning is limited to pile burning in isolated locations that are not accessible for equipment to dispose of cut vegetation.

Herbicides would be an option for the treatment of invasive/non-native vegetation in isolated locations. This treatment intends to reduce the competition of invasive/non-native species, resulting in the retention of native, healthy vegetation (shrubs and trees) that are spatially separated to lessen fuel loading. The project manager would consult with a Pest Control Advisor to develop a written recommendation. The written recommendation would identify the target species, the appropriate herbicide (from the herbicide list identified in the CalVTP PEIR), and the application methods and equipment. Application of herbicides must follow the label instructions. Herbicides would only be applied through all-terrain vehicles or backpack-style sprayers. Aerial herbicide application is not permitted. To ensure herbicides are applied appropriately on the target species under the prescribed site conditions, including weather conditions, all personnel applying herbicides would receive herbicide use and safety training.

Herbivory practices would be an option for initial treatment for some locations within the treatment area. Further, herbivory practices would help maintain the fuel break. The project manager would consult with a Certified Rangeland Manager (CRM) to develop an herbivory treatment plan. The herbivory treatment plan would consider the project site conditions, the type and number of grazing animals, target vegetation for grazing (shrubs and invasive grass/forbs), and the ability to manage the grazing herd to stay within the fuel reduction prescription. Factors such as fencing, access, capacity and facilities for loading/offloading animals, proximity to developed areas, and water availability would need to be considered. The grazing stock would need to be weed-free before arriving at the project site and then moved off-site to release any weed seeds from their digestive tract. Herders would be required to implement this treatment activity.

Prescribed pile burning would serve as an option to dispose of cut vegetation in isolated locations that are not accessible for equipment to chip or masticate. Crews would coordinate with the project manager for suitable locations for pile burning. The project manager would consult with CAL FIRE to create a Burn Plan and submit a Smoke Management Plan to the South Coast Air Quality Management District (SCAQMD). Consistent with the Burn Plan, CAL FIRE would notify the public before the commencement of pile burning. CAL FIRE would conduct pile burning on permissible burn days.

Project Participation

On October 29, 2019, RVC held a community meeting to inform landowners within the area about the proposed project. The public was informed that the proposed project is based on landowner participation. The proposed project involves 523 parcels for a total of 1056.7 acres. If all the landowners agree to participate in the project, the proposed project expects to treat the entire area. If only a portion of the landowners agrees to participate, only a portion of the fuel break is treated. Outreach effort to landowners within the vicinity of the project area is based on public record information (assessor parcel data). RVC mailed landowners within the project the Riverside County Agreement forms and a project questionnaire. Landowners interested in participating in the project signed the agreement and completed the project questionnaire. The project participant list is found in Section 7 – Project Participants.

As of September 1, 2021, 36% of parcel landowners representing 46% of the treatment area have agreed to participate. The landowner list identifies the current participation status. Due to the complexities of notifying landowners, outreach efforts expect to be ongoing throughout the life of the project. Experience has shown, once work begins on a vegetation treatment project, landowners find the treatment results pleasing and express interest in participating in these types of projects. Thus, the participation rate and treatment acres are expected to increase throughout the project's life. Further, the treatment area may be slightly adjusted, within the intent of the proposed project and participating landowners, to best fit the fuel break to the landscape.

Terrain

The slope of the treatment area ranges from 5-75%, with a few sites exceeding 75%. Approximately half of the treatment area exceeds 30% slope. Soils have low organic matter and are rocky; thus, the combination of slope and soil conditions limits treatment activities. Mechanical operations (heavy equipment) would be limited to slopes less than 50%, manual treatment would be limited to slopes less than 65%, and 65% or higher slopes are "no work zones."

Watercourses

According to the California Wetland GIS data, the fuel break spans across or adjacent to 28 streams (classified as Freshwater Ponds or Freshwater Forested/Shrub Wetland). The fuel break also spans across or adjacent to 135 dry ravines. The PEIR utilizes stream protection measures according to California Forest Practice Rules regarding Watercourse and Lake Protection Zone (WLPZ) regulations. The classification for streams within the proposed project area fit into Class II, III, or IV ratings, while dry ravines fit into Class IV or swales ratings.

Roads

Access primarily occurs from community rural paved and natural surfaced (dirt-surfaced) roads. There is no single road or a network of roads that connects the fuel break. Occasionally, the fuel break spans near or adjacent to roads. The project manager coordinates access between the landowners and the crews.

Biomass

Most cut vegetation would be processed on-site as chipped or masticated material and dispersed over exposed soil sites no greater than 2-3 inches. When chipping or masticating material is not feasible, excessive biomass may be transported off-site to a greenwaste facility. An Organic Solid Waste Plan describes the details on greenwaste recycling. Where access is limited, the lop and scatter practice is permissible and coordinated with the project manager. Due to the proximity to developed areas, piling brush for prescribed burning requires approval by an appropriate fire officer. Prescribed pile burning is the last resort practice for biomass disposal.

Workforce, Manual and Mechanical Operations

Conservation crews (CAL FIRE, CCC, or other trained workforces) or a Licensed Timber Operator (LTO) would serve as the workforce for implementing manual and mechanical treatments. The workforce uses various vehicles, equipment, and tools to conduct manual and mechanical treatments and prescribed pile burning. Vehicles include pickup trucks, crew carriers, chip trucks, dump trucks, trailers, fire engines, and other associated types of vehicles. Equipment includes masticators, chippers, loaders, winches, and other associated types of equipment. Tools include chainsaws, weed eaters or weed-whips, axes, rakes, shovels, and other hand tools.

Operational Hours

The proposed project limits treatment activities to Monday – Saturday during the daylight hours of 7:00 a.m. to 5:00 p.m. Before initiating treatment activities, notify noise-sensitive receptors, such as residential areas, schools, and other noise-sensitive facilities within 1,500 feet of the treatment area. Notification information includes anticipated dates and operations hours, the name of the representative and daytime telephone number, and recommendations to reduce interior noise levels (e.g., close windows and doors).

Pre-implementation Training

Conservation crew, LTOs, or other workforces approved by the project manager to work on the proposed project shall attend a training workshop before the commencement of work. The training workshop includes specific details about the appropriate work practices to effectively implement the SPRs and MMs, including those SPRs and MMs for biological and cultural resources identified in the PSA.

Reporting Requirements

The proposed project would follow the CalVTP reporting requirements (CalVTP 2.6.1). The reporting requirements follow as:

- To initiate a project, submit a Planned CalVTP Project form (SPR AD- 7: Information on Planned Treatment Projects) to the CalVTP Program at CalVTPprojects@fire.ca.gov at least 15 days prior to project the approval of the PSA
- To indicate an approved project, submit the approved PSA and the associated documents and geospatial data to the CalVTP Program at CalVTPprojects@fire.ca.gov when a Notice of Determination is filed. Submit the following:
 - Approved PSA Environmental Checklist
 - Approved Mitigation Monitoring and Reporting Program (PSA: Attachment A)
 - Geospatial data for the project area and treatment type (utilized the CalVTP Project Data Entry Guide and the CalVTP Project Template for the geospatial data)
- To indicate the initial project is completed or maintenance work is completed, submit a post-implementation report to the CalVTP Program at CalVTPprojects@fire.ca.gov. Submit the following:
 - Post-project implementation report includes the size of the treated area, treatment types, activities implemented, dates of work, a list of the SPRs and MMs that were implemented, and any explanations regarding implementation if required by SPRs and mitigation measures.
 - An updated geospatial data report showing completed treatment or maintenance (utilized the CalVTP Project Data Entry Guide and the CalVTP Project Template for the geospatial data)
 - Should only portions of the proposed project be completed under grant funding, RVC would coordinate with CAL FIRE regarding the post-implementation report.

The utilization of the CalVTP program enables tracking and monitoring the proposed project, including the SPRs and MMs, and documenting the project's compliance with the SPRs and MMs measures. Further, the statewide program monitors the effectiveness of treatments. The Monitoring Report is found in the Attachment Section – Attachment A.

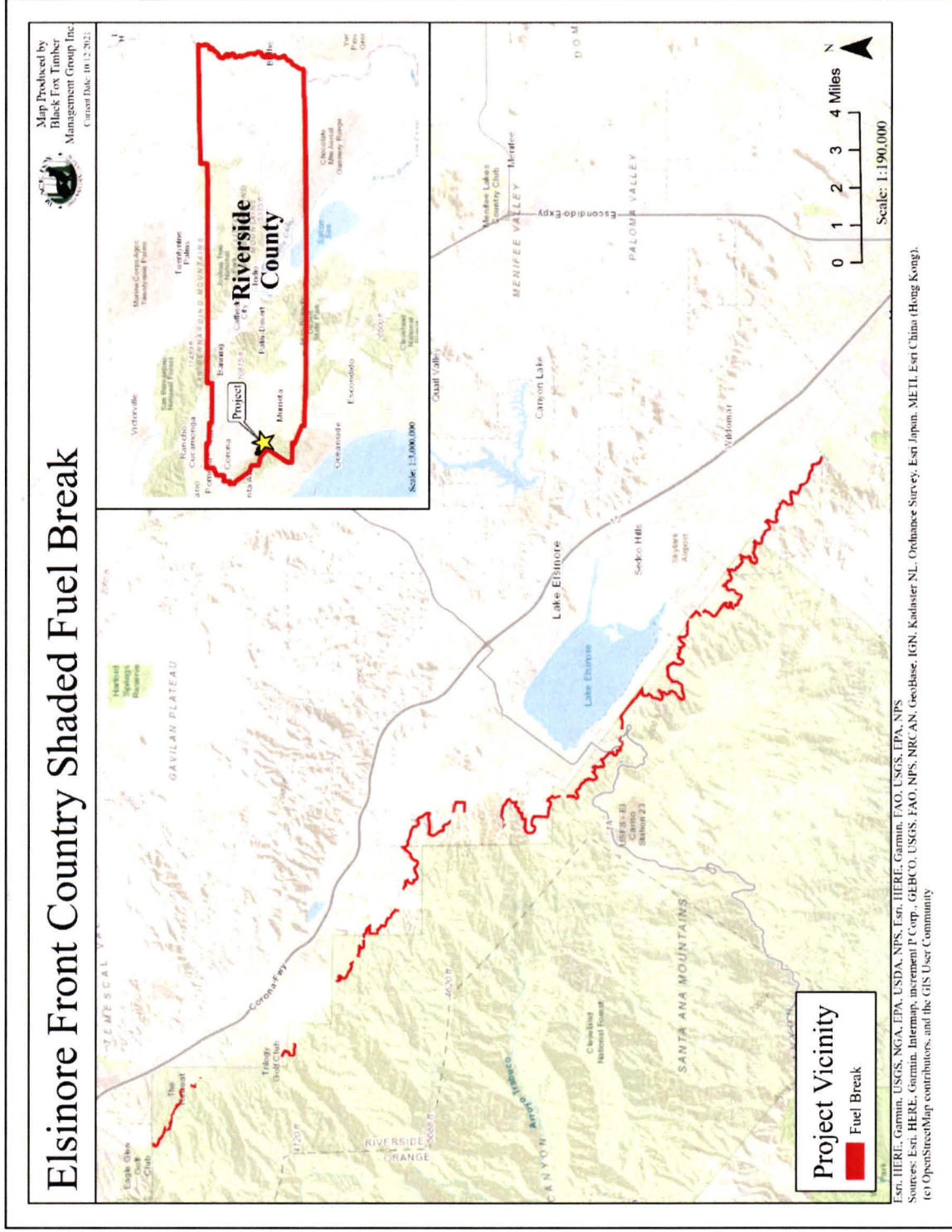
B. Implementation, Grant Funding, and Need for Future Funding

The proposed project expects to treat 22 parcels for a total of 100.2 acres before the current CCI grant funds expire in March 2022. Due to time constraints, biological plant surveys were not completed on 167 agreement-signed parcels for 334.6 acres. Additional funding is needed to support 1) completing a biological survey on current agreement-signed parcels, 2) reviewing current landowner agreements for changes and updates, 3) conducting outreach to landowners who have not participated in the project, and 4) complete archaeological, biological, and field surveys for new participating parcels within the treatment area.

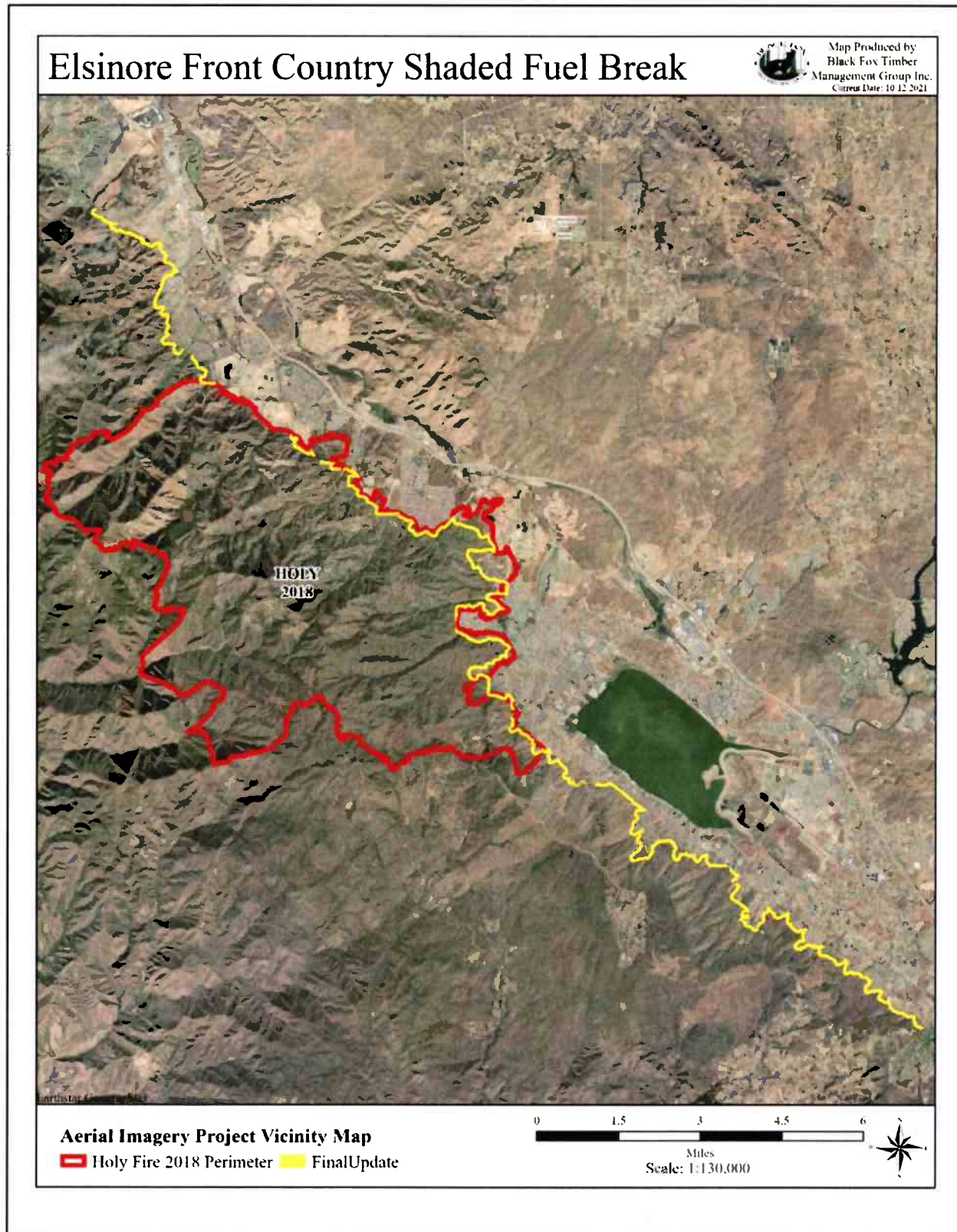
C. Maintenance

The current grant funding is intended to complete the environmental review, conduct landowner outreach, and implement fuels treatment on agreement-signed parcels with completed field surveys. Future grant funding would be needed to complete the initial treatment on parcels with signed agreements and maintain the effectiveness of the initial treatment. Maintenance costs likely would substantially be less than the initial treatment. Landowners may assist with maintaining the fuel break. The maintenance cycle of the fuel break would vary from 3-7 years, based on site conditions, regrowth of vegetation, and wildfires. The project proponent or a Registered Professional Forester (RPF) should conduct an on-site evaluation to determine the need for maintenance.

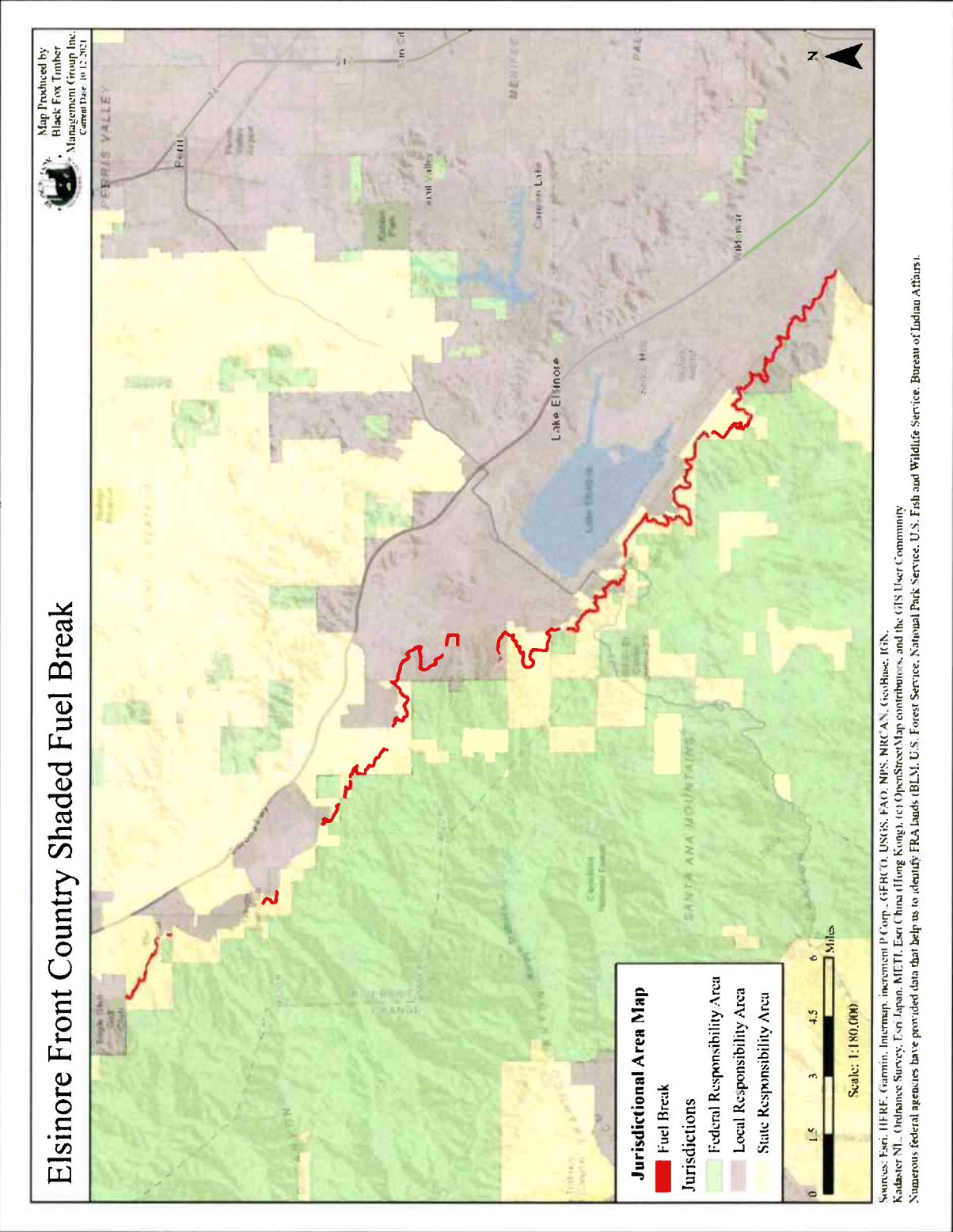
Map 1: Elsinore Front Country Fuel Break – Vicinity Map



Map 2: Elsinore Front Country Fuel Break and the 2018 Holy Fire



Map 3: Elsinore Front Country Fuel Break - Jurisdictional Map



3. ENVIRONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

A. **Project Title:** Elsinore Front Country Fuel Break

B. **CalVTP ID:** 2021-16

C. **Project Proponent Name and Address:**

Riverside County Fire Department
CAL FIRE/Riverside County Fire Department
210 W. San Jacinto
Perris, CA 92570

Phone: (951) 940-6900

D. **Contact Person Information and Phone Number**

Melissa Curtis
Admin. Services Analyst II / County Finance - Grants
CAL FIRE/Riverside County Fire Department
210 W. San Jacinto Perris, CA 92570

Melissa.Curtis1@fire.ca.gov
Phone: (951) 940-6361

Michael Sullivan
Senior Environmental Planner Riverside County
Project Management Office
3133 Mission Inn Ave. Riverside, CA 92507

msullivan@rivco.org
Phone: 951.955.8009

E. **Project Location:**

Location Description:	West of Wildomar, Lakeland Village, Lake Elsinore, Horsethief Canyon, Temescal Canyon, and Trilogy communities and east of the CNF in western Riverside County
Project Coordinates (Decimal Degrees)	Southern Point: Lat: 33.584233° -- Long: -117.265116° Northern Point: Lat: 33.799234° -- Long: -117.532505° Center Point: Lat: 33.661361° -- Long: -117.396708°

F. **Total Area to be Treated (acres):** 1,056.7 Acres involving 523 parcels

G. **Project Description:** See Section 2 for the description of the project

H. Treatment Types

Treatment Types	Check all that applies
Wildland-Urban Interface Fuel Reduction	X
Fuel Break	X
Ecological Restoration	

I. Treatment Activities

Treatment Activities	Acres	Check all that applies
Prescribed Burning (Broadcast)	0	N/A
Prescribed Burning (Pile Burning)	79.8	X
Mechanical Treatment	343.0	X
Manual Treatment	1056.7	X
Prescribed Herbivory	284.9	X
Herbicide Application	343.0	X

J. Fuel Type

Fuel Type	Check all that applies
Grass Fuel Type	X
Shrub Fuel Type	X
Tree Fuel Type	

K. Geographic Scope

Geographical Scope	Check only one box
The treatment site is entirely within the CalVTP treatable landscape	
The treatment site is NOT entirely within the CalVTP treatable landscape.	X

Discussion: The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions with the SRA that are outside the treatable landscape are essentially the same as those within the treatable landscape. Further, the site conditions in LRA that are outside the LRA treatable landscape are essentially similar to the site conditions within LRA treatable landscape. Given the general understanding that site conditions with the proposed project are consistent with concepts of treatable landscape, then it is reasonable to assert that the proposed project is consistent with the scope of the CalVTP, and it is reasonable to conduct the environmental review utilizing the PEIR for the entire proposed project area.

M. Regional Setting and Surrounding Land Uses:

The project is located on the east side of the Santa Ana Mountains at the base slope between WUI CNF. Aspect trends east with the elevation ranging from 1400 -1,800 feet ASL. The dominant vegetation is a mixture of brush species (mixed chaparral, coastal sage scrub, and scrub oak). In a few open sites, grass and forbs occupy the area, while occasionally, trees or tall brush species stand above the brush and grass areas. The slope ranges from 5-75%, with a few sites exceeding 75%. Approximately half of the treatment area exceeds 30% slope. Soils have low organic matter and are rocky; thus, the combination of slope and soils limits treatment activities. Mechanical operations are limited to slopes less than 50%, manual treatment is limited to slopes less than 65%, and slopes 65% or higher are "no work zones."

In general, the area above the project is undeveloped and primarily held under CNF jurisdiction, and the area below the project is developed (WUI).

N. Other Public Agencies Whose Approval is Required, Consulted or Notified: (e.g., permits)

- Public Agencies

Public Agencies	Check all that applies
Department of Fish and Wildlife	Consulted
US Fish and Wildlife	Consulted
South Coast Air Quality Management District	X
City of Wildomar	Notified
City of Lake Elsinore	Notified
Western Riverside County Regional Conservation Authority (RCA)	Notified
Other:	

Discussion: Pile burning requires a CAL FIRE burn plan and Smoke Management Plan submitted to SCAQMD. A notification was made to the City of Wildomar and the City of Lake Elsinore City. No response from the two cities. An informal consultation was made with RCA regarding the Western Riverside Multi-Species Habitat Conservation Plan (MSHCP).

- Coastal Act Compliance

Coastal Act Compliance	Check all that applies
The proposed project is NOT within the Coastal Zone	X
The proposed project is within the Coastal Zone	
<i>For proposed projects within the coastal zone, check one of the following boxes</i>	
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	

O. Native American Consultation

Discussion: The request for records was placed with the Eastern Information Center (EIC) in Riverside, California, on October 28, 2019. Alta Archaeological Consulting, LLC was retained to conduct the records search at the EIC facility. The results of the record check were completed on January 14, 2020. The records search found 37 cultural resources records within the search area (the project area plus 0.25-mile buffer around the outer perimeter of the proposed project). Nine of the 37 sites are listed as historic, 26 sites are listed as prehistoric, and 2 sites have both historic and prehistoric features.

On February 5, 2020, Black Fox Timber Management Group, Inc. sent notification letters to 27 tribal members representing 14 tribes and the Native American Heritage Commission (NAHC) as listed on the 2020 Native American Contact List (NACL) for Western Riverside. The NAHC responded to the notification on February 12, 2020, and advised that the project area contains a sacred site and directed the project proponent to contact the Pechanga Band of Luiseño Indians (Pechanga). In following up on the direction by the NAHC, on February 13, 2020, staff reached out to Molly Earp-Escobar, Cultural Planning Specialist for the Pechanga Cultural Resources Department. The consultation process was initiated with Pechanga. Rincon Band of

Luiseno Indians (Rincon) also requested consultation (February 13, 2020). While the consultation was initiated with the two tribes, the process was placed on hold due to grant contracting changes.

On June 17, 2021, RVC sent an updated letter to 32 tribal members representing 14 tribes and the NAHC listed on the 2021 NACL for Western Riverside County. In July 2021, Cheryl Madrigal representing Rincon requested consultation. Mike Sullivan, Senior Environmental Planner, Riverside County, coordinated the government-to-government consultation with Ms. Madrigal. The consultation meeting was held on August 5, 2021, via the Teams web-video platform. From this meeting, Ms. Madrigal requested a site visit. Mr. Sullivan coordinated a site visit, which was held on August 18, 2021. Attendees at the meeting included: Cheryl Madrigal for the Rincon Band of Luiseno Indians; Adam Giacinto, Dudek; Mike Sullivan, Senior Environmental Planner, Riverside County; Karen Gipson, Program Manager, RVC; Melissa Curtis, Project Manager, RVC; Mary Kapella, Project Assistant, RVC; and Kathleen Edwards, Forester, Black Fox Timber Management Group, Inc. The on-site consultation process resulted in Ms. Madrigal requesting a tribal monitor for areas with known sites within the project area and a copy of the cultural resources report.

On October 8, 2021, the NAHC responded to the letter and indicated that the proposed project shows a positive finding in the Sacred Lands File (SLF) positive finding.

P. Use of the PSA for Treatment Maintenance

Before implementing a maintenance treatment, the project proponent would verify that the expected site conditions described in the PSA are present in the treatment area. As time passes, the project proponent would need to consider the continued relevance of the PSA in light of potentially changed conditions or circumstances. When the project proponent determines the PSA is no longer sufficiently relevant, the project proponent would determine whether a new PSA or other environmental analysis is warranted.

In addition to verifying that the PSA continues to provide relevant CEQA coverage for treatment maintenance, the project proponent would update the PSA when a maintenance treatment is needed for more than 10 years since the approval of the PSA or the latest PSA update. For example, the project proponent may conduct a reconnaissance survey to verify that conditions are substantially similar to those anticipated in the PSA. The project proponent shall document updated information.

4. DETERMINATION STATEMENT

DETERMINATION

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

- ☒ I find that all of the effects of the proposed project (a) have been covered in the CalVTP PEIR, and (b) all applicable Standard Project Requirements and mitigation measures identified in the CalVTP PEIR will be implemented. The proposed project is, therefore, **WITHIN THE SCOPE** of the CalVTP PEIR. **NO ADDITIONAL CEQA DOCUMENTATION** is required.
- ☐ I find that the proposed project will have effects that were not covered in the CalVTP PEIR. These effects are less than significant without any mitigation beyond what is already required pursuant to the CalVTP PEIR. A **NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project will have effects that were not covered in the CalVTP PEIR or will have effects that are substantially more severe than those covered in the CalVTP PEIR. Although these effects may be significant in the absence of additional mitigation beyond the CalVTP PEIR's measures, revisions to the proposed project or additional mitigation measures have been agreed to by the project proponent that would avoid or reduce the effects so that clearly no significant effects would occur. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- ☐ I find that the proposed project will have significant environmental effects that are (a) new and were not covered in the CalVTP PEIR and/or (b) substantially more severe than those covered in the CalVTP PEIR. Because one or more effects may be significant and cannot be clearly mitigated to less than significant, an **ENVIRONMENTAL IMPACT REPORT** will be prepared.



Signature

12-1-2021

Date

Mike Sullivan

Printed Name

Senior Environmental Planner

Title

Riverside County

Agency

5. PROJECT SPECIFIC ANALYSIS/ADDENDUM

5.1 AESTHETICS AND VISUAL RESOURCES

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

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

New Aesthetic and Visual Resource Impacts: Would the treatment result in other impacts to aesthetics and visual resources that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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Discussion

The proposed project aligns between developed/community areas and CNF lands based on jurisdictional and topographic conditions, which results in an existing established visible physical division. The proposed project, located on private property, county flood control, and water district parcels, presents intermittent public views of the treatment areas. State Route Highway 74, commonly known as the Ortega Highway, bisects the proposed project. This highway is eligible for scenic highway classification. Traveling motorists along this highway have few visual opportunities of the proposed project areas. Generally, this area's visual character and quality are considered low, as the surrounding area is a mix of development and rural land use. Interstate 15(I-15) is within 1.25 miles of the project and is eligible for a scenic highway classification. Due to site conditions, motorists traveling on I-15 are unlikely to notice the treatment area.

In isolated locations, the proposed project is adjacent to recreational trails. The proposed project is also adjacent to conserved lands governed by RCA or the Riverside-Corona Resource Conservation District (RC-RCD) as guided by the MSHCP. In addition, the proposed project borders land under the jurisdiction of CNF. In general, the visual character and quality near trails and conserved lands are considered moderate. The proposed project

spans across Riverside County jurisdictional area and the local jurisdictions of Lake Elsinore and Wildomar Cities. The overall visual character ranges from low to moderate across all jurisdictional areas.

The proposed project intends to reduce the density and spatial composition of the native vegetation, which alters the visual character but does not permanently convert the environment. The reduction of density and spatial composition of native vegetation would not introduce a new visual element or substantially degrade the visual character, scenic views, scenic resources or quality of public views..

Impact AES-1 - Less Than Significant

The proposed project's treatment activities that would generate short-term aesthetic impacts include manual and mechanical treatments, herbivory, herbicides, and pile burning. The proposed project would occur in WUI areas where, in many locations, the natural environment has been disturbed or altered. Most of the treatment areas would occur on private property where the public does not have direct access and in limited areas, and on water district or county flood control property where the public also does not have direct access. State Route 74 is eligible for scenic highway classification. In isolated public locations, public roads may provide the public with a view of the treatment area. The proposed treatments reduce hazardous vegetation and retain healthy spatially separated vegetation. In isolated locations, smoke generated from pile burning may be visible to the public.

The potential for the treatment activities to result in short-term degradation of the scenic resources was examined in the PEIR. The project proponent would apply **SPRs AES-1, AES-2, AES-3, AQ-2, and REC-1**. **SPR AES-1** addresses the perimeter of the treatment area. Vegetation near the perimeter is scalloped or feathered to blend into the adjacent untreated vegetation to minimize blunt or sharp edges. **AES-2** directs for the storing of project equipment and tools in staging areas outside the viewshed of public trails, parks, recreational areas, and roadways to the extent feasible. **AES-3** guides the treatment activities to retain sufficient vegetation to screen the view near parks, trails, recreational areas, and roadways to the extent feasible. **AQ-2** requires, for prescribed pile burning, the submittal of a smoke management plan to SCAQMD. The smoke management plan includes the public notification requirements before implementing pile burning. **REC-1** requires public notification at least 2-weeks before closing trails or recreational areas.

The potential for the proposed project to result in short-term substantial degradation of the visual character of the project area is within the scope of the PEIR analysis as the scenic resources are essentially the same within and outside the treatable landscape, and that the proposed treatment type and activities are consistent with those analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact in short-term degradation of scenic resources is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact AES-2- Less Than Significant

The treatment type, a fuel break adjacent to WUI areas, would not generate significant long-term aesthetic impacts as there is an existing visual buffer at the fuel break between development and CNF. The vegetation reduction prescription (the design of the treatment area) creates a shaded fuel break. While hazardous vegetation is removed, the treatment area would retain healthy, spatially separated vegetation in a mosaic pattern. Retention areas (untreated areas) are expected to be scattered throughout the proposed treatment, most likely associated with watercourse buffers, habitat areas, cultural resources, steep slopes, or aesthetics.

The potential long-term degradation of the scenic resources was examined in the PEIR. The project proponent would apply the SPRs listed above in Impact-1 (**AES-1, AES-2, AES-3, AQ-2**) and **AD-4**. **AD-4** directs for public notifications before prescribed burning.

The potential for the project to result in a long-term degradation of scenic resources is within the scope of the PEIR analysis as the scenic resources are essentially the same within and outside the treatable landscape and the proposed treatment type and activities are consistent with those analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on long-term degradation of scenic resources is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact AES-3 – No Significant Impact

The proposed project does not propose a non-shaded fuel break. No significant impact would occur.

New Aesthetic and Visual Resource Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.2.1 "Environmental Setting" and Section 3.2.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented 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 PEIR. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts related to aesthetics and scenic resources would occur that are not covered in the PEIR.

5.2 AGRICULTURE AND FORESTRY RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AG-1: Directly Result in the Loss of Forest Land or Conversion of Forest Land to a Non-Forest Use or Involve Other Changes in the Existing Environment Which, Due to Their Location or Nature, Could Result in Conversion of Forest Land to Non-Forest Use	LTS	Impact AG-1, pp. 3.3-7 – 3.3-8	Yes	N/A	N/A	LTS	No	Yes

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

New Agriculture and Forestry Resource Impacts: Would the treatment result in other impacts to agriculture and forestry resources that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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Discussion

The zoning classifications vary across the proposed project. The lead zoning classification of the southern treatment units is rural residential, while the northern treatment areas are zoned under a specific plan classification. In isolated locations, agricultural lands (orchards) are adjacent to the proposed project. The treatment area does not include these agricultural lands.

The dominant vegetation type is chaparral, which includes various brush species, such as chamise, ceanothus, scrub oaks, manzanita, sumac, bush penstemon, buckwheat, and other associated chaparral species. Hardwoods and riparian trees (oaks, willows, alders, cottonwood) are scattered throughout the proposed project area and drainages. Overall, for the chaparral areas, the existing tree canopy is less than the 10% native tree cover, which means the site conditions do not fit the forest land definition as identified in Public Resources Code 12220(g). In isolated sites, hardwood site conditions exceed 10% native tree cover. Non-native and invasive trees are found within the project area, such as tree-of-heaven, silk tree, and tamarisk.

Impact AG-1 - Less Than Significant

The proposed project intends to establish a shaded fuel break in a chaparral vegetation type. Oaks and other associated lowland trees or riparian trees are scattered throughout the project area. Overall, most of the treatment area has less than 10% native tree canopy. In isolated sites, such as those near riparian areas, tree canopy may exceed 10%. The proposed project removes only a percentage of the brush (40-60%), and areas of untreated brush or scattering small clumps of brush species remain on-site as retention areas. Native tree removal is limited to removing dead or dying trees; therefore, no loss of healthy forest trees or lands. Where appropriate, treatment activities include the removal of non-native species and invasive species.

The potential for the treatment area to result in loss or conversion of forest lands was examined in the PEIR. There are no applicable SPRs or MMs for this impact.

The potential impact for the proposed project to result in loss or conversion of forest lands is within the scope of the PEIR analysis as the agriculture and forest resources are essentially the same within and outside the treatable landscape and that the proposed treatment type and activities are consistent with those analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on loss or conversion of Forest Land is less than significant. The

determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Agriculture and Forestry Resource Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.3.1 "Environmental Setting" and Section 3.3.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented 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 PEIR. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts on agricultural and forest resources would occur that are not covered in the PEIR.

5.3 AIR QUALITY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	SU	Table 3.4-1; Impact AQ-1, pp. 3.4-26 – 3.4-32; Appendix AQ-1	Yes	AD-4, AQ-1 and AQ-6	NA (No feasible mitigation available)	SU	No	Yes
Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk	LTS	Table 3.4-6; Impact AQ-2 pp. 3.4-33 – 3.4-34; Appendix AQ-1	Yes	HAZ-1, NOI-4 and NOI-5	N/A	LTS	No	Yes
Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	LTS	Section 3.4.2; Impact AQ-3, pp. 3.4-34 – 3.4-35	No	N/A	N/A	LTS	No	Yes
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	SU	Section 3.4.2; Impact AQ-4, pp. 3.4-35 – 3.4-37	Yes	AD-4, AQ-2, AQ-3, and AQ-6	N/A (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	HAZ-1, NOI-4 and NOI-5	N/A	LTS	No	Yes
Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	SU	Section 2.5.2; Impact AQ-6; pp. 3.4-38	Yes	AD-4, AQ-2, AQ-3, and AQ-6	N/A (No feasible mitigation available)	SU	No	Yes

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

New Air Quality Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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Discussion

The proposed project is within SCAQMD jurisdiction.

Impact AQ-1 - Significant and Unavoidable

The proposed project involves using various types of equipment, vehicles, handheld power tools, and potentially using prescribed fire to burn piles. Masticators, loaders, dump trucks, chippers, pickups, trucks, crew carriers, chainsaws, weed-whips, weed-eaters, and other associated vegetation management equipment, vehicles, and tools are types of petroleum-powered resources for on-road and off-road use to implement vegetation treatment. Fire engines and fire crew carriers, which also use petroleum-powered resources, would be used to support the prescribed burning of piles. The usages of the equipment, vehicles, tools, and prescribed burning for on-road and off-road purposes would result in emissions of criteria pollutants that could exceed California ambient air quality standards (CAAQS), the national ambient air quality standards (NAAQS), or SCAQMD rules and regulations.

The potential emission of criteria air pollutants from these sources to exceed the thresholds standards was examined in the PEIR. The project proponent would apply **SPRs AD-4, AQ-1 through AQ-4, and AQ-6** to reduce the criteria of air pollutants generated from treatment activities. **AD-4** directs for public notifications before prescribed burning. **AQ-1** requires the project to comply with air quality regulations. **AQ-2** requires, for prescribed pile burning, the submittal of a smoke management plan to SCAQMD. The smoke management plan includes the public notification requirements before implementing pile burning. **AQ-3** requires a burn plan prepared by a qualified technician or certified State burn boss. **AQ-4** directs the project to implement dust management measures. **AQ-6** directs all safety procedures are applied and followed for prescribed fire projects.

The emission of criteria air pollutants from the proposed project are within the scope of the PEIR analysis, as the air quality conditions are the same within and outside the CalVTP treatable landscape, and the treatment activities, including the usages of the equipment, are consistent with the treatment activities identified in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on air quality from criteria air pollutants is also significant. As described in the PEIR, due to multiple variables quantifying the reduction of emissions, the impact would remain potentially significant and unavoidable. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact AQ-2 – Less than Significant

The proposed project involves using various types of equipment and vehicles. Masticators, loaders, dump trucks, chippers, pickups, trucks, and associated vegetation management equipment and vehicles may be diesel-powered and could expose people to diesel particulate matter emissions. The usage of diesel-powered equipment and vehicles is temporary, 1-2 weeks at any given area within the project area.

The potential to expose people to diesel particulate matter was examined in the PEIR. The project proponent would apply **SPRs HAZ-1, NOI-4, and NOI-5**. **HAZ-1** requires all diesel and gasoline-powered equipment and vehicles to be properly maintained according to state and federal regulations. **NOI-4** directs the placement of staging areas for equipment and tools away from noise-sensitive land uses. However, portions of the proposed project are adjacent to the WUI areas and potentially sensitive receptors. The project proponent would coordinate with landowners and locate staging areas, where feasible, away from sensitive areas. **NOI-5** restricts the idle time for equipment and vehicles.

The emission of diesel particulate matter emissions from the proposed project is within the scope of the PEIR analysis, as the potential exposure situation is the same within and outside the CalVTP treatable landscape, and the treatment activities, including the usages of the equipment and vehicles, and the duration of implementing the proposed project, is consistent with the treatment activities identified in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on air quality from diesel particulate matter emissions is less than significant. The analysis of people exposed to diesel particulate matter emissions is consistent with the PEIR and would not constitute a substantially more serve significant impact than determined in the PEIR. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact AQ-3 – Less than Significant

The proposed project involves using various equipment and vehicles in off-road conditions and potentially using prescribed fire to burn piles. The off-road use of equipment and vehicles and prescribed fire to reduce biomass entail ground-disturbing activities. Ground-disturbing activities can expose people to naturally occurring asbestos (NOA) fugitive dust emissions.

The potential to expose people to NOA fugitive dust emissions was examined in the PEIR examined. California Geological Survey's list of asbestos sites, the proposed project is not within known areas with naturally occurring asbestos. Therefore, this impact would be less than significant.

The potential of the proposed project to result in the exposure of people to NOA is within the scope of the PEIR, as the potential exposure situation is the same within and outside the CalVTP treatable landscape, and the treatment activities, including the usages of the equipment and vehicles, and the duration of implementing the proposed

project, is consistent with the treatment activities identified in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact from ground-disturbing activities generating NOA fugitive dust emissions is also the same as described above. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact AQ-4 - Significant and Unavoidable

The proposed project potentially would apply prescribed burning, in the form of pile burning, to reduce biomass from manual treatments. Prescribed pile burning would occur in the remote areas of the fuel break, where equipment access is not feasible to chip or haul excessive biomass off-site, and it would occur as short-term events lasting 1 day to 1 week. Firefighters and people in the nearby community areas potentially would be exposed to the toxic air contaminants from prescribed pile burning. Community areas near the proposed project include Wildomar, Lakeland Village, Lake Elsinore, Horsethief Canyon, Temescal Canyon, and Trilogy.

The potential to expose people to toxic air contaminants was examined in the PEIR. The project proponent would apply **SPRs AD-4, AQ-2, AQ-3, and AQ-6**. **AD-4** directs for public notifications before prescribed burning. **AQ-2** requires submitting a smoke management plan to SCAQMD. An approved smoke management plan limits prescribed burning to permissible burn days. **AQ-3** requires a burn plan prepared by a qualified technician or certified State burn boss. **AQ-6** requires a prescribed burn project planned and managed by non-CAL FIRE crews must follow all safety procedures required by CAL FIRE. The analysis of people exposed to toxic air contaminants from prescribed pile burning activities is consistent with the PEIR and would be significant, but would not constitute a substantially more severe significant impact than determined in the PEIR.

The conditions and duration of prescribed pile burning are within the scope of the activities identified in the PEIR, and within the boundary of the proposed project area, air quality conditions are essentially the same within and outside the CalVTP treatable landscape. Therefore, the potential for exposure to toxic air contaminants is also within the scope of the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on air quality from toxic air contaminants from prescribed pile burning operations is significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact AQ-5- Less Than Significant

The proposed project involves using various types of equipment and vehicles. Masticators, loaders, dump trucks, chippers, pickups, trucks, crew carriers, and other associated vegetation management equipment and vehicles potentially are diesel-powered resources used to implement vegetation treatment. The use and duration of diesel-powered equipment are short-term and temporary, and objectionable odors dissipate within the air mass.

The potential to expose people to objectionable odors from diesel exhaust was examined in the PEIR. The project proponent would apply **SPR HAZ-1, NOI-4 and NOI-5**, as identified above in Impact AQ-2. The analysis of people exposed to objectionable odors from diesel exhaust is consistent with the PEIR and would be less than significant.

The objectionable odor from diesel exhaust is within the scope of the PEIR analysis because, within the boundary of the project area, the potential exposure is the same within and outside the CalVTP treatable landscape. The associated equipment and equipment usage are consistent with those identified in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on people exposed to objectionable odors from diesel exhaust is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact AQ-6 - Significant and Unavoidable

The proposed project potentially would apply prescribed burning, in the form of pile burning, to reduce biomass from manual treatments. Prescribed burning could expose people to objectionable odor from smoke during prescribed burning operations. The exposure would be short-term and temporary, and the objectionable odor would dissipate in the air mass.

The potential impacts from objectionable odor from prescribed burning operations were examined in the PEIR. The project proponents would apply **SPR AD-4, AQ-2, AQ-3, and AQ-6**, as identified above. The SPRs prevent and minimize smoke odors and exposure to smoke order. No other mitigation measures are feasible. Therefore, consistent with the PEIR, the impact of objectionable odor remains significant and unavoidable.

The conditions and the duration of prescribed burning are consistent with the activities identified in the PEIR, and within the boundary of the project area, the exposure potential is essentially the same within and outside the CalVTP treatable landscape. Therefore, exposure to objectionable odor from smoke is also within the scope of the PEIR analysis. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on people exposed to objectionable odors from smoke from prescribed burning is also significant and unavoidable. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Air Quality Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.4.1 "Environmental Setting" and Section 3.4.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented 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 PEIR. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts on air quality would occur that are not covered in the PEIR.

5.4 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources	LTS	Impact CUL-1, pp. 3.5-14 – 3.5-15	Yes	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	CUL-1, through CUL-5 and 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	CUL-1, through CUL-6 and CUL-8	NA	LTS	No	Yes
Impact CUL-4: Disturb Human Remains	LTS	Impact CUL-4, p. 3.5-18	Yes	NA	NA	LTS	No	Yes

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

New Archaeological, Historical, and Tribal Cultural Resource Impacts: Would the treatment result in other impacts to archaeological, historical, and tribal cultural resources that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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Discussion

The PEIR conducted tribal notification and satisfied the AB 52 consultation requirements. As a part of the consultation, the PEIR identifies the process to evaluate potential cultural resources impacts and outlines SPRs and MM's to avoid or minimize impact to these resources, including further coordination with applicable local tribes. The following describes the process:

Consistent with **SPR CUL-1**, the request for records was placed with the Eastern Information Center (EIC) in Riverside, California, on October 28, 2019. Alta Archaeological Consulting, LLC was retained to conduct the records search at the EIC facility. The results of the record check were completed on January 14, 2020. The records search found 37 cultural resources records within the search area (the project area plus 0.25-mile buffer around the outer perimeter of the proposed project). Nine of the 37 sites are listed as historic, 26 sites are listed as prehistoric, and 2 sites have both historic and prehistoric features.

Consistent with **SPR CUL-2**, on February 5, 2020, Black Fox Timber Management Group, Inc. sent notification letters to 27 tribal members representing 14 tribes and the NAHC as listed on the 2020 NACL for Western Riverside. The NAHC responded to the notification on February 12, 2020, and advised that the project area contains a sacred site and directed the project proponent to contact the Pechanga Band of Luiseño Indians (Pechanga). In following up on the direction by the NAHC, on February 13, 2020, staff reached out to Molly Earp-Escobar, Cultural Planning Specialist for the Pechanga Cultural Resources Department. The consultation process was initiated with Pechanga. Rincon Band of Luiseño Indians (Rincon) also requested consultation (February 13, 2020). While the consultation was initiated with the two tribes, the process was placed on hold due to grant contracting changes.

Consistent with **SPR CUL-2**, on June 17, 2021, RVC sent an updated letter to 32 tribal members representing 14 tribes and the NAHC listed on the 2021 NACL for Western Riverside County. In July 2021, Cheryl Madrigal representing Rincon, requested consultation. Mike Sullivan, Senior Environmental Planner, Riverside County, coordinated the government-to-government consultation with Ms. Madrigal. The consultation meeting was held on August 5, 2021, via the Teams web-video platform. From this meeting, Ms. Madrigal requested a site visit. Mr. Sullivan coordinated a site visit, which was held on August 18, 2021. Attendees at the meeting included: Cheryl Madrigal for the Rincon Band of Luiseno Indians; Adam Giacinto, Dudek; Mike Sullivan, Senior Environmental Planner, Riverside County; Karen Gipson, Program Manager, RVC; Melissa Curtis, Project Manager, RVC, Mary Kapella, Project Assistance, RVC; and Kathleen Edwards, Forester, Black Fox Timber Management Group, Inc. The on-site consultation process resulted in Ms. Madrigal requesting a tribal monitor for areas with known sites with the project area and a copy of the cultural resources report.

On October 8, 2021, the NAHC responded to the letter and indicated that the proposed project shows a positive finding in the Sacred Lands File (SLF) positive finding.

Dudek was retained to conduct the cultural resources investigation. The review of the 37 previously recorded determined that only four sites are located within the treatment area. One of these four records is a historic built site (Glen Ivy Hot Springs Lodge, 1872), one site is a prehistoric site, and the other two sites show a mixture of both prehistoric and historical content. The prehistoric sites contain bedrock milling stations or metates and manos. Other prehistoric features are associated with these sites. The historic content found with the two prehistoric sites is associated with period trash scatter or trash dump sites.

In preparation for the pedestrian survey, Dudek conducted a steep slope survey and concluded that the pedestrian survey area, based on slope steepness (30% or less), resulted in approximately 423 acres. Pedestrian surveys were conducted on May 24-26, 2021, August 2-3, 2021, and August 12, 2021, on parcels with signed landowner agreements. The survey resulted in the discovery of 4 new sites. Two sites are prehistoric bedrock milling sites, one site is a prehistoric lithic flake, and the fourth is a historic trash scatter site. The trash scatter site is presumed to be material that was relocated during the construction and development of the adjacent residential area. Dudek concluded that the trash scatter site is not eligible for listing with the California Register of Historical Resources (CRHR). Dudek completed a Cultural Resources Inventory Report (CRIR) found in the Attachment Section - Attachment D.

The CRIR reflects that an archaeological monitor and Native American monitor from a traditionally affiliated tribe would be provided the opportunity to be present during fuels treatment activities within 300 feet of the listed sites in the CRIR as a condition of approval for the permit. Further, the CRIR provides recommendations for protecting cultural resources and working conditions, responsibilities, and authority of the monitors. Although no further action is required under AB52, ongoing coordination with tribes will ensure that notification and the opportunity for monitoring are provided as the project schedule is finalized.

Impact CUL-1- Less Than Significant

The proposed project includes manual and mechanical treatment activities, herbivory and prescribed pile burning. These activities have the potential to damage historical resources. The EIC records search found one potential historical resource near the proposed project area – the Glen Ivy Hot Spring Lodge. The lodge itself and the surrounding landscape are not directly within the footprint of the project area. Therefore, the proposed project would not impact this historical resource. Pedestrian surveys were conducted on parcels with signed landowner agreements. The survey results found one potential historical trash scatter site adjacent to a developed residential area. A professional archaeologist reviewed the site information and concluded that the site is not eligible for CRHR listing. Therefore, the proposed project would not impact this site. For additional information, refer to CRIR in Attachment D.

The potential for the treatment activities to result in disturbance or destruction of built-environmental structures that have not yet been evaluated for historical significance was examined in the PEIR. The project proponent would continue to apply the identification and evaluation process defined in **SPR CUL-1, CUL-7 and CUL-8**. **CUL-1**, as mentioned above in the discussion section. **CUL-7** requires establishing a 100-foot buffer around known historical resources and that prescribed burning and mechanical treatments shall avoid operating within the 100-foot buffer

area. The standard practice also requires that if structures (buildings, bridges, roadways) over 50 years old that have not been evaluated for historical significance are present in the treatment area, then the 100-foot avoidance measure is applied. **CUL-8** directs the project proponent to provide cultural resources training to the workforce implementing the proposed project.

The potential for the proposed project to result in substantial adverse changes in the significance of built historical resources is within the scope of the PEIR analysis because the potential to discover built resources that have not been evaluated for historical significance is essentially the same within and outside the treatable landscape. Further, the proposed treatment type and activities are consistent with those analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact to cause a substantial adverse change in the significance of built historical resources is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact CUL-2 - Significant and Unavoidable

The proposed treatment activities include manual and mechanical activities and prescribed pile burning activities, which could potentially impact significant archaeological resources that are known and unknown. Manual treatment activities would remove brush and visually open up surface and rock sites. This activity may result in the discovery of archaeological sites and or inadvertent damage to an archaeological site. Besides brush removal, mechanical treatment activities potentially would stir up soils and expose sub-surface soils. This activity may also result in the discovery of archaeological sites and or inadvertent damage to a site. Prescribed pile burning potentially could damage these resources as well. The EIC records search resulted in 3 prehistoric resources within the proposed project area. The pedestrian survey discovered 3 additional prehistoric sites within the proposed project area. During treatment activities, there is potential to discover additional new sites within the proposed project area. For additional information, refer to CRIR in Attachment D.

The potential for the treatment activities to result in a substantial adverse change in the significance of unique archaeological resources or subsurface historical resources was examined in the PEIR. The project proponent would continue to apply the identification and evaluation process defined in **SPR CUL-4** and **CUL-5**. Pedestrian surveys were completed on parcels with signed landowner agreements. The survey results led to finding 3 new prehistoric sites and 1 historic site (the site was deemed not eligible for registry with the CRHR). For landowners that opt to participate in the project in the future, the same cultural resource identification and evaluation as identified above would be implemented, with pedestrian surveys being conducted, within the scope identified in the CRIR, as a condition of approval and before implementing treatment activities on their parcel(s). **CUL-5** identifies that if cultural resources are within the treatment area and cannot be avoided, a qualified archaeologist would notify the culturally affiliated tribes and assess the resources for the archaeological status (as a unique archaeological resource or a historic resource, or a tribal cultural resource). Protection measures would be designed to protect these resources. Consistent with **CUL-5**, the protection measures identified in the CRIR fulfill this requirement.

The potential for the proposed project to result in substantial adverse changes of unique archaeological resources or subsurface historical resources is within the scope of the PEIR analysis as the potential to discover archaeological resources is essentially the same within and outside the treatable landscape. Further, the proposed treatment type and activities are consistent with those analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact that may result in substantial adverse changes of unique archaeological resources or subsurface historical resources is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact CUL-3 - Less Than Significant

The proposed treatment activities include manual and mechanical activities and prescribed pile burning activities. These activities could cause a substantial adverse change in the significances of Tribal Cultural Resources. Tribal Cultural Resources are known to exist within the proposed treatment area. As discussed above, Pechanga and Rincon responded to the project notification letters. Initially, Pechanga was active in the early consultation stages but did not respond to the updated notification letter. Rincon responded to both project notification letters. The

project proponent met with Ms. Madrigal onsite. Verbally, Ms. Madrigal requested the opportunity to assign a tribal monitor to the proposed project when treatment activities occur near tribal cultural resources. Further, Ms. Madrigal indicated that she would advise and coordinate with Pechanga on tribal monitoring services. She also requested a copy of the CRIR. Government-to-government will continue to ensure that the opportunity for tribal monitoring is provided as a condition of approval. For additional information, refer to CRIR in Attachment D.

The potential for the treatment activities to cause a substantial adverse change in the significance of Tribal Cultural Resources was examined in the PEIR. The project proponent would apply the standard practices are described above.

The potential for the proposed project to cause a substantial adverse change in significant Tribal Cultural Resources is within the scope of the PEIR analysis as the potential to discover archaeological resources is essentially the same within and outside the treatable landscape. Further, the proposed treatment type and activities are consistent with those analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact that may cause substantial adverse change to a Tribal Cultural Resource is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact CUL-4 - Less Than Significant

The proposed treatment activities include mechanical activities that may disturb subsurface soils. This activity may expose human remains. One EIC record reflects the potential of human cremation. The record was recorded in 1972. Since this early record, several wildfires and storm events have occurred within the vicinity of the site and have impacted the site. For more information, refer to CRIR.

The potential for the treatment activities to uncover human remains was examined in the PEIR. There are no SPRs for this impact. However, the CRIR outlines protection measures for the one potential known sites. Further, if human remains are discovered within the treatment area, the project proponent must comply with California Health and Safety Code Sections 7050.5 and 7052.2 and Public Resource Code (PRC) Section 5097.

The potential for the proposed project to disturb human remains is within the scope of the PEIR analysis as the potential to discover archaeological resources is essentially the same within and outside the treatable landscape. Further, the proposed treatment type and activities are consistent with those analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact that may disturb human remains is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Archaeological, Historical, and Tribal Cultural Resource Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.5.1 "Environmental Setting" and Section 3.5.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented 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 PEIR. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts on archaeological, historical, and tribal cultural resources would occur that are not covered in the PEIR.

5.5 BIOLOGICAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTS	Impact BIO-1, pp 3.6-131–3.6.138	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-3 SPR BIO-4 SPR BIO-5 SPR BIO-6 SPR BIO-7 SPR BIO-9 SPR BIO-11 SPR GEO-1 SPR GEO-3 SPR GEO-4 SPR GEO-7 SPR GEO-8 SPR HYD-4 SPR HYD-5	MM BIO-1A MM BIO-1B	LTS	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTS (all wildlife species except bumble bees) S&U (bumble bees)	Impact BIO-2, pp 3.6-138–3.6-184	Yes	SPR BIO-1 SPR BIO-10 SPR BIO-2 SPR BIO-3 SPR BIO-4 SPR BIO-5 SPR BIO-11 SPR BIO-12 SPR BIO-5 SPR HYD-4	MM BIO-2A MM BIO-2B MM BIO-2G MM BIO-3A	LTS	No	Yes

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function	LTS	Impact BIO-3, pp 3.6-186–3.6-191	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-3 SPR BIO-4 SPR BIO-5 SPR BIO-6 SPR BIO-7 SPR BIO-9 SPR BIO-10 SPR BIO-11 SPR BIO-12 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR HAZ-5 SPR HAZ-6 SPR HYD-1 SPR HYD-4 SPR HYD-5 SPR CUL-8	MM BIO-3A	LTS	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTS	Impact BIO-4, pp 3.6-191–3.6-192	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-3 SPR BIO-4 SPR BIO-11 SPR GEO-1 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR HYD-1 SPR HYD-3 SPR HYD-4	MM BIO-4	LTS	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTS	Impact BIO-5, pp 3.6-192–3.6-196	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-4 SPR BIO-5 SPR BIO-9 SPR BIO-11 SPR HYD-4	MM BIO-5	LTS=	No	Yes

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197–3.6-198	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-4 SPR BIO-5 SPR BIO-6 SPR BIO-9 SPR BIO-11 SPR BIO-12	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	No Impact	Impact BIO-7, pp 3.6-198–3.6-199	Yes	SPR AD-3 SPR BIO-1 SPR BIO-3 SPR BIO-7	N/A	No Impact	No	Yes
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	No Impact	Impact BIO-8, pp 3.6-199–3.6-200	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-3 SPR BIO-4 SPR BIO-5 SPR BIO-6 SPR BIO-7 SPR BIO-9 SPR BIO-10 SPR BIO-12 PSR BIO-1 PSR BIO-2 SPR GEO-3 SPR GEO-4 SPR GEO-7 SPR HAZ-5 SPR HAZ-6 SPR HAZ-8 SPR HAZ-9 SPR HYD-1 SPR HYD-2 SPR HYD-4 SPR HYD-5 SPR NOI-1 SPR NOI-2 SPR NOI-3 SPR NOI-4 SPR NOI-5 SPR AD -6	N/A	No Impact	No	Yes

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

New Biological Resources Impacts: Would the treatment result in other impacts to biological resources that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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Discussion

The PEIR identifies a process for identifying biological resources and avoiding impacts. The process begins with a biological survey of all areas that would be subject to treatment activities. For areas, where sensitive biological resources are present, mitigation measures are provided to avoid any impacts. Pursuant to SPR BIO-1, SoCal Biology's Principal Dr. Kathryn A. Kramer conducted a data review of project-specific biological resources. Two month-long reconnaissance-level surveys of the treatment area were also completed in May 2020 and 2021 to identify and document sensitive biological resources and assess the suitability of habitat for special-status species. The surveys were conducted for parcels where access and participation agreements have been established and represent, 22 of the project parcels. Proposed treatment for parcels that enter into future access agreement, would require surveys to identify biological resources and mitigation identified below would also apply in the same manner as described below under the impacts section.

Vegetation Review:

CAL FIRE and Fire Protection's Fire and Resource Assessment Program (FRAP) vegetation layer was used to identify the habitat and vegetation types within the treatment area. While the MSHCP Program produced a detailed vegetation map of Western Riverside County, it unfortunately does not cover the entire project area. The treatment area comprises approximately 1056.7 acres, and vegetation types within this area are, in increasing order, annual grassland, cropland, coastal oak woodlands, chamise-redshank chaparral, mixed chaparral and coastal sage scrub (includes area within project area burned in 2018 Holy Fire). Please refer to the sensitive resource maps included in the Biological Attachment for distribution of habitats in the project area.

Following **SPR BIO-5**, the alliances potentially present in chaparral and coastal sage scrub are identified. The FRAP vegetation types were reviewed in the field (refer to Biological Attachment) and potentially occurring alliances (Sawyer et al. 2008) were identified using the crosswalk table in Vol. 2 of the VTP PEIR (Table 3.6-29) for the project area:

FRAP Vegetation Type:	MVC Alliances
Chamise-Redshank Chaparral:	Chamise chaparral
	Chamise-black sage chaparral
	Hoary leaf ceanothus chaparral
	<i>Chamise-white sage chaparral (S3)</i>
Coastal Scrub:	California sagebrush scrub
	California sagebrush-California buckwheat scrub
	California sagebrush-black sage scrub
	California buckwheat scrub
	California buckwheat-white sage scrub
	Deerweed scrub
	Laurel sumac scrub
	Black sage scrub
	Poison oak scrub
	<i>Menzies's golden bush scrub (S4?)</i>
	<i>Bush penstemon scrub (S3)</i>
	<i>Palmer's goldenbush scrub (S3)</i>
	<i>White sage scrub (S3)</i>
Mixed Chaparral:	Hoary leaf ceanothus chaparral
	Deerweed scrub
	Laurel sumac scrub

	Bush poppy scrub
	Scrub oak chaparral
	Scrub oak-chamise chaparral
	<i>Thick leaf yerba santa scrub (S3)</i>

Sensitive alliances found in the project area are in italics with their rarity ranking in parentheses. A ranking of S3 indicates the alliance is vulnerable within California. An S4 ranking indicates that the alliance is secure statewide and not threatened. Note that 6 alliances that may occur within the project area are uncommon or rare (S3 and S4). Please refer to the Biological Attachment Sensitive Resource Maps 1-12 for locations of the FRAP vegetation types in the project area.

Sensitive natural communities within the project boundary identified in the California Natural Diversity Database (CNDDDB 2021) include: Southern Sycamore Alder Riparian Woodland and South Coast Live Oak Riparian Forest. There are 5 locations of Southern Sycamore Alder Riparian Forest in the project area with a total of 28 acres, however 4 locations burned within the Holy Fire perimeter (22.7 acres). There are 2 locations of Southern Coast Live Oak Riparian Forest for a total of 27.1 acres with 1 site of 3.8 acres burned in the Holy Fire. The locations burned in the Holy Fire are included in the Biological Attachment and are shown on Sensitive Resource Maps North 2 – 6; unburned locations in Maps North 1, South 1 and 2.

Riparian Habitat Review:

There are 28 riparian areas of varying quality that cross the project area (National Hydrography Dataset 2021). Refer to the Sensitive Resource Maps 1-2 for locations of riparian areas in the Biological Attachment. There are no perennial streams in the project area; all riparian areas are intermittent or ephemeral streams and well-developed riparian vegetation occurs in a few areas.

State or Federally Protected Wetlands Review:

Only 2 wetland areas, man-made ponds, have been identified in the project area thus far that qualify as wetland habitat. (National Wetlands Inventory, 2021). The ponds are in Sensitive Resource Map North 1 (surrounded by project) and in Map North 7 (pond adjacent to project area) in the Biological Attachment. Although Lake Elsinore and Temescal Valley with Temescal creek are located on the east side of the project area, these areas are separated by a band of rural and suburban residential areas. Please refer to the Sensitive Resource Maps in the Biological Attachment.

Special Status Plant Species Review:

The species list included in Table 17a for the Southern California Mountain and Valley Ecological Section (M262B) in Vol. 2 of the CalVTP PEIR, was further refined with: 1) a CNDDDB search in 2020 and an additional one with a 0.5 mile buffer around project on June 8, 2021, 2) a California Department of Fish and Wildlife (CDFW) BIOS review generated from the public view option (<https://apps.wildlife.ca.gov/bios/>), and 3) a CNPS Inventory of Rare Plant search of all quads within and surrounding the project on June 8, 2021 (<https://rareplants.cnps.org/Search/Advanced>). From this working list, individual species were checked in the 1) California Consortium of Herbaria (CCH) (<https://ucjeps.berkeley.edu/consortium/>) accessed April – June 2021, the Jepson eFlora (<https://ucjeps.berkeley.edu/eflora/>) as well as the 2012 print copy of the Jepson Manual, 2) occasionally with CalFlora (<https://www.calflora.org/>). The project plant species list was further verified with: 1) the (MSHCP) species list (https://www.wrc-rca.org/Permit_Docs/MSHCP/MSHCP-Volume2.pdf), 2) a list of species found near the project area provided by the MSHCP monitoring group (received 1 June 2021 from RCA staff GIS analyst Emily Lee), 3) a Holy Fire botanical survey produced by the Orange County Chapter of CNPS (OC CNPS 2019) 4) an additional Holy Fire botanical survey produced by Rancho Santa Ana Botanical Garden under contract to CNF (RSABG 2019). These survey reports were provided by CNF botanist Lauren Quon in 2020. Discussions with Teresa Salvato, the field botanist hired for the 2021 surveys helped shape the final list as her years of experience surveying rare plants in the Elsinore Trough and Temescal Valley were directly applicable to the project. *The criteria for the final target plant species list are species that are found within the Santa Ana mountains and are found in habitats within the treatment area.* Note that several species covered in the MSHCP are potentially present in the project area but were not found on the Southern California Mountain and Valley Ecological Section list and in some cases only had a state-wide CRPR of 3 or 4. These species were included in the target list for consistency

with the MSHCP and are considered locally significant. There is no federal critical habitat for plants in the project area.

The list of species to analyze contains 48 special status plants: 2 liverworts and 1 moss, 4 federally endangered plants: Munz's onion, San Diego ambrosia and slender-horned spineflower, with Munz's onion also State threatened and thread-leaved brodiaea and slender-horned spineflower also State endangered. There are 33 plant species covered by the MSHCP including the 3 federally listed plants. Refer to Table 1. Clay soil species include: Munz's onion, San Diego ambrosia, long-spine spineflower, small flowered morning glory, many stemmed dudleya, small flowered microseris and Hammit's clay cress. Special status plants found in chaparral include intermediate mariposa lily, Payson's jewelflower, Parry's spineflower, delicate clarkia, summer holly, Cleveland bush monkey flower, sticky dudleya, Palmer's grapplinghook, chaparral nolina, Fish's milkwort, single-leaf skunkbush and Parry's teracoccus.

Table 1. Special Status Plant Species Known to Occur in the Vicinity of the Treatment Area and Potential for Occurrence in the Treatment Area

NON-VASCULAR PLANTS			
Species	Status	Habitat	Potential to Occur
Campbell's liverwort <i>Geothallus tuberosus</i>	1B.1	Coastal scrub, vernal pools. Liverwort known from mesic soil. 33 to 1969 ft in elevation.	May occur: Suitable habitat is available and species distribution is not well known.
Shevock's copper moss <i>Mielichhoferia shevockii</i>	1B.2	Cismontane woodland. Moss on metamorphic rocks containing heavy metals; mesic sites. On rocks along roads, in same habitat as <i>Mielichhoferia elongata</i> . 2461 to 4593 ft in elevation.	May occur: habitat available in treatment area and distribution of species not well known.
bottle liverwort <i>Sphaerocarpos drewei</i>	1B.1	Chaparral, coastal scrub. Liverwort in openings; on soil. 295 to 1969 ft in elevation.	May occur: habitat is available in treatment area and distribution of species not well known.

VASCULAR PLANTS			
Species	Status	Habitat	Potential to Occur
Munz's onion <i>Allium munzii</i>	FE, ST, 1B.1, MSHCP	Chaparral, coastal scrub, cismontane woodland, pinyon and juniper woodland, valley and foothill grassland. Heavy clay soils; grows in grasslands and openings within shrublands or woodlands. 1230-3412 feet. Blooms Mar. - May.	May occur. Suitable habitat is available and recorded occurrences are nearby.
San Diego ambrosia <i>Ambrosia pumila</i>	FE, 1B.1, MSHCP	Chaparral, coastal scrub, valley and foothill grassland. Sandy loam or clay soil; sometimes alkaline. In valleys; persists where disturbance has been superficial. Sometimes on margins or near vernal pools. 10 to 1903 ft in elevation. Blooms April-October.	May occur: Suitable habitat is available and there are nearby recorded occurrences of the species.

VASCULAR PLANTS - Continue			
Species	Status	Habitat	Potential to Occur
rainbow manzanita <i>Arctostaphylos rainbowensis</i>	1B.1, MSHCP	Chaparral. Usually found in gabbro chaparral. 328 to 2854 ft in elevation. Blooms December-March.	Known to occur: The species has been observed within the treatment areas.
San Jacinto Valley crownscale <i>Atriplex coronata</i> var. <i>notatior</i>	FE 1B.1 MSHCP	Annual, alkaline flats, 1312 to 1649 feet, Blooms April to Aug.	May occur: Suitable habitat may be available.
Parish's brittlescale <i>Atriplex parishii</i>	1B.1 MSHCP	Annual, playas and vernal pools, below 1542 feet, blooms June to October.	May occur: Suitable habitat may be available.
Davidson's saltscale <i>Atriplex serenana</i> var. <i>davidsonii</i>	1B.2 MSHCP	Annual, coastal sage scrub and wetland/riparian, below 656 feet, blooms April - October.	May occur: Suitable habitat may be available.
thread-leaved brodiaea <i>Brodiaea filifolia</i>	CE FE 1B.1 MSHCP	Bulb, coastal sage scrub, foothill woodland, wetland/riparian, 83 - 2822 feet, blooms Mar. - June.	May occur: Suitable habitat may be available.
round-leaved stork's bill <i>California macrophylla</i> (<i>Erodium macrophyllum</i>)	MSHCP	Open sites in grassland and scrub, below 3900 feet. Mar - May.	May occur: Suitable habitat is available and there are nearby recorded occurrences of the species.
intermediate mariposa-lily <i>Calochortus weedii</i> var. <i>intermedius</i>	1B.2, MSHCP	Coastal scrub, chaparral, valley and foothill grassland. Dry, rocky open slopes and rock outcrops. 197 to 5167 ft in elevation. Blooms May-July.	May occur: Suitable habitat is available and there are nearby recorded occurrences of the species.
Payson's jewelflower <i>Caulanthus simulans</i>	4.2, MSHCP	Chaparral, scrub and pinyon-juniper woodlands. 1312-7218 feet. Blooms Mar - May.	May occur but only recorded at higher elevations in Santa Ana mountains.
smooth tarplant <i>Centromadia pungens</i>	MSHCP	Small shrub, wetland/riparian, below 4,000 feet, blooms April - Nov.	May occur: Suitable habitat may be available.
Parry's spineflower <i>Chorizanthe parryi</i> var. <i>parryi</i>	1B.1, MSHCP	Coastal scrub, chaparral, cismontane woodland, valley and foothill grassland. Dry slopes and flats; sometimes at interface of 2 vegetation types, such as chaparral and oak woodland; dry, sandy soils. 738 to 4003 ft in elevation. Blooms April-June.	Known to occur: The species has been observed within the treatment areas.
long-spined spineflower <i>Chorizanthe polygonoides</i> var. <i>longispina</i>	1B.2, MSHCP	Chaparral, coastal scrub, meadows and seeps, valley and foothill grassland, vernal pools. Gabbroic clay. 98 to 5052 ft in elevation. Blooms April-July.	May occur: Suitable habitat is available and there are nearby recorded occurrences of the species.
delicate clarkia <i>Clarkia delicata</i>	1B.2	Cismontane woodland, chaparral. Often on gabbro soils. 164 to 4462 ft in elevation. Blooms April-June.	May occur: Suitable habitat is available and treatment area is not well studied.

VASCULAR PLANTS - Continue			
Habitat	Habitat	Habitat	Habitat
San Miguel savory <i>Clinopodium chandleri</i> (<i>Satureja chandleri</i>)	1B.2, MSHCP	Chaparral, cismontane woodland, coastal scrub, riparian woodland, valley and foothill grassland. Rocky, gabbroic or metavolcanic substrate. 394 to 3527 ft in elevation. Blooms March-July.	May occur: Suitable habitat is available and recorded locations are nearby.
summer holly <i>Comarostaphylis diversifolia</i> ssp. <i>diversifolia</i>	1B.2	Chaparral, cismontane woodland. Often in mixed chaparral in California, sometimes post-burn. 98 to 3100 ft in elevation. Blooms April-June.	May occur: Suitable habitat is available and recorded locations are nearby.
small-flowered morning-glory <i>Convolvulus simulans</i>	4.2, MSHCP	Clay substrates in annual grasslands, coastal sage and chaparral. 98-2870 feet. Blooms Mar - July.	May occur: Suitable habitat is available and recorded locations are nearby.
Cleveland's bush monkey flower <i>Diplacus clevelandii</i> (<i>Mimulus clevelandii</i>)	4.2, MSHCP	Disturbed yellow pine and chaparral communities. 3000 - 4800 feet. Apr - July.	May occur: Suitable habitat is available and recorded locations are nearby.
slender-horned spineflower <i>Dodecahema leptoceras</i>	FE, SE, 1B.1, MSHCP	Chaparral, cismontane woodland, coastal scrub (alluvial fan sage scrub). Flood deposited terraces and washes; associates include <i>Encelia</i> , <i>Dalea</i> , <i>Lepidospartum</i> , etc. Sandy soils. 656 to 2510 ft in elevation. Blooms April-June.	May occur, however most suitable habitat is outside of the treatment area or if within will be avoided as intermittent streambed areas.
Santa Monica dudleya <i>Dudleya cymosa</i> ssp. <i>ovatifolia</i>	1B.1	Shaded rocky outcrops and slopes. 492 - 1640 feet. Blooms Mar - June.	May occur: Suitable habitat is available and recorded locations are nearby.
many-stemmed dudleya <i>Dudleya multicaulis</i>	1B.2, MSHCP	Chaparral, coastal scrub, valley and foothill grassland. In heavy, often clayey soils or grassy slopes. 49 to 2592 ft in elevation. Blooms April-July.	May occur: Suitable habitat is available and the species is known from El Sobrante landfill nearby.
sticky dudleya <i>Dudleya viscida</i>	1B.2	Coastal scrub, coastal bluff scrub, chaparral, cismontane woodland. On north and south-facing cliffs and banks. 33 to 1804 ft in elevation. Blooms May-June.	May occur: Suitable habitat is available although most Santa Ana mountain range populations are on the coastal side. Since the study area is not well surveyed, this species is on the possible presence list.

VASCULAR PLANTS - Continue			
Species	Status	Habitat	Potential to Occur
Palmer's grapplinghook <i>Harpagonella palmeri</i>	4.2, MSHCP	Dry, semi-barren sites in chaparral, coastal sage scrub and grassland. Below 3300 feet. Blooms Mar - May.	May occur: Suitable habitat is available, recorded locations near the project area.
Ramona horkelia <i>Horkelia truncata</i>	1B.3	Chaparral, cismontane woodland. Habitats in California include: mixed chaparral, vernal streams, and disturbed areas near roads. Clay soil; at least sometimes on gabbro. 1312 to 4265 ft in elevation. Blooms May-June.	May occur: Suitable habitat is available.
California black walnut <i>Juglans californica</i>	4.2, MSHCP	Southern oak woodlands in wetland-riparian areas. 100 - 980 feet.	May occur: Suitable habitat is available, recorded locations south of project area. However, limited work in riparian areas.
Coulter's goldfields <i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	1B.1 MSHCP	Annual herb, wetland/riparian, below 3280 feet, blooms Feb. - June.	May occur: Suitable habitat may be present.
heart-leaved pitcher sage <i>Lepechinia cardiophylla</i>	1B.2 MSHCP	Shrub, chaparral, foothill woodlands, 1968 - 3938 feet, blooms April-July.	May occur: Suitable habitat may be present.
ocellated Humboldt lily <i>Lilium humboldtii</i> ssp. <i>ocellatum</i>	4.2, MSHCP	Oak canyons, chaparral and yellow-pine forest. Below 5900 feet. Blooms Mar - July.	May occur: Suitable habitat is available, recorded locations near the project area though riparian habitat will be mostly avoided in treatment area.
mountain springs bush lupine <i>Lupinus albifrons</i> var. <i>medius</i>	1B.3	Pinyon and juniper woodland, Sonoran desert scrub. Dry, sandy, gently sloping canyon washes, sandy soil pockets, and flats in steeper slopes and drainages. 1394 to 4494 ft in elevation. Blooms March-May.	May occur: Suitable habitat is available and there are nearby recorded occurrences of the species.
small-flowered microseris <i>Microseris douglasii</i> ssp. <i>platycarpa</i>	4.2, MSHCP	Clay soils, grassland. Below 3600 feet. Blooms Mar - May.	May occur: Suitable habitat is available and there are nearby recorded occurrences of the species.

VASCULAR PLANTS - Continue			
Species	Status	Habitat	Potential to Occur
California muhly <i>Muhlenbergia californica</i>	4.3, MSHCP	Streambanks, canyons. 328 - 1640 feet. Blooms June - Sept.	May occur: suitable habitat is available and the species is known from El Sobrante landfill nearby.
little mousetail <i>Myosurus minimus ssp. apus</i>	3.1 MSHCP	annual herb, wetland/riparian, below 6900 feet, blooms April - June.	May occur: Suitable habitat may be present.
spreading navarretia <i>Navarretia fossalis</i>	1B.1 MSHCP	Annual herb, wetland/riparian, 98-4265 feet, blooms April - June.	May occur: Suitable habitat may be present.
chaparral nolina <i>Nolina cismontana</i>	1B.2	Ultramafic. Chaparral, coastal scrub. Primarily on sandstone and shale substrates; also known from gabbro. 459 to 4183 ft in elevation. Blooms (March), May-July.	May occur: Suitable habitat is available and recorded locations are nearby.
California Orcutt grass <i>Orcuttia californica</i>	1B.1 MSHCP	Annual to woody perennial herb, wetland/riparian, below 2296 feet, blooms April - August.	May occur: Suitable habitat may be present.
Fish's milkwort <i>Polygala cornuta var. fishiae</i>	4.3, MSHCP	Chaparral, oak woodland. 295 - 4167 feet. Blooms May - Aug.	May occur: Suitable habitat is available and recorded locations are nearby.
Engelmann Oak <i>Quercus engelmannii</i>	4.2, MSHCP	Southern Oak woodlands, edges of riparian woodlands with restrict distribution. 165 - 4265 feet. Bloom April-May; acorns mature in 1 year. 2. 3.	Known to occur: The species has been observed within the treatment area.
single-leaved skunkbrush <i>Rhus aromatica var. simplicifolia</i>	2B.3	Pinyon and juniper woodland. Usually granitic. 2395 to 4364 ft in elevation. Blooms March-April.	May occur: Suitable habitat is available and recorded locations are nearby.
Coulter's matilija poppy <i>Romneya coulteri</i>	4.2, MSHCP	Dry washes of coastal sage and chaparral. Below 4000 feet. Mar - July.	Known to occur: The species has been observed within the treatment areas.
southern mountains skullcap <i>Scutellaria bolanderi ssp. austromontana</i>	1B.2	Chaparral, cismontane woodland, lower montane coniferous forest. In gravelly soils on streambanks or in mesic sites in oak or pine woodland. 1394 to 6562 ft in elevation. Blooms June-August.	May occur: Suitable habitat is available and recorded locations are nearby.

VASCULAR PLANTS - Continue			
Status	Habitat	Potential to Occur	
Hammitt's clay-cress <i>Sibaropsis hammittii</i>	1B.2, MSHCP	Valley and foothill grassland, chaparral. Mesic microsites in open areas on clay soils in Stipa grassland. Often surrounded by Adenostoma chaparral. 2362 to 3494 ft in elevation. Blooms March-April. IN SANTA ANA MOUNTAINS NEAR SA PEAK	May occur: Suitable habitat is available and recorded locations are nearby. Known sites are at higher elevations however this small plant is easily overlooked.
prairie wedge grass <i>Sphenopholis obtusata</i>	2B.2	Cismontane woodland, meadows and seeps. Open moist sites, along rivers and springs, alkaline desert seeps. 984 to 6562 ft in elevation. Blooms April-July.	May occur, however, most suitable habitat is outside of the treatment area or if within will be avoided as riparian habitat.
San Bernardino aster <i>Symphyotrichum defoliatum</i>	1B.2	Meadows and seeps, cismontane woodland, coastal scrub, lower montane coniferous forest, marshes and swamps, valley and foothill grassland. Vernal mesic grassland or near ditches, streams and springs; disturbed areas. 7 to 6693 ft in elevation. Blooms July-November.	May occur: Suitable habitat is available and recorded locations are nearby.
Parry's tetracoccus <i>Tetracoccus dioicus</i>	1B.2	Chaparral, coastal scrub. Stony, decomposed gabbro soil. 541 to 3281 ft in elevation. Blooms April-May.	May occur: Suitable habitat is available and recorded locations are nearby.
Wright's tricoloronis <i>Trichocoronis wrightii</i> var. <i>wrightii</i>	2B.1 MSHCP	annual herb, wetland/riparian, below 1640 feet, blooms March - Sept.	May occur; Suitable habitat may be present.
California fan palm, <i>Washingtonia filifera</i>	--	Perennial monocot, native habitat is seeps and springs, below 3900 feet.	Observed; important to note in city limits of Lake Elsinore.

Special Status Wildlife Species Review:

Table 17B. of Special Status Wildlife Species in Vol. 2 of the CalVTP PEIR for the Southern California Mountain and Valley Ecological Section (M262B) was the starting point for reviewing special status wildlife species in the area. Literature reviews and available field data were used to determine potential species presence in the project area with special attention given to range map and habitat preferences when field data was not available. This list was further refined with 1) a CNDDDB search in 2020 and an additional one with a 0.5 mile buffer around project on June 8, 2021, 2) the MSHCP species list (https://www.wrc-rca.org/Permit_Docs/MSHCP/MSHCP-Volume2.pdf), and 3) a list of species found near the project area provided by the MSHCP monitoring group (received 1 June 2021 from RCA staff GIS analyst Emily Lee).

No habitat for fairy shrimp or Quino Checkerspot Butterfly (QCB) occurs within the project area and there is no federally designated Critical Habitat for any species in the project area.

Birds: Observations obtained from eBird were used to refine the Special Status Bird Species with Birds of the World (Cornell Lab of Ornithology: <https://birdsoftheworld.org/>) reviewed for ranges, migratory behavior, habitat and nesting information.

There are 37 special status bird species in the Elsinore Front Country Fuel Break Project area. See Table 2 for the list of special status bird species analyzed for the project. There are 2 federally endangered species (Bald eagle and Southwestern willow flycatcher), 1 federally threatened species (California gnatcatcher), 4 fully protected species (California): Golden eagle, white-tailed kite, American peregrine falcon and the Bald eagle, 1 state endangered (the Southwestern willow flycatcher), and 1 state threatened species (Swainson's hawk). In addition there are 16 birds identified as CDFW species of special concern and 16 species covered by the MSHCP. There is no critical habitat for federally listed species in the project area.

There are migratory species that fly over the project area or use nearby habitat: Swainson's hawk, Wilson's warbler, yellow-breasted chat, purple martin, Clark's marsh wren, MacGillivray's warbler and the Nashville warbler. Three species are found in the area due to Lake Elsinore: bald eagle, osprey and northern harrier (nests near large water bodies). There are 6 species that use various types of riparian habitats: white-tailed kite, Southwestern willow flycatcher, black swift, summer tanager, vermilion flycatcher and Lincoln's sparrow.

Table 2. Special Status Bird Species Known to Occur in the Vicinity of the Treatment Area and Potential for Occurrence in the Treatment Area

BIRDS			
Species	Status	Habitat	Potential to Occur
golden eagle <i>Aquila chrysaetos</i>	FP	Nests in cliffs and large trees; none in treatment areas.	Range overlaps project area.
Swainson's hawk <i>Buteo swainsoni</i>	ST	Migrate thru only, Sept-Oct.	Migration range overlaps project area.
white-tailed kite <i>Elanus leucurus</i>	SFP	Riparian species.	A small amount of habitat in treatment area.
southwestern willow flycatcher <i>Empidonax traillii extimus</i>	SE,FE,	Riparian species.	Small change for species to occur in project area as there is a small amount of habitat.
American peregrine falcon <i>Falco peregrinus anatum</i>	FP	Nests variable; cliffs to manmade structures; project area within breeding range.	Recorded observation over Lake Elsinore 10 years ago (eBird). Potential for species to occur.
bald eagle <i>Haliaeetus leucocephalus</i>	FE FP	Observed in area, not known to breed here. Lake Elsinore is probably the attraction as fish is its preferred food. Project area not important for foraging.	Observed in area, not known to breed in project area.
coastal California gnatcatcher <i>Poliophtila californica californica</i>	FT, SC	Habitat in treatment area of CSS.	Potential to occur.
grasshopper sparrow <i>Ammodramus savannarum</i>	SC	Prefers open grasslands, observed near project area (eBird).	Potential to occur in appropriate habitat of project area.
long-eared owl <i>Asio otus</i>	SC	Uses dense shrubland vegetation used by this species for nesting	Potential to occur.

BIRDS - Continue			
Species	Status	Habitat	Potential to Occur
burrowing owl <i>Athene cunicularia</i>	SC	Grassland species.	Potential to occur.
northern harrier <i>Circus hudsonius</i>	SC	Nests in wetland areas such as areas near Lake Elsinore.	Potential to occur.
black swift <i>Cypseloides niger</i>	SC	Steep canyons with nearby waterfalls.	Potential to occur.
loggerhead shrike <i>Lanius ludovicianus</i>	SC	Year-round resident. Open grasslands with perches.	Potential to occur.
summer tanager <i>Piranga rubra</i>	SC	Prefers riparian forests in broad zones over narrow ones; scattered sightings in area.	Potential to occur.
yellow warbler <i>Setophaga petechia</i>	MSHCP	Breeds in lowland riparian woodlands.	Actively in area; reported in eBird. Year-round residents in area.
Bell's sage sparrow <i>Artemisospiza belli belli</i> (<i>Amphispiza belli belli</i>)	MSHCP	Prefers chaparral with chamise that is less than 5 feet high and not dense.	A few observations reported (eBird) in surrounding area; not commonly found in dense chaparral (Martin and Carlson 2020).
Cooper's hawk <i>Accipiter cooperii</i>	MSHCP	Year-round resident in project area. Has adapted to human habitation especially for hunting. Nests in large-diameter trees.	Present in area (eBird).
ferruginous hawk <i>Buteo regalis</i>	MSHCP	Overwinters in area. Prefers hunting in open habitats. Common prey is rabbit.	Species observations reported (eBird) in project area.
merlin <i>Falco columbarius</i>	MSHCP	Prefers open areas and grasslands. Overwinters in project area vicinity.	Present in project vicinity.
osprey <i>Pandion haliaetus</i>	MSHCP	Found near lakes, streams and ocean. Fish-eater so does not hunt in project area.	Reported in vicinity of project area but does not breed here (Bierregaard et al 2020).
sharp-shinned hawk <i>Accipiter striatus</i>	MSHCP	Hunts along forest edges. Frequents human habitation and preys on birds at bird feeders.	Present in project area (eBird).
Southern California rufous-crowned sparrow <i>Aimophila ruficeps canescens</i>	MSHCP	Year-round resident is not found in dense shrublands (Stephenson and Calcarone 1999).	Many observations recorded on sparse vegetation on east side of Lake Elsinore with none in dense chaparral on west side (eBird). Not in project area.

BIRDS - Continue			
Species	Status	Habitat	Potential to Occur
Wilson's warbler <i>Cardellina pusilla</i> (<i>Wilsonia pusilla</i>)	MSHCP	Migrates thru area only.	eBird data indicates this species is present during spring migration (March-June) and fall migration (Aug-Oct).
olive-sided flycatcher <i>Contopus cooperi</i>	SC	Breeds in montane forests and forages along ecotones. Insectivorous, catching insects on the wing.	Potential to occur in project area.
yellow-breasted chat <i>Icteria virens</i>	SC	Dense scrub along ecotones. Omnivorous and secretive behavior. May breed or only migrate thru Elsinore trough area.	Potential to occur.
Oregon vesper sparrow <i>Pooecetes gramineus affinis</i>	SC	Prefers patchy vegetation. Project area is within wintering habitat only.	Potential to occur.
purple martin <i>Progne subis</i>	SC	Project area within in migration route. Insectivorous.	Potential to occur.
downy woodpecker <i>Picoides pubescens</i>	MSHCP	Present year-round, prefers riparian forests.	Potential to occur.
Clark's marsh wren <i>Cistothorus palustris clarkae</i>	SC	Elsinore trough is migratory habitat; present in riparian habitat is at Lake Elsinore.	Does not occur in project area.
MacGillivray's warbler <i>Oporornis tolmiei</i>	MSHCP	Migratory thru Elsinore trough only. Prefer disturbed dense vegetation along riparian areas. Spring migration April-May, fall Mid-August to mid-Nov.	Potential to occur.
Nashville warbler <i>Leiothlypis ruficapilla</i> (<i>Vermivora ruficapilla</i>)	MSHCP	Migratory thru Elsinore trough only. Prefer disturbed dense vegetation along riparian areas. Spring migration Mar - mid-May, fall Mid-August -Sept.	Potential to occur.
tree swallow <i>Tachycineta bicolor</i>	MSHCP	Breeding area, cavity nester (in large trees), near large bodies of water. Needs dead snags.	Low potential to occur in project area; few large riparian snags.
vermillion flycatcher <i>Pyrocephalus rubinus</i>	SC	Associated with riparian habitat. Needs open areas to catch insectivorous prey.	Potential to occur.
Lincoln's sparrow <i>Melospiza lincolni</i>	MSHCP	Shy species, overwinters but does not breed. Needs riparian habitat.	Potential to occur.
prairie falcon <i>Falco mexicanus</i>	MSHCP	Year-round, eats rodents prefers to hunt in open grassland habitats. May nest in cliffs and rock outcrops above project area on NFS lands.	Potential to occur.

BIRDS - Continue			
Species	Status	Habitat	Potential to Occur
turkey vulture <i>Cathartes aura</i>	MSHCP	Breeds in project vicinity. Prefers open land to scavenge in for food. May nest in rock formations and crevices above project area in NFS lands. No roosting areas known in treatment area.	Potential to occur.
California horned lark <i>Eremophila alpestris actia</i>	SC	Habitat nearby but not in project area. Species prefers open grassland habitat.	Low potential to occur in project area.

Mammals: In addition to the PEIR lists, CNDDDB and the MSHCP covered species lists and monitoring data, the San Diego Co Mammal Atlas (Tremor et al, eds., 2017) was used to obtain current life history information and potential for occurrence of special status mammal species in the project area, supplemented by species accounts from CDFW. iNaturalist was also searched for potential ringtail occurrences.

There are 23 special status mammal species to review in this fuel break project. The species of most conservation concern is the Stephen's kangaroo rat, an endemic to Riverside County and the subject of much consternation and study. Stephen's kangaroo rate (SKR) is federally endangered, also state-threatened and one of the 11 species covered under the MSHCP. It has been found nearby according to the CNDDDB. There may be some suitable habitat in the northern portion of the project area where topography is more gentle. The ringtail, a raccoon relative, is the only state fully protected species. It is difficult to detect, however, thus little is known about its current distribution. There are 15 state species of concern, including 9 bat species. Note that no bat species are covered in the MSHCP. Please refer to Table 3 for the list of special status mammal species analyzed for the project area.

Table 3. Special Status Mammal Species Known to Occur in the Vicinity of the Treatment Area and Potential for Occurrence in the Treatment Area

MAMMALS			
Species	Status	Habitat	Potential to Occur
ringtail <i>Bassariscus astutus</i>	FP	Chaparral, oak woodlands and riparian areas with steep rocks and tree trunks for climbing. Mostly carnivorous.	Potential to occur.
coyote <i>Canis latrans</i>	MSHCP	Widespread, all kinds of habitats. May use fuel breaks for movement. Omnivorous	Present in project area; observed during fieldwork.
long-tailed weasel <i>Mustela frenata</i>	MSHCP	Diverse habitats, needs cover for nests and prefers areas of abundant rodent burrows. Carnivorous, may store carrion for later consumption.	Potential to occur.
mountain lion <i>Puma concolor</i>	MSHCP	Requires thick brush for cover. Carnivorous, primary prey is deer but eats many other animals.	Potential to occur.

MAMMALS - continue			
Species	Status	Habitat	Potential to Occur
San Diego black-tailed jackrabbit <i>Lepus californicus bennettii</i>	SC, MSHCP	Flat open areas with easy access to cover. May use fire breaks for movement. Herbivore, browser and grazer.	Potential to occur; known from nearby CNDDDB occurrences.
brush rabbit <i>Sylvilagus bachmani</i>	MSHCP	Dense brush, primarily thick chaparral. Herbivore, mainly grasses.	Present in project area; observed during fieldwork.
Stephens' kangaroo rat <i>Dipodomys stephensi</i>	FE,ST, MSHCP	Open grasslands with annual forbs or sparse coastal sage scrub with extensive bare ground. Granivore.	Potential to occur, but may be outside of project area.
northwestern San Diego pocket mouse <i>Chaetodipus fallax fallax</i>	SC, MSHCP	Rocky habitats near shrubs. Ok with shrub cover being disturbed in openings but needs shrub cover. Granivorous, mainly a seed eater but also eats leaves & stems.	Potential to occur.
south coast marsh vole <i>Perognathus alticola alticola</i>	SC	Prefers mesic areas but will also use sage scrub and dry creek beds. Likes dense grasses. Herbivorous, grasses, sedges & bulbs & tubers.	Potential to occur.
San Diego desert woodrat <i>Neotoma lepida intermedia</i>	SC MSHCP	potentially on site; check Chase et al.	Taxonomy may have changed. If not, low potential to occur. Woodrats trapped during fieldwork are <i>N. macrotis</i> .
southern grasshopper mouse <i>Onychomys torridus ramona</i>	SC	open habitats with gentle terrain with coastal sage scrub among other habitats. Carnivorous, mainly insectivorous. Large home ranges thus in low densities where it is found. Not easily caught in Sherman Traps.	Potential to occur; very rare and not well known.
Los Angeles pocket mouse <i>Perognathus longimembris brevinasus</i>	SC, MSHCP	grassland, coastal sage, gentle terrain, disturbance ok.	Potential to occur in portions of project area.
bobcat <i>Lynx rufus</i>	MSHCP	Highly adaptable incl coastal sage and chaparral. Needs access to water every few days.	Present in project area.
Dulzura kangaroo rat <i>Dipodomys simulans</i>	MSHCP	Prefers shrublands with open ground. Granivorous, seeds roots buds, stems and insects.	Present in project area.

MAMMALS - continue			
Species	Status	Habitat	Potential to Occur
pallid bat <i>Antrozous pallidus</i>	SC	Roosting sites variable (rock crevices, caves, under tree bark, rodent burrows, mines buildings, bridges, culverts) but known roosting sites are rare. Insectivorous, gleaning prey off ground or vegetation.	Present in project area.
Mexican long-tongued bat <i>Choeronycteris Mexicana</i>	SC	May roost in man-made structures. Nectivorous species that may be found near ornamental plants that offer nectar as a food source.	Potential to occur but difficult to detect.
Townsend's big-eared bat <i>Corynorhinus townsendii</i>	SC	Obligate cave and cave-analog rooster, including old mines and boulder caves. Foraging distance likely variable. Moth specialist.	Present in project area.
spotted bat <i>Euderma maculatum</i>	SC	Believed to occur in rocky arid and semi-arid environments. Forages along ecotones. Moth specialist.	Present in project area.
western mastiff bat <i>Eumops perotis californicus</i>	SC	Roosts in steep rocky outcrops, cliffs and abandoned quarries. May be long distance forager so may forage above Lake Elsinore. Mainly eats large moths but will eat other insects.	Present in project area.
western red bat <i>Lasiurus blossevillei</i>	SC	Only roosts in foliage usually in riparian trees but uses ornamental trees and shrubs and orchard trees in man-made environments. Mainly eats moths.	Present in project area.
western yellow bat <i>Lasiurus xanthinus</i>	SC	Preferred roost is skirts of palm trees. Suspected range expansion with more palm trees planted in suburban areas. May fly long-distances. Insectivorous, eating beetles, flies, true bugs, moths and several other insect orders.	Present in project area.

MAMMALS - continue			
Species	Status	Habitat	Potential to Occur
California leaf-nosed bat <i>Macrotus californicus</i>	SC	Thought to be desert species but needs vegetation that harbors large-bodied insects. Cave and mine roosts that do not go below 73 degrees F. Insectivorous, large-bodied insects gleaned from vegetation and ground. Will eat fruit.	Present in project area.
pocketed free-tailed bat <i>Nyctinomops femorosaccus</i>	SC	Wide-ranging species that roosts in crevices in steep rocky cliffs and abandoned quarries. Often found near large water bodies. Insectivorous feeding on the wing.	Present in project area.

Amphibians and Reptiles: In addition to the PEIR lists, CNDDDB observations and the MSHCP species accounts and monitoring data, species accounts found in Jones and Lovich (2009), Lemm (2006) and Stebbins (1966) were consulted to determine potential occurrence in the project area.

There are 2 amphibian species and 11 reptiles for a total of 13 special status species with potential to occur in the project area. The arroyo toad is the only federally endangered species on the list. There are 2 federal species of concern, the red-diamond rattlesnake and the coast patch-nosed snake: both have been observed in the project area (Refer to Attachment 4 for details on observed species). There are 10 state species of concern and 8 species covered by the MSHCP included in the Special Status list. Please see Table 4 for the list of special status amphibian and reptile species analyzed for the project area.

Table 4. Special Status Amphibian and Reptile Species Known to Occur in the Vicinity of the Treatment Area and Potential for Occurrence in the Treatment Area

AMPHIBIANS			
Species	Status	Habitat	Potential to Occur
arroyo toad <i>Anaxyrus californicus</i>	FE, SC, MSHCP	Riparian habitats with sandy streambeds with willow, oak and sycamore species. Nocturnal and active from the first rains in Jan or Feb to early August. After breeding they burrow into stream terraces and are inactive fall-winter.	May occur: Suitable habitat is available in treatment area.
western spadefoot <i>Spea hammondi</i>	SC, MSHCP	Nocturnal and found in chaparral and scrub where soil is friable enough for burrowing. Remains underground for most of the year. Breeds in pools, when present Jan-June.	Known to occur: the species has been observed within the treatment area.

REPTILES			
Species	Status	Habitat	Potential to Occur
California legless lizard <i>Anniella pulchra</i>	SC	Fossorial lizard that requires porous, loosely packed substrates such as sand or sandy-loam soils and may be found in chaparral. Usually within 10" of soil surface. Hear by detecting soil vibrations. Bear young Sept – Nov.	Potential to occur: range encompasses project area and suitable habitat is present.
California glossy snake <i>Arizona elegans occidentalis</i>	SC	Known from coastal sage and chaparral communities. Rare secretive snake. Most active during the spring and summer; spends winters in underground burrows. Preys on lizards and rodents.	Potential to occur: range encompasses project area and suitable habitat is present.
Belding's orange-throated whiptail <i>Aspidoscelis hyperythrus beldingi</i>	MSHCP	Fast-moving lizard most active from early spring to late summer. Found in patches with thick vegetation surrounded by open areas with loose soil and rocks. Found in high quality habitats and are rare or absent in marginal habitats and developed areas. Young hatch and emerge Aug-Sept.	Potential to occur: range encompasses project area and suitable habitat is present.
coastal whiptail <i>Aspidoscelis tigris stejnegeri</i>	SC, MSHCP	Large lizard with ventral spotting. Very wary. Present in a variety of habitats including chaparral. Prefers riparian corridors with sandy soil. Most active in spring and summer.	Potential to occur: range encompasses project area and suitable habitat is present.
San Diego banded gecko <i>Coleonyx variegatus abbotti</i>	SC, MSHCP	Nocturnal live-bearers that eat small arthropods. Found in chaparral habitats in S. California. Eggs hatch mid to late summer.	Potential to occur: range encompasses project area and suitable habitat is present.
red-diamond rattlesnake <i>Crotalus ruber</i>	FSC, SC, MSHCP	Prefers high quality chaparral and coastal sage scrub vegetation. May occur in rocky areas or not. Most active April - November. May overwinter with others of species. Young born July - September.	Known to occur: the species has been observed within the treatment area.

REPTILES			
Species	Status	Habitat	Potential to Occur
coast horned lizard <i>Phrynosoma blainvillii</i> (formerly <i>P. cornutum</i>)	SC, MSHCP	Found in coastal sage and dense chaparral with loose soils for burying themselves 5-10 cm under soil. Needs harvester ants as prey. Emerge from soil Mar- April. Bask and hide in shrubs mid-day and bury themselves at night. Hatchlings emerge in late July and August and forage until November.	Known to occur: the species has been observed within the treatment area.
coast patch-nosed snake <i>Salvadora hexalepis virgulata</i>	FSC, SC	Not commonly observed and fast when found. In coastal sage and chaparral. Active Mar - Oct. Preys on lizards. Not a well-known species.	Known to occur: the species has been observed within the treatment area.
granite spiny lizard <i>Sceloporus orcutti</i>	MSHCP	Prefers rock outcroppings in a wide range of habitats including chaparral. Active between Feb to Nov. Aggressive insectivores. Rock cracks, fissures and granite exfoliations serve as overwintering and refugia from predators. Young hatch July to September.	Known to occur: the species has been observed within the treatment area.
southern sagebrush lizard <i>Sceloporus graciosus</i>	MSHCP	Ground dwelling, agile species. May be found in chaparral and riparian areas. Use leaf litter, debris piles, holes, rocks as cover. Eats small arthropods. Eggs are laid in loose soil a few centimeters below the surface at the base of shrubs. Young hatch July - October.	Known to occur: the species has been observed within the treatment area.
granite night lizard <i>Xantusia henshawi</i>	SC, MSHCP	Rock outcrop specialist that maintains high site fidelity. Reported in chaparral. Active late in the day and early evening. Insectivorous. Young born in Sept.	Potential to occur: range encompasses project area and suitable habitat is present.

Insects: In addition to the PEIR lists, CNDDDB, species accounts found in Koch et al (2012) and Williams et al (2014) were used to determine that Crotch's bumble bee is only potential sensitive invertebrate in project area: There is no suitable habitat in the project area for Quino checkerspot butterfly, although it has been observed in the vicinity (CNDDDB).

INSECTS			
Species	Status	Habitat	Potential to Occur
<i>Bombus crotchii</i> Crotch bumble bee	CS	Food plants Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia, Eriogonum all found in project area. Known from west of the Sierra Nevada mtns, open grassland and shrub. Nests underground.	May occur in project area; survey when forage plants are in bloom. Males and workers most active in May and June.

Impact BIO-1 - Less Than Significant

Special Status Plant Species

Treatment activities and maintenance treatments could result in direct or indirect adverse effects to the 48 special-status plant species with suitable habitat within the treatment area. Nine of these species— slender-horned spineflower, California black walnut, ocellated Humboldt lily, mountain spring bush lupine, California muhly, southern mountains skullcap, prairie wedge grass and San Bernardino Aster —are typically associated with wet areas (e.g., creekbanks, streams, wetlands, meadows). Pursuant to **SPR HYD-4**, WLPZs ranging from 50 to 150 feet adjacent to all aquatic habitat (i.e., wetland areas) within the treatment area will be implemented, which would avoid most adverse effects to these species.

Pursuant to **SPR BIO-7**, protocol-level surveys for special-status plants will be conducted prior to implementation of any treatment. If special-status plants are identified during surveys, **MM BIO-1b** will be implemented to avoid loss of identified special-status plants. Per **MM BIO-1b**, if special-status plants are identified during protocol-level surveys, a no-disturbance buffer of appropriate distance by a qualified biologist will be established around the area occupied by the species within which mechanical treatments, manual treatments, grazing treatments, herbicide applications nor burn pile stacking will not occur.

The potential for treatment activities to result in adverse effects on special-status plants was examined in the PEIR. This impact on special-status plants is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on special-status plants is less than significant. SPRs that apply to project impacts under Impact BIO-1 are SPRs **BIO-1** review and survey project-specific biological resources, **BIO-2** require biological resource training for workers, **BIO-3** survey sensitive natural communities and other sensitive habitats, **BIO-4** design treatment to avoid loss or degradation of riparian habitat function, **BIO-5** avoid environmental effects of type conversion and maintain habitat function in chaparral and coastal sage scrub, **BIO-6** prevent spread of plant pathogens, **BIO-7** survey for special-status plants, **BIO-9** prevent spread of invasive plants, noxious weeds and invasive wildlife, **BIO-11** install wildlife-friendly fencing when using prescribed herbivory to avoid impacts to special status plants, **GEO-1** suspend disturbance during heavy precipitation, **GEO-3** limit high ground pressure vehicles, **GEO-4** monitor erosion, **GEO-7** minimize erosion, **GEO-8** identify steep slopes with unstable soils and include measures to avoid topsoil loss, **HYD-4** identify and protect watercourse and lake protection zones, and **HYD-5** protect non-target vegetation and special-status species from herbicides. With implementation of the SPRs, this determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-2 - Less Than Significant

Special Status Wildlife Species

Treatment activities could result in direct and indirect impacts to special-status wildlife (Tables 2, 3 and 4). Data review and reconnaissance surveys were conducted in accordance with **SPR BIO-1** (see Biological Attachment). The project proponent has consulted with regulatory agencies (CDFW and U.S. Fish and Wildlife Service) and has implemented all agency recommendations into project design.

Tree-nesting and cavity nesting species: There are few large trees in the project area and existing trees will be preserved. Courtship behavior and nest building for **Golden eagle** and **White-tailed kite** may occur outside of the nesting season (February 15 – August 15) established for Southern California required by the Federal Migratory Bird Treaty Act (MBTA) and State Fish and Game Code (FGC) 3503. No Golden eagle nests have been recorded within the project area, however, there is potential habitat to the west on adjacent Forest Service lands. There is a small amount of riparian habitat where White-tailed kites could nest within the project area; these areas will be identified in **SPR BIO-2** and protected by **SPR-4**. A pre-implementation survey for these species 5 days prior to implementation work as part of **MM BIO-2B** will identify any potential breeding efforts by these species and if found, those areas will be buffered and avoided.

All other tree and cavity nesting avian species will be protected with pre-implementation surveys, including ringtails.

Shrub-nesting species: Breeding behavior of avian species is protected by the MBTA and California FGC 3503. If fuel reduction treatments are implemented during this limited operating period (LOP) of February 15 – August 15, nesting surveys will be conducted 5 days prior to planned implementation. If nests are found, nests will either be buffered a sufficient distance to avoid disturbing nesting birds or implementation will be delayed until birds fledge from nest. The potential habitat of California gnatcatcher (CAGN) may also be treated; pre-implementation surveys will be conducted and measures described above implemented to avoid impacts to nesting and fledging CAGN. These measures are included in **SPRs BIO-10** survey for special-status wildlife and nursery sites and **BIO-12** protect common nesting birds, including raptors.

CAGN are year-round residents of coastal sage habitat in Southern California. Recent work suggests that CAGN prefer coastal sage habitat of 40-60% open space (Winchel and Doherty 2018, C. Winchel, pers. comm.). This is in contrast with the recommendation of 50% *minimum* cover by Beyer and Wirtz (1995). While birds may move during treatment, fuel reduction activities will not reduce habitat for CAGN and may in fact enhance it. Coastal sage scrub habitat function will not be impacted by the project **SPR BIO-5**.

Treatments planned in select riparian areas in accordance with **SPR BIO-4** "design treatment to avoid loss or degradation of riparian habitat function", will not occur during nesting season. Least Bell's vireo (LBV) and Southwestern willow flycatcher (SWWF) will not be impacted by fuel treatment activities. Both species migrate to these areas and are not expected outside of nesting season.

Ground-nesting species: **SPR BIO-10** survey for special-status wildlife and nursery sites and **BIO-12** protect common nesting birds, including raptors protect ground-nesting species. For special status mammal species, the San Diego woodrat, San Diego Black-tailed jackrabbit and the brush rabbit, these pre-implementation surveys will identify nesting sites under shrubs and avoid and buffer nesting areas if found as part of **MM BIO-2B**. Ringtails, which may nest at ground level, will be also surveyed for during pre-implementation surveys as their breeding cycle is synchronous with the MBTA breeding bird season prohibition.

Burrowing or Denning species: No treatments will be done in occupied Stephen's kangaroo rat (SKR) habitat. All potential habitat will be surveyed for presence as per **SPR BIO-10** and if SKR are found, these areas will be avoided as per **MM BIO-2A**. The pre-implementation survey will also focus on small mammal presence in potential habitat for the special status species: Dulzura kangaroo rat, Northwest San Diego pocket mouse, Los Angeles pocket mouse and Southern grasshopper mouse. Evidence of active coyote, bobcat, mountain lion and ringtail dens will also be surveyed for in each planned treatment area during pre-implementation surveys and temporary fencing installed for select grazing treatments will be permeable to native wildlife species **SPR BIO-11**. If potential burrowing owl habitat is found within the treatment area, occupancy surveys will be part of the pre-implementation survey. If any special status species is present, the occupied portion of the treatment area will be avoided and buffered as per **MM BIO-2B**. All workers will receive biological resource training to avoid any previously unidentified burrowing or denning sites (**SPR BIO-2**).

Insects and Invertebrate special status species: The range of special status insect Crotch's bumblebee overlaps with the project area and research grade observations have been reported in iNaturalist. Focused surveys as per **SPR BIO-10** will include surveys for bumblebee presence on spring flowers and flying individuals. Implementation of **MM BIO-2G** is designed to avoid loss of Crotch's bumblebee nests.

Note that there is no habitat for the QCB in the project area although it has been recorded on the level Elsinore Valley floor near the project area.

Special Status Bat species: Treatment in areas near or in sensitive bat species roosting habitat will be avoided as per **SPR BIO-1** review and survey project-specific biological resources and **BIO-10** survey for special-status wildlife and nursery sites. Pre-implementation surveys will include checking rock outcrops for deep crevices and evidence of bat roosts. If evidence is found, rock outcrops will be buffered with a no-treatment zone and avoided as per **MM BIO-2B**. Other potential roosts include large palm trees in the adjacent suburbs. Animals living thus far undetected in these suburban trees are unlikely to be disturbed by implementation of the fuel break. The **SPR BIO-10** pre-implementation surveys will also include canvassing any adjacent national forest lands for potential habitat and designating a no-treat buffer inside the project area if potential roosting areas are within 100 feet of the project area.

Special Status Ungulate species: There are no special status ungulate species in or near the project area.

Special Status Amphibian and Reptile species: Potential habitat for Arroyo toad will be identified prior to implementation (**SPR BIO-10**) and avoided as per **MM BIO-2A**. The WPLZ for potential toad habitat may be increased for potential upslope aestivation habitat of Arroyo toads as part of **SPR HYD-4** identify and protect watercourse and lake protection zones. Pre-implementation surveys, as per **SPR BIO-10** at various seasons prior to implementation will be conducted to identify and avoid any impacts to the additional special status amphibian and reptile species.

The potential for treatment activities to result in adverse effects on special-status wildlife species was examined in the PEIR. This impact on special-status wildlife species is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on special-status plants is less than significant.

SPRs that apply to project impacts under Impact BIO-1 are SPRs **BIO-1** review and survey project-specific biological resources, **BIO-2** require biological resource training for workers, **BIO-3** survey sensitive natural communities and other sensitive habitats, **BIO-4** design treatment to avoid loss or degradation of riparian habitat function, **BIO-5** avoid environmental effects of type conversion and maintain habitat function in chaparral and coastal sage scrub, **BIO-11** install wildlife-friendly fencing when using prescribed herbivory to permit movement of native wildlife species, **BIO-12** protect common nesting birds, including raptors, **GEO-1** suspend disturbance during heavy precipitation, **GEO-3** limit high ground pressure vehicles and **HYD-4** identify and protect watercourse and lake protection zones. Additionally, MM's that apply for all special status species includes: **MM BIO-2A**, **MM BIO-2B** and **MM BIO-3A**. With implementation of SPRs, this less-than-significant determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-3 - Less Than Significant

Riparian/Sensitive Natural Communities

Initial treatment and maintenance treatments could result in direct or indirect adverse effects on sensitive habitats, including designated sensitive natural communities in the project area.

Data review and reconnaissance-level surveys of project-specific biological resources were conducted according to **SPR BIO-1**. Two sensitive natural communities identified in the CNDDDB occur within the project area; both are riparian plant communities: Southern Sycamore Alder Riparian Woodland and South Coast Live Oak Riparian Forest. There are six potential sensitive vegetation alliances within the chaparral and coastal sage scrub vegetation in project area that have a rarity and threat ranking of S3 (up to 100 occurrences are known). They are: Chamise-white sage chaparral, Bush penstemon scrub, Palmer's goldenbush scrub, white sage scrub, Thick leaf yerba santa scrub with Menzies's goldenbush scrub conservatively included (ranked as "S4?"). These communities and alliances will be identified, and if present, mapped and flagged prior to implementation (**SPR BIO-3** survey sensitive natural communities and other sensitive habitats). The riparian and any identified chaparral/coastal sage alliances

will be treated with prescriptions designed to maintain habitat function and avoid type conversion (**SPR BIO-4** design treatment to avoid loss or degradation of riparian habitat function and **SPR BIO-5** avoid environmental effects of type conversion and maintain habitat function in chaparral and coastal sage scrub) or remain untreated to comply with **MM BIO-3A**. Note that none of the chaparral and coastal sage alliances are understory communities; vegetation treatments will not be removing these communities. Presence of special status plants and wildlife species will also be surveyed prior to implementation and avoidance measures will be taken as part of **SPR BIO-7** survey for special-status plants and **SPR BIO-10** survey for special-status wildlife and nursery sites. Any active nests found will be buffered and avoided along with raptor nests that may be found in riparian areas (**SPR BIO-12**). Sensitive plant communities will also be protected from animals in selected grazing treatments by fencing in the grazing animals in the target areas **SPR BIO-11**).

The sensitive riparian communities will be protected from treatments of the surrounding vegetation with the WLPZ of **SPR HYD-4**. No ground disturbance or pile burning will occur within the buffer zones. Any herbicides used, primarily to prevent the spread of the invasive Malta starthistle or tocalote (*Centaurea melitensis*) (**SPR BIO-9** prevent spread of invasive plants, noxious weeds and invasive wildlife) will adhere to **SPR HAZ-5** protect non-target vegetation and special-status species from herbicides, **HAZ-6** comply with herbicide application regulations, **HYD-1** comply with water quality regulations and **HYD-5** protect non-target vegetation and special-status species from herbicides. Precautions such as cleaning tools and equipment will be incorporated into all treatments in or near the riparian zones, working near smooth-bark trees such as sycamores, to avoid introducing shot-hole borers (**SPR BIO-6**, prevent spread of plant pathogens) into the project area. Disturbed soils will be stabilized (**SPR GEO-3**, stabilize disturbed soil areas), soil erosion will be minimized (**SPR GEO-7**), monitored for erosion (**SPR GEO-4**) and future storm water draining off the steep slopes of the project area will be captured and carefully directed with water bars constructed as part of the project (**SPR GEO-5**).

Workers implementing the fuel treatment will be trained to avoid and minimize impacts to sensitive resources and riparian areas (**SPR BIO-2**) and to avoid or lightly treat culturally significant plants in these areas (e.g. Holly-leaf cherry, *Prunus ilicifolia*) as part of **SPR CUL-6**, develop effective protective measures for tribal cultural resources.

The potential for treatment activities to result in adverse effects on sensitive habitats, as described above, was examined in the PEIR. This impact on sensitive habitats is within the scope of the PEIR analysis because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, general habitat characteristics are essentially the same within and outside the treatable landscape (i.e., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on sensitive habitats is less than significant. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-4 - Less Than Significant

State and federal wetlands

Initial treatment and maintenance treatments could result in direct or indirect adverse effects on state-protected or federally protected wetlands. The aquatic habitat within the treatment area has been excluded during the design of the treatments. However, based on review and survey of project-specific biological resources (**SPR BIO-1**), some portions of the treatment area contain portions of intermittent, and ephemeral streams, as well as portions of seasonal wetland features (e.g., the sensitive community Southern Sycamore Alder Riparian Woodland). Under **SPR HYD-4**, WLPZs ranging from 50 to 150 feet will be established adjacent to all Class I and Class II streams within the treatment area, and Equipment Limitation Zones (ELZs) of at least 25 feet will be established around all Class III ephemeral streams within the treatment area. Under **MM BIO-4**, a qualified RPF or biologist will delineate the boundaries of the seasonal wetlands and associated riparian habitat and will establish a no-disturbance buffer of at least 25 feet with flagging or fencing. Ground disturbance will be prohibited within this buffer.

The potential for treatment activities to result in adverse effects on state-protected or federally protected wetlands was examined in the PEIR. This impact on wetlands is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in

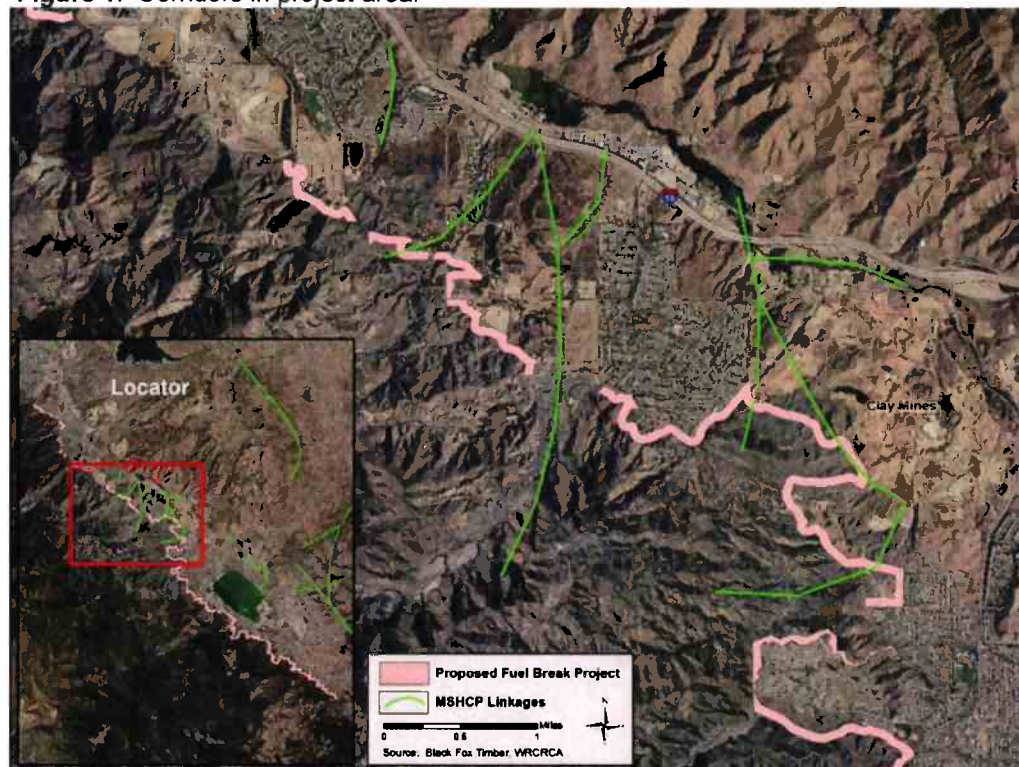
the PEIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, general habitat characteristics are essentially the same within and outside the treatable landscape (i.e., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on wetlands is also the same, as described above. SPRs that apply to project impacts under Impact BIO-4 are **SPRs BIO-1** review and survey project-specific biological resources, **BIO-2** require biological resource training for workers, **BIO-3** survey sensitive natural communities and other sensitive habitats, **BIO-11** install wildlife-friendly fencing when using prescribed herbivory to keep grazing animals out of wetland areas, **GEO-1** suspend disturbance during heavy precipitation, **GEO-3**, stabilize disturbed soil areas **GEO-4** monitor erosion, **GEO-5** drain stormwater via water breaks, **GEO-7** minimize erosion, **HYD-1** comply with water quality regulations, **HYD-3** water quality protections for prescribed herbivory including providing grazing animals water in containers, and **HYD-4** identify and protect watercourse and lake protection zones. This less-than-significant determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-5 - Less Than Significant

Wildlife movement corridors and nurseries

Initial treatment and maintenance treatments could result in direct or indirect adverse effects on wildlife movement corridors and nurseries because suitable habitat is present in the treatment area. Based on review and survey of project-specific biological resources (**SPR BIO-1**), the project area contains one modeled "irreplaceable and essential corridor" in CDFW's Habitat Connectivity Planning project. This modeled corridor closely matches the corridors identified in the MSHCP (Figure 3-2, Schematic Cores and Linkages Map in the MSHCP (RC TMLA 2003)). Refer to Figure 1.

Figure 1. Corridors in project area.



Due to the nature of the proposed treatment activities, implementation would not result in a substantial change in the existing conditions that facilitate wildlife movement in the treatment area. Although Lake Elsinore is nearby, and is an important stopover in the Pacific Flyway, the project area is separated from the lake by development and is

not an important area for migratory water bird species for nesting or foraging. No rookeries were observed during the reconnaissance surveys, however as land-owner participation increases, new parcels will be surveyed as the project is implemented (**SPR BIO-1** review and survey project-specific biological resources and **MM BIO-5**). Mule deer are known in the project area but primarily use the adjacent CNF lands. No bat roosts were identified during the surveys. However, bats are plentiful in the area and may roost in adjacent large trees in the established neighborhoods. Bats may not be impacted by project activities. Arroyo toads may burrow above some of the dry stream beds; however, riparian areas will be buffered (**SPR BIO-4** design treatment to avoid loss or degradation of riparian habitat function and **HYD-4** identify and protect watercourse and lake protection zones) and thus avoided. One rattlesnake hibernaculum (snake den) was identified during the recon surveys and will be flagged for avoidance (**MM BIO-5**) – for the snakes as well as the workers who will receive training (**SPR BIO-2** require biological resource training for workers) on these kinds of resources. Insect movement is not expected to be impacted as project implementation will create new habitat for plant species that serve as nectar resources within the fuel break area and invasive plants will be controlled so that small mammals and reptiles can move through the project area (**SPR BIO-9** prevent spread of invasive plants, noxious weeds and invasive wildlife). The chaparral and coastal sage communities will not be type-converted due to project activities (**SPR BIO-5** avoid environmental effects of type conversion and maintain habitat function in chaparral and coastal sage scrub) and in areas where herbivory treatments make sense (**SPR BIO-11** install wildlife-friendly fencing when using prescribed herbivory) will apply. No long-term impacts to wildlife moving through the area are anticipated.

The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the PEIR. This impact is within the scope of the PEIR analysis because the treatment activities and extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, general habitat characteristics are essentially the same within and outside the treatable landscape (i.e., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on wildlife movement corridors is less than significant. SPRs that apply to project impacts under Impact BIO-5 are **SPRs BIO-1, BIO-2, BIO-4, BIO-5, BIO-9, BIO-11** and **HYD-4**. Implementation of **MM BIO-5** that identifies and avoids important nursery and denning sites will also reduce impacts. This less-than-significant determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-6 - Less Than Significant

Common wildlife

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds and lizard species that lay eggs a few centimeters deep in soil under shrubs, because habitat suitable for these species is present throughout treatment areas. The potential for treatment activities, including maintenance treatments, to result in adverse effects on these resources was examined in the PEIR.

Adverse effects on nesting birds would be clearly avoided by conducting initial treatments between October 1 and January 31, outside of the nesting songbird season (February 1–August 31). Maintenance treatments, including manual and mechanical treatment activities, may be conducted during portions of the nesting bird season (e.g., February–March, August). These activities could result in direct loss of active nests or disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chain saws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks. If maintenance treatments would occur during the nesting season, then **SPR BIO-12** (protect common nesting birds, including raptors) would apply for common birds as well as raptor species (i.e. red-tail hawks that are known to nest in December and January in this area), and a survey for these species would be conducted within the treatment areas by a qualified biologist prior to treatment activities. 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 biologist. In addition,

implementation of **SPR BIO-2** includes training for workers and would include what to do if active bird nests were observed and how to look under shrubs for lizard eggs. **SPR BIO-4** (design treatment to avoid loss or degradation of riparian habitat function) would protect common wildlife in riparian areas. **SPR BIO-6** (avoidance of chaparral and coastal sage scrub type conversion) will minimize long-term treatment effects on common species. **SPR BIO-6** (prevent spread of plant pathogens) will target common tree species and their persistence in the treatment area. **SPR BIO-9** (preventing the spread of invasive and noxious plants and invasive wildlife) will also protect common species. **SPR-11** (install wildlife-friendly fencing when using prescribed herbivory) would reduce impacts of native wildlife moving through areas where animals are being grazed as part of the project.

The potential for adverse effects on common wildlife, including nesting birds, is within the scope of the PEIR because the treatment activities and extent of expected disturbance as a result of implementing vegetation treatments, including maintenance treatments, are consistent with those analyzed in the PEIR. SPRs applicable to this impact are **BIO-1, BIO-2, BIO-4, BIO-5, BIO-6, BIO-9, BIO-11** and **BIO-12**. This impact of the proposed project is consistent with the PEIR less-than-significant determination and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, general habitat characteristics are essentially the same within and outside the treatable landscape (i.e., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact on common wildlife, including nesting birds, is less than significant.

Impact BIO-7 – No Impact

Conflict with Local Policies

The Elsinore Front Country Fuel Break Project is within the boundaries of Riverside County with portions within the city limits of Lake Elsinore and Wildomar. Although Riverside County has a tree-removal ordinance, it does not apply to the project area (Ordinance No. 559). It applies to tree removals above 5,000 feet and the entire project area is below that elevation. Additional resource protection measures are codified within the MSHCP (RC TMLA 2003). See discussion of Impact BIO-8, below. The City of Lake Elsinore has a Significant Palm Tree Preservation ordinance (Chapter 5.116)¹. Several palm trees were found in the reconnaissance surveys (See the Biological Attachment), however, if any are found within the city limits of Lake Elsinore, they will be avoided as palm trees will be considered a special status species for this project (within Lake Elsinore city limits). The City of Wildomar has no biological resource protection policies or ordinances currently on record².

The potential for treatment activities to result in conflict with local policies or ordinances was examined in the PEIR. The potential for the treatment project to conflict with local policies or ordinances is within the scope of the PEIR analysis 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** Consistency with Local Plans, Policies, and Ordinances.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, the existing regulatory conditions and biological resources present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, there is no significant impact from potential for conflicts with local policies or ordinances. SPRs that apply to this impact include **AD-3, BIO-1** review and survey project-specific biological resources, **BIO-3** survey sensitive natural communities and other sensitive habitats and

¹ **City of Lake Elsinore** – Ms. Demaris Abraham of the Lake Elsinore Planning Department was contacted by email on 07/08/21. She responded on 07/08/21. The only potentially conflicting biological ordinance was a palm tree preservation ordinance. Palm trees within the City Limits of Lake Elsinore will be treated as special status plants.

² **City of Wildomar**: Mr. Abdu Lachgar was contacted by phone on 07/08/21. There are no local ordinances for biological resource protection in the City of Wildomar.

BIO-7 survey for special-status plants. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-8 – No Impact

Local NCCP/HCPs

The Elsinore Front Country Fuel Break Project is within the boundary of the Western Riverside MSHCP (2004). It is a requirement of the CalVTP that this project must be consistent with any existing conservation plans.

All covered species in the MSHCP found in or near the project area are included in **SPR BIO-1**. The project area is within the Lake Elsinore and Temescal Valley plan areas of the MSHCP and is adjacent to CNF, a core conservation area of the MSHCP. The project area does not include any public or quasi-public lands (PQP).

For the EFCFB project under the Cal VTP EIR to be consistent with the MSHCP, and consistent with **SPR AD-3**, the following **Project Specific Requirements** (PSRs) will be implemented:

PSR BIO-1: For each participating landowner parcel, the RCA MSHCP Information will be consulted (RCA Information Map) and survey requirements addressed. If suitable habitat is present, protocol species surveys will be completed prior to project implementation. Note that the project area includes part of 7 MSHCP Criteria Cells that include portions of 8 parcels in the EFCFB project. Under this Project Specific Requirement, surveys for criteria area species will be identified and addressed.

PSR BIO-2: Results for surveys on all parcels will be reported to the RCA, the MSHCP administrating agency so that presence and negative survey areas can be recorded. Presence of special status species will also be reported to the CNDDB.

To conserve Riparian/Riverine and Vernal Pool habitat (6.1.2 of Implementation Structure (RC TLMA 2003)), **SPR BIO 1, 3, 4, 7 and 10** apply. Covered species with the potential to occur in the project area are included in the analysis in addition to any other expected special status plant (Table 1) or animal species (Tables 2, 3, 4 and Crotch bumble bee). Riparian areas are specifically analyzed along with state and federally protected wetlands. See Impact Bio-3 and Bio-4 discussions, above.

To protect narrow endemic plant species (6.1.3 of Implementation Structure (RC TLMA 2003)), all covered MSHCP plant species potentially in the project area are included in Table 1 (See BIO Impact 1 discussion, above). **PSR BIO-1** ensures that MSHCP narrow endemic plant species are identified for parcel-level surveys. Special status plant species (MM BIO-1a and 1b) will be flagged and avoided during treatments if recorded. The following SPRs also apply: **SPR BIO-1** (review and survey project-specific biological resources), **SPR BIO-2** (require biological resource training for workers), **SPR BIO-3** (survey natural communities and other sensitive habitats), **SPR BIO-4** (design treatments to avoid loss or degradation of riparian habitat), **SPR BIO-5** (avoid environmental effects of type conversion and maintain habitat function in chaparral and coastal sage scrub), **SPR BIO-6** (prevent the spread of plant pathogens), **SPR BIO-7 (survey for special status plants)** and **SPR BIO-9** (prevent spread of invasive plants, noxious weeds and invasive wildlife).

To address the Urban/Wildlands Interface (6.1.4 Urban/Wildlands Interface of Implementation Structure (RC TLMA 2003)):

- a. Drainage Measures to protect the habitat value and biological resources within the project area from changes in water run-off and associated issues are covered by the following SPRs of the CalVTP EIR: **SPR HYD-1** (comply with water quality regulations), **SPR HYD-2** (protect existing drainage systems), **SPR HYD-4** (identify and protect watercourse and lake protection zones) **SPR HYD-5** (protect non-target vegetation and special status species from herbicides), **SPR GEO-3** (stabilize disturbed soil areas), **SPR GEO-4** (conduct erosion monitoring), **SPR GEO-5** (drain stormwater via water breaks), **SPR GEO-7** (minimize erosion) and **SPR BIO-2** (conduct biological resource training for workers).
- b. Toxics - Project requirements to prevent discharge of any chemicals used in the project outside of the project boundaries included: **SPR HYD-1** (comply with water quality regulations), **SPR HYD-2** (protect existing drainage systems), **SPR BIO-2** (conduct biological resource training for workers), **SPR HAZ-5** (prepare a spill prevention and response plan), **SPR HAZ-6** (comply with herbicide

application regulations). **SPR HAZ-8** (minimize herbicide drift to public areas) and **SPR HAZ-9** (notify public of herbicide use in vicinity of public areas).

- c. **Lighting** - Project will be implemented during daytime hours. In addition, the following standard project requirements apply: **SPR AD-6** (notify public of treatment projects 3 days prior to initiation) and **SPR NOI-1** (limit heavy equipment to daytime hours).
- d. **Noise** - To control noise generated by project implementation, these standard project requirements apply: **SPR NOI-1** (limit heavy equipment use to daytime hours), **SPR NOI-2** (maintain equipment), **SPR NOI-3** (close engine shrouds during operation), **SPR NOI-4** (locate staging areas away from noise-sensitive land uses), **SPR NOI-5** (restrict equipment idle time), **SPR BIO-2** (conduct biological resource training for workers) and **SPR BIO-12** (protect common nesting birds, including raptors).
- e. **Invasives** - No landscape planting will be done in this project. To protect the biological resources from further incursion by invasive species, these project specific requirements apply: **SPR BIO-1** (review and survey project-specific biological resources), **SPR BIO-2** (conduct biological resource training for workers) and **SPR BIO-9** (*prevent spread of invasive plants, noxious weeds and invasive wildlife*).
- f. **Barriers** - As the EFCFB project is a vegetation treatment project designed to retain permeability and movement of wildlife species (refer to Impact 5 above) and not a development project and is on private land, no barriers will be installed.
- g. **Grading/Land Development** - The EFCFB project does not include grading or land development. See **SPR HYD-2** (avoid construction of new roads).

With these standard project requirements (SPRs) and project specific requirements (PSRs) of the project, the EFCFB is consistent with the MSHCP and no significant impact would occur.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape but also within the MSHCP constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, the existing regulatory conditions and biological resources present in the areas outside the treatable landscape are the same as those within the treatable landscape; therefore, no significant impact for potential conflicts with the MSHCP would occur. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

SPRs applicable to this impact include: **BIO-1** review and survey project-specific biological resources, **BIO-2** require biological resource training for workers, **BIO-3** survey sensitive natural communities and other sensitive habitats, **BIO-4** design treatment to avoid loss or degradation of riparian habitat function, **BIO-5** avoid environmental effects of type conversion and maintain habitat function in chaparral and coastal sage scrub, **BIO-6** prevent spread of plant pathogens, **BIO-7** survey for special-status plants, **BIO-9** prevent spread of invasive plants, noxious weeds and invasive wildlife, **BIO-10** survey for special-status wildlife and nursery sites, **BIO-12** protect common nesting birds, including raptors, **GEO-3** stabilize disturbed soil areas, **GEO-4** monitor erosion, **GEO-7** minimize erosion, **HAZ-5** Spill Prevention and Response Plan, **HAZ-6** comply with herbicide application regulations, **HAZ-8** minimize Herbicide Drift to Public Areas, **HAZ-9** Notification of Herbicide Use in the Vicinity of Public Areas, **HYD-1** comply with water quality regulations, **HYD-2** avoid construction of new roads, **HYD-4** identify and protect watercourse and lake protection zones, **HYD-5** protect non-target vegetation and special-status species from herbicides, **NOI-1** Limit Heavy Equipment Use to Daytime Hours, **NOI-2** maintain equipment, **NOI-3** close engine shrouds when in operation, **NOI-4** Locate Staging Areas Away from Noise-Sensitive Land Uses, **NOI-5** Restrict Equipment Idle Time and **AD-6** Public Notifications for Treatment Projects. In addition to these SPRs, the following project specific requirements (PSRs) are also included: **SPR-1** For each participating landowner *parcel*, the RCA MSHCP Information will be consulted (RCA Information Map) and survey requirements addressed. If suitable habitat is present; protocol species surveys will be completed prior to project implementation. Note that the project area includes part of 7 MSHCP Criteria Cells that include portions of 8 parcels in the EFCFB project. Under this PSR, surveys for criteria area species will be identified and addressed and **PSR BIO-2**: Results for surveys on ALL parcels will be reported to the RCA, the MSHCP administering agency so that presence and negative survey areas can be recorded. Presence of special status species will also be reported to the CNDDB. With implementation of these SPRs and PSRs, this determination of no significant impact is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

**** Note that for the EFCFB project, under the CalVTP EIR, consistency with MSHCP does NOT apply to ANY future development projects for any parcel. *****

New Biological Resource Impacts

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. 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 PEIR (refer to Section 3.6.1, "Environmental Setting," and Section 3.6.2, "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment 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 PEIR analysis. 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 biological resources would occur.

5.6 GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	LTS	Impact GEO-1, pp. 3.7-26 – 3.7-29	Yes	GEO-1 thru GEO-8, AQ-3 & AQ-4	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	GEO-1 thru GEO-4, GEO-7 & GEO-8 HYD-3 & HYD-4	NA	LTS	No	Yes

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

New Geology, Soils, Paleontology, and Mineral Resource Impacts: Would the treatment result in other impacts to geology, soils, paleontology, and mineral resources that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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Discussion

The proposed project is located on the eastern flank of the Santa Ana Mountains, near the base of the slope. The NRCS Soils Report (Attachment E) reflects a complex of soils within the project area. Cieneba-rock outcrop complex, Friant fine sandy loam, Soboba cobbly loamy sandy, and Hanford sandy loam are the dominant soils, representing over two-thirds of the project area. The Potential Erosion Hazard rating ranges from slight to severe. Overall, approximately 40% of the project area has a severe erosion hazard rating, 22% has a moderate rating, 31% has a slight rating, and the remaining area is unrated. The erosion hazard rating is based on landscapes disturbance where 50-75% of the surface has been exposed through various treatment activities, such as vegetation removal. The Mechanical Site Preparation (Surface) ratings range from well suited to unsuitable. Approximately 45% of the area is rated as unsuitable for mechanical operations, 16% rated as well suited, 20% rated as moderately suited, 12% as poorly suited, and the remaining area is unrated. The soils report indicates that erosion is likely unless erosion control measures are applied. The fuel reduction prescription identifies 40-60% removal of vegetation balanced with the retention of healthy plants in a mosaic pattern. The prescription is adjusted based on slope steepness, soil conditions, retaining root structures, limiting mechanical operations (mastication) to suitable locations, dispersing chips or shredded material over bare soils, and installing water-break, all of which are consistent with best management practices to minimize soil erosion.

Impact GEO-1 - Less Than Significant

Treatment activities include manual and mechanical treatments, herbivory, and prescribed pile burning. Manual and mechanical treatment activities and herbivory would result in the removal of vegetation and soils disturbance. Prescribed pile burning to dispose of cut vegetation would also result in soils disturbance. The fuel reduction prescription calls for a 40-60% reduction of hazardous vegetation in a mosaic pattern. For manual and mechanical treatments, cut vegetation is chipped or masticated, and the chips or shredded material is rebroadcast back over bare soil areas with a depth of 3 inches or less. Herbivory and prescribed pile burning would be used in isolated locations to support or work with manual or mechanical treatment activities. Mechanical operations (heavy equipment) would be limited to slopes less than 50%, manual treatment would be limited to slopes less than 65%, and 65% or higher slopes are "no work zones."

The potential for these activities to cause substantial erosion or loss of topsoil was examined in the PEIR. The project proponent would apply **SPR AQ-3, AQ-4, GEO-1 thru GEO-8** to reduce soil erosion. **AQ-3** requires a burn plan prepared by a qualified technician or certified State burn boss. **AQ-4** directs the project to implement dust

management measures. **GEO-1** directs suspending fuels treatment activities (mechanical, manual, herbivory, and herbicide application) when the National Weather Service forecasts a chance (30% or more) of precipitation within 24 hours. **GEO-2** restricts high-ground pressure vehicles from operating on saturated soil conditions. **GEO-3** instructs for stabilizing disturbed soils by applying mulch over exposed soils. **GEO-4** requires an inspection of the treatment area to determine that erosion control SPRs and mitigations were installed correctly before the first rainy season. If not, then corrections shall be made prior to the rain event. **GEO-5** guides the installation of water breaks according to the waterbreak section in the California Forest Practice Rule (FPR) - Section 914.5.6(c). If waterbreaks are ineffective, then other erosion control measures would be instated as needed to maintain topsoils. **GEO-6** limits the size of burn piles not to exceed 20 feet in length, width, or diameter or on the contour to minimize damage to soils. **GEO-7** prohibits heavy equipment (mechanical operations) from operating on steep slopes greater than 50% for erosion hazard rating of high or extreme. Herbivory practices would not be used in areas with slopes steeper than 50% slope. **GEO-8** directs for evaluating treatment areas for slopes greater than 50% for unstable areas by a RPF or licensed geologist (PG or CEG). To the greatest extent feasible, steep slopes with unstable areas would be avoided.

The potential of the proposed project to result in the substantial erosion or loss of topsoil is within the scope of the PEIR analysis as the soils conditions within the project area essentially are the same outside the treatable landscape and the treatment activities (type and use of equipment, extend of vegetation removal, and isolated application of prescribed pile burning) are consistent with the analysis in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of causing substantial erosion or loss of topsoil is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact GEO-2 - Less Than Significant

Treatment activities include manual and mechanical treatments, herbivory, and prescribed pile burning. Manual and mechanical treatment activities and herbivory would result in the removal of vegetation and soils disturbance on steep slopes, but treatment activities would be limited to 65% or less. Waterbreaks would be installed before the rainy season, and monitoring would occur during rain events to evaluate the effectiveness of the waterbreaks. There are no recorded landslides within or adjacent to the proposed project (CSG, Reported Landslide California – via the interactive map viewer).

The potential for these activities to increase the risk of landslides was examined in the PEIR. The project proponent would apply **SPR GEO-1 thru GEO-4, GEO-7 and GEO-8, HYD-3, and HYD-4** to minimize the risk of landslides. The standard project requirements **GEO-1 thru GEO-4 and GEO-7 and GEO-8** are described above. **HYD-3** directs herbivory practices herded out of areas if accelerated soil erosion occurs. **HYD-4** directs to protect watercourses per the WLPZ section in the FPR – Section 916.5.

The potential of the proposed project to result in the increased risk of landslides is within the scope of the PEIR analysis as the soils conditions within the project area essentially are the same outside the treatable landscape and the treatment activities (type and use of equipment, extend of vegetation removal, and isolated application of prescribed pile burning) are consistent with the analysis in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of increasing the risk of landslides is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Geology, Soils, Paleontology, and Mineral Resources Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.7.1 "Environmental Setting" and Section 3.7.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented 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 PEIR analysis. No changed circumstances are

present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts to geology, soils, or minerals resources would occur that are not covered in the PEIR.

5.7 GREENHOUSE GAS EMISSIONS (GHG)

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs	LTS	Impact GHG-1, pp. 3.8-10 – 3.8-11	Yes	N/A	N/A	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	PS	Impact GHG-2, pp. 3.8-11 – 3.8-17	Yes	AQ-3	MM-GHG-2	SU	No	Yes

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

New GHG Emissions Impacts: Would the treatment result in other impacts to GHG emissions that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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Discussion

Impact GHG-1- Less Than Significant

The proposed project involves using various types of equipment, vehicles, handheld power tools, and potentially using prescribed fire to burn piles. The use of equipment, vehicles, handheld power tools, and implementing prescribed burning would result in GHG emissions.

The potential of the treatment activities to conflict with an applicable plan, policy, or regulations related to reducing GHG emissions was examined in the PEIR. Since the proposed project is not subject to AB 1504 as a registered carbon offset project, SPR GHG-1 is not applicable practice.

The potential of the proposed project to result in conflicts applicable plan, policy, or regulation for reducing GHG emissions is within the scope of the PEIR analysis, as the plans, policies, and regulations relevant to GHG reduction are essentially the same within and outside the treatable landscape, and proposed treatment activities in terms of GHG emissions from equipment and duration of use, are consistent with the associated activities analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to consistency with applicable plans, policies, and regulations regarding GHG reduction is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact.

Impact GHG-2 - Significant and Unavoidable

The treatment activities require equipment, vehicles, handheld power tools and include using prescribed pile burning. These treatment activities would result in GHG emissions. Priority is placed on chipping or masticating most of the biomass and utilizing prescribed pile burning operations as the last option for biomass disposal.

The potential for treatment activities to generate GHG emissions was examined in the PEIR. The project proponent would apply **SPR AQ-3** and **MM GHG-2** to reduce GHG emissions related to prescribed burning. **MM-GHG-2** directs the planning and implementing prescribed burning operations to incorporate feasible methods for reducing GHG emissions. **MM-GHG-2** works in conjunction with **AQ-3** and directs that the burn plan includes feasible GHG reductions techniques.

The potential of the proposed project to result in generating GHG from implementing the treatment activities is within the scope of the PEIR analysis, as GHG emissions are essentially the same within and outside the treatable landscape, and proposed treatment activities in terms of GHG emissions from equipment and duration of use, are consistent with the associated activities analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to GHG emissions is significant and unavoidable. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Impacts Related to GHG Emissions

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.8.1 "Environmental Setting" and Section 3.8.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented 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 PEIR analysis. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts from GHG emissions would occur that are not covered in the PEIR.

5.8 ENERGY RESOURCES

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

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

New Energy Resource Impacts: Would the treatment result in other impacts to energy resources that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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Discussion

Impact ENG-1 - Less Than Significant

The treatment activities require the use of various types of vehicles and mechanical equipment. Vehicles and equipment use fossil fuels which results in the consumption of energy resources. The potential for treatment activities to result in wasteful use of fossil fuels was examined in the PEIR. There are no SPRs or MM practices applicable to this impact. The potential of the proposed project to result in wasteful use of fossil fuel from implementing the treatment activities is within the scope of the PEIR analysis, as the consumption of energy resources are essentially the same within and outside the treatable landscape, and the proposed treatment activities, in terms of use of energy for equipment and duration of use, are consistent with the associated activities analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to GHG emissions is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Energy Resource Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.9.1 "Environmental Setting" and Section 3.9.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented 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 less than significant and consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts on energy resources would occur that are not covered in the PEIR.

5.9 HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

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

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

New Hazardous Materials, Public Health and Safety Impacts: Would the treatment result in other impacts related to hazardous materials, public health and safety that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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Discussion

Impact HAZ-1 - Less Than Significant

The proposed project includes manual and mechanical treatment activities and prescribed pile burning. These activities would require the transportation, use, and storage of petroleum products (fuels, oils, and lubricants). These products are known hazardous materials that can cause significant health hazards.

The potential for the treatment activities that involve hazardous materials that can cause significant health hazards was examined in the PEIR. The project proponent would apply **SPR-HAZ 1** to minimize leaks and the risk of resultant contaminants from entering the environment. **HAZ-1** requires maintenance of all diesel- and gasoline-powered equipment to the manufacture's specification.

The potential impact is within the scope of the PEIR analysis, as the area within the project boundary, the potential exposure is essentially the same within and outside the treatable landscape. Further, the types of treatment, including equipment and the use of hazardous materials, are consistent with the analysis identified in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of creating a significant health hazard from the use of hazardous material is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact HAZ-2 - Less Than Significant

The proposed project includes the use of herbicides. This activity would require the transportation, use, and storage of various herbicides. The use of herbicides targets invasive or non-native vegetation. Herbicides are known types of products that are known to cause significant health hazards.

The potential for this treatment activity to cause a significant health hazard was examined in the PEIR. The project proponent would apply **SPR-HAZ 5 through SPR HAZ-9** to minimize human exposure leaks and potential health risks. **HAZ-5** requires that a spill prevention and response plan would be prepared before beginning herbicide treatments activities. **HAZ-6** directs the project proponent to coordinate with the Agricultural Commissioner regarding required licenses and permits before implementing herbicide treatment activities. **HAZ-7** instructs that all herbicides and adjuvant containers would be triple rinsed with clean water at an approved site and disposed of rinsate in a batching tank (3 CCR Section 6684). **HAZ-8** indicates that herbicide treatment activities shall minimize drift by applying herbicide application parameters. **HAZ-9** requires notification within or adjacent to public and residential areas within 500 feet. Signs shall be posted at a specified location that shows the pertinent herbicide information prior to the start of the treatment, and notification shall remain posted at least 72 hours after ending the treatment application.

The impact is within the scope of the PEIR analysis, as the area within the project boundary, the potential exposure is essentially the same within and outside the treatable landscape. Further, the types of treatment, including equipment and the use of hazardous materials, are consistent with the analysis identified in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of creating a significant health hazard from the use of herbicides is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact HAZ-3 - Less Than Significant

The proposed project includes manual and mechanical treatments, prescribed pile burning. These activities would generate soil disturbance, which could expose workers or the environment to hazardous materials. Treatment would occur primarily on private property with a few small parcels owned by local flood control or water district properties, where the public does not have access to treatment areas.

The potential for treatment activities to expose workers or the environment to significant hazards from the disturbance of known hazardous materials within the project area was examined in the PEIR. There are no applicable SPRs for this impact. **MM HAZ-3** applies and directs the review of the Hazardous Waste and Substance Site List (Cortese) (www.envirostor.dtsc.ca.gov/public/). Consistent with **MM HAZ-3**, the review of the Cortese List reflects no known hazardous material sites within the proposed project area and the closest known site is over 5 miles north of the project in the City of Corona.

The impact is within the scope of the PEIR analysis, as the area within the project boundary, the potential exposure is essentially the same within and outside the treatable landscape. Further, the types of treatment, including equipment and the use of hazardous materials, are consistent with the analysis identified in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of exposing the public or environment to significant hazards from disturbance to known hazardous material sites is less than significant. While the PEIR identifies the impact as potentially significant, the results of the site-specific analysis indicate that the impact is less than significant. Therefore, the proposed project is consistent with and within the scope of the PEIR. The impact is less than significant. Therefore, the determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Hazardous Materials, Public Health and Safety Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.10.1 "Environmental Setting" and Section 3.10.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented 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 PEIR analysis. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts related to hazardous materials, public health, and safety would occur that are not covered in the PEIR.

5.10 HYDROLOGY AND WATER QUALITY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning	LTS	Impact HYD-1, pp. 3.11-25 – 3.11-27	Yes	AQ-3, GEO-4, GEO-6, HYD-4	NA	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	AQ-3, BIO-1, GEO-4, GEO-6, HAZ-1, HYD-2, HYD-4	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	Yes	BIO-1, GEO-1, GEO-4, GEO-7, GEO-8, HAZ-1, HYD-3, HYD-4	NA	LTS	No	Yes
Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides	LTS	Impact HYD-4, pp. 3.11-30 – 3.11-31	Yes	BIO-4, GEO-1, HAZ-5, HAZ-6, HYD-2, HYD-4	NA	LTS	No	Yes
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-31	Yes	GEO-1, GEO-2, GEO-5, HYD-2, HYD-4, HYD-6	NA	LTS	No	Yes

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

New Hydrology and Water Quality Impacts: Would the treatment result in other impacts to hydrology and water quality that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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Discussion

The climate in southern California is characterized as a Mediterranean climate, with warm to hot and dry summers and cool, wet winters. Rainfall may occur from late October to late April, although the rainfall events are variable, and precipitation occurs in relatively few events. Occasionally, subtropical moisture occurs during the summer

months that may produce thunderstorms at higher elevations and cause flash floods at lower elevations. Mean annual rainfall is around 18 inches, but drought conditions have prevailed over the last few years.

The proposed project is located within the South Coast hydrological region. Twenty-eight (28) blue-lined streams and over a hundred ravines bisect the project. Most streams and ravines are dry and flow stormwater during rain events. Also, the proposed project is located about ½ mile west of Lake Elsinore. Lake Elsinore is an impaired water body (Clean Water Act - Section 303(d), and it is the only impaired water body within proximity of the project. Between the project area and the lake is a developed community area with paved roads and drainage structures.

According to the California Wetland GIS data, the fuel break spans across or adjacent to 28 streams (classified as Freshwater Ponds or Freshwater Forested/Shrub Wetland). The fuel break also spans across or adjacent to 135 dry ravines. The PEIR utilizes stream protection measures according to California Forest Practice Rules regarding Watercourse and Lake Protection Zone (WLPZ) regulations. The classification for streams within the proposed project area fit into Class II, III, or IV ratings, while dry ravines fit into Class IV or swales ratings.

Administratively, the proposed project is in the Santa Ana Regional Water Quality Control Board (SARWQCB) service area, the Santa Ana Watershed Project Authority planning area, and the Western Municipal Water District. Riverside County Flood Control maintains flood control drainage structures within the project area. SARWQCB does not offer or require Waste Discharge Requirements or waivers for vegetation management projects within their jurisdiction.

Impact HYD-1 - Less Than Significant

The proposed project includes prescribed pile burning. This treatment activity is the last option for the disposal of cut vegetation in isolated areas where chipping or masticating is not feasible. In general, isolated areas would be located midslope and away from water resources, such as watercourses, lakes, ponds, and wetlands. During rain events, ash and debris from pile burning could be carried in surface runoff into drainages and streams.

The potential for prescribed pile burning to cause runoff and violate water quality standards, regulations, or conflict with plans was examined in the PEIR. The project proponent would apply **SPR AQ-3, GEO-4, GEO-6, and HYD-4**. **AQ-3** requires a burn plan prepared by a qualified technician or certified State burn boss. **GEO-4** requires an inspection of the treatment area to determine that erosion control SPRs and mitigations were installed correctly before the first rainy season. **GEO-6** limits the size of burn piles not to exceed 20 feet in length, width, or diameter or on the contour to minimize damage to soils. **HYD-4** directs protecting water resources using the WLPZ on either side of the resources are defined in 12 CCR Section 916.5 of the FPR. WLPZs are classified based on the uses of the stream and the presence of aquatic life. Protection measures for WLPZ Class I-II would range from 50 feet to 150 feet, and WLPZ- Class IV would range from 25 feet to 50 feet. **HYD-3** outlines water quality protection measures related to prescribed herbivory.

The impact is within the scope of the PEIR analysis, as the area within the project boundary, the potential exposure is essentially the same within and outside the treatable landscape. Further, the type of treatment, including equipment to support prescribed pile burning, is consistent with the analysis identified in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of violating water quality standards, regulations, or conflict with plans from prescribed pile burning is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact HYD-2 - Less Than Significant

The proposed project would include manual and mechanical treatments. The fuel reduction prescription removes 40-60% of the vegetation and retains healthy vegetation in a mosaic pattern. Cut vegetation may be chipped or masticated material and dispersed over bare soils to a depth of 3 inches or less to protect soils.

The potential for this treatment to violate water quality standards, regulations, or conflict with plans was examined in the PEIR. The project proponent would apply **SPR AQ-3, BIO-1, GEO-4, GEO-6, HAZ-1, HYD-2, and HYD-4**. Therefore, the proposed project is consistent with and within the scope of the PEIR. **AQ-3** requires, for prescribed pile burning, a burn plan prepared by a qualified technician or certified State burn boss. **BIO-1** requires a qualified RPF or biologist to conduct a data review and a reconnaissance level survey prior to treatment. **GEO-4** requires an

inspection of the treatment area to determine that erosion control SPRs and mitigations were installed correctly before the first rainy season. If not, then corrections shall be made prior to the rain event. **GEO-6** limits the size of burn piles not to exceed 20 feet in length, width, or diameter or on the contour to minimize damage to soils. **HAZ-1** requires maintenance of all diesel- and gasoline-powered equipment to the manufacturer's specification. **HYD-2** avoids construction or reconstruction of roads. **HYD-4** directs protecting water resources using the WLPZ on either side of the resources are defined in 12 CCR Section 916.5 of the FPR. WLPZs are classified based on the uses of the stream and the presence of aquatic life. Protection measures for WLPZ Class I-II would range from 50 feet to 150 feet, and WLPZ- Class IV would range from 25 feet to 50 feet.

The impact is within the scope of the PEIR analysis, as the area within the project boundary, the potential exposure is essentially the same within and outside the treatable landscape. Further, the types of treatment, including equipment, work locations, and the duration of activities, is consistent with the analysis identified in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of violating water quality standards, regulations, or conflict with plans from manual or mechanical treatment activities is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact HYD-3 - Less Than Significant

The proposed project includes herbivory. This treatment activity utilizes animals to graze on vegetation to treat vegetation. Grazing animals, allowed to move freely, tend to move towards water sources and nutrient-rich vegetation near water sources. Grazing could result in overconsumption or denuding vegetation or soil compaction or erosion, leading to soil and water quality impacts. The accumulation of manure and urine in one area could lead to the runoff of nutrients and pathogens into water sources. Active herding, fencing, providing alternative water sources, and monitoring are common best management strategies to manage grazing animals.

The potential for this treatment to violate water quality standards, regulations, or conflict with plans was examined in the PEIR. The project proponent would apply **SPR BIO-1, GEO-1, GEO-4, GEO-7, GEO-8, HAZ-1, HYD-3, and HYD-4**. Therefore, the proposed project is consistent with and within the scope of the PEIR. **BIO-1** requires a qualified RPF or biologist to conduct a data review and a reconnaissance level survey prior to treatment. **GEO-1** directs suspending fuels treatment activities (mechanical, manual, herbivory, and herbicide application) when the National Weather Service generates a forecast for a chance (30% or more) of precipitation within 24 hours. **GEO-4** requires an inspection of the treatment area to determine that erosion control SPRs and mitigations were installed correctly before the first rainy season. If not, then corrections shall be made prior to the rain event. **GEO-7** prohibits heavy equipment (mechanical operations) from operating on steep slopes greater than 50% for erosion hazard rating of high or extreme. Herbivory practices would not be used in areas with slopes steeper than 50% slope. **GEO-8** directs for evaluating treatment areas for slopes greater than 50% for unstable areas by a RPF or licensed geologist (PG or CEG). To the greatest extent feasible, steep slopes with unstable areas would be avoided. **HAZ-1** requires maintenance of all diesel- and gasoline-powered equipment to the manufacturer's specification. **HYD-4** directs protecting water resources using the WLPZ on either side of the resources are defined in 12 CCR Section 916.5 of the FPR. WLPZs are classified based on the uses of the stream and the presence of aquatic life. Protection measures for WLPZ Class I-II would range from 50 feet to 150 feet, and WLPZ- Class IV would range from 25 feet to 50 feet.

The impact is within the scope of the PEIR analysis, as the area within the boundary of the project area, the potential exposure is essentially the same within and outside the treatable landscape. Further, the herbivory treatment, including types of grazing animals, grazing sites, and the duration of activities, is consistent with the analysis identified in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of violating water quality standards, regulations, or conflict with plans from herbivory activities is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact HYD-4 - Less Than Significant

The proposed project includes herbicides. This treatment activity would apply in limited locations to reduce or manage invasive or non-native species. The application of herbicides could impact water sources through direct contact, runoff, drift, leaching, misapplication, or spills.

The potential for this treatment to violate water quality standards, regulations, or conflict with plans was examined in the PEIR. The project proponent would apply **SPR BIO-4, GEO-1, HAZ-5, HAZ-6, and HYD-4**. **BIO-4** directs that the design of the treatment avoids loss or degradation of riparian habitat function. It further indicates that only hand application of herbicides, approved for aquatic environments, would be allowed and only during low flow periods or when seasonal streams are dry. **GEO-1** directs suspending fuels treatment activities (mechanical, manual, herbivory, and herbicide application) when the National Weather Service generates a forecast for a chance (30% or more) of precipitation within 24 hours. **HAZ-5** requires that a spill prevention and response plan would be prepared before beginning herbicide treatments activities. **HAZ-6** directs the project proponent to coordinate with the Agricultural Commissioner regarding required licenses and permits before implementing herbicide treatment activities. **HYD-4** directs protecting water resources using the WLPZ on either side of the resources are defined in 12 CCR Section 916.5 of the FPR. WLPZs are classified based on the uses of the stream and the presence of aquatic life. Protection measures for WLPZ Class I-II would range from 50 feet to 150 feet, and WLPZ- Class IV would range from 25 feet to 50 feet.

The impact is within the scope of the PEIR analysis, as the area within the project, the potential exposure is essentially the same within and outside the treatable landscape. Further, the herbicide application, including types of grazing animals, grazing sites, and the duration of activities, is consistent with the analysis identified in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of violating water quality standards, regulations, or conflict with plans from the ground-based application of herbicides is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact HYD-5 - Less Than Significant

The proposed project involves manual, mechanical, herbivory treatment activities. These treatment activities could alter the existing drainage pattern within the treatment area. The fuel reduction prescription, retention of healthy plants, mulching bare soils with chips or shredded material, and waterbreaks are activities consistent with best management practices to minimize the substantial altering of existing drainage patterns.

The potential for this treatment to violate water quality standards, regulations, or conflict with plans was examined in the PEIR. The impact is within the scope of the PEIR, as the area within the boundary of the project area, the potential exposure is essentially the same within and outside the treatable landscape. Further, the treatment activities, including types of equipment and duration of activities, are consistent with the analysis identified in the PEIR. The project proponent would apply **SPR GEO-1, GEO-2, GEO-5, HYD-2, HYD-4 and HYD-6**. Therefore, the proposed project is consistent with and within the scope of the PEIR analysis. **GEO-1, GEO-2, HYD-2 and HYD-4** are described above. **GEO-5** guides the installation of water breaks according to the waterbreak section in the California Forest Practice Rule (FPR) - Section 914.5.6(c). If waterbreaks are ineffective, then other erosion control measures would be instated as needed to maintain topsoils. **HYD-6** directs protecting existing stormwater drainage systems would be marked before initiating treatment operations to avoid disturbance.

The impact is within the scope of the PEIR analysis, as the area within the boundary of the project area, the potential exposure is essentially the same within and outside the treatable landscape. Further, the treatment activities, including types of equipment and duration of activities, are consistent with the analysis identified in the PEIR.

The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of substantially altering the existing drainage pattern within the treatment area is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Hydrology and Water Quality Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.11.1 "Environmental Setting" and Section 3.11.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of

the project area, the existing environmental and regulatory conditions presented 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 PEIR analysis. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts related to hydrology and water quality would occur that are not covered in the PEIR.

5.11 LAND USE AND PLANNING, POPULATION AND HOUSING

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

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

New Land Use and Planning, Population and Housing Impacts: Would the treatment result in other impacts to land use and planning, population and housing that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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Discussion

The proposed project mainly would occur on private property, and county flood control and water district properties. Most of the proposed project would occur within the SRA, which is within CAL FIRE jurisdiction for wildland protection. The southern portion of the proposed project would occur within LRA for the City of Wildomar and the City of Lake Elsinore. RVC provides fire protection services for rural areas of Riverside County and provides contract fire protection services for these two cities.

The following plans, policies and ordinances that would be relevant to the proposed project. The proposed project would not result in any inconsistency or incompatibility with the applicable land use policies.

1. Riverside County General Plan Safety Element:

- **Fire Hazard:** The proposed project site is primarily situated in the County of Riverside, with portions of the project occurring within the City of Wildomar, the City of Lake Elsinore. Highly flammable vegetation exists across jurisdictional boundaries on hillside terrain and is within the Very High Fire Hazard Severity Zone. As such, the area has substantial fire risk.
 - S 5.2 -- Encourage continued operation of programs for fuel breaks, brush management, controlled burning, revegetation and fire roads.
 - S 5.3 -- Monitor fire-prevention measures (such as fuel reduction) through a site specific fire-prevention plan to reduce long-term fire risks in the Very High Fire Hazard Severity Zones.
 - S 5.9 -- Reduce fire threat and strengthen fire-fighting capability so that the County could Successfully respond to multiple fires. (AI 88).
- **Elsinore Lake Area Plan:**
 - ELAP 19.1 -- Protect life and property from wildfire hazards through adherence to the Fire Hazards section of the General Plan Safety Element.
- **Temescal Canyon Area Plan:**

TCAP 21.1 -- Protect life and property from wildfire hazards through adherence to the Fire Hazards section of the General Plan Safety Element.

2. Western Riverside County Multiple Species Habitat Conservation Plan

- Section 6.4 Fuels Management
 - The proposed project is situated directly adjacent to WUI. Conserved lands are excluded from the proposed project.

3. Riverside County: Climate Action Plan

- Section 4.7 R2 Solid Waste Measure (page 4-15) -- GHG emissions from unincorporated area of Riverside County's solid waste generation are the third emission source of the total community emissions in 2017 (LSA 2018).
 - The proposed project would not dispose of greenwaste through the county solid waste services (landfills). Most of the greenwaste (95%) would remain on-site as chipped or masticated material.
- R2-S1: Reduce Waste to Landfills -- According to 2014 Statewide Waste Characterization data (CalRecycle 2015), much of the waste disposed in landfills is readily recyclable. Increasing the recovery of recyclable materials will directly reduce GHG emissions
 - The proposed project potentially would allow off-site removal of greenwaste, which would be limited to 5% or less of the treated vegetation. Disposal of greenwaste is restricted to approved Green Woody Waste Recyclers.

4. Riverside County Ordinance 787

- 104.1.1 Authority of the Fire Chief and Fire Department.

1. The Fire Chief is authorized and directed to enforce all applicable State fire laws and provisions of this ordinance and to perform such duties as directed by the Riverside County Board of Supervisors.

2. The Fire Chief is authorized to administer, interpret and enforce this ordinance. Under the Fire Chief's direction, the Riverside County Fire Department is authorized to enforce ordinances of Riverside County pertaining to the following:

2.1. The prevention of fires.

2.6. The maintenance of fire protection and the elimination of fire hazards on land, in buildings, structures and other property, including those under construction.

Impact LU-1 - Less Than Significant

The treatment activities would involve manual and mechanical treatment, herbivory, herbicide, and prescribed pile burning. The treatment area would occur mainly on private property and on county flood control and water district parcels. As the lead local agency, the project proponent must comply with local plans, policies and regulations.

The potential for the proposed project to result in significant environmental impacts due to a conflict with a land use plan, policy, or regulations was examined in the PEIR. The project proponent would apply **SPR AD-3** to ensure that the proposed project does not conflict with local land use plans, policies and regulations.

The potential of the proposed project to result in land use conflicts that would cause significant environmental impact is within the scope of the PEIR analysis as the land use conditions within the project area essentially are the same

outside the treatable landscape and the treatment type and the treatment activities are consistent with the analysis in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to causing a significant environmental impact due to conflicts with a land use plan, policy or regulation is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact LU-2 - Less Than Significant

The proposed project involves manual and mechanical treatments. During the initial and peak operational period, mechanical treatment would involve 2-5 workers per day, and manual treatment would involve 15-50 workers per day. The number of workers is slightly higher than the number of workers identified in the PEIR; however, manual treatment workers would be managed into smaller units (handcrews) and assigned to different sections of the project area. Typically, a handcrew is an organized group of 12-20 workers with a crew leader. For any given portion of the proposed project, the operational work period would range from 1-10 days during the initial treatment phase and 1-3 days during the maintenance phase. After completing the work in one area, the crews would move to the next treatment section. The proposed project would generate the highest demand for temporary workers during the initial treatment phase and lesser demand for temporary workers during the maintenance phase of the project. Potentially, the workforce would be a mixture of temporary local workers and non-local workers. This amount of workers would not induce significant population growth.

The potential for the proposed project to cause substantial population growth and thereby increase the demand for housing was examined in the PEIR. There are no SPRs or MMs for this impact. The potential for the proposed project to result in a substantial population and increase in the demand for housing is within the scope of the PEIR analysis as the population, and housing demands conditions, essentially are the same within and outside the CAL VTP treatable landscape. Further, the number of workers managed as handcrew units is consistent with the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to inducing substantial unplanned population growth is also less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Land Use and Planning, Population and Housing Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.12.1 "Environmental Setting" and Section 3.12.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented 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 PEIR. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts to land use and planning, population, and housing would occur that are not covered in the PEIR.

5.12 NOISE

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

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

New Noise Impacts: Would the treatment result in other noise-related impacts that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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Discussion

Although the County is exempt, the proposed project would voluntarily comply with Riverside County's Noise Ordinance (Ord. 847). Treatment activities would occur Monday – Saturday between 8:00 a.m. – 5:00 p.m. When and where feasible, start times could be adjusted to start at 7:00 am.

Impact NOI-1 - Less Than Significant

The treatment activities would include equipment, vehicles, and handheld power tools. These activities generate noise. Portions of the treatment area are adjacent to developed areas that include residential areas, worship facilities, equestrian areas, and schools. Consistent with the grant funding source, project signs would be posted to inform the public about the project.

The potential short-term increase in ambient noise was examined in the PEIR. The project proponent would apply **SPR AD-3, SPR NOI 1 through NOI 6** to reduce noise exposure generated by the vegetation treatment activities. Consistent with **AD-3 and NOI-1**, Riverside County's Noise Ordinance (Ord. 847) limits construction noise. Treatment activities would occur Monday – Saturday between 7:00 a.m. – 5:00 p.m. Duration of the noise may range from 1 to 10 days for any given area within the treatment area. Due to mandatory work breaks and lunch breaks, a break in the noise would occur throughout the workday. **NOI-2** specifically addresses that all equipment, vehicles, and power tools, are expected to be used and maintained according to manufacturers' specifications. **NOI-3** requires engine shrouds to be closed during operations. **NOI-4** indicates that staging areas, where feasible, shall be located away from noise-sensitive areas. **NOI-5** limits the idle time for motorized equipment to 5 minutes or shut down when not in use. **NOI-6** requires notifying nearby noise-sensitive receptors before beginning operations. These conditions are within the scope of the PEIR analysis and implementation of the SPRs would result in a less-than-significant impact.

The impact generated from the short-term increase in ambient noise is within the scope of the PEIR analysis, as the noise exposure potential is essentially the same within and outside the treatable landscape, and the number and type of equipment proposed, and the duration of the equipment used, are consistent with those analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to noise impacts is less than significant. The

determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact NOI-2 - Less Than Significant

Treatment activities involve mechanical treatment. Large trucks used to haul heavy equipment, crews, and livestock to and from treatment sites may pass through residential receptors, increasing the single event noise (SENL). Travel to and from the worksite would most likely occur early mornings and after the typical workday. Heavy equipment used to treat vegetation would operate throughout the day.

The potential short-term increase in large trucks generating SENL was examined in the PEIR. The project proponent would apply **SPR NOI-1** to reduce SENL generated by large hauling trucks. **NOI-1** requires notifying noise-sensitive receptors with 1,500 feet of the project area before beginning treatment activities. The notification would list the dates and times of the treatment activities, the name of the representative, and a contact telephone number.

The impact generated from the short-term increase in SENL is within the scope of the PEIR, as the noise exposure potential is essentially the same within and outside the treatable landscape, and the number and type of equipment proposed, and the duration of the equipment used, are consistent with those analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to large trucks generating SENL impacts is also the same as described above. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Noise Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.13.1 "Environmental Setting" and Section 3.13.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented 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 PEIR analysis. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts to noise would occur that are not covered in the PEIR.

5.13 RECREATION

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

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

New Recreation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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Discussion

Impact REC-1 - Less Than Significant

The treatment area occurs primarily on private property and on flood control and local water district properties. There are no public designated trails within the project boundary; however, a few known recreational trails and facilities are adjacent to or within the vicinity of the treatment area. The proposed project would temporarily restrict access to known recreational trails, approximately 1 day to 1 week. The proposed project would not restrict access to known facilities adjacent to the project are located sufficiently outside the treatment area.

The potential for treatment activities to disrupt recreational activities was examined in the PEIR. The project proponent would apply **SPR AD-3** and **REC-1**. **AD-3** directs the project proponent to design and implement the project consistent with local plans and ordinances. **REC-1** requires public notification at least 2-weeks before closing trails or recreational areas.

The impact generated from disrupted recreational activities is within the scope of the PEIR analysis, as the recreational resources and activities are essentially the same within and outside the treatable landscape, and the treatment activities and intensity are consistent with those analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to recreation is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Recreation Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.14.1 "Environmental Setting" and Section 3.14.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented 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 PEIR analysis. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts to recreation would occur that are not covered in the PEIR.

5.14 TRANSPORTATION

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

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

New Transportation Impacts: Would the treatment result in other impacts to transportation that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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Discussion

Impact TRAN-1 - Less Than Significant

The proposed project would temporarily increase vehicular traffic on public and private roads. Grand Avenue would serve as the primary access road. The vast majority of the treatment area would occur on private property. Limited portions of the treatment area would bisect or be located adjacent to a public or private road. The proposed project would expect 4-25 vehicles to transport people and equipment to the treatment area during the implementation phase. Vehicles and equipment would be parked at or directly next to the proposed project area during workday operations. Overnight, vehicles and equipment would be parked at designated staging areas.

The potential for a temporary increase in vehicular traffic to conflict with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures was examined in the PEIR. The project proponent would apply **SPRs AD-3 and TRAN-1** to reduce potential traffic impacts. **AD-3** directs the project proponent to design and implement the project consistent with local plans and ordinances. **TRANS-1** guides the project proponent to coordinate with the transportation department to determine whether a Traffic Management Plan is needed.

The potential for the proposed project to result in temporary traffic impacts by conflicting with a program, plan, ordinance, or policy regarding roadway facilities is within the scope of the PEIR analysis, as the treatment duration and the limited number of vehicles associated with the proposed project are consistent with the analysis identified in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to temporary traffic operation impacts is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact TRAN-2 - Less Than Significant

The proposed project does not construct new roads or modify existing roads. The proposed project includes prescribed pile burning. This treatment activity would produce smoke that could affect visibility near roadways and generate a transportation hazard. The potential for smoke to affect visibility along roadways was examined in the PEIR.

The impact from this treatment activity is within the scope of the PEIR, as the analysis to implement prescribed pile burning is consistent with the PEIR. The project proponent would apply **SPRs AD-3, HYD-2, and TRAN-1** to reduce the potential of a smoke hazard. **AD-3** directs the project proponent to design and implement the project consistent with local plans and ordinances. **HYD-2** avoids construction or reconstruction of roads. **TRANS-1** guides the project proponent to coordinate with the transportation department to determine a TMP is needed.

The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of increased hazards due to design features or incompatible uses is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact TRAN-3 - Less Than Significant

The proposed project would require various vehicles and trucks daily to transport people and equipment to the treatment area during the implementation phase. Manual treatment activities would require 2-4 crew carriers, 2-4 pickup trucks with trailers or chippers, a water tender, a dump truck or a chip van. Mechanical treatment activities would need 1-2 tractor-trailers hauling masticators and 2-3 pickup trucks with support trailers. Herbicide treatment would require 1 pickup truck hauling equipment in the bed of the truck. Herbivory practices require 1-2 trucks hauling grazing animals and 1-2 pickup trucks with trailers. Prescribed pile burning would require a fire engine, a fire crew, a water tender and 1-2 support pickup trucks. Vehicles and trucks would travel from various starting points or home base facilities with the vicinity of the proposed project.

The potential for the proposed project to temporarily increase vehicle miles traveled (VMT) above the baseline was examined in the PEIR. According to the analysis in the PEIR and the Technical Advisory on Evaluating Transportation Impacts published by the Governor's Office of Planning and Research (OPR2018), transportation impacts are evaluated based on the number of trips per day. Since the CalVTP PEIR covers the statewide program, the net VMT is assumed to be greater than 110 trips per day; therefore, the transportation impact was determined as significant and unavoidable for the statewide program. However, the discussion in the Impact TRAN-3 section indicates that an individual vegetation treatment project, evaluated as a later activity, likely would generate fewer than 110 trips per day, which would cause a less-than-significant impact. Even if all the vehicles and trucks listed above were deployed on the same day, the VMT would be less than 110 trips per day. This impact is, therefore, determined to be less than significant. There are no SPRs for this impact, and the MM **AQ-1** is not applicable for this impact.

The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on a net increase in VMT is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Transportation Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.15.1 "Environmental Setting" and Section 3.15.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented 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 PEIR analysis. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant

impact not addressed in the PEIR. Therefore, no new impacts to transportation would occur that are not covered in the PEIR.

5.15 PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

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

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

New Public Services, Utilities and Service System Impacts: Would the treatment result in other impacts to public services, utilities and service systems that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
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Discussion

Impact UTIL-1 - Less Than Significant

The proposed treatment activities include manual and mechanical treatment and herbivory. These activities potentially could generate dust and may require on-site water to control fugitive dust. The proposed project includes prescribed pile burning. If conditions change or the prescribed pile burning is out of the prescription, this activity requires an on-site water supply for fire suppression. These treatment activities, based on need, could provide on-site water by a water truck or fire engine. A local water district is a participant in the project and likely would support the project with a water supply. The potential to need on-site water was examined in the PEIR. There are no SPRs or MMs for this impact.

The impact is within the scope of the activities and impacts addressed in the PEIR, as the proposed project treatments, including the prescribed pile burning, are consistent with the analysis in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact associated with sufficient water supply to support the project is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact UTIL-2 - Less Than Significant

The proposed treatment activities that generate biomass are manual and mechanical treatments. Most of the cut vegetation, biomass, would be chipped or masticated and dispersed over the site. The depth of chipped or masticated material would be limited to 3 inches in depth or less. A lop and scatter practice would be allowed for isolated sites with a height no greater than 6 inches. In isolated locations, biomass may be piled for prescribed pile burning during the wet season. If excessive biomass exceeds the treatment prescription, biomass would be redistributed to other locations within the treatment area. In isolated locations, and as a last option for biomass

disposal, excessive biomass would be transported to a near greenwaste facility. Less than 5% of the biomass would be transported to a nearby greenwaste facility. Disposal of biomass at a solid waste facility (landfill) is not allowed.

The potential to generate solid waste in excess of state standards was examined in the PEIR. The project proponent would apply **SPR AD-3 and UTIL-1**. **AD-3** directs the project proponent to design and implement the project consistent with local plans and ordinances. **UTIL-1** directs the project proponent to prepare a Solid Organic Waste Disposition Plan to guide biomass disposal.

The potential biomass impact is within the scope of activities and impacts identified in the PEIR, as the conditions for removing biomass are consistent with the analysis in the PEIR. Based on the variability of assessing biomass disposal across the state, the determination in the PEIR classified the impact as potentially significant and unavoidable to reflect CEQA's mandate of good faith disclosure of all potential effects. Locally, Riverside County's Waste Management Department reflects the capacity to utilize greenwaste and provides the public with a list of greenwaste recycler facilities. Two facilities are located less than 20 miles from the proposed project area and can accommodate any waste created by the proposed project that needs to be directed to these facilities. Therefore, the impact on solid waste disposal is less than significant. Further, this determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact generated from solid waste in excess of state standards is less than significant. Although this proposed project, as a later activity, reflects a lesser impact than the statewide program, the determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact UTIL-3 – Less Than Significant

The proposed treatment activities, manual and mechanical treatment, generate biomass or solid waste. However, most of the biomass (95% of the biomass) would remain on-site. Potentially, 5% biomass would be deemed excessive and transported to a greenwaste recycler, as identified above in Impact UTIL-2. Disposal of biomass at a solid waste facility (landfill) is not allowed.

The proposed project was evaluated for compliance with the federal, state, and local goals and regulations related to solid waste, as examined in PEIR. The project proponent would apply **UTIL-1** and prepare a Solid Organic Waste Disposition Plan. Two of the facilities are located less than 20 miles from the proposed project area and can accommodate any waste created by the proposed project.

The proposed project reflects compliance with federal, state and local solid waste disposal and that the proposed project is within the scope of activities and impacts identified in the PEIR. Further, the conditions for removing biomass within and outside the treatable landscape and the operational components are consistent with the analysis in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to compliance with federal, state and local goals and regulations regarding solid waste is less than significant. Although this proposed project, as a later activity, reflects a lesser impact than the statewide program, the determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Impacts to Public Services, Utilities and Service Systems

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.16.1 "Environmental Setting" and Section 3.16.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented 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 PEIR analysis. No changed circumstances are

present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts to public services, utilities, and service systems would occur that are not covered in the PEIR.

5.16 WILDFIRE

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

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

New Wildfire Impacts: Would the treatment result in other impacts related to wildfire that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[Identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

Impact WIL-1 - Less Than Significant

The proposed project intends to reduce wildfire risk and provide a strategic location for firefighters to defend the community from a wildfire and minimize the potential of a fire spreading into wildland areas. The treatment activities include manual and mechanical treatments and prescribed pile burning, which are activities that could pose a fire risk and expose people to the uncontrolled spread of a wildfire through a fire spark-ignition from equipment, including hand-held power tools, or an escape from prescribed pile burning.

The potential impact of these activities was examined in the PEIR. The project proponent would apply **SPRs AQ-3, HAZ-2, HAZ-3 and HAZ-4**. **AD-3** directs the project proponent to design and implement the project consistent with local plans and ordinances. **HAZ-2** requires mechanized equipment hand tools to be equipped with federal or state-approved spark arrestors. **HAZ-3** requires a crew using chainsaws to have a fire extinguisher per chainsaw, and each vehicle would be equipped with one long-handled shovel and one axe or pulaski, which is consistent with PRC 4428. **HAZ-4** would also apply to restrict smoking to a designated area, a minimum of a 3-foot diameter area, barren and cleared down to mineral soil. Smoking is prohibited in vegetated areas.

Increased wildfire risk from these treatment activities is within the scope of the PEIR analysis, as wildfire risk of the project area within and outside the treatable landscape is essentially the same, and that the operational component (type of equipment and duration of treatment) of these activities are consistent with the analysis of the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of substantially exacerbated fire risk and expose people to uncontrolled wildfire is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact WIL-2 - Less Than Significant

The treatment activities include manual and mechanical treatments, herbivory, and prescribed pile burning. The results of these activities could expose people or structures to substantial risks related to post-fire flooding or landslides. Although the proposed project is located at the base of the slope, steep slopes are present in the treatment area. The removal of vegetation and prescribed pile burning could result in slope instability. The fuel reduction prescription removes a portion of the vegetation (40-60%), indicating the retention of healthy vegetation. Plant root systems remain in place to retain soil stability. In addition, chipped or masticated biomass would be dispersed over bare soils, which aids in surface soil stability. Prescribed burning would be limited to pile burning in small, isolated sites. Herbivory would be used as short-term activities in isolated sites.

The potential impact of these activities was examined in the PEIR. The impact from these treatment activities is within the scope of the PEIR, as the exposure of people to post-fire flooding and landslides within and outside the treatable landscape is essentially the same, and that the operational component (type of equipment and duration of treatment) of these activities are consistent with the analysis of the PEIR. The project proponent would apply **SPRs AQ-3 and GEO-1 through GEO-8.**

AD-3 directs the project proponent to design and implement the project consistent with local plans and ordinances. **GEO-1** directs suspending fuels treatment activities (mechanical, manual, herbivory, and herbicide application) when the National Weather Service forecasts a chance (30% or more) of precipitation within 24 hours. **GEO-2** restricts high-ground pressure vehicles from operating on saturated soil conditions. **GEO-3** instructs for stabilizing disturbed soils by applying mulch over exposed soils. **GEO-4** requires an inspection of the treatment area to determine that erosion control SPRs and mitigations were installed correctly before the first rainy season. If not, then corrections shall be made prior to the rain event. **GEO-5** guides the installation of water breaks according to the waterbreak section in the California Forest Practice Rule (FPR) - Section 914.5.6(c). If waterbreaks are ineffective, then other erosion control measures would be instated as needed to maintain topsoils. **GEO-6** limits the size of burn piles not to exceed 20 feet in length, width, or diameter or on the contour to minimize damage to soils. **GEO-7** prohibits heavy equipment (mechanical operations) from operating on steep slopes greater than 50% for erosion hazard rating of high or extreme. Herbivory practices would not be used in areas with slopes steeper than 50% slope. **GEO-8** directs for evaluating treatment areas for slopes greater than 50% for unstable areas by a RPF or licensed geologist (PG or CEG). To the greatest extent feasible, steep slopes with unstable areas would be avoided.

Potential exposure of people or structures to substantial risks related to post-fire flooding or landslides from these treatment activities is within the scope of the PEIR, as the risk for landslides is essentially the same within and outside the treatable landscape and severity and duration of the treatment activities are consistent with those analyzed in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of exposing people and structures to substantial risk related to post-fire flooding and landslides is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Impacts to Wildfire

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.17.1 "Environmental Setting" and Section 3.17.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented 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 PEIR analysis. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts related to wildfire would occur that are not covered in the PEIR.

6. CUMULATIVE EFFECTS ANALYSIS

The cumulative impacts were examined in Section 4 of the PEIR and the analysis is incorporated herein. The following table summarizes the cumulative effects of the proposed project.

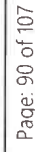
Impact	Type	Cumulative Effects	
		PEIR	Project
Aesthetics		No	No
	MM AES-3	Yes	No
Agricultural		No	No
Air Quality		No	No
	MM AQ-1	Yes	No
Archaeological		No	No
	MM CUL-2	Yes	Yes
Biological		No	No
	MM BIO-2g (Bees)	Yes	Yes
Geology		No	No
Greenhouse		Yes	No
Energy		No	No
Hazardous		No	No
Hydrology		No	No
Land Use		No	No
Noise		No	No
Recreation		No	No
Transportation		No	No
	Related to VMT	Yes	No
Public Service		No	No
	Related to Disposal of Biomass	Yes	No
Wildfire		No	No

7. Maps

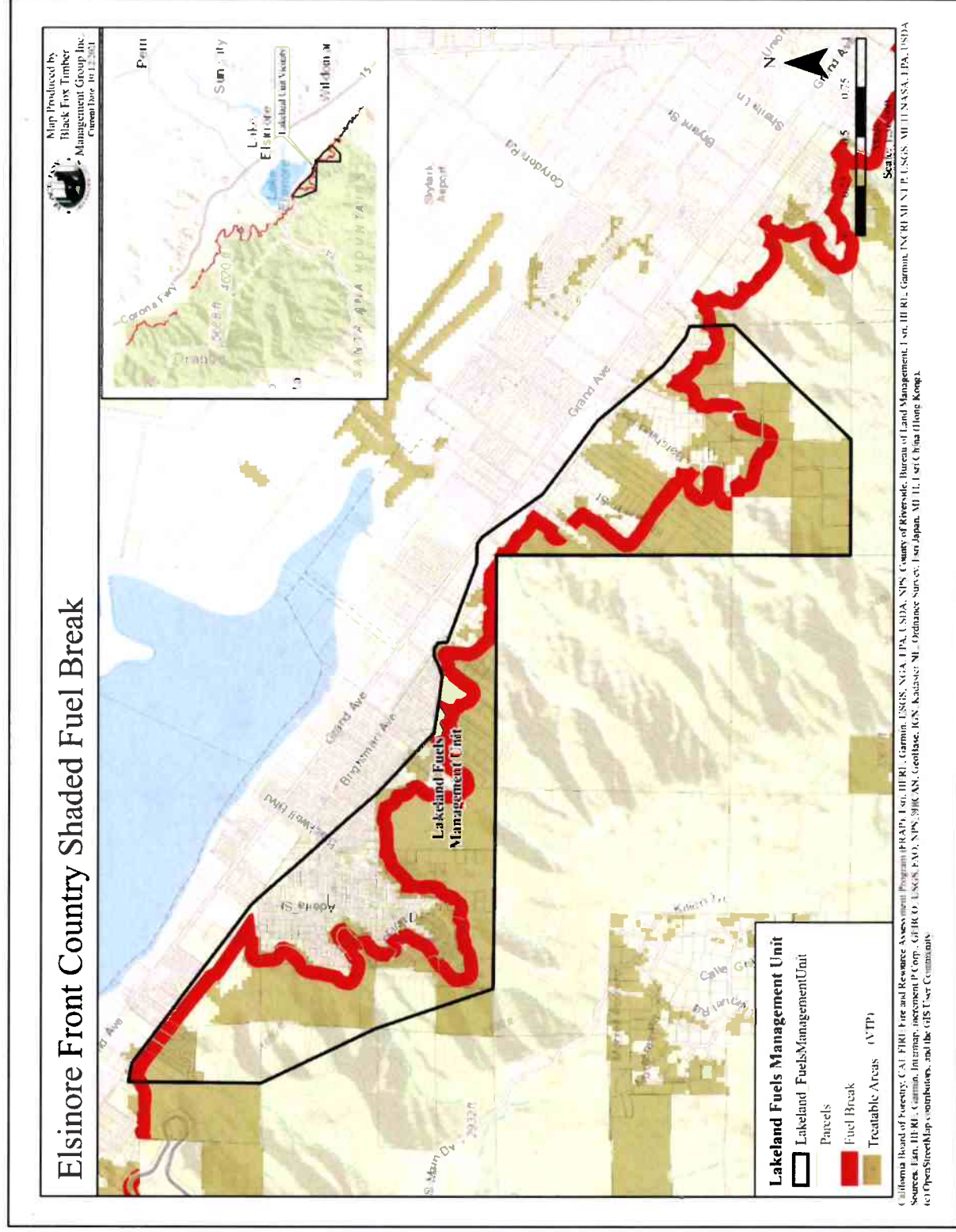
The Treatment Unit maps are arranged from south to north:

1. Wildomar
2. Lakeland
3. Elsinore
4. Horsethief Canyon
5. Temescal Canyon
6. Trilogy

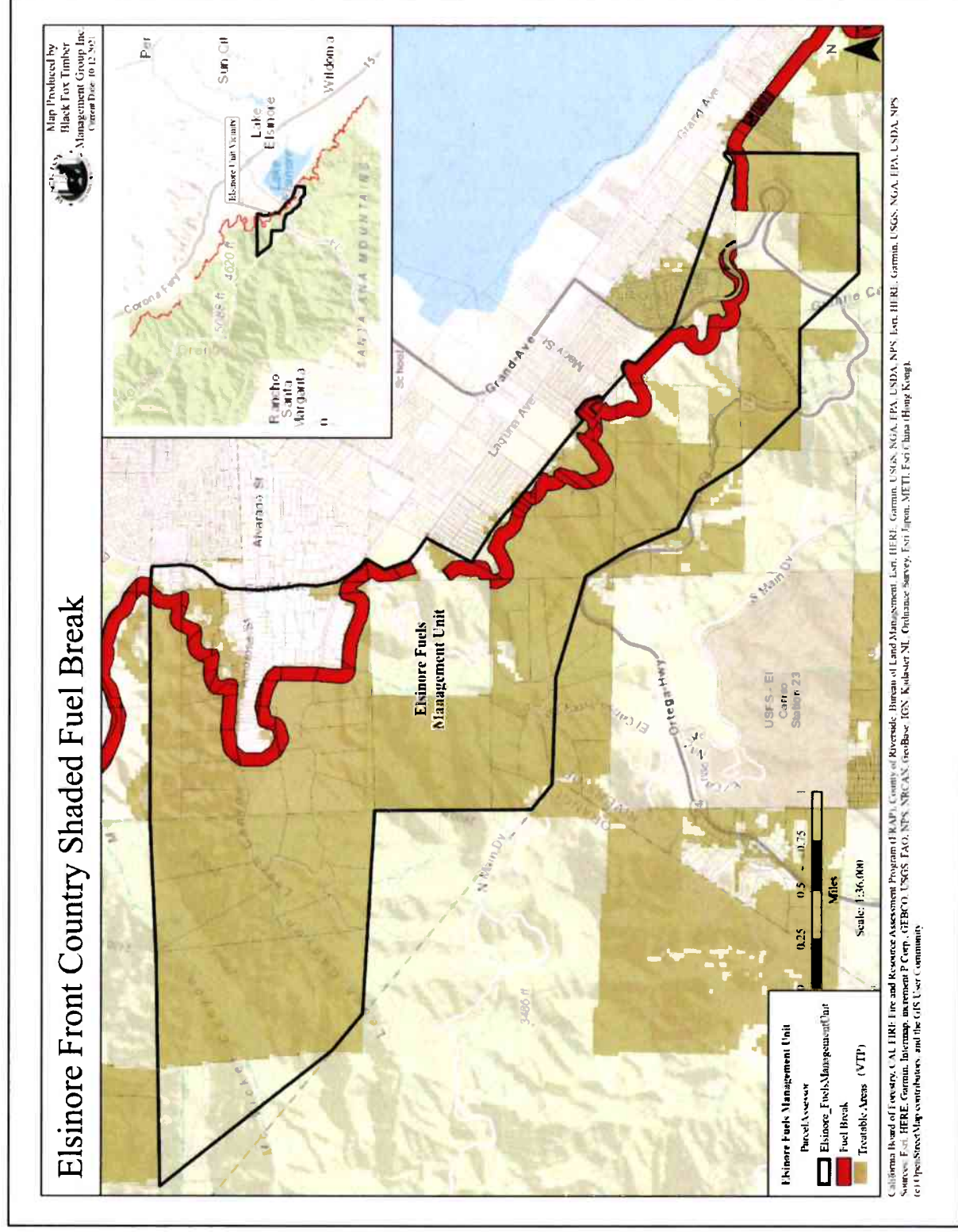
Elsinore Front Country Shaded Fuel Break



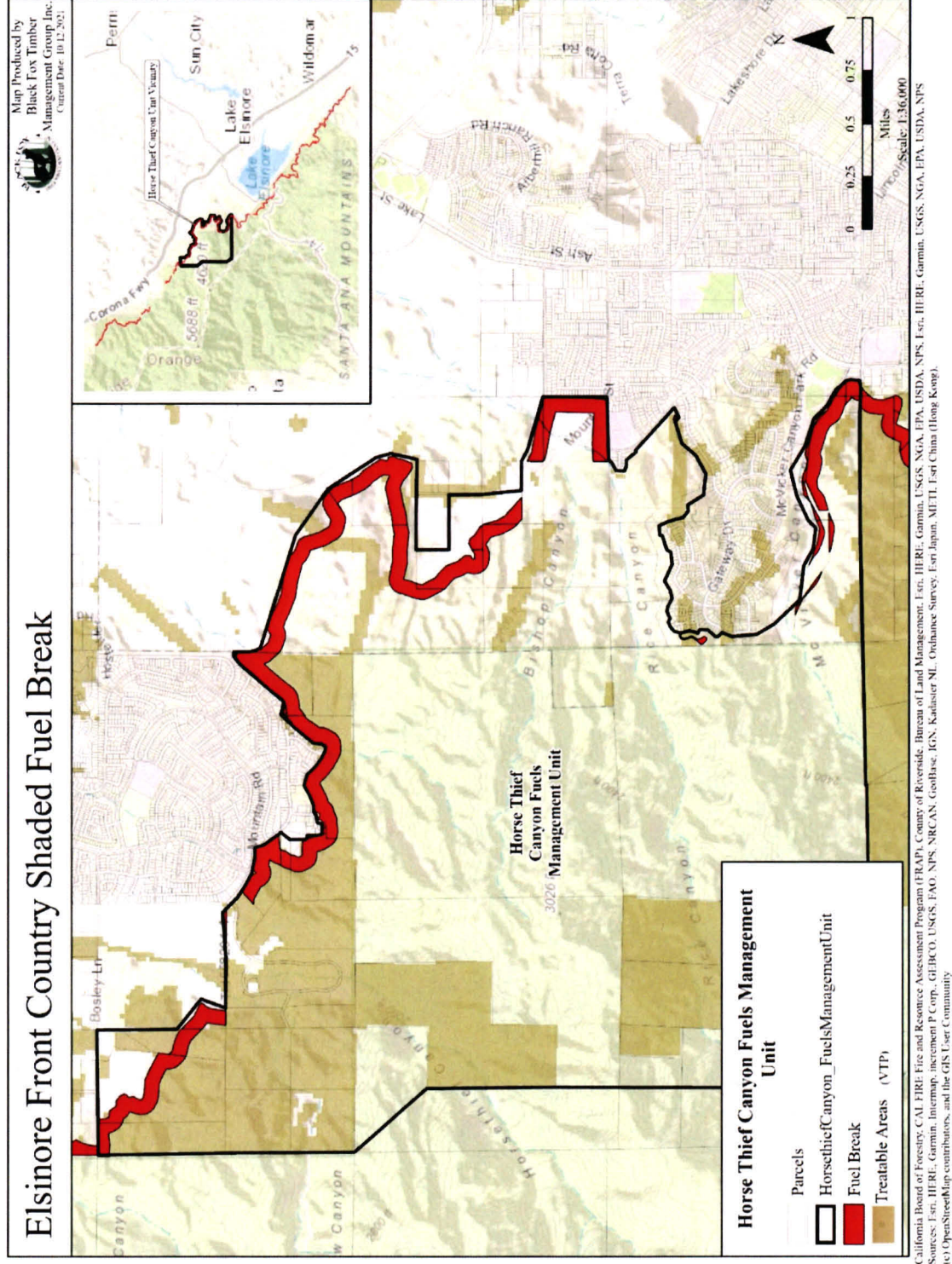
Lakeland Treatment Unit



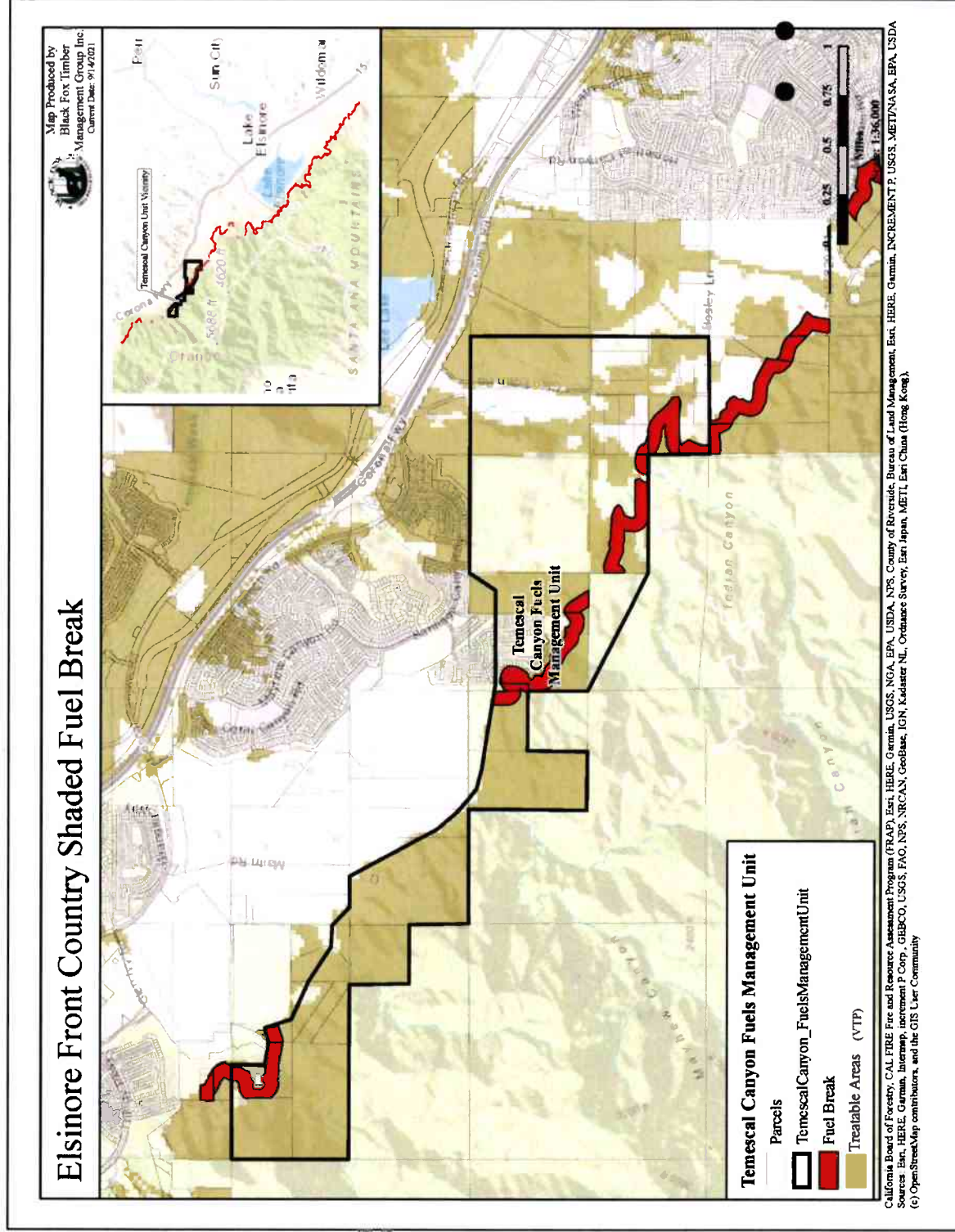
Elsinore Treatment Unit



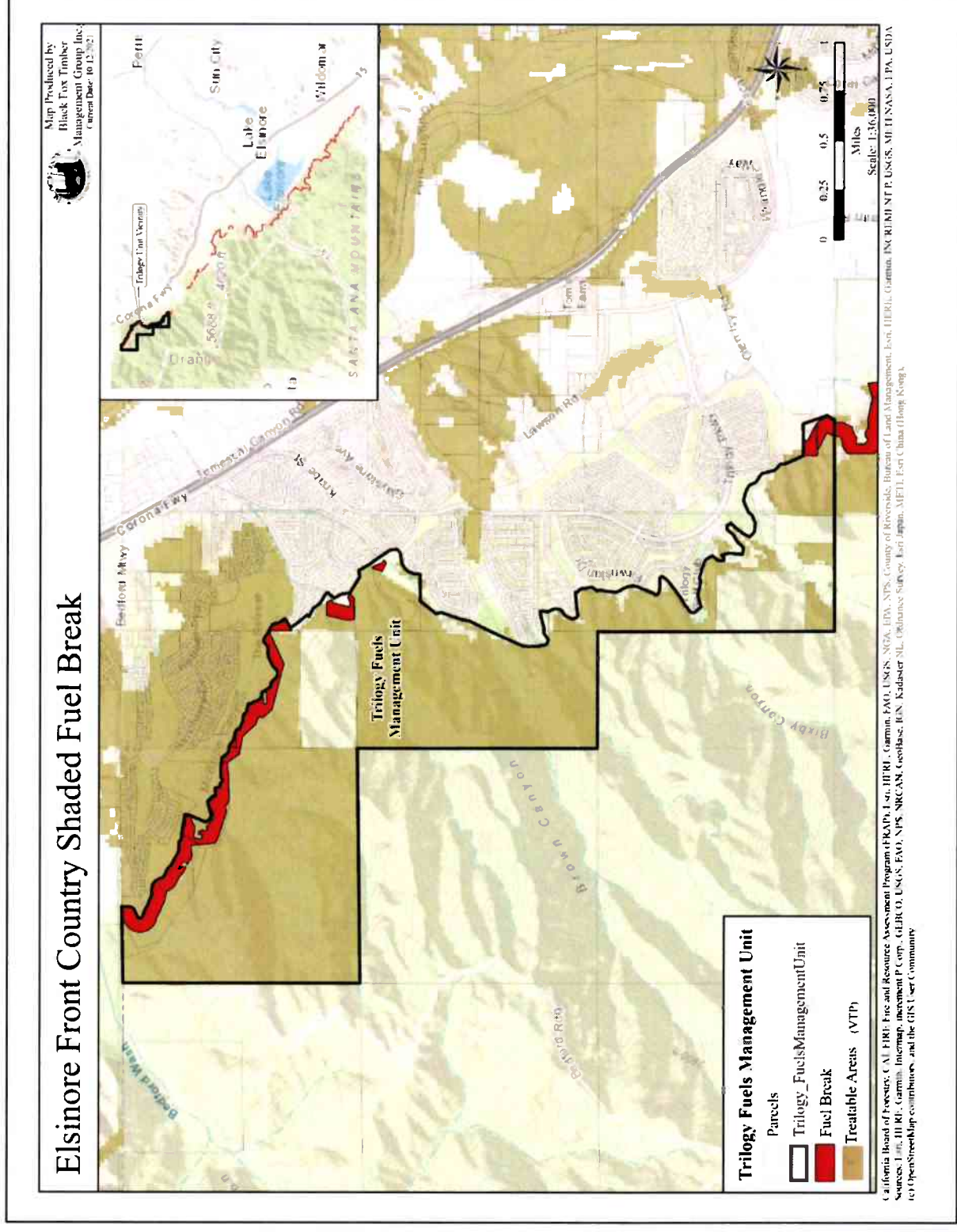
Horsethief Canyon Treatment Unit



Temescal Canyon Treatment Unit



Trilogy Treatment Unit



8. Project Participants

Elsinore Front Country Fuel Break
List of Participants by Treatment Unit

N#	Tx #	Tx Unit	APN	Status of Participation	APN acres	FB Acres
1	1	Wildomar	282310066	YES	15.89	8.58
2	1	Wildomar	282581029	Other	1.78	0.01
3	1	Wildomar	382140002	Unknown	16.40	7.11
4	1	Wildomar	382140009	YES	2.35	0.32
5	1	Wildomar	382140010	Unknown	1.98	0.08
6	1	Wildomar	382140011	Unknown	2.89	2.21
7	1	Wildomar	382150001	Unknown	8.83	1.13
8	1	Wildomar	382150002	Unknown	88.89	12.32
9	1	Wildomar	382150006	YES	5.00	1.16
10	1	Wildomar	382150012	Unknown	2.67	0.70
11	1	Wildomar	382150017	YES	3.42	1.79
12	1	Wildomar	382150028	YES	5.47	4.02
13	1	Wildomar	382150038	Unknown	0.98	0.20
14	1	Wildomar	382150048	Unknown	6.20	5.83
15	1	Wildomar	382150048	Unknown	3.26	1.14
16	1	Wildomar	382150050	YES	1.88	1.80
17	1	Wildomar	382150052	YES	13.34	10.81
18	1	Wildomar	382150053	Unknown	0.00	9.81
19	1	Wildomar	382150054	YES	0.00	0.61
20	1	Wildomar	382160005	Other	10.30	3.94
21	1	Wildomar	382160006	Unknown	5.23	0.22
22	1	Wildomar	382160008	Unknown	61.06	2.23
23	1	Wildomar	382180003	YES	1.76	1.75
24	1	Wildomar	382180005	Unknown	1.80	0.39
25	1	Wildomar	382180014	Unknown	0.70	0.66
26	1	Wildomar	382180022	Returned to Sender	3.04	0.36
27	1	Wildomar	382210011	Other	2.81	0.07
28	1	Wildomar	382210002	YES	7.34	5.19
29	1	Wildomar	382230008	Unknown	1.50	0.04
30	1	Wildomar	382230025	YES	0.96	0.89
31	1	Wildomar	382230027	Unknown	2.71	0.65
32	1	Wildomar	382270002	YES	15.51	0.68
33	1	Wildomar	382280004	YES	18.65	1.99
34	1	Wildomar	382280018	YES	0.36	0.16
35	1	Wildomar	382280021	YES	2.00	1.83
36	1	Wildomar	382280022	YES	2.33	1.32
37	1	Wildomar	382280023	YES	2.39	1.50
38	1	Wildomar	382290005	Other	5.34	1.35
39	1	Wildomar	382310007	Unknown	3.84	1.44
40	1	Wildomar	382310020	YES	3.98	0.30
41	1	Wildomar	382320003	YES	83.00	0.93
42	1	Wildomar	382320008	Unknown	20.08	2.17
43	1	Wildomar	382320010	Unknown	21.04	6.75
44	1	Wildomar	382320011	YES	34.14	8.14
45	1	Wildomar	382320012	Returned to Sender	13.10	7.41
46	1	Wildomar	382320014	YES	81.53	21.32
47	1	Wildomar	382320015	YES	2.20	2.18
48	1	Wildomar	382320017	YES	449.95	27.43
49	1	Wildomar	382320018	YES	12.44	7.74
50	1	Wildomar	382320019	YES	4.78	2.47
51	1	Wildomar	382380001	YES	20.12	7.43
52	1	Wildomar	382380002	Returned to Sender	20.72	2.30
53	1	Wildomar	382420007	Unknown	0.63	0.10
54	1	Wildomar	382420008	Unknown	0.57	0.00
55	1	Wildomar	382420013	Other	0.57	0.02
56	1	Wildomar	382430002	Unknown	0.49	0.44
57	1	Wildomar	382430009	Unknown	0.44	0.00
58	1	Wildomar	382430010	Unknown	0.54	0.02
59	1	Wildomar	382440002	Unknown	0.68	0.08
60	1	Wildomar	382440003	Unknown	0.55	0.07
61	1	Wildomar	382440004	Unknown	0.46	0.02
62	1	Wildomar	382440013	YES	1.45	0.38
63	1	Wildomar	385151041	YES	0.00	0.14
64	1	Wildomar	393561003	Unknown	0.37	0.02
65	1	Wildomar	393580001	Unknown	31.11	13.74
66	1	Wildomar	393580002	Unknown	19.12	10.88
67	1	Wildomar	393602019	Unknown	0.50	0.03
68	1	Wildomar	394182015	Other	0.27	0.03
69	1	Wildomar	828225030	Unknown	10.02	0.04
70	2	Lakeland	282040003	Other	160.09	0.00
71	2	Lakeland	371200031	Other	1.71	0.01
72	2	Lakeland	371210005	Other	1.40	0.01

List Date: 09/01/2021

Page 1 of 8

Elsinore Front Country Fuel Break List of Participants by Treatment Unit

N#	Tx #	Tx Unit	APN	Status of Participation	APN acres	FB Acres
73	2	Lakeland	371210010	Other	0.18	0.02
74	2	Lakeland	371210015	Other	2.60	0.00
75	2	Lakeland	371210018	Unknown	1.10	0.00
76	2	Lakeland	371210028	YES	2.86	0.29
77	2	Lakeland	382050003	Other	0.52	0.00
78	2	Lakeland	382050007	Unknown	0.47	0.19
79	2	Lakeland	382050028	YES	1.18	1.06
80	2	Lakeland	382050036	Unknown	5.20	0.52
81	2	Lakeland	382050037	YES	1.52	0.76
82	2	Lakeland	382050038	YES	1.04	0.72
83	2	Lakeland	382050040	YES	2.25	0.43
84	2	Lakeland	382050044	YES	4.85	1.36
85	2	Lakeland	382050045	YES	0.16	0.06
86	2	Lakeland	382050048	Unknown	0.68	0.52
87	2	Lakeland	382050049	YES	7.69	3.67
88	2	Lakeland	382050058	Unknown	1.87	0.01
89	2	Lakeland	382050059	YES	2.21	0.77
90	2	Lakeland	382050060	YES	2.35	0.34
91	2	Lakeland	382050064	Unknown	0.61	0.09
92	2	Lakeland	382050066	Unknown	0.98	0.19
93	2	Lakeland	382050069	YES	7.48	3.88
94	2	Lakeland	382060003	Unknown	1.08	0.49
95	2	Lakeland	382060004	Unknown	1.21	1.24
96	2	Lakeland	382060005	YES	3.64	0.36
97	2	Lakeland	382060009	Unknown	0.68	0.68
98	2	Lakeland	382060010	Unknown	0.91	0.49
99	2	Lakeland	382060012	Unknown	0.09	0.02
100	2	Lakeland	382060013	YES	0.06	0.00
101	2	Lakeland	382060014	YES	1.08	0.37
102	2	Lakeland	382060015	Unknown	1.75	0.28
103	2	Lakeland	382060016	YES	0.64	0.37
104	2	Lakeland	382060027	YES	7.67	5.32
105	2	Lakeland	382060028	Unknown	1.31	0.86
106	2	Lakeland	382060029	Unknown	1.95	0.48
107	2	Lakeland	382060030	Unknown	2.43	1.59
108	2	Lakeland	382060031	YES	1.21	0.46
109	2	Lakeland	382060038	Unknown	0.14	0.03
110	2	Lakeland	382060048	YES	6.65	1.88
111	2	Lakeland	382070003	Unknown	1.14	0.85
112	2	Lakeland	382070004	Unknown	1.14	0.09
113	2	Lakeland	382070009	Other	1.14	0.01
114	2	Lakeland	382070012	Returned to Sender	1.14	0.92
115	2	Lakeland	382070013	YES	1.14	0.11
116	2	Lakeland	382070019	Unknown	1.14	0.99
117	2	Lakeland	382070020	YES	1.14	0.61
118	2	Lakeland	382070025	Unknown	1.14	0.68
119	2	Lakeland	382070026	YES	1.11	0.85
120	2	Lakeland	382070030	Unknown	1.14	0.00
121	2	Lakeland	382070031	Unknown	1.14	0.71
122	2	Lakeland	382070032	Unknown	0.90	0.85
123	2	Lakeland	382070035	YES	1.14	0.35
124	2	Lakeland	382070036	YES	1.44	1.84
125	2	Lakeland	382070038	Unknown	1.36	0.03
126	2	Lakeland	382070039	Unknown	1.14	0.85
127	2	Lakeland	382070040	Other	1.14	0.00
128	2	Lakeland	382070041	Unknown	1.14	0.66
129	2	Lakeland	382070042	Unknown	0.68	0.93
130	2	Lakeland	382070044	YES	0.16	0.37
131	2	Lakeland	382070054	Unknown	1.12	0.57
132	2	Lakeland	382070055	Unknown	1.13	0.66
133	2	Lakeland	382070061	YES	0.94	1.20
134	2	Lakeland	382070062	YES	0.66	0.37
135	2	Lakeland	382070063	Unknown	1.36	1.23
136	2	Lakeland	382070067	Unknown	1.11	0.18
137	2	Lakeland	382070068	YES	1.29	0.54
138	2	Lakeland	382070069	Unknown	1.39	1.51
139	2	Lakeland	382070070	YES	1.33	1.40
140	2	Lakeland	382080001	YES	40.00	11.35
141	2	Lakeland	382080013	Unknown	8.18	4.58
142	2	Lakeland	382080014	Unknown	9.48	1.14
143	2	Lakeland	382080015	Returned to Sender	9.03	1.97
144	2	Lakeland	382100001	Unknown	27.36	5.14

List Date: 09/01/2021

Page 2 of 8

Elsinore Front Country Fuel Break List of Participants by Treatment Unit

N#	Tx #	Tx Unit	APN	Status of Participation	APN acres	FB Acres
145	2	Lakeland	382100032	Unknown	17.30	1.39
146	2	Lakeland	382100033	Unknown	18.07	1.39
147	2	Lakeland	382100034	Unknown	18.06	1.34
148	2	Lakeland	382110010	Unknown	10.80	4.30
149	2	Lakeland	382110014	Unknown	0.72	0.02
150	2	Lakeland	382110020	Unknown	3.67	1.59
151	2	Lakeland	382110021	Unknown	2.25	0.64
152	2	Lakeland	382110027	Unknown	2.25	0.61
153	2	Lakeland	382110028	YES	2.25	1.29
154	2	Lakeland	382110031	Unknown	2.48	0.00
155	2	Lakeland	382110033	Unknown	2.49	0.01
156	2	Lakeland	382110034	YES	2.48	0.15
157	2	Lakeland	382110035	Unknown	2.14	0.01
158	2	Lakeland	382110036	YES	2.77	1.27
159	2	Lakeland	382110037	YES	2.48	1.95
160	2	Lakeland	382110038	Unknown	2.47	1.75
161	2	Lakeland	382110039	Unknown	1.63	1.19
162	2	Lakeland	382110040	Unknown	1.15	0.48
163	2	Lakeland	382110041	Unknown	2.59	2.25
164	2	Lakeland	382110042	Unknown	4.62	4.53
165	2	Lakeland	382110044	YES	1.23	0.20
166	2	Lakeland	382110045	YES	2.28	1.58
167	2	Lakeland	382130038	YES	14.20	4.64
168	2	Lakeland	382130042	YES	1.70	0.20
169	2	Lakeland	382130043	Unknown	2.22	0.47
170	2	Lakeland	382130052	Unknown	2.36	1.33
171	2	Lakeland	382130053	Unknown	5.45	2.00
172	2	Lakeland	382130054	Other	1.24	0.63
173	2	Lakeland	382130055	Unknown	1.16	0.75
174	2	Lakeland	382130058	Unknown	8.05	3.93
175	2	Lakeland	382130057	Other	1.00	0.10
176	2	Lakeland	382150027	Returned to Sender	4.66	0.11
177	2	Lakeland	382380001	Unknown	4.78	0.71
178	2	Lakeland	382380002	Unknown	3.80	0.70
179	2	Lakeland	382380003	Unknown	3.40	2.51
180	2	Lakeland	382380004	Unknown	7.09	5.08
181	2	Lakeland	382380010	Unknown	7.40	3.42
182	2	Lakeland	382380030	Unknown	7.00	5.81
183	2	Lakeland	382400004	Unknown	5.15	0.14
184	2	Lakeland	382400005	Unknown	4.15	1.43
185	2	Lakeland	382400006	Unknown	22.75	11.90
186	2	Lakeland	382420008	Unknown	0.54	0.11
187	2	Lakeland	382420011	Unknown	0.53	0.00
188	2	Lakeland	382420012	Unknown	0.50	0.01
189	2	Lakeland	382430004	Unknown	0.53	0.03
190	2	Lakeland	382430005	Unknown	0.53	0.01
191	2	Lakeland	382440014	YES	0.85	0.34
192	2	Lakeland	383020002	YES	10.09	0.46
193	2	Lakeland	383020005	Unknown	15.00	7.11
194	2	Lakeland	383031001	Unknown	0.12	0.03
195	2	Lakeland	383032002	Unknown	3.50	3.27
196	2	Lakeland	383032003	Unknown	0.96	0.87
197	2	Lakeland	383032004	Unknown	1.33	1.30
198	2	Lakeland	383032007	Unknown	0.45	0.44
199	2	Lakeland	383032008	Unknown	0.15	0.15
200	2	Lakeland	383032009	Unknown	0.14	0.13
201	2	Lakeland	383032010	Unknown	0.14	0.13
202	2	Lakeland	383032011	Unknown	0.16	0.16
203	2	Lakeland	383033007	Other	0.23	0.00
204	2	Lakeland	383033049	Unknown	1.82	0.35
205	2	Lakeland	383053003	Unknown	0.82	0.44
206	2	Lakeland	383053005	Unknown	0.29	0.01
207	2	Lakeland	383054006	Unknown	0.54	0.03
208	2	Lakeland	383054011	Unknown	0.40	0.05
209	2	Lakeland	383054013	YES	0.21	0.03
210	2	Lakeland	383054014	YES	0.48	0.18
211	2	Lakeland	383054015	YES	1.96	1.77
212	2	Lakeland	383054016	Unknown	4.69	3.76
213	2	Lakeland	383055003	YES	0.48	0.58
214	2	Lakeland	383055005	YES	0.60	0.58
215	2	Lakeland	383055006	Unknown	1.08	0.51
216	2	Lakeland	383055009	Unknown	1.22	1.17

List Date: 09/01/2021

Page 3 of 8

Elsinore Front Country Fuel Break
List of Participants by Treatment Unit

N#	Tx #	Tx Unit	APN	Status of Participation	APN acres	FB Acres
217	2	Lakeland	383055010	Unknown	0.22	0.05
218	2	Lakeland	383061001	Unknown	0.96	0.96
219	2	Lakeland	383062003	YES	0.20	0.17
220	2	Lakeland	383062004	YES	0.20	0.15
221	2	Lakeland	383062005	YES	0.23	0.11
222	2	Lakeland	383062006	YES	2.59	0.37
223	2	Lakeland	383062046	YES	0.59	0.22
224	2	Lakeland	383130001	Unknown	84.21	20.19
225	2	Lakeland	383140002	YES	1.11	0.14
226	2	Lakeland	383140003	Unknown	1.44	0.86
227	2	Lakeland	383140004	Unknown	1.11	1.07
228	2	Lakeland	383140006	Unknown	0.92	0.34
229	2	Lakeland	383140905	Unknown	1.14	0.63
230	2	Lakeland	383140009	Unknown	1.06	0.18
231	2	Lakeland	383140010	Unknown	1.06	0.98
232	2	Lakeland	383140022	Unknown	2.22	0.26
233	2	Lakeland	383140025	Unknown	42.91	8.54
234	2	Lakeland	383140027	Unknown	1.59	1.32
235	2	Lakeland	383164010	Unknown	0.09	0.01
236	2	Lakeland	383164011	Unknown	0.06	0.00
237	2	Lakeland	383164012	Unknown	0.07	0.00
238	2	Lakeland	383164013	Unknown	0.08	0.01
239	2	Lakeland	383164014	Unknown	0.09	0.04
240	2	Lakeland	383164015	Unknown	0.08	0.05
241	2	Lakeland	383164016	Unknown	0.08	0.02
242	2	Lakeland	383164017	Unknown	0.08	0.01
243	2	Lakeland	383164018	Unknown	0.07	0.00
244	2	Lakeland	383164019	Unknown	0.25	0.03
245	2	Lakeland	383164020	Unknown	0.09	0.04
246	2	Lakeland	383164021	Returned to Sender	0.16	0.10
247	2	Lakeland	383171003	Unknown	0.32	0.05
248	2	Lakeland	383171004	Unknown	0.37	0.32
249	2	Lakeland	383171005	Unknown	0.46	0.46
250	2	Lakeland	383171006	Unknown	0.63	0.63
251	2	Lakeland	383171007	Unknown	0.51	0.51
252	2	Lakeland	383171008	Unknown	0.00	0.61
253	2	Lakeland	383171009	Unknown	0.00	0.06
254	2	Lakeland	383173012	YES	0.19	0.18
255	2	Lakeland	383173021	Unknown	0.02	0.01
256	2	Lakeland	383173022	Unknown	0.23	0.10
257	2	Lakeland	383173023	YES	0.34	0.14
258	2	Lakeland	383173024	YES	0.26	0.13
259	2	Lakeland	383173025	YES	0.26	0.16
260	2	Lakeland	383173026	YES	0.23	0.16
261	2	Lakeland	383173027	YES	0.18	0.14
262	2	Lakeland	383173028	YES	0.21	0.20
263	2	Lakeland	383173029	YES	0.23	0.23
264	2	Lakeland	383173030	Returned to Sender	0.31	0.31
265	2	Lakeland	383173031	Unknown	0.26	0.19
266	2	Lakeland	383173032	Unknown	0.23	0.18
267	2	Lakeland	383173033	Returned to Sender	0.17	0.16
268	2	Lakeland	383173039	Returned to Sender	0.58	0.69
269	2	Lakeland	383173040	Returned to Sender	0.24	0.21
270	2	Lakeland	383181005	YES	2.04	0.10
271	2	Lakeland	383182001	YES	0.20	0.19
272	2	Lakeland	383182002	YES	0.21	0.19
273	2	Lakeland	383182003	YES	0.20	0.18
274	2	Lakeland	383182006	YES	0.22	0.18
275	2	Lakeland	383182009	YES	0.24	0.19
276	2	Lakeland	383182010	YES	0.26	0.20
277	2	Lakeland	383182011	YES	0.27	0.21
278	2	Lakeland	383182012	YES	0.25	0.19
279	2	Lakeland	383182013	YES	0.23	0.17
280	2	Lakeland	383182015	YES	3.61	2.87
281	2	Lakeland	383182016	Unknown	0.29	0.16
282	2	Lakeland	383182017	YES	0.44	0.37
283	2	Lakeland	383182018	YES	0.46	0.37
284	2	Lakeland	383191001	YES	1.21	0.98
285	2	Lakeland	383192001	YES	0.21	0.15
286	2	Lakeland	383192002	YES	0.21	0.16
287	2	Lakeland	383192003	YES	0.21	0.16
288	2	Lakeland	383192004	YES	0.17	0.10

List Date: 09/01/2021

Page 4 of 8

Elsinore Front Country Fuel Break List of Participants by Treatment Unit

N#	Tx #	Tx Unit	APN	Status of Participation	APN acres	FB Acres
289	2	Lakeland	383192005	Unknown	0.19	0.09
290	2	Lakeland	383192006	Unknown	0.19	0.05
291	2	Lakeland	383193001	YES	0.20	0.20
292	2	Lakeland	383193002	YES	0.18	0.18
293	2	Lakeland	383193003	YES	0.32	0.28
294	2	Lakeland	383193004	YES	0.76	0.76
295	2	Lakeland	383196002	Unknown	1.15	0.03
296	2	Lakeland	383196008	Unknown	0.29	0.00
297	2	Lakeland	383197001	YES	0.23	0.23
298	2	Lakeland	383197003	Unknown	0.22	0.22
299	2	Lakeland	383198002	Returned to Sender	0.17	0.03
300	2	Lakeland	383198003	YES	0.85	0.84
301	2	Lakeland	386140004	YES	5.93	3.24
302	2	Lakeland	386140008	YES	1.24	0.09
303	2	Lakeland	386140010	YES	1.10	0.71
304	2	Lakeland	386140014	YES	5.93	1.57
305	2	Lakeland	386151001	YES	0.13	0.15
306	2	Lakeland	386151002	YES	0.13	0.15
307	2	Lakeland	386151003	YES	0.13	0.15
308	2	Lakeland	386151004	YES	0.08	0.08
309	2	Lakeland	386151005	YES	0.07	0.07
310	2	Lakeland	386151008	YES	0.13	0.15
311	2	Lakeland	386151007	YES	0.13	0.07
312	2	Lakeland	386151034	Unknown	0.00	0.08
313	2	Lakeland	386151035	Unknown	0.00	0.14
314	2	Lakeland	386151036	YES	0.00	0.14
315	2	Lakeland	386151037	YES	0.00	0.07
316	2	Lakeland	386151038	YES	0.00	0.07
317	2	Lakeland	386151039	YES	0.00	0.08
318	2	Lakeland	386151040	Unknown	0.00	0.07
319	2	Lakeland	386152001	Unknown	0.00	0.13
320	2	Lakeland	386152002	Unknown	0.00	0.14
321	2	Lakeland	386152003	YES	0.00	0.14
322	2	Lakeland	386152004	YES	0.00	0.13
323	2	Lakeland	386152005	Unknown	0.00	0.14
324	2	Lakeland	386152006	Unknown	0.00	0.09
325	2	Lakeland	386152018	YES	0.08	0.16
326	2	Lakeland	386152019	YES	0.00	0.14
327	2	Lakeland	386152020	Unknown	0.00	0.06
328	2	Lakeland	386152021	YES	0.00	0.08
329	2	Lakeland	386152022	YES	0.00	0.14
330	2	Lakeland	386152023	Unknown	0.00	0.14
331	2	Lakeland	386152024	Unknown	0.00	0.14
332	2	Lakeland	386153001	Unknown	0.00	0.13
333	2	Lakeland	386153002	Unknown	0.00	0.14
334	2	Lakeland	386153003	Unknown	0.00	0.14
335	2	Lakeland	386153004	Unknown	0.14	0.14
336	2	Lakeland	386153005	Unknown	0.00	0.14
337	2	Lakeland	386153006	Unknown	0.00	0.11
338	2	Lakeland	386153020	Unknown	0.00	0.13
339	2	Lakeland	386153021	Unknown	0.00	0.16
340	2	Lakeland	386153022	Unknown	0.00	0.15
341	2	Lakeland	386153023	Unknown	0.00	0.16
342	2	Lakeland	386153024	Unknown	0.00	0.16
343	2	Lakeland	386153025	Unknown	0.00	0.14
344	2	Lakeland	386160004	Returned to Sender	69.91	24.78
345	2	Lakeland	386160011	YES	2.30	0.17
346	2	Lakeland	393310005	Unknown	160.00	6.71
347	2	Lakeland	393620012	Other	0.19	0.00
348	2	Lakeland	394161002	Unknown	0.13	0.01
349	2	Lakeland	394192011	Other	0.21	0.00
350	2	Lakeland	394210021	Other	0.18	0.00
351	2	Lakeland	394210022	Other	0.15	0.00
352	2	Lakeland	394243002	Unknown	0.22	0.00
353	3	Elsinore	382210041	YES	1.38	0.80
354	3	Elsinore	382280013	Unknown	2.74	0.05
355	3	Elsinore	382420006	Other	0.44	0.00
356	3	Elsinore	382430003	Unknown	0.56	0.02
357	3	Elsinore	383020001	Unknown	70.00	11.67
358	3	Elsinore	386100030	YES	40.87	8.46
359	3	Elsinore	386100034	Unknown	72.99	21.31
360	3	Elsinore	386100035	YES	1.27	0.08

List Date: 09/01/2021

Page 5 of 8

Elsinore Front Country Fuel Break
List of Participants by Treatment Unit

N#	Tx #	Tx Unit	APN	Status of Participation	APN acres	FB Acres
361	3	Elsinore	386120008	Unknown	53.84	8.89
362	3	Elsinore	386120024	Unknown	4.90	0.61
363	3	Elsinore	386120031	Unknown	12.22	0.10
364	3	Elsinore	386120037	Unknown	9.35	1.30
365	3	Elsinore	386131010	Unknown	0.48	0.02
366	3	Elsinore	386131012	Unknown	0.79	0.42
367	3	Elsinore	386131013	Unknown	1.26	0.27
368	3	Elsinore	386131014	Unknown	0.87	0.04
369	3	Elsinore	386131017	YES	0.53	0.64
370	3	Elsinore	386131018	Unknown	0.32	0.26
371	3	Elsinore	386140007	Unknown	1.65	0.09
372	3	Elsinore	386140009	Unknown	6.74	0.24
373	3	Elsinore	386140013	YES	0.57	0.22
374	3	Elsinore	386160013	Unknown	73.42	7.60
375	3	Elsinore	386172029	Unknown	0.26	0.01
376	3	Elsinore	386172030	Unknown	0.26	0.04
377	3	Elsinore	387050012	YES	88.39	12.59
378	3	Elsinore	387050016	YES	4.56	4.67
379	3	Elsinore	387050017	YES	4.57	2.50
380	3	Elsinore	387050020	YES	14.44	7.34
381	3	Elsinore	387050022	YES	7.77	0.18
382	3	Elsinore	387140006	YES	1.31	0.43
383	3	Elsinore	387140010	YES	0.83	0.86
384	3	Elsinore	387140056	YES	1.79	1.68
385	3	Elsinore	387222041	Unknown	0.80	0.32
386	3	Elsinore	387230001	Unknown	1.48	1.03
387	3	Elsinore	387230003	Unknown	1.90	1.10
388	3	Elsinore	387230005	Unknown	0.46	0.26
389	3	Elsinore	387230007	Unknown	22.96	9.21
390	3	Elsinore	387230009	Unknown	0.50	0.36
391	3	Elsinore	387230012	Unknown	1.30	0.77
392	3	Elsinore	387230013	Unknown	1.87	0.96
393	3	Elsinore	387230014	YES	0.02	0.03
394	3	Elsinore	387230015	Unknown	2.01	0.80
395	3	Elsinore	387230016	Unknown	2.36	1.76
396	3	Elsinore	387230017	Unknown	6.28	1.37
397	3	Elsinore	387230027	YES	5.88	3.28
398	3	Elsinore	387230029	YES	9.90	3.19
399	3	Elsinore	387230030	YES	9.90	2.05
400	3	Elsinore	387230031	YES	9.90	5.03
401	3	Elsinore	387260008	YES	21.77	1.65
402	3	Elsinore	387270001	Unknown	82.75	7.50
403	3	Elsinore	387270009	YES	20.00	5.33
404	3	Elsinore	387270010	YES	20.00	4.44
405	3	Elsinore	387270011	YES	20.00	0.22
406	3	Elsinore	387270014	YES	20.00	7.78
407	3	Elsinore	387270032	YES	9.80	2.50
408	3	Elsinore	387270036	YES	2.75	2.13
409	3	Elsinore	387270037	YES	7.53	2.45
410	3	Elsinore	387270039	YES	12.73	3.88
411	3	Elsinore	387280001	YES	8.39	2.41
412	3	Elsinore	387280005	YES	21.88	0.16
413	3	Elsinore	387280010	YES	21.20	5.73
414	3	Elsinore	387280014	Unknown	6.62	5.32
415	3	Elsinore	387280017	YES	28.46	7.05
416	3	Elsinore	387280018	YES	4.15	3.24
417	3	Elsinore	387364001	YES	3.81	2.68
418	3	Elsinore	387380001	Unknown	3.51	0.34
419	3	Elsinore	387380002	Unknown	10.42	4.47
420	3	Elsinore	387390001	YES	6.18	3.44
421	3	Elsinore	387390002	Unknown	11.31	1.11
422	3	Elsinore	387400008	YES	0.96	0.18
423	3	Elsinore	387400009	Unknown	0.96	0.16
424	3	Elsinore	387400010	Unknown	0.96	0.13
425	3	Elsinore	387400011	Unknown	0.96	0.10
426	3	Elsinore	387400012	Unknown	0.96	0.03
427	3	Elsinore	387400016	Unknown	0.96	0.19
428	3	Elsinore	387420003	Unknown	0.96	0.02
429	3	Elsinore	387420004	Unknown	0.96	0.10
430	3	Elsinore	387420009	Unknown	0.96	0.19
431	3	Elsinore	387430001	Unknown	1.16	0.46
432	3	Elsinore	387443001	Unknown	1.04	0.08

List Date: 09/01/2021

Page 6 of 8

Elsinore Front Country Fuel Break List of Participants by Treatment Unit

N#	Tx #	Tx Unit	APN	Status of Participation	APN acres	FB Acres
433	3	Elsinore	387443015	Unknown	2.19	0.57
434	3	Elsinore	387443017	YES	20.71	12.48
435	3	Elsinore	393512001	Unknown	2.92	0.05
436	3	Elsinore	393611622	Unknown	1.23	0.06
437	3	Elsinore	393620020	Unknown	0.32	0.03
438	3	Elsinore	394110011	YES	114.59	17.19
439	3	Elsinore	394140016	YES	3.94	1.58
440	3	Elsinore	394140017	Unknown	58.71	1.90
441	3	Elsinore	394261003	Other	0.15	0.01
442	3	Elsinore	394310002	Unknown	51.28	15.06
443	3	Elsinore	394310006	Unknown	0.94	0.80
444	3	Elsinore	394310013	YES	8.52	1.53
445	4	Horsechief Canyon	382150037	Unknown	1.74	0.42
446	4	Horsechief Canyon	383020067	Unknown	14.00	3.30
447	4	Horsechief Canyon	383140016	Unknown	0.00	0.91
448	4	Horsechief Canyon	383140017	Unknown	0.00	1.46
449	4	Horsechief Canyon	383173013	Unknown	0.20	0.12
450	4	Horsechief Canyon	383173014	Unknown	0.34	0.04
451	4	Horsechief Canyon	383173015	Unknown	0.30	0.01
452	4	Horsechief Canyon	383173020	Unknown	0.22	0.07
453	4	Horsechief Canyon	383197002	Unknown	1.31	1.31
454	4	Horsechief Canyon	383197004	Unknown	1.59	1.57
455	4	Horsechief Canyon	383591004	Unknown	2.76	2.17
456	4	Horsechief Canyon	383310002	YES	22.38	4.42
457	4	Horsechief Canyon	383310003	Unknown	84.46	16.64
458	4	Horsechief Canyon	383310004	Unknown	39.77	4.17
459	4	Horsechief Canyon	383561001	Unknown	0.35	0.15
460	4	Horsechief Canyon	383561002	YES	0.48	0.21
461	4	Horsechief Canyon	383580003	Unknown	6.60	1.55
462	4	Horsechief Canyon	393590004	Unknown	39.72	7.89
463	4	Horsechief Canyon	393580008	Unknown	55.22	21.94
464	4	Horsechief Canyon	393602018	Other	0.25	0.01
465	4	Horsechief Canyon	393611028	Unknown	0.86	0.16
466	4	Horsechief Canyon	393620011	Other	0.20	0.00
467	4	Horsechief Canyon	394110001	YES	125.07	13.50
468	4	Horsechief Canyon	394110002	YES	26.00	9.69
469	4	Horsechief Canyon	394110004	YES	16.45	2.11
470	4	Horsechief Canyon	394120002	YES	40.00	4.96
471	4	Horsechief Canyon	394120003	YES	13.94	3.50
472	4	Horsechief Canyon	394120006	Unknown	13.50	7.36
473	4	Horsechief Canyon	394120007	Unknown	34.97	3.88
474	4	Horsechief Canyon	394120008	Unknown	3.54	0.51
475	4	Horsechief Canyon	394120012	Unknown	10.40	2.28
476	4	Horsechief Canyon	394120013	Unknown	30.70	16.98
477	4	Horsechief Canyon	394161001	YES	0.77	6.12
478	4	Horsechief Canyon	394181006	Unknown	0.42	0.11
479	4	Horsechief Canyon	394181007	Unknown	0.32	0.00
480	4	Horsechief Canyon	394192024	Unknown	0.25	0.00
481	4	Horsechief Canyon	394192034	Unknown	0.82	0.71
482	4	Horsechief Canyon	394201004	Unknown	0.15	0.00
483	4	Horsechief Canyon	394210020	Other	0.19	0.00
484	4	Horsechief Canyon	394243003	Unknown	0.44	0.05
485	4	Horsechief Canyon	394243004	Other	0.42	0.00
486	4	Horsechief Canyon	394310006	YES	1.33	0.60
487	4	Horsechief Canyon	394310007	Unknown	2.78	0.56
488	4	Horsechief Canyon	394310016	YES	0.51	0.06
489	5	Temescal Canyon	282210049	Unknown	5.22	1.75
490	5	Temescal Canyon	282210050	Unknown	44.23	17.80
491	5	Temescal Canyon	282630024	Unknown	0.37	0.38
492	5	Temescal Canyon	290090016	Unknown	75.03	2.43
493	5	Temescal Canyon	290150003	YES	40.00	3.88
494	5	Temescal Canyon	290150004	Unknown	54.00	3.53
495	5	Temescal Canyon	290150006	Unknown	80.00	21.99
496	5	Temescal Canyon	290160011	Unknown	34.14	8.62
497	5	Temescal Canyon	290160017	Unknown	3.11	0.17
498	5	Temescal Canyon	290290013	Unknown	0.61	0.02
499	5	Temescal Canyon	290680011	Unknown	5.00	2.12
500	5	Temescal Canyon	290680013	Unknown	0.31	6.01
501	5	Temescal Canyon	290680033	Unknown	12.95	10.96
502	5	Temescal Canyon	290910025	Unknown	1.13	0.12
503	5	Temescal Canyon	393100004	YES	5.01	1.39
504	5	Temescal Canyon	393100009	Unknown	19.98	13.55

List Date: 09/01/2021

Page 7 of 8

Elsinore Front Country Fuel Break
List of Participants by Treatment Unit

N#	Tx #	Tx Unit	APN	Status of Participation	APN acres	FB Acres
505	5	Temescal Canyon	393139010	Unknown	4.77	0.23
506	5	Temescal Canyon	393100012	Unknown	9.60	3.79
507	6	Trilogy	282179015	Unknown	8.63	0.57
508	6	Trilogy	282175023	Unknown	42.91	14.12
509	6	Trilogy	282280021	Other	5.40	0.00
510	6	Trilogy	282630005	Unknown	5.01	0.01
511	6	Trilogy	282630006	Unknown	46.81	13.99
512	6	Trilogy	282630007	Unknown	10.19	1.73
513	6	Trilogy	282630023	Unknown	57.70	19.51
514	6	Trilogy	290040934	YES	4.06	3.17
515	6	Trilogy	290040937	Unknown	0.23	0.07
516	5	Trilogy	200540973	YES	22.29	3.95
517	6	Trilogy	290090925	YES	37.59	15.03
518	6	Trilogy	290090026	YES	7.41	0.01
519	6	Trilogy	290290007	Unknown	2.54	0.01
520	6	Trilogy	290290310	Unknown	4.48	0.01
521	6	Trilogy	290292089	Unknown	8.18	1.42
522	6	Trilogy	394000003	YES	12.71	3.17
523	6	Trilogy	394000004	YES	204.13	26.90

List Date: 09/01/2021

Page 8 of 8

Elsinore Front Country Fuel Break Questionnaire

Please fill out this questionnaire to help Riverside County Fire Department and Black Fox Timber Mgt. Group Inc. assess any concerns or special needs you might have in moving forward with this Forest Fire Prevention Project.

1. Are there any animals on the property(s) that we should know about before entering any of the property(s)? ☐ Yes ☐ No
2. Are there any gates or Locks that would prevent access to any of the property(s)? ☐ Yes ☐ No
3. Do you have any memorials or special sites on any of the property(s) that need to be avoided or protected? ☐ Yes ☐ No
4. If needed could a contractor stage equipment on any of the property(s)? ☐ Yes ☐ No
5. Are there any water wells or tanks on any of the property(s)? ☐ Yes ☐ No
6. Is there a septic tank on the property? ☐ Yes ☐ No
7. Do you have renters? If yes please provide contact information.
Name: _____ ☐ Yes ☐ No
Phone: _____
Email: _____
8. Is there anything else you would like us to know or are concerned about? ☐ Yes ☐ No

Please provide Contact information in the event the County or Black Fox Timber Mgt. Group Inc. needs to reach out regarding this project.
(Print Clearly please)

Name: _____

Phone: _____

Email : _____

Confidentiality: County or any of their officers, agencies, agents, contractors, subcontractors, employees and volunteers shall not use privileged or confidential information acquired in connection with this project for personal gain. Nor shall County or any of their officers, agencies, agents, contractors, subcontractors, employees and volunteers make other improper use of privileged or confidential information which is acquired in connection with this project. Please note that the County is subject to the California Public Records Act.

9. Project Team Members and List of Preparers

Riverside County Fire Department

Karen Gipson	Project Team Member	Program Manager
Melissa Curtis	Project Team Member	Project Manager
Mary Kapella	Project Team Member	Project Assistant

Riverside County Project Management Office

Mike Sullivan	Project Team Member & County CEQA Leader	Senior Environmental Planner
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Black Fox Timber Management Group, Inc

Jimmy Smith	Contractor	Company Owner/ Project Coordinator
Katie Benson	Preparer	Forester/ GIS Analyst
Josh Julian	Preparer	Forester/Biometrician
Jarrod Dowden	Field Support	Field Forester
Kathleen Edwards	Preparer	Forester/RPF#2771 (All sections except for Biological)

Dudek, Inc

Adam Giacinto	Preparer	Archaeologist (Attachment D: Cultural Resources Inventory Report)
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SoCal Biology

Dr. Kate Kramer	Preparer	Biologist (Section: Biological Resources) Attachment D: Biological Resources Report
Tony McKinney	Preparer	GIS Analyst

10. REFERENCES

CalVTP References

California Board of Forestry and Fire Protection website: <https://bof.fire.ca.gov/projects-and-programs/calvtp/>

Purisima Ridge Fuel Break Project, County of Santa Barbara Fire Department. Project ID: 2021-9

Yuba Foothills Healthy Forest Project, Yuba County Water Agency, Project ID: 2020-9

Technical References

Eastern Information Center. January 2020. Records Search

California Department of Fish and Wildlife.

California Department of Forestry and Fire Protection. Riverside Unit. Riverside Unit Fire Plan

California Department of Toxic Substances Control, 2021. EnviroStore Database. September 12, 2021

California Department of Transportation, 2021. List of eligible and officially designated scenic highway

California Environmental Protection Agency. 2021 Cortese List Database

California Geological Survey. 2021. List of asbestos sites

California Natural Diversity Database

Natural Resources Soil Survey – Web Soil Survey – Soils Report, September 10, 2021

South Coast Air Quality Management District. Rule 444 – Open Burning

US Fish and Wildlife

Riverside County

Riverside County – Area Plan. Elsinore Area Plan. June 29, 2021

Riverside County – Area Plan. Temescal Canyon Area Plan. June 26, 2018

Riverside County Climate Action Plan. November 2019

Riverside County – General Plan: Safety Element

Riverside County – Ordinances: Noise, Recreation, Fire, and Zoning

Riverside County Regional Park and Open-Space District – Parks and Comprehensive Trails. February 2018.

Riverside County Waste Management – Greenwaste Suppliers

Cities

City of Lake Elsinore. Ordinance review. July 2021

City of Wildomar. Ordinance review. 2021

Mapping

Environmental Systems Research Institute. ArcGIS Pro 2021.

Google Earth. 2021

Avenza. 2021

GIS – various data sources

11. ATTACHMENTS

- A. Mitigation Monitoring and Reporting Program
- B. Project Specific CEQA Findings and Statement of Overriding Consideration
- C. Biological Resources Report
- D. Cultural Resources Inventory Report - Confidential
- E. Soils Report

ATTACHMENT A

Mitigation Monitoring and Reporting Program

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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 CalVTP, because the PEIR identifies potential significant adverse impacts and all feasible mitigation measures have been adopted. Standard project requirements (SPRs), which are part of the program description, have been defined 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 the CalVTP MMRP to assist in implementation of all environmental protection features of later activities consistent with the CalVTP.

PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

This MMRP has been prepared to monitor the implementation of SPRs and mitigation measures in connection with the approval of the CalVTP and its use by project proponents. The attached table presents the text of each SPR and mitigation measure, 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 PEIR. SPRs and mitigation measures that are referenced more than once in the PEIR are not duplicated in the MMRP.

ROLES AND RESPONSIBILITIES

The Board is the lead agency for adoption of the program-level MMRP. The Riverside County Fire Department (project proponent) has prepared a project-specific MMRPs in connection with the PSA and approval of the project, as described above.

Unless otherwise specified herein, the project proponent is responsible for taking all actions necessary to implement the mitigation measures pursuant to Section 15097 of the State CEQA Guidelines, according to the specifications provided for each measure and for demonstrating that the action has been successfully completed.

The project proponent is responsible for overall administration of the project-specific MMRP and for verifying that staff members or contractors have completed the necessary actions for each measure (i.e., appropriate amendments to the proposed ordinance).

REPORTING

The project proponent shall document and describe the compliance of the later treatment project with the required SPRs and mitigation measures either by adapting the project-specific MMRP table or preparing a separate post-project implementation report (referred to by CAL FIRE as a Completion Report).

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 verbatim 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.

Program-Level Mitigation Monitoring and Reporting Program

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
STANDARD PROJECT REQUIREMENTS (SPRS)			
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. For any 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 projects	RVC	RVC
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 projects	RVC	RVC
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 treatment projects	RVC	RVC
SPR AD-4 Public Notifications for Prescribed Burning: At least three days 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 three days prior to prescribed burn activities	RVC	RVC

Standard Project Requirements and Mitigation Measures	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 projects	RVC	RVC
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 prescribed burn activities	RVC	RVC
<p>SPR AD-7 Provide Information on Proposed, Approved, and Completed Treatment Projects. For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the 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.</p> <p>Information on proposed projects (PSA in progress):</p> <ul style="list-style-type: none"> ▶ GIS data that include project location (as a point); ▶ project size (typically acres); ▶ treatment types and activities; and ▶ contact information for a representative of the project proponent. <p>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).</p> <p>Information on approved projects (PSA complete):</p> <ul style="list-style-type: none"> ▶ A completed PSA Environmental Checklist; ▶ A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); 	Prior to, during, and following treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<ul style="list-style-type: none"> ► 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) <p>Information on completed projects:</p> <ul style="list-style-type: none"> ► 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 <ul style="list-style-type: none"> ▪ 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). <p>This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p>			
<p>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.</p>	Prior to treatment projects	RVC	RVC
<p>SPR AD-9: Obtain a Coastal Development Permit for Proposed Treatment Within the Coastal Zone Where Required. When planning a treatment project within the Coastal Zone, the project proponent will contact the local Coastal Commission district office, or applicable local government to determine if the project area is within the jurisdiction of the Coastal Commission, a local government with a certified Local Coastal Program (LCP), or both. All treatment projects in the Coastal Zone will be reviewed by the local Coastal Commission district office or local government with a certified LCP (in consultation with the local Coastal Commission district office regarding whether a Coastal Development Permit (CDP) is required). If a CDP is required, the treatment project will be designed to meet the following conditions:</p> <ol style="list-style-type: none"> The treatment project will be designed in compliance with applicable provisions of the Coastal Act that provide substantive performance standards for the protection of 	Prior to treatment projects	NA	NA

Standard Project Requirements and Mitigation Measures		Timing	Implementing Entity	Verifying/Monitoring Entity
<p>potentially affected coastal resources, if the treatment activity will occur within the original jurisdiction of the Commission or an area of a local coastal government without a certified LCP; and</p> <p>ii. The treatment project will be designed in compliance with the applicable provisions of the certified LCP, specifically the substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the jurisdiction of a local coastal government with a certified LCP.</p> <p>This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p>				
Aesthetic and Visual Resource Standard Project Requirements				
<p>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.</p>		During mechanical and manual treatment activities	RVC	RVC
<p>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.</p>		During treatment projects	RVC	RVC
<p>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.</p>		During design of treatment projects	RVC	RVC
Air Quality Standard Project Requirements				
<p>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.</p>		During treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p>	Prior to prescribed burn treatment activities	RVC	RVC
<p>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.</p>	Prior to prescribed burn treatment activities	RVC	RVC
<p>SPR AQ-4 Minimize Dust: To minimize dust during treatment activities, the project proponent will implement the following measures:</p> <ul style="list-style-type: none"> ▶ 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 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 	During treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113.</p> <p>► 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.</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>			
<p>SPR AQ-5 Avoid Naturally Occurring Asbestos: The project proponent will avoid ground-disturbing treatment activities in areas identified as likely to contain naturally occurring asbestos (NOA) per maps and guidance published by the California Geological Survey, unless an Asbestos Dust Control Plan (17 CCR Section 93105) is prepared and approved by the air district(s) with jurisdiction over the treatment area. Any NOA-related guidance provided by the applicable air district will be followed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	During treatment projects	RVC	RVC
<p>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.</p>	During prescribed burn treatment activities	RVC	RVC
Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements			
<p>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.</p>	Prior to treatment projects	RVC	RVC
<p>SPR CUL-2 Contact Geographically Affiliated Native American Tribes: The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided</p>	Prior to treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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:</p> <ul style="list-style-type: none"> ▶ 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. <p>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.</p>			
<p>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.</p>	Prior to treatment projects	RVC	RVC
<p>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.</p>	Prior to treatment projects	RVC	RVC
<p>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</p>	Prior to and during treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p>			
<p>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.</p>	<p>Prior to and during treatment projects</p>	<p>RVC</p>	<p>RVC</p>
<p>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.</p>	<p>Prior to treatment projects</p>	<p>RVC</p>	<p>RVC</p>
<p>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</p>	<p>Prior to and during treatment projects</p>	<p>RVC</p>	<p>RVC</p>

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Biological Resources Standard Project Requirements			
<p>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.</p> <p>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 PEIR 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, CNDDDB, 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:</p> <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> a. by physically avoiding the suitable habitat, or 	Conduct data review and reconnaissance-level survey prior to treatment projects and no more than 1 year prior to submittal of the PSA for each treatment project	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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).</p> <p>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.</p> <p>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).</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>			
<p>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</p>	<p>Conduct biological resource training for crew members and contractors prior to treatment projects; contact CDFW or USFWS, as appropriate, if any wildlife protected by CESA or ESA is encountered and cannot leave the site on its own (without being handled) during treatment projects</p>	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
Sensitive Natural Communities and Other Sensitive Habitats			
<p>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:</p> <ul style="list-style-type: none"> ► 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 <i>A Manual of California Vegetation</i> (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. <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	Prior to treatment projects	RVC	RVC
<p>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:</p> <ul style="list-style-type: none"> ► 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. 	During design of treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<ul style="list-style-type: none"> ▶ 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 <i>Accelerated Wood Recruitment and Timber Operations: Process Guidance from the California Timber Harvest Review Team Agencies and National Marine Fisheries Service</i>). ▶ 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 when required by 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 			

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p> <p>SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub. The project proponent will design treatment activities to avoid type conversion where native coastal sage scrub and chaparral are present. An ecological definition of type conversion is used in the CalVTP PEIR for assessment of environmental effects: a change from a vegetation type dominated by native shrub species that are characteristic of chaparral and coastal sage scrub vegetation alliances to a vegetation type characterized predominantly by weedy herbaceous cover or annual grasslands. For the PEIR, type conversion is considered in terms of habitat function, which is defined here as the arrangement and capability of habitat features to provide refuge, food source, and reproduction habitat to plants and animals, and thereby contribute to the conservation of biological and genetic diversity and evolutionary processes (de Groot et al. 2002). Some modification of habitat characteristics may occur provided habitat function is maintained (i.e. the location, essential habitat features, and species supported are not substantially changed).</p> <p>During the reconnaissance-level survey required in SPR BIO-1, a qualified RPF or biologist will identify chaparral and coastal sage scrub vegetation to the alliance level and determine the condition class and fire return interval departure of the chaparral and/or coastal sage scrub present in each treatment area.</p> <p>For all treatment types in chaparral and coastal sage scrub, the project proponent, in consultation with a qualified RPF or qualified biologist will:</p> <ul style="list-style-type: none"> ► Develop a treatment design that avoids environmental effects of type conversion in chaparral and coastal sage scrub vegetation alliances, which will include evaluating and determining the appropriate spatial scale at which the proponent would consider type conversion, and substantiating its appropriateness. The project proponent will demonstrate with substantial evidence that the habitat function of chaparral and coastal sage scrub would be at least maintained within the identified spatial scale at which type conversion is evaluated for the specific treatment project. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, spatial 	During design of treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>needs of sensitive species, presence of sufficient seed plants and nurse plants, light availability, and edge effects may inform the determination of an appropriate spatial scale.</p> <ul style="list-style-type: none"> ▶ The treatment design will maintain a minimum percent cover of mature native shrubs within the treatment area to maintain habitat function; the appropriate percent cover will be identified by the project proponent in the development of treatment design and be specific to the vegetation alliances that are present in the identified spatial scale used to evaluate type conversion. Mature native shrubs that are retained will be distributed contiguously or in patches within the stand. If the stand consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity, to the extent needed to avoid type conversion. <p>These SPR requirements apply to all treatment activities and all treatment types, including treatment maintenance.</p> <p>Additional measures will be applied to ecological restoration treatment types:</p> <ul style="list-style-type: none"> ▶ For ecological restoration treatment types, complete removal of the mature shrub layer will not occur in native chaparral and coastal sage scrub vegetation types. ▶ Ecological restoration treatments will not be implemented in vegetation types that are within their natural fire return interval (i.e., time since last burn is less than the average time listed as the fire return interval range in Table 3.6-1) unless the project proponent demonstrates with substantial evidence that the habitat function of chaparral and coastal sage scrub would be improved. ▶ A minimum of 35 percent relative cover of existing shrubs and associated native vegetation will be retained at existing densities in patches distributed in a mosaic pattern within the treated area or the shrub canopy will be thinned by no more than 20 percent from baseline density (i.e., if baseline shrub canopy density is 60 percent, post treatment shrub canopy density will be no less than 40 percent). A different percent relative cover can be retained if the project proponent demonstrates with substantial evidence that alternative treatment design measures would result in effects on the habitat function of chaparral and coastal sage scrub that are equal or more favorable than those expected to result from application of the above measures. <p>Biological considerations that may inform a deviation from the minimum 35 percent relative cover retention include but are not limited to soil moisture requirements, increased soil temperatures, changes in light/shading, presence of sufficient seed plants and nurse plants, erosion potential, and site hydrology.</p> <ul style="list-style-type: none"> ▶ If the stand within the treatment area consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity. 			

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>These SPR requirements apply to all treatment activities and only the ecosystem restoration treatment type, including treatment maintenance.</p> <p>A determination of compliance with the SB 1260 prohibition of type conversion in chaparral and coastal sage scrub is a statutory issue separate from CEQA compliance that may involve factors additional to the ecological definition and habitat functions presented in the PEIR, such as geographic context. It is beyond the legal scope of the PEIR to define SB 1260 type conversion and statutory compliance. The project proponent, acting as lead agency for the proposed later treatment project, will be responsible for defining type conversion in the context of the project and making the finding that type conversion would not occur, as required by SB 1260. The project proponent will determine its criteria for defining and avoiding type conversion and, in making its findings, may draw upon information presented in this PEIR.</p>			
<p>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., lone chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of <i>Phytophthora</i> and other plant pathogens (e.g., pitch canker (<i>Fusarium</i>), goldspotted oak borer, shot hole borer, bark beetle):</p> <ul style="list-style-type: none"> ▶ 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 <i>Phytophthora</i> 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 <i>Phytophthora</i>s in Native Habitats 2016). <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	During treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Special-Status Plants			
<p>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."</p> <p>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.</p> <p>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.</p> <p>For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances:</p> <ul style="list-style-type: none"> ▶ 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. <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	Prior to treatment projects	RVC	RVC
Environmentally Sensitive Habitat Areas			
<p>SPR BIO-8: Identify and Avoid or Minimize Impacts in Coastal Zone ESHAs. When planning a treatment project within the Coastal Zone, the project proponent will, in consultation with the Coastal Commission or a local government with a certified Local Coastal Program (LCP) (as applicable), identify the habitat types and species present to determine if the area qualifies as an Environmentally Sensitive Habitat Area (ESHA). If the</p>	Prior to and during treatment projects	Project Proponent	Project Proponent and California Coastal Commission or a local government with a certified LCP (as applicable)

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>area is an ESHA, the treatment project may be allowed pursuant to this PEIR, if it meets the following conditions. If a project requires a CDP by the Coastal Commission or a local government with a certified LCP (as applicable), the CDP approval may require modification to these conditions to further avoid and minimize impacts:</p> <ul style="list-style-type: none"> ▪ The treatment will be designed, in compliance with the Coastal Act or LCP if a site is within a certified LCP area, to protect the habitat function of the affected ESHA, protect habitat values, and prevent loss or type conversion of habitat and vegetation types that define the ESHA, or loss of special-status species that inhabit the ESHA. ▪ Treatment actions will be limited to eradication or control of invasive plants, removal of uncharacteristic fuel loads (e.g., removing dead, diseased, 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 vegetation types present in the ESHA. ▪ A qualified biologist or RPF familiar with the ecology of the treatment area will monitor all treatment activities in ESHAs. ▪ Appropriate no-disturbance buffers will be developed in compliance with the Coastal Act or relevant LCP policies for treatment activities in the vicinity of ESHAs to avoid adverse direct and indirect effects to ESHAs. <p>This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p>			
<p>Invasive Plants and Wildlife</p> <p>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):</p> <ul style="list-style-type: none"> ▪ 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 	During treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas;</p> <ul style="list-style-type: none"> ▶ 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 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). <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>			
<p>Wildlife</p> <p>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.</p> <p>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</p>	No more than 14 days prior to treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p> <p>SPR BIO-11. Install Wildlife-Friendly Fencing (Prescribed Herbivory). If temporary fencing is required for prescribed herbivory treatment, a wildlife-friendly fencing design will be used. The project proponent will require a qualified RPF or biologist to review and approve the design before installation to minimize the risk of wildlife entanglement. The fencing design will meet the following standards:</p> <ul style="list-style-type: none"> ▶ Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale or snag a leaping animal; and, if feasible, keeping electric netting-type fencing electrified at all times or laid down while not in use. ▶ Charge temporary electric fencing with intermittent pulse energizers; continuous output fence chargers will not be permitted. ▶ Allow wildlife to jump over easily without injury by installing fencing that can flex as animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass. ▶ Be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers. <p>This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.</p> <p>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 PEIR. The active nesting season will be defined by the qualified RPF or biologist.</p> <p>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 identify 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</p>	<p>Prior to and during treatment projects</p>	<p>RVC</p>	<p>RVC</p>

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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).</p> <p>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:</p> <ul style="list-style-type: none"> ► 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. <p>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</p>			

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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 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).</p> <p>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:</p> <ul style="list-style-type: none"> ► 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. <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>			
Geology, Soils, Paleontology, and Mineral Resource Standard Project Requirements			
<p>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</p>	During treatment projects if there is a "chance" (30 percent or more) of rain within the next 24 hours	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p>			
<p>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.</p>	<p>During treatment projects if there is a "chance" (30 percent or more) of rain within the next 24 hours</p>	<p>RVC</p>	<p>RVC</p>
<p>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.</p>	<p>During mechanical, prescribed herbivory, and prescribed burn activities that result in exposure of bare soil over 50 percent or more of the treatment area</p>	<p>RVC</p>	<p>RVC</p>
<p>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.</p>	<p>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, remediate prior to the first rainfall event; 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</p>	<p>RVC</p>	<p>RVC</p>

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
	feasible after the event; any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours		
<p>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.</p>	During mechanical, manual, and prescribed burn treatment activities	RVC	RVC
<p>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.</p>	During mechanical, manual, and prescribed burn treatment activities	RVC	RVC
<p>SPR GEO-7 Minimize Erosion: To minimize erosion, the project proponent will:</p> <ol style="list-style-type: none"> (1) Prohibit use of heavy equipment where any of the following conditions are present: <ol style="list-style-type: none"> (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: <ol style="list-style-type: none"> (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. <p>This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p>	During treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures		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 identify 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 treatment projects with slopes greater than 50 percent	RVC	RVC
Greenhouse Gas Emission Standard Project Requirements				
SPR GHG-1 Contribute to the AB 1504 Carbon Inventory Process: The project proponent of treatment projects subject to the AB 1504 process will provide all necessary data about the treatment that is needed by the U.S. Forest Service and FRAP to fulfill requirements of the AB 1504 carbon inventory, and to aid in the ongoing research about the long-term net change in carbon sequestration resulting from treatment activity. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.		During treatment projects subject to the AB 1504 process	NA	NA
Hazardous Materials 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.		Inspect all equipment for leaks prior to treatment projects; inspect everyday thereafter until equipment is removed from the site; promptly remove any leaking equipment; maintain all diesel- and gasoline-powered equipment per manufacturer's specifications and in compliance with all state and federal emissions requirements during treatment projects	RVC	RVC
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	RVC	RVC
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		During manual treatment activities	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
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.			
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 treatment projects	RVC	RVC
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): <ul style="list-style-type: none"> ▶ 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.	Prepare SPRP prior to beginning any herbicide treatment activities; implement measures during herbicide treatment activities	RVC	RVC
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: <ul style="list-style-type: none"> ▶ 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. ▶ 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.	Prior to treatment projects	RVC	RVC and Riverside County Agricultural Commissioner

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p>	During herbicide treatment activities	RVC	RVC
<p>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:</p> <ul style="list-style-type: none"> ▶ 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. <p>This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.</p>	During herbicide treatment activities	RVC	RVC
<p>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.</p>	During herbicide treatment activities occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Hydrology and Water Quality Standard Project Requirements			
<p>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 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.</p>	During treatment projects	RVC	RVC
<p>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.</p>	Prior to treatment projects	RVC	RVC
<p>SPR HYD-3 Water Quality Protections for Prescribed Herbivory: The project proponent will include the following water quality protections for all prescribed herbivory treatments:</p> <ul style="list-style-type: none"> ▶ Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified in the treatment prescription and excluded from prescribed herbivory project areas using temporary fencing or active herding. A buffer of approximately 50 feet will be maintained between sensitive and actively grazed areas. ▶ Water will be provided for grazing animals in the form of an on-site stock pond or a portable water source located outside of environmentally sensitive areas. ▶ Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed. 	Prior to prescribed herbivory treatment activities	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.			
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 projects; implement WLPZ protections during treatment projects	RVC	RVC

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
30-50 % Slope	100	75	
>50 % Slope	150	100	beneficial uses of water. Determined on a site-specific basis.

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

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>The following WLPZ protections will be applied for all treatments:</p> <ul style="list-style-type: none"> ▶ 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. 			

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>► 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.</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>			
<p>SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides: The project proponent will implement the following measures when applying herbicides:</p> <p>► 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.</p> <p>► 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.</p> <p>► 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.</p> <p>► 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.</p> <p>► 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.</p> <p>► 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).</p> <p>► No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities.</p> <p>This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.</p>	During herbicide treatment activities	RVC	RVC

Standard Project Requirements and Mitigation Measures		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.		Mark existing stormwater drainage infrastructure prior to ground disturbing activities; if a drainage structure or infiltration system is inadvertently disturbed or modified during treatment, coordinate with owner to repair damage and restore pre-project drainage conditions	RVC	RVC
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 treatment projects	RVC	RVC
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.		During treatment projects	RVC	RVC
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 treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures		Timing	Implementing Entity	Verifying/Monitoring Entity
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 treatment projects	RVC	RVC
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 treatment projects	RVC	RVC
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 within 1,500 feet of noise-sensitive receptors	RVC	RVC
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.		Approximately 2 weeks prior to treatment projects requiring temporary closure of public recreation areas or facilities	RVC	RVC
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		If needed, prepare TMP prior to treatment projects and implement during project treatments	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>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.</p>			
Public Services and Utilities Standard Project Requirements			
<p>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.</p>	<p>Prepare an Organic Waste Disposition Plan prior to mechanical or manual treatment activities; implement plan during mechanical or manual treatment activities</p>	RVC	RVC

Standard Project Requirements and Mitigation Measures		Timing	Implementing Entity	Verifying/Monitoring Entity
MITIGATION MEASURES				
Aesthetics				
Mitigation Measure AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks The project proponent will conduct a visual reconnaissance of the treatment area prior to implementing non-shaded fuel breaks to observe the surrounding landscape and determine if public viewing locations, including scenic vistas, public trails, and state scenic highways, have views of the proposed treatment area. If none are identified, the non-shaded fuel break may be implemented without additional visual mitigation. If the project proponent identifies public viewing points, including heavily used scenic vistas, public trails, recreation areas, and state scenic highways with lengthy views (i.e., longer than a few seconds) of a proposed non-shaded fuel break treatment area, the project proponent will, prior to implementation, attempt to identify any feasible change in location of the fuel break to reduce its visibility from public viewpoints. If no feasible location changes exist that would reduce impacts to public viewers and achieve the intended wildfire risk reduction objectives of the proposed non-shaded fuel break, the project proponent will implement, where feasible, a shaded fuel break rather than a non-shaded fuel break, if the shaded fuel break would achieve the intended wildfire risk reduction objectives. With the shaded fuel break, the project proponent will thin and feather adjacent vegetation to break up the linear edges of the fuel break and strategically preserve vegetation at the edge of the fuel break, as feasible, to help screen public views and minimize the contrast between the fuel break and surrounding vegetation.		Prior to and during non-shaded fuel break treatment projects	NA	NA
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: <ul style="list-style-type: none"> ▶ 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. 		During treatment projects	NA	NA

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <ul style="list-style-type: none"> ▶ Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria: <ul style="list-style-type: none"> ▪ 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. 			
Archaeological, Historical, and Tribal Cultural Resources			
<p>Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources</p> <p>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</p>	During ground-disturbing activities	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
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.			
Biological Resources			
<p>Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA</p> <p>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 (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.</p> <p>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.</p> <p>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</p>	Prior to treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p>			
<p>Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA</p> <p>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:</p> <ul style="list-style-type: none"> ▶ 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 treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>► 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.</p> <p>► No fire ignition (and associated use of accelerants) will occur within the special-status plant buffer.</p> <p>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.</p> <p>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.</p>			
<p>Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants</p> <p>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</p>	<p>Prior to treatment projects</p>	<p>NA</p>	<p>NA</p>

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> ▶ 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. <p>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:</p> <ul style="list-style-type: none"> ▶ 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. <p>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</p>			

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity.</p> <p>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.</p> <p>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.</p> <p>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 PEIR.</p> <p>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.</p>			
<p>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)</p> <p>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</p> <p>Avoid Mortality, Injury, or Disturbance of Individuals</p> <p>The project proponent will implement one of the following 2 measures to avoid mortality, injury, or disturbance of individuals:</p> <ol style="list-style-type: none"> 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 	Prior to and during treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>▶ 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.</p> <p>▶ 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.</p> <p><u>Maintain Habitat Function</u></p> <p>▶ The project proponent will design treatment activities to maintain the habitat function, by implementing the following:</p> <ul style="list-style-type: none"> ▪ 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 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 			

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. If consultation determines that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c.			
<p>Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)</p> <p>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.</p> <p>Avoid Mortality, Injury, or Disturbance of Individuals</p> <ul style="list-style-type: none"> ▶ The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: <p>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 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).</p> <ul style="list-style-type: none"> ■ 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 	Prior to and during treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <ul style="list-style-type: none"> 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. <p><u>Maintain Habitat Function</u></p> <ul style="list-style-type: none"> For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following: <ul style="list-style-type: none"> 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. 			

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>► 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.</p> <p>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 alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented.</p> <p>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.</p>			
<p>Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)</p> <p>If the provisions of Mitigation Measure BIO-2a, BIO-2b, BIO-2d, BIO-2e, BIO-2f, or BIO-2g cannot be implemented and the project proponent determines that additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or protecting land that provides (or will provide in the case of restoration) habitat function for affected</p>	Prior to treatment projects	NA	NA

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>species that is at least equivalent to the habitat function removed or degraded as a result of the treatment.</p> <p>Compensation may include:</p> <ol style="list-style-type: none"> 1. Preserving existing habitat outside of the treatment area in perpetuity; this may entail purchasing mitigation credits and/or lands from a CDFW- or USFWS-approved entity in sufficient quantity to offset the residual significant impacts, generally at a ratio of 1:1 for habitat; and 2. Restoring or enhancing existing habitat within the treatment area or outside of the treatment area (including decommissioning roads, adding perching structures, removing existing perching structures, or removing existing movement barriers or other existing features that are adversely affecting the species). <p>The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and:</p> <ol style="list-style-type: none"> 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 mechanisms 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 habitat. <p>Review requirements are as follows:</p> <ul style="list-style-type: none"> ► 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. ► For species listed under ESA or CESA or a California Fully Protected Species, the project proponent will submit the mitigation plan to CDFW and/or USFWS/NOAA Fisheries for review and comment. 			

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>► For other special-status wildlife species the project proponent may consult with CDFW and/or USFWS regarding the availability and applicability of compensatory mitigation and other related technical information.</p> <p>Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit), if these requirements are equally or more effective than the mitigation identified above.</p> <p>Mitigation Measure BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)</p> <p>If elderberry shrubs within the documented range of valley elderberry longhorn beetle are identified during review and surveys for SPR BIO-1, and valley elderberry longhorn beetle or likely occupied suitable elderberry habitat (e.g., within riparian, within historic riparian, containing exit holes) is confirmed to be present during protocol-level surveys following the protocol outlined in USFWS <i>Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle</i> (USFWS 2017) per SPR BIO-10, the following protective measures will be implemented to avoid and minimize impacts to valley elderberry longhorn beetle:</p> <p>► If elderberry shrubs are 165 feet or more from the treatment area, and treatment activities would not encroach within this distance, direct or indirect impacts are not expected and further mitigation is not required.</p> <p>► If elderberry shrubs are located within 165 feet of the treatment area, the following measures will be implemented:</p> <ul style="list-style-type: none"> ■ A minimum avoidance area of at least 20 feet from the dripline of each elderberry plant will be fenced or flagged and maintained to avoid direct impacts (e.g., damage to root system) that could damage or kill the plant, with the exception of the following activities: <ul style="list-style-type: none"> ■ Manual trimming of elderberry shrubs will only occur between November and February and will avoid removal of any branches or stems that are greater than or equal to 1 inch in diameter to avoid and minimize adverse effects on valley elderberry longhorn beetle. ■ Manual or mechanical vegetation treatment within the drip-line of any elderberry shrub will be limited to the season when adults are not active (August - February), will be limited to methods that do not cause ground disturbance, and will avoid damaging the elderberry. ■ A qualified RPF, biologist, or biological technician familiar with valley elderberry longhorn beetle and its life history will monitor the work area to verify the avoidance and minimization measures are implemented. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to valley elderberry longhorn beetle. 	Prior to and during treatment project	NA	NA

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of VELB or degradation of occupied habitat such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.</p> <p>Mitigation Measure BIO-2c: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities)</p> <p>If federally listed butterflies are identified as occurring or having potential to occur during review and surveys for SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, then the following measures will be implemented:</p> <ul style="list-style-type: none"> ▶ Treatment areas within the range of these species will be surveyed for the host plant for each species (Table 3.6-34). ▶ Host plants for federally listed butterflies within the occupied habitat will be marked with high-visibility flagging, fencing, or stakes, and no treatment activities will occur within 10 feet of these plants. ▶ Because prescribed herbivory could result in the indiscriminate removal of the host plants for federally listed butterflies, this treatment type will not be used within occupied habitat of any federally listed butterfly species, unless it is known that the host plant is unpalatable to the herbivore. ▶ Treatment areas that are not occupied but are within the range of the federally listed butterfly will be divided into as many treatment units as feasible such that the entirety of the habitat is not treated within the same year. ▶ Treatments will be conducted in a patchy pattern to the extent feasible in areas that are not occupied but are within the range of the federally listed butterfly, such that the entirety of the habitat is not burned or removed and untreated portions of suitable habitat are retained. <p>If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of federally listed butterflies or degradation of occupied habitat (host plants) such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.</p> <p>CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of any feasible impact avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed butterflies or degradation of occupied habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c.</p>	Prior to and during treatment projects	NA	NA

Table 3.6-34 Special-status Butterflies and Associated Host Plants

Butterfly Species	Host Plants
bay checkerspot butterfly	dwarf plantain (<i>Plantago virginica</i>), purple owl's clover (<i>Castilleja exserta</i>)
Behren's silverspot butterfly	blue violet (<i>Viola adunca</i>)
callippe silverspot butterfly	California golden violet (<i>Viola pedunculata</i>)
Carson wandering skipper	salt grass (<i>Distichlis spicata</i>)
El Segundo blue butterfly	seaciff buckwheat (<i>Eriogonum parvifolium</i>)
Hermes copper butterfly	spiny redberry (<i>Rhamnus crocea</i>)
Kern primrose sphinx moth	plains evening-primrose (<i>Camissonia contorta</i>), field primrose (<i>Camissonia campestris</i>)
Laguna Mountains skipper	Cleveland's horkelia (<i>Horkelia clevelandii</i>), sticky cinquefoil (<i>Drymocallis glandulosa</i>)
Lange's metalmark butterfly	naked-stemmed buckwheat (<i>Eriogonum nudum</i>)
lotis blue butterfly	seaside bird's foot trefoil (<i>Hosackia gracilis</i>)
Mission blue butterfly	Lupine (<i>Lupinus</i> spp.)
Myrtle's silverspot butterfly	blue violet
Oregon silverspot butterfly	blue violet
Palos Verdes blue butterfly	Santa Barbara milkvetch (<i>Astragalus trichopodus</i>), common deerweed (<i>Acmispon glaber</i>)
San Bruno elfin butterfly	broadleaf stonecrop (<i>Sedum spathulifolium</i>), manzanita (<i>Arctostaphylos</i> spp.), huckleberry (<i>Vaccinium</i> spp.)
Smith's blue butterfly	seaciff buckwheat, seaside buckwheat (<i>Eriogonum latifolium</i>)
Quino checkerspot butterfly	dwarf plantain, purple owl's clover

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status 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 species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status butterflies would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status butterflies 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.</p> <p>The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status butterfly species would benefit from treatment in the occupied habitat area even though some may be killed, injured or disturbed during treatment activities. For a treatment to be considered beneficial to special-status butterfly species, 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). If it is determined that treatment activities would be beneficial to special-status butterflies, no compensatory mitigation will be required.</p>			
<p>Mitigation Measure BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities)</p> <p>If treatment activities would occur within the limited range of any state or federally listed beetle, fly, grasshopper, or snail, and these species are identified as occurring or having potential to occur due to the presence of potentially suitable habitat during review and surveys for SPR BIO-1 and surveys for SPR BIO-10, then the following measures will be implemented:</p> <ul style="list-style-type: none"> ▶ To avoid and minimize impacts to Mount Hermon June beetle and Zayante band-winged grasshopper, treatment activities will not occur within "Sandhills" habitat in Santa Cruz County, the only suitable habitat for these species. ▶ To avoid and minimize impacts to Casey's June beetle, Delhi Sands flower-loving fly (<i>Rhaphiomidas terminatus abdominalis</i>), Delta green ground beetle (<i>Elaphrus viridis</i>), Morro shoulderband snail, Ohlone tiger beetle (<i>Cicindela ohtone</i>), and Trinity bristle snail, treatment activities will not occur within habitat in the range of these species that is deemed suitable by a qualified RPF or biologist with familiarity of the species. 	Prior to and during treatment projects	NA	NA

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities)</p> <p>If special-status bumble bees are identified as occurring during review and surveys under SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, or if suitable habitat for special-status bumble bees is identified during review and surveys under SPR BIO-1 (e.g., wet meadow, forest meadow, riparian, grassland, or coastal scrub habitat containing sufficient floral resources within the range of the species), then the project proponent will implement the following measures, as feasible:</p> <ul style="list-style-type: none"> ▶ Prescribed burning within occupied or suitable habitat for special-status bumble bees will occur from October through February to avoid the bumble bee flight season. ▶ Treatment areas in occupied or suitable habitat will be divided into a sufficient number of treatment units such that the entirety of the habitat is not treated within the same year; the objective of this measure is to provide refuge for special-status bumble bees during treatment activities and temporary retention of suitable floral resources proximate to the treatment area. ▶ Treatments will be conducted in a patchy pattern to the extent feasible in occupied or suitable habitat, such that the entirety of the habitat is not burned or removed and untreated portions of occupied or suitable habitat are retained (e.g., fire breaks will be aligned to allow for areas of unburned floral resources for special-status bumble bees within the treatment area). ▶ Herbicides will not be applied to flowering native plants within occupied or suitable habitat to the extent feasible during the flight season (March through September). <p>CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of feasible avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance to the species, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed bumble bees (in the event the Candidate listing is confirmed) or degradation of occupied (or assumed to be occupied) habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c</p> <p>Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status 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 species' habitat or because the loss of special-status individuals would</p>	Prior to and during treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status bumble bees would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status bumble bees or degradation of occupied (or assumed to be 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.</p> <p>The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status bumble bee species would benefit from treatment in the occupied (or assumed to be occupied) habitat area even though some of the non-listed special-status bumble bees may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to special-status bumble bee species, 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 bumble bees, no compensatory mitigation will be required.</p>			
<p>Mitigation Measure BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory)</p> <p>The project proponent will implement the following measure if treatment activities are planned within the range of desert bighorn sheep, peninsular bighorn sheep, Sierra Nevada bighorn sheep, or pronghorn:</p> <ul style="list-style-type: none"> ▶ Prescribed herbivory activities will be prohibited within a 14-mile buffer around suitable habitat for any species of bighorn sheep within the range of these species consistent with the more stringent recommendations in the Recovery Plan for Sierra Nevada bighorn sheep (USEWS 2007). ▶ Prescribed herbivory activities will be avoided within the range of pronghorn where feasible (where this range does not overlap with the range of any species of bighorn sheep). 	During prescribed herbivory activities	NA	NA
<p>Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands</p> <p>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:</p>	Prior to and during treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<ul style="list-style-type: none"> ▶ Reference the <i>Manual of California Vegetation</i>, Appendix 2, Table A2, <i>Fire Characteristics</i> (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 <i>Fire in California's Ecosystems</i> (Van Wagtendonk et al. 2018) and the <i>Manual of California Vegetation</i> (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. ▶ 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 <i>Fire in California's Ecosystems</i> (Van Wagtendonk et al. 2018) and the <i>Manual of California Vegetation</i> (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 			

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>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).</p> <p>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.</p> <p>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.</p>			

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands</p> <p>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:</p> <ul style="list-style-type: none"> ▶ Compensate for unavoidable losses of sensitive natural community and oak woodland acreage and function by: <ul style="list-style-type: none"> ▪ 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: <ol style="list-style-type: none"> 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. <p>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.</p>	Prior to treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat</p> <p>If, after implementation of SPR BIO-4, impacts to riparian habitat remain significant under CEQA, the project proponent will implement the following:</p> <ul style="list-style-type: none"> ▶ Compensate for unavoidable losses of riparian habitat acreage and function by: <ul style="list-style-type: none"> ▪ 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: <ol style="list-style-type: none"> 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. <p>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.</p>	Prior to treatment projects	NA	NA

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands</p> <p>Impacts to wetlands will be avoided using the following measures:</p> <ul style="list-style-type: none"> ▶ 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: <ul style="list-style-type: none"> ■ 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 treatment projects	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites</p> <p>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:</p> <ul style="list-style-type: none"> ▶ 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. 	Prior to and during treatment projects	RVC	RVC
Greenhouse Gas Emissions			
<p>Mitigation Measure GHG-2: Implement GHG Emission Reduction Techniques During Prescribed Burns</p> <p>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 <i>National Wildfire Coordinating Group Smoke Management Guide for Prescribed Fire</i> (NWCWG 2018):</p> <ul style="list-style-type: none"> ▶ 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. 	Prior to and during prescribed burn activities	RVC	RVC

Standard Project Requirements and Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>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.</p> <p>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.</p>			
Hazardous Materials, Public Health and Safety			
<p>Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites</p> <p>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.</p>	Prior to treatment projects	RVC	RVC

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ATTACHMENT B

Project-Specific CEQA Findings and Statement of Overriding Considerations

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INTRODUCTION

The **Riverside County Fire Department**¹, referred to herein as "Project Proponent," in the exercise of its independent judgment, makes and adopts the following findings regarding its decision to approve the **Elsinore Front Country Fuel Break – CalVTP Project ID; 2021-16**, referred to herein as "vegetation treatment project," within the scope of the California Vegetation Treatment Program (CalVTP). This document has been prepared in accordance with the California Environmental Quality Act (Pub. Resources Code, Sections 21000 et seq.) (CEQA) and the CEQA Guidelines (Cal. Code Regs., Tit. 14, Sections 15000 et seq.).

STATUTORY REQUIREMENTS FOR FINDINGS

Public Resources Code section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The same section provides that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." (Pub. Resources Code, Section 21002.) Section 21002 goes on to provide that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in Public Resources Code section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See Pub. Resources Code, Section 21081, subd. (a); CEQA Guidelines, Section 15091, subd. (a).) For each significant environmental effect identified in an EIR for a project, the approving agency must issue a written finding reaching one or more of three permissible conclusions:

- (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

(CEQA Guidelines, Section 15091, subd. (a); Pub. Resources Code, Section 21081, subd. (a).) Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors." (See also *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 565.)

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a Statement of Overriding Considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered

¹ For the purposes of implementing the CalVTP, a project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. If through the Project Specific Analysis (PSA) a project proponent determines that a proposed project is within the scope of the CalVTP PEIR, then the project proponent would act as a responsible agency pursuant to CEQA. A regulatory agency seeking to use the CalVTP PEIR to issue any secondary approval or permit for vegetation treatments would also be a responsible agency. If the PSA determines that one or more impacts of a proposed later vegetation treatment project is not within the scope of the CalVTP PEIR, then the project proponent may serve as a lead agency in the preparation of additional environmental documentation that accompanies the PEIR for CEQA compliance.

"acceptable" its "unavoidable adverse environmental effects." (CEQA Guidelines, Sections 15093, 15043, subd. (b); see also Pub. Resources Code, Section 21081, subd. (b).) The California Board of Forestry and Fire Protection (the Board), adopted Findings and a Statement of Overriding Considerations on December 30, 2019.

Here, as explained in the Board's Findings and the Draft Program Environmental Impact Report (Draft PEIR) and the Final PEIR (collectively, the "PEIR"), the CalVTP would result in significant and unavoidable environmental effects to the following: Aesthetics; Air Quality; Archaeological, Historical, and Tribal Cultural Resources; Biological Resources; Greenhouse Gas Emissions; Transportation; and Public Services, Utilities, and Service Systems. For reasons set forth in the Board's Statement of Overriding Considerations, however, the Board determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the CalVTP.

When a responsible agency approves a vegetation treatment project using a within the scope finding for all environmental impacts, it must adopt its own CEQA findings pursuant to Section 15091 of the State CEQA Guidelines, and if needed, a statement of overriding considerations, pursuant to Section 15093 of the State CEQA Guidelines. (See CEQA Guidelines section 15096(h).) According to case law, a responsible agency's findings need only address environmental impacts "within the scope of the responsible agency's jurisdiction." (*Riverwatch v. Olivenhain Municipal Water District* (2009) 170 Cal.App.4th 1186, 1202.) Although each responsible agency must adopt its own findings, such agencies have the option of reusing, incorporating, or adapting all or part of the findings adopted by the Board for the CalVTP PEIR to meet the agency's own requirements to the extent the findings are applicable to the proposed vegetation treatment project. The following document sets forth the required findings for an agency's project-specific approval that relies on and implements the CalVTP PEIR.

The Project Proponent adopts these findings to document its exercise of its independent judgment regarding the potential environmental effects analyzed in the PEIR and to document its reasoning for approving the vegetation treatment project under the CalVTP in spite of these effects.

BACKGROUND AND PROJECT DESCRIPTION

The concept of the proposed project is identified in the Riverside Unit Fire Plan (CAL FIRE – Riverside Unit). RVC and CAL FIRE have been contractual partners in fire services for 100 years. RVC Fire has assumed the leadership to establish a fuel break directly adjacent to a Wildland Urban Interface (WUI) area. Located directly west of the Wildomar, Lake Elsinore, Horsethief Canyon, Temescal Canyon, Trilogy communities, and east of the Cleveland National Forest boundary, the fuel break is situated at the base of the slope between community areas and wildland areas. Nearly 6,000 homes, businesses, governmental buildings, schools, and other structures are within a quarter of a mile to the proposed project. In the event of a wildfire, the purpose of the shaded fuel break allows firefighters to conduct fire suppression operations to defend the community from wildfires or reduce the threat of a wildfire spreading into the wildlands. In turn, the shaded fuel break reduces risk to firefighters, reduces cost and losses from destructive wildfires, and reduces the potential loss of lives.

In January 2019, RVC received a CCI grant from Cal Fire to fund the environmental review and implement the proposed project. The proposed project starts north of the Bear Creek Golf Course in Wildomar, near Clinton Keith Road, and continues north towards the Trilogy Golf Course, just south of Corona near the Bedford Motor Parkway Road. The fuel break is approximately 21 miles in length and 300 feet wide. The proposed project involves 523 parcels mostly held as private properties, with a few non-federal land holdings (water district and county flood control parcels), for a total of 1,056.7 acres. The fuel break is relatively continuous, although in places where there are natural barriers, such as the clay pit area, where the fuel break ties into these areas, and no treatment is required. The proposed project considered including lands owned or managed by conservation organizations; however, these lands are designated as "conserved" lands and are excluded from the proposed project. Thus, the fuel break is relatively continuous in the southern treatment units and discontinuous in the northern units, see Map-1.

The placement of the proposed project was digitized utilizing a geographic information system (GIS) platform and aerial imagery. The treatment area layout focused on maximizing community protection by aligning the fuel break closest to developed areas. The fuel break layout is influenced by landowner interest, parcel map information, developed areas (WUI), infrastructure, roads, watercourses, and other natural or artificial barriers. The alignment of the

fuel break may slightly vary within parcels with signed agreements with approved field surveys. The proposed project does not include federal lands (Cleveland National Forest).

Treatment Type and Activities

The proposed project integrates Wildland-Urban Interface fuel reduction as a fuel break. The fuel break, strategically located at the base of the slope, provides firefighters with a logistical location to defend communities from wildfires. The fuel break is relatively continuous as a linear treatment area next to community areas and would serve as a long-term project.

The proposed treatment activities include the following: manual treatment, mechanical treatment, herbivory, and prescribed fire (pile burning). In isolated sites, herbicides may be used to treat non-native or invasive species.

Vegetation Treatment Prescription

The dominant vegetation is a mixture of brush species (mixed chaparral, coastal sage scrub, and scrub oak). In a few open sites, grass and forbs occupy the area, while occasionally, trees or tall brush species stand above the brush and grass areas. Collectively, this vegetation adjacent to community areas constitutes the classification as hazardous fuel (refer to CalVTP 2.4.1 – Fuel Types).

The fuels reduction prescription would reduce, modify, and remove 40-60% vegetation based on slope, terrain conditions, habitat for sensitive biological species, cultural resources, soils, buffers for watercourse protection, and access. The retained vegetation expects to appear as a random mosaic pattern within the treatment area to create a shaded fuel break. The perimeter is scalloped or feathered to blend into the adjacent untreated vegetation to minimize blunt or sharp edges. Retained vegetation expects to be a mixture of young and mature vegetation. Where appropriate, pruning and limbing, consistent with industry-standard pruning practices, minimizes ladder fuels. Emphasis is placed on removing dead and dying brush and trees. Where appropriate, retention areas (untreated areas) are expected to be scattered throughout the proposed treatment, most likely associated with watercourse buffers, habitat areas, cultural resources, steep slopes, or aesthetics.

The treatment methods primarily are manual and mechanical operations. Access, slope, soil conditions, and other site factors determine the treatment method. Most of the treatment area (70-80%) would occur through manual or hand treatment. Approximately 20-30% of the area is suitable for mechanical treatment. The steep slopes and soil conditions limit the size of mastication equipment to small or medium-sized masticators. Hand tools, such as chain saws, axes, shovels, weed eaters, are likely tools for manual or hand-treatment operations. Other support vehicles may be necessary to complete the job, such as dump trucks, loaders, and trailers. Access limits the use of these vehicles to paved or existing dirt or natural surfaced roads.

The proposed project includes using herbicides, herbivory, and prescribed pile burning to provide supplement or remote support to the project. Herbicide application would be used for targeted invasive/non-native species that contribute to hazardous fuel loading. Herbivory practices would be an option for initial treatment and maintenance in suitable locations. Prescribed burning is limited to pile burning in isolated locations that are not accessible for equipment to dispose of cut vegetation.

See Section 2 in the Project Specific Analysis for further details about the EFCFB project.

ENVIRONMENTAL REVIEW PROCESS

The Project Proponent followed the evaluation and reporting process outlined in the PSA and required under the CalVTP.

On October 28, 2021, Project Proponent submitted to CAL FIRE the required information regarding this project when it began preparing the PSA. The submittal included:

- GIS data that included project location (as a point);
- project size;
- planned treatment types and activities; and
- contact information for a representative of the project proponent.

Upon adoption of these findings and approval of the project, Project Proponent will submit this completed PSA and associated geospatial data to CAL FIRE at the time a Notice of Determination is filed. The submittal will include the following:

- ▶ The completed PSA Environmental Checklist;
- ▶ The 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)

As required under the CalVTP, Project Proponent will submit the following information to CAL FIRE after implementation of the 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; and
 - 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.

RECORD OF PROCEEDINGS

In accordance with Public Resources Code Section 21167, subdivision (e), the record of proceedings for the Project Proponent's decision to approve the vegetation treatment project under the CalVTP includes the following documents at a minimum:

- ▶ The certified Final PEIR for the CalVTP, including the Draft PEIR, responses to comments on the Draft PEIR, and appendices;

- ▶ All recommendations and findings adopted by the Board in connection with the CalVTP and all documents cited or referred to therein;
- ▶ All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the treatment project prepared by the Project Proponent, consultants to the Project Proponent, or responsible or trustee agencies with respect to the Project Proponent's compliance with the requirements of CEQA and with respect to the Project Proponent's action on the CalVTP;
- ▶ Matters of common knowledge to the Project Proponent, including but not limited to federal, state, and local laws and regulations;
- ▶ Any documents expressly cited in these findings, in addition to those cited above; and
- ▶ Any other materials required for the record of proceedings by Public Resources Code section 21167.6, subdivision (e).

Pursuant to CEQA Guidelines section 15091, subdivision (e), the documents constituting the record of proceedings are available for review during normal business hours at:

Riverside County – Project Management Office
3133 Mission Inn Avenue,
Riverside, CA 92507

The custodian of these documents is Mike Sullivan, Senior Environmental Planner.

MITIGATION MONITORING AND REPORTING PROGRAM

A Mitigation Monitoring and Reporting Program (MMRP) was adopted by the Board for the CalVTP, and the applicable mitigation measures for this treatment project have been identified in the PSA and added to the MMRP. The Project Proponent will use the MMRP to track compliance with the CalVTP mitigation measures. The MMRP will remain available for public review during the compliance period. The Final MMRP is attached to and is approved in conjunction with the approval of the treatment project and adoption of these Findings.

FINDINGS FOR DETERMINATIONS OF LESS THAN SIGNIFICANT

The Project Proponent has reviewed and considered the information in the Final PEIR for the CalVTP addressing potential environmental effects, proposed mitigation measures, and alternatives. The Project Proponent, relying on the facts and analysis in the Final PEIR and the treatment project PSA, which were presented to the Riverside County Board of Supervisors and reviewed and considered prior to any approvals, concurs with the conclusions of the Final PEIR and the treatment project PSA regarding the potential environmental effects of the CalVTP and the treatment project.

The Project Proponent concurs with the conclusions in the Final PEIR and treatment project PSA that all of the following impacts will be less than significant:

AESTHETICS AND VISUAL RESOURCES

- ▶ 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

- ▶ Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types

AGRICULTURAL AND FORESTRY RESOURCES

- ▶ 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

AIR QUALITY

- ▶ Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk
- ▶ Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk
- ▶ Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust

ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

- ▶ Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources
- ▶ Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource
- ▶ Impact CUL-4: Disturb Human Remains

BIOLOGICAL RESOURCES

- ▶ Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife
- ▶ Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources
- ▶ Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan

GEOLOGY, SOILS, AND MINERAL RESOURCES

- ▶ Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil
- ▶ Impact GEO-2: Increase Risk of Landslide

GREENHOUSE GAS EMISSIONS

- ▶ Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs

ENERGY RESOURCES

- ▶ Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy

HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

- ▶ Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials
- ▶ Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides

HYDROLOGY AND WATER QUALITY

- ▶ 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
- ▶ 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
- ▶ 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
- ▶ Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides
- ▶ Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area

LAND USE AND PLANNING, POPULATION AND HOUSING

- ▶ Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation
- ▶ Impact LU-2: Induce Substantial Unplanned Population Growth

NOISE

- ▶ Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation
- ▶ Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities

RECREATION

- ▶ Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas

TRANSPORTATION

- ▶ 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
- ▶ Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses

PUBLIC SERVICES, UTILITIES, AND SERVICE SYSTEMS

- ▶ Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs
- ▶ Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste

WILDFIRE

- ▶ Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire
- ▶ Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides

CUMULATIVE

- ▶ Agriculture and Forestry Resources
- ▶ Biological Resources
- ▶ Geology, Soils, Paleontology, and Mineral Resources
- ▶ Energy Resources
- ▶ Hazardous Materials, Public Health and Safety
- ▶ Hydrology and Water Quality
- ▶ Population and Housing
- ▶ Noise
- ▶ Recreation
- ▶ Wildfire

SIGNIFICANT EFFECTS AND MITIGATION MEASURES

The PEIR identified a number of significant and potentially significant environmental effects (or impacts) that the CalVTP will contribute to or cause. The Board adopted Findings and Statement of Overriding Considerations (findings) determined that some of these significant effects can be fully avoided through the application of feasible mitigation measures. Other effects, however, cannot be avoided by the adoption of feasible mitigation measures or alternatives and thus will be significant and unavoidable. For reasons set forth in Section 10.2 of the findings, the Board determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the CalVTP.

The Board adopted the findings required by CEQA for all direct and indirect significant impacts. The findings provided a summary description of each impact, described the applicable mitigation measures identified in the PEIR and adopted by the Board, and stated the Board's findings on the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the Final PEIR; and the Board incorporated by reference into its findings the discussion in those documents supporting the Final PEIR's determinations. In making those findings, the Board ratified, adopted, and incorporated into the findings the analyses and explanations in the Draft PEIR and Final PEIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions were specifically and expressly modified by the findings.

Similarly, the Project Proponent and County of Riverside Board of Supervisors incorporates herein, the analyses and explanations in the Draft PEIR and Final PEIR relating to environmental impacts and mitigation measure, as well as the

findings and analysis of alternatives, except to the extent, if any, where changes resulting from the project specific PSA are different from the PEIR and, as a result are discussed separately, below. The impacts and mitigation measures identified below reflect the conclusions of the PSA, in combination with the PEIR by indicating which of the CalVTP's impacts that this treatment project will contribute to or cause. By indicating the project-specific effects of this treatment project as follows, the Project Proponent's Riverside County Board of Supervisors is hereby making the required findings under CEQA regarding the application or feasibility of mitigation measures to reduce those impacts.

FINDINGS FOR IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

The Project Proponent finds that changes or alterations have been required in, or incorporated into, the treatment project which avoid or substantially lessen the significant environmental effects indicated below, as identified in the Final PEIR and the PSA. Implementation of the mitigation measures indicated below to be applicable to the treatment project, which have been required or incorporated into the project, will reduce these impacts to a less-than-significant level. The Project Proponent hereby directs that these mitigation measures be adopted.

BIOLOGICAL RESOURCES

☒ **Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications**

- ☒ Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA
- ☒ Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA
- ☐ Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants

☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Tree-Nesting and Cavity-Nesting Wildlife)**

- ☒ 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)
- ☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Shrub-Nesting Wildlife)**

- ☒ 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)
- ☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)

- ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- ☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Ground-Nesting Wildlife)**
 - ☒ 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)
 - ☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
 - ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
 - ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
 - ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
 - ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- ☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Burrowing and Denning Wildlife)**
 - ☒ 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)
 - ☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
 - ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
 - ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
 - ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
 - ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- ☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Insects and Other Terrestrial Invertebrates)**
 - ☐ 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)
 - ☐ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
 - ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
 - ☐ Mitigation Measure BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)
 - ☐ Mitigation Measure BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities)

- ☐ Mitigation Measure BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities)
- ☒ Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities)
- ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- ☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Bats)**
 - ☒ 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)
 - ☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
 - ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
 - ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
 - ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
 - ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- ☐ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Ungulates)**
 - ☐ 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)
 - ☐ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
 - ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
 - ☐ Mitigation Measure BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory)
 - ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
 - ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
 - ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- ☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Fish and Aquatic Invertebrates (in wetlands, vernal pools))**
 - ☒ 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)
 - ☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)

- ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- ☐ Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands
- ☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Amphibians and Reptiles (in wetlands, vernal pools, associated riparian))**
 - ☒ 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)
 - ☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
 - ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
 - ☐ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
 - ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
 - ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
 - ☐ Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands
- ☒ **Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function**
 - ☒ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
 - ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
 - ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- ☒ **Impact BIO-4: Substantially Affect State or Federally Protected Wetlands**
 - ☒ Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands
- ☒ **Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries**
 - ☒ Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites

HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

- ☐ **Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites**
 - ☐ Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites

FINDINGS FOR SIGNIFICANT AND UNAVOIDABLE IMPACTS

The CalVTP PEIR determined that some impacts of the program would be significant and unavoidable, even after implementation of all feasible mitigation. The Project Proponent finds that the treatment project would contribute to or cause the following significant and unavoidable impacts as indicated. Incorporating and implementing the following mitigation measures indicated to be applicable to the treatment project will reduce the severity of this impact, but not to a less-than-significant level. The Project Proponent hereby directs that these mitigation measures be adopted. The Project Proponent, therefore, finds that changes or alterations have been required in, or incorporated into, the treatment project that will substantially lessen, but not avoid, the significant environmental effect as identified in the PEIR and PSA.

The Project Proponent finds that fully mitigating these impacts are not feasible; there are no feasible mitigation measures beyond the mitigation measures indicated below to reduce these impacts. These impacts will remain significant and unavoidable. The Project Proponent concludes, however, that the benefits of the CalVTP and the vegetation treatment project outweigh the significant unavoidable impacts of the Program and treatment project, as set forth in the Board's Statement of Overriding Considerations the Project Proponent's own Statement of Overriding Considerations, if any].

AESTHETICS AND VISUAL RESOURCES

- ☐ Impact AES-3: Result in long-term substantial degradation of a scenic vista or visual character or quality of public views, or damage to scenic resources in a state scenic highway from the non-shaded fuel break treatment type
 - ☐ Mitigation Measure AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks

AIR QUALITY

- ☐ Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that Would Exceed CAAQS Or NAAQS and Conflict with Regional Air Quality Plans
 - ☐ Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques
- ☐ Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk
 - ☒ No feasible mitigation is available.
- ☒ Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning
 - ☒ No feasible mitigation is available.

ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

- ☒ Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources
 - ☒ Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources

BIOLOGICAL RESOURCES

- ☐ Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Insects and Other Terrestrial Invertebrates - Bumble Bees)

- ☐ Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities)

GREENHOUSE GAS EMISSIONS

- ☒ Impact GHG-2: Generate GHG Emissions through Treatment Activities
- ☒ Mitigation Measure GHG-2: Implement GHG Emission Reduction Techniques During Prescribed Burns

TRANSPORTATION

- ☐ Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP
- ☐ No feasible mitigation is available.

PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

- ☐ Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity
- ☐ No feasible mitigation is available.

CUMULATIVE

Aesthetics

- ☐ Cumulative Aesthetics Impact related to Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway
- ☐ Mitigation Measure AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks

Air Quality

- ☐ Cumulative Air Quality Impact related to On-Road Vehicle and Off-Road Equipment Exhaust Emissions
- ☐ Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques

Archaeological, Historical, and Tribal Cultural Resources

- ☒ Cumulative Archaeological, Historical, and Tribal Cultural Resources Impact related to Inadvertent Discoveries of Unique Archaeological Resources
- ☒ Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources

Biological Resources

- ☒ Cumulative Biological Resources Impact related to Bumble Bees
- ☒ Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities)

Transportation

☐ Cumulative Transportation Impact related to Vehicle Miles Travelled

☐ No feasible mitigation is available.

Public Services, Utilities and Service Systems

☐ Cumulative Public Services, Utilities, and Service Systems Impact related to Disposal of Biomass

☐ No feasible mitigation is available.

STATEMENT OF OVERRIDING CONSIDERATIONS²

As set forth in the Board's adopted Findings, the Board determined that the CalVTP will result in significant adverse environmental effects that cannot be avoided even with the adoption of all feasible mitigation measures, and there are no feasible project alternatives that would mitigate or substantially lessen the impacts. Despite these effects, however, the Board, in accordance with CEQA Guidelines Section 15093, chose to approve the CalVTP because, in its view, the benefits to life, property, and other resources, and the other benefits of the CalVTP, will render the significant effects acceptable.

In the Board's judgment, the CalVTP and its benefits outweigh its unavoidable significant effects. The Board's Findings were based on substantial evidence in the record. The Board's Statement of Overriding Considerations identified the specific reasons why, in the Board's judgment, the benefits of the CalVTP as approved outweigh its unavoidable significant effects.

Exercising its independent judgment and review, the Project Proponent concurs that the benefits of the CalVTP and the treatment project outweigh the significant environmental effects and hereby incorporates by reference and adopts the Board's Statement of Overriding Considerations for the CalVTP, and that there were no feasible alternatives that would reduce significant and unavoidable impacts while satisfying project objectives.

Any one of the reasons listed in the Statement of Overriding Considerations is sufficient to justify approval of the treatment project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the Project Proponent would stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section, and the documents found in the Record of Proceedings, which are described and defined in Section 5, above.

- ▶ The CalVTP will reduce dire risks to life, property, and natural resources in California.
- ▶ The CalVTP reflects the most current and commonly accepted science and conditions in California and allows for adaptation in response to potential evolution and changes in science and conditions.
- ▶ The CalVTP reflects the Board's and CAL FIRE's goals. The CalVTP will help the Board and CAL FIRE achieve their central goals for reducing and preventing the impacts of fire in the state, as outlined in the *2018 Strategic Fire Plan for California*. The CalVTP will help to establish a natural environment that is more resilient and built assets that are more resistant to the occurrence and effects of wildland fire.
- ▶ The CalVTP will help implement Executive Orders, including:
 - EO B-42-17: Governor Brown's order issued to bolster the state's response to unprecedented tree die-off through further expediting removal of millions of dead and dying trees across the state;

² If the PSA indicates that the project proponent's treatment project will not contribute to or cause any of the significant and unavoidable impacts determined in the PEIR, the proponent need not adopt a statement of overriding considerations.

- EO B-52-18: Governor Brown's order to improve forest management and restoration, provide regulatory relief, and reduce barriers for prescribed fire; and
- EO N-05-19: Governor Newsom's order directing CAL FIRE to recommend immediate-, medium-, and long-term actions to help prevent destructive wildfires.
- ▶ The Board is required by law to comply with SB 1260, signed into law by Governor Brown in February 2018, which improves California forest management practices to reduce the risk of wildfire in light of the changing climate and includes provisions for the CalVTP PEIR to serve as the programmatic CEQA coverage for prescribed burns within the SRA. The CalVTP will bring the Board into compliance with these requirements.
- ▶ The Board is required by law to comply with SB 632, signed into law by Governor Newsom in October 2019, which requires the Board to certify a Final PEIR, pursuant to CEQA, for the vegetation treatment program filed with the State Clearinghouse under Number 2019012052 in January 2019. The CalVTP will bring the Board into compliance with this requirement.
- ▶ The CalVTP will help to meet California's GHG emission goals consistent with the California Forest Carbon Plan, California's 2017 Climate Change Scoping Plan, Fire on the Mountain: Rethinking Forest Management in the Sierra Nevada, and California 2030 Natural and Working Lands Climate Change Implementation Plan.

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