

Project-Specific Analysis and Addendum to the CalVTP Program EIR

CalVTP Project ID: 2026-03

Tehama Wildlife Area Vegetation Treatment Project

Prepared for:

Resource Conservation District of Tehama County
202 Walnut Street, Red Bluff, CA 96080

Contact:

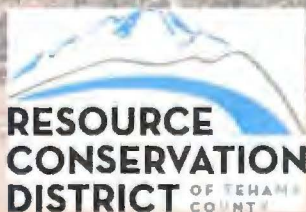
Jon Barrett, District Manager
jbarrett@tehamacountyrcd.org

Prepared by:

California Department of Fish and Wildlife
Region 1 Timber Conservation and Fire Resiliency Program
601 Locust Street, Redding, CA 96001

Contact:

Teresa Spade, Environmental Scientist
teresa.spade@wildlife.ca.gov



1 INTRODUCTION

1.1 PROJECT OVERVIEW AND DOCUMENT PURPOSE

In response to a significant increase in catastrophic wildfire activity over the past decade, and to facilitate an increase in the pace and scale of vegetation treatment to reduce catastrophic wildfire risk, The California Board of Forestry and Fire Protection certified the California Environmental Quality Act Program Environmental Impact Report for the California Vegetation Treatment Program (CalVTP), in 2019. The CalVTP Program EIR addresses CEQA compliance on a program level basis for fire resiliency treatments within the CalVTP mapped treatment areas in California. This document is a Project-Specific Analysis (PSA) and Addendum to the CalVTP Program EIR.

1.1.1 Proposed Project

The proposed project consists of vegetation treatments on up to 40,327 acres of California Department of Fish and Wildlife owned properties within the Tehama Wildlife Area in Tehama County, California (Figure 1), for the purpose of wildfire resiliency. The proposed treatment types include ecological restoration and fuel breaks, and the treatment activities, including manual and mechanical treatments, herbivory, prescribed burning, and herbicide application, are consistent with those considered in the CalVTP EIR. Maintenance treatments would be follow up treatments, and would involve the same treatment types and activities used in the initial treatments.

California Department of Fish and Wildlife employs herbivory on a wildlife area-wide basis for the purpose of deer habitat management and enhancement, and while the proposed treatment types and activities of the subject CalVTP PSA and Addendum will also be undertaken in support of wildlife management and ecological enhancement, this will be an independent effort and does not rely on, adopt, or supercede existing grazing range management.

1.1.2 Agency Roles

RCDTC and CDFW will both serve as implementing agencies for the project. Vegetation treatment activities may be carried out by RCDTC, CDFW, or their contractors, consistent with the project description, applicable permits, and all CalVTP Standard Project Requirements and mitigation measures.

This Project-Specific Analysis (PSA) and Addendum to the California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR) was prepared by the California Department of Fish and Wildlife on behalf of RCDTC to support RCDTC's consideration and adoption of the PSA and Addendum pursuant to CEQA Guidelines Section 15164.

The California Department of Fish and Wildlife (CDFW) is a Responsible Agency under CEQA, as the landowner and manager of the Tehama Wildlife Area where the project would be implemented.

The Resource Conservation District of Tehama County (RCDTC) is the California Environmental Quality Act (CEQA) Lead Agency for the Tehama Wildlife Area Vegetation Treatment Project.

1.1.3 Purpose of this PSA/Addendum

This Project-Specific Analysis and Addendum serves to describe the parameters of the project and determine whether the proposed treatments fall within the scope of the CalVTP Programmatic EIR, and to the extent that the project falls outside of the scope of the CalVTP Programmatic EIR, the Addendum covers those changes or revisions that would not result in new or significantly more severe environmental impacts, but do constitute revisions or updated circumstances. For the subject PSA and Addendum, there are areas outside of and adjacent to the mapped CalVTP treatable area that are proposed to be included in the project area, as they are substantially the same as those areas within the mapped CalVTP treatable landscape, and similarly warrant fire resiliency treatment. Additionally, revisions are proposed to SPRs AQ-4 and HAZ-1 as discussed below.

This document provides an analysis of conformance with California Environmental Quality Act (CEQA) compliance under the CalVTP Programmatic EIR for consideration by the adopting entity, RCDTC. This includes the PSA checklist, analyzing aspects of the project and how they either conform to the CalVTP EIR, or whether the changes would result in significant impacts under CEQA, and the project-specific Mitigation, Monitoring, and Reporting Program (MMRP) which identifies the measures that will be implemented as avoidance and mitigation for the project consistent with the CalVTP Programmatic EIR.

PROPOSED PROJECT REVISIONS

Revisions are proposed to two SPRs, and CDFW additionally proposes to include areas that are outside of the CalVTP mapped treatable landscape.

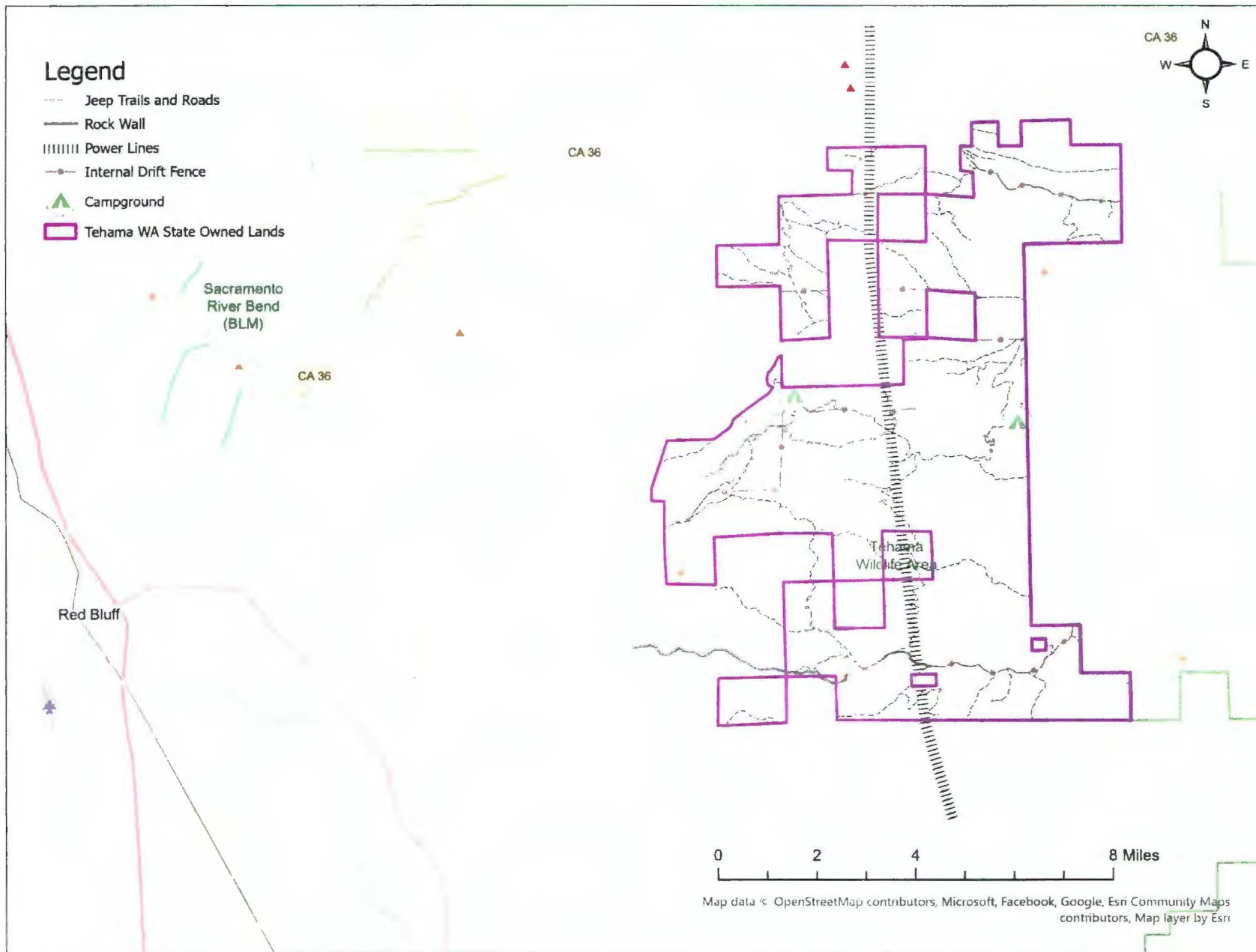


Figure 1. Project location.

SPR revisions subject to addendum:

- CDFW proposes to revise SPR AQ-4 to limit equipment and vehicle speeds on unpaved roadways to 25 miles per hour, unless fugitive dust emissions are visibly occurring (then vehicle speeds would be reduced to no more than 15 mile per hour), and to remove dust, silt, and mud from the public paved roadways any time it is visibly being tracked out onto public paved roadways when entering or exiting Tehama Wildlife Area, in accordance with Vehicle Code Section 23113. All other elements of SPR AQ-4 would remain the same as presented in the CalVTP EIR.
- CDFW proposes a revision to SPR HAZ-1 to allow for the prompt stabilization and repair of leaking equipment on-site if feasible, otherwise equipment would be promptly removed. SPR HAZ-1 will apply to the project, requiring that all diesel and gas fuel powered equipment is properly maintained per the manufacturer's specifications, and requiring inspections for any leaks, and prompt removal of any leaking equipment from the project site. Given the size and remoteness of the Tehama Wildlife Area, removal of leaking equipment from the project site may have a greater detrimental impact than fixing equipment promptly on-site. Some portions of the wildlife area are so remote and the terrain is so rough that it takes over four hours to get to some locations. For this reason, a revision is included to allow for prompt repair of leaking equipment on-site if feasible. All other elements of SPR HAZ-1 would remain the same as presented in the CalVTP EIR.

Project area outside of the CalVTP mapped treatable landscape:

The project is also subject to an addendum due to portions of the project area being outside of the CalVTP mapped treatable landscape. The project area includes all portions of the CDFW-owned properties at Tehama Wildlife Area that are vegetated by trees, shrubs and grasslands, which is about 40,327 GIS mapped acres. Of that area, about 48%, or 19,413 acres, is within areas shown as VTP mapped treatable areas, and an additional 20,914 acres adjacent to the mapped CalVTP treatable landscape is proposed to be added as part of the project area.

Various reasons may be attributable to why CalVTP mapped treatable landscape areas were included or omitted at the time of mapping in the vicinity of the Tehama Wildlife Area, however it is understood that if the areas of the proposed project outside of the mapped VTP treatable landscape are generally the same or have similar vegetative conditions as the areas within the adjacent mapped VTP treatable landscape, that the environmental analysis in the CalVTP EIR would be applicable to those adjacent and similar areas. In determining the extent of the treatable landscape for the purpose of the CalVTP EIR, the intent was to capture all portions of the State Responsibility Area where vegetation conditions are suitable for treatment. In this way, all portions added to the project area as proposed meet the criteria for inclusion.

Areas of grassland, shrubs and trees within the CDFW owned portions of the Tehama Wildlife Area were analyzed relative to vegetation type both in and out of the VTP mapped area, and that analysis illustrates that similar vegetative conditions exist both within the CalVTP treatable landscape, and within those adjacent areas that are outside of the mapped treatable landscape but are proposed to be included in the Tehama Wildlife Area Vegetation Treatment Project. The 2007 Lassen Foothills Vegetation Mapping Project Final Vegetation Map was utilized, and a comparison of total acreage within and outside of the VTP treatable landscape on CDFW owned portions of Tehama Wildlife Area was calculated. Those results are outlined in Table 1. The results of this analysis illustrate that all areas of grassland, shrub, and tree vegetation cover types are essentially the same both within the CalVTP treatable landscape as compared to those adjacent areas proposed to be included in the subject VTP.

Table 1. Vegetation types at Tehama Wildlife Area including acreage in CalVTP treatable landscape.

CWHR Vegetation Types	VegCamp Mapped Natural Communities, Lassen Foothills Vegetation Mapping Project, 2007	Vegetation Type	CDFW Ownership (GIS acres)	Mapped VTP treatable landscape (GIS acres)	% in VTP treatable landscape
Annual Grassland					
	California Annual or Perennial Grassland Mapping Unit	Grass	14891.72	6148.3	41.29%
Blue Oak Woodland					
	Quercus douglasii Alliance	Tree	138.52	55.07	39.76%
Blue Oak Woodland (continued)	Quercus douglasii/Aesculus californica/Herbaceous Association	Tree	49.41	15.4	31.17%
	Quercus douglasii/Arctostaphylos manzanita/Herbaceous Association	Tree	77.3	53.48	69.18%
	Quercus douglasii/Annual - Perennial Herbaceous Sub-Alliance	Tree	7738.1	3810.1	49.24%
	Quercus douglasii/Ceanothus cuneatus/Herbaceous Association	Tree	2908.78	1433	49.26%
	Quercus douglasii/Juniperous californica (Ceanothus cuneatus) Herbaceous Association	Tree	70.63	18.71	26.49%
	Quercus wislizeni - (Quercus douglasii) Super Alliance	Tree	1958.2	861.47	43.99%

CWHR Vegetation Types	VegCamp Mapped Natural Communities, Lassen Foothills Vegetation Mapping Project, 2007	Vegetation Type	CDFW Ownership (GIS acres)	Mapped VTP treatable landscape (GIS acres)	% in VTP treatable landscape
Blue Oak - Foothill Pine					
	Quercus wislizeni - (Quercus douglasii) - Pinus sabiniana Association	Tree	336.68	233.54	69.37%
	Quercus douglasii - Pinus sabiniana Mapping Unit	Tree	1540.98	1023.6	66.43%
	Pinus sabiniana Alliance	Tree	32.15	18.81	58.51%
	Pinus sabiniana/Ceanothus cuneatus Association	Tree	456.67	273.92	59.98%
Montane Hardwood					
	Aesculus californica Alliance	Tree	52.86	23.13	43.76%
	Quercus chrysolepis Alliance	Tree	144.32	116.83	80.95%
	Quercus wislizeni Alliance	Tree	1299.77	812.39	62.50%
	Quercus wislizeni - (Quercus douglasii) Aesculus californica Mapping Unit	Tree	706.26	316.75	44.85%
	Quercus kelloggii Alliance	Tree	631.16	455.72	72.20%
	Umbellularia californica - Quercus wislizeni Mapping Unit	Tree	8.42	2.95	35.04%
Montane Hardwood - Conifer					
	Quercus kelloggii/Pinus ponderosa Association	Tree	84.22	58.27	69.19%

CWHR Vegetation Types	VegCamp Mapped Natural Communities, Lassen Foothills Vegetation Mapping Project, 2007	Vegetation Type	CDFW Ownership (GIS acres)	Mapped VTP treatable landscape (GIS acres)	% in VTP treatable landscape
Mixed Chaparral					
	(Ceanothus cuneatus) - Eriodictyon californicum Mapping Unit	Shrub	239.52	114.66	47.87%
	Ceanothus cuneatus Alliance	Shrub	171.03	118.48	69.27%
	Ceanothus cuneatus/Herbaceous Association	Shrub	3575.28	1787	49.98%
	Mixed Scrub-Oak Chaparral Super Alliance	Shrub	233.86	87.82	37.55%
Mixed Chaparral (continued)	Northern Mixed Mesic Chaparral Mapping Unit	Shrub	2151.95	1148.4	53.36%
Montane Chaparral					
	Quercus garryana Alliance	Shrub	98.74	57.29	58.02%
Valley Foothill Riparian					
	Mixed Shrub Willow Thicket Mapping Unit	Shrub	3.72	2.17	58.33%
	North American Temperate Riparian Woodlands & Forests Mapping Unit	Tree	715.13	363.21	50.79%
Wet Meadow					
	Seasonally Flooded Wetland Herbaceous Mapping Unit	Grass	11.9	2.35	19.75%
Riverine					
	Stream Beds and Flats		19.46	2.73	14.03%
Lacustrine					
	Water		56.58	19.43	34.34%

CWHR Vegetation Types	VegCamp Mapped Natural Communities, Lassen Foothills Vegetation Mapping Project, 2007	Vegetation Type	CDFW Ownership (GIS acres)	Mapped VTP treatable landscape (GIS acres)	% in VTP treatable landscape
Barren					
	Cliffs - Rock Outcrops - Steep Eroded Slopes		96.25	21.1	21.92%
Urban					
	Built-up		9.75	0.12	1.23%
	Total Trees, Shrubs and Grasslands (omitting riverine, lacustrine, barren, and urban)		40327.28	19413	48.14%

2 PROJECT DESCRIPTION

The California Department of Fish and Wildlife (CDFW) is proposing vegetation treatment activities utilizing the California Vegetation Treatment Program (CalVTP) Programmatic Environmental Impact Report (PEIR), certified by the California Board of Forestry and Fire Protection for compliance with the California Environmental Quality Act (CEQA). The Resource Conservation District of Tehama County (RCDTC) is the CEQA Lead Agency for the Tehama Wildlife Area Vegetation Treatment Project. CDFW is a Responsible Agency under CEQA as the landowner and manager of the Tehama Wildlife Area. This Project-Specific Analysis (PSA) and Addendum was prepared by CDFW on behalf of RCDTC to support RCDTC's consideration and adoption of the PSA and Addendum pursuant to CEQA Guidelines Section 15164. RCDTC, as Lead Agency, has determined that the proposed vegetation treatment activities are within the scope of the CalVTP PEIR and will not result in new, or more severe, adverse impacts than those evaluated by the PEIR.

Vegetation treatments are proposed on approximately 40,327 GIS acres comprising all CDFW-owned portions of the Tehama Wildlife Area in Tehama County that are covered by trees, shrubs, and grasslands. This property is zoned Public according to the Tehama County General Plan. The Public land use designation applies to lands under the jurisdiction of a federal or state agency. The project is designed to reduce fuels by removing excess shrub and tree vegetation and by conducting selective prescribed burns in grasslands, shrublands, and oak woodlands to reduce wildfire risk. The overall objectives of the project are to reduce the risk of catastrophic wildfire, support Tehama County wildfire management, restore oak woodland habitat, improve browse habitat for deer, increase soil health, and maintain water quality. Treatment activities include broadcast and pile prescribed fire, prescribed herbivory, herbicide application, mastication, chipping, and tree pruning. Both mechanical and manual treatments are proposed.

2.1 SITE DESCRIPTION

The Tehama Wildlife Area is located about 17 miles east of Red Bluff, in the foothills of the Cascade Range. The Lassen National Forest is located to the east of the property. Dye Creek Preserve, a privately owned nature preserve, is to the south, and other privately owned properties are located on the north and west sides. The elevation ranges roughly from around 1,000' to 2,500'. The terrain is characterized by a series of north/south facing rocky slopes divided by small to medium sized streams. Vegetation is largely non-native grasslands and blue oak woodlands, with smaller areas of chaparral, valley foothill riparian, and montane hardwood. The wildlife area, which was historically used to graze cattle and sheep, was purchased incrementally, starting in 1941, to preserve the winter range for the Eastern Tehama Mule Deer Herd, which is the largest migratory population of mule deer in California. Two anadromous fish streams are present, Antelope Creek and Mill Creek, which provide habitat for special status spring-run chinook salmon, Central Valley DPS steelhead, Foothill yellow-legged frog, and Northwestern pond turtle. The wildlife area also provides public access for hunting, fishing, camping, and wildlife viewing.

2.1.1 Recent Wildfire Disturbance

The Park Fire of 2024 burned approximately 429,603 acres in Butte and Tehama Counties, including nearly the entire ~44,000-acre Tehama Wildlife Area. Structures including those associated with CalFire's Ishi Conservation Camp and the California Department of Fish and Wildlife Management Offices and Facilities were protected from the fire due to a history of prescriptive burning and other fire prevention in the vicinity such as seasonal grazing, backfiring operations, and firefighting efforts. One of the two campground restroom structures was damaged, resulting in seasonal closure of that campground. Areas of heavy brush, conifers, and vegetation in some gulches burned hot, reducing all vegetation to ash. In much of the wildlife area, the fire burned through quickly, consuming fine fuels in the understory, and much of the oak woodland overstory has been retained. Within weeks, new shrub vegetation in the understory sprouted from stumps, providing winter forage for deer. Impacts to fish populations from increased sedimentation resulting from the fire will be determined in the upcoming years as data is collected on returning populations.

It is anticipated that fire adapted shrub species will continue to experience an abundant return over the next decade, and active fire resiliency management will be beneficial to prevent overcrowding brush conditions, and to minimize future impacts on critical habitat streams at Tehama Wildlife Area.

2.2 PROPOSED TREATMENT TYPES

The Tehama Wildlife Area Vegetation Treatment Project utilizes fuel breaks and ecological restoration treatment types to achieve fire resiliency goals. Ecological restoration areas and fuel break locations are shown in Figure 2.

2.2.1 Fuel Breaks

Fuel breaks support fire suppression efforts by providing access and staging for fire responders and can serve to halt or slow the path of a fire. These are zones of vegetation removal and ongoing maintenance that are strategically located, often along ridges. Both shaded and non-shaded fuel breaks are proposed. Non-shaded fuel breaks are typically located where there is a natural change in vegetation type, from forest or shrubland to grassland, and all vegetation is removed from the fuel break area. Heavy equipment is typically used, except on steep slopes, where manual treatments or prescriptive burns would be used instead. Shaded fuel breaks are used in forest settings. Retention of a good portion of canopy helps to reduce shrub regrowth in the understory and reduces the potential for erosion.

At Tehama Wildlife Area, proposed fuel breaks would be shaded where feasible, and would be non-shaded in areas that do not include a tree overstory, such as areas dominated by grasslands and/or shrubs. Fuel break locations have been mapped along numerous ridges and roadways and generally follow the same course as mapped in the CalVTP treatable landscape fuel break map layer. It is unlikely that all areas mapped as proposed fuel breaks will be constructed and maintained as such, however all areas where fuel breaks would be appropriate have been included in the project proposal in order to allow for a wide range of strategic locations to select from as treatment strategies are prioritized and carried out.

2.2.2 Ecological Restoration

Ecological restoration from a fire resiliency standpoint means vegetation treatments utilized to bring the landscape closer to natural conditions where fire processes can be re-established within a non-catastrophic range, and habitat quality is improved. This can be applied to lands where fire suppression and other management have altered the natural landscape, resulting in a change to fire intensity and return intervals, which can lower habitat value and result in degradation of soils and water quality.

Prior to the establishment of the wildlife area, in the 1800s and early 1900s, the land was grazed by sheep and cattle. Eventually, conflicts arose between grazing interests and wildlife needs. The Tehama Wildlife Area was purchased incrementally starting in 1941, to protect the critical winter range for the East Tehama Deer Herd. Grazing agreements ended in 1949 at the wildlife area and grazing was discontinued, however it was observed over the following years that the vegetation now present was more favorable to livestock than deer. The changes that had occurred to the landscape over time included reduction of native bunchgrasses, and the introduction of non-native grasses and forbs that are widely present. In 1955, livestock grazing, primarily cattle grazing, was reintroduced at the wildlife area to manage the land better for deer habitat given the existing changed landscape (Tehama Wildlife Area History, 2005). Grazing continues to be utilized as a management tool for improving deer habitat.

Prescriptive fire has been proven a successful management tool for introduced grasses, as it is used seasonally by CalFire in proximity to the Ishi Conservation Camp at Tehama Wildlife Area. The subject VTP would facilitate the expanded use of prescriptive fire within the non-native grasslands of the wildlife area, and would additionally allow

for CDFW to utilize a full range of treatments as appropriate for ecological restoration, including expansion of and targeted herbivory, herbicide, and mechanical and manual treatments.

Additionally, prescriptive fire and other treatment methods will be used to improve winter forage and cover for the East Tehama Deer Herd, consistent with policies and objectives of the Tehama Wildlife Area Management Plan and other guidance documents. An objective of the 1992 Tehama Wildlife Area Management Plan is to maintain a minimum of 500 acres containing browse in age class of 4 years or less, to be achieved through brush crushing, lopping, mosaic pattern burning, and seeding. The Deer Winter Range Management Plan recommends annual meetings with CalFire in spring to plan and coordinate controlled burns to rejuvenate *Ceanothus* spp. Browse is the key food component for winter forage and preferred browse species in the winter range include buck brush (*Ceanothus cuneatus*), birch leaf mahogany (*Cercocarpus betuloides* var. *betuloides*), poison oak (*Toxicodendron diversilobum*), interior live oak (*Quercus wislizeni* var. *wislizeni*), silktassel (*Garrya* spp.), flannelbrush (*Fremontodendron californicum*), and manzanita (*Arctostaphylos* spp.), with buck brush being the most widespread and most used forage species, heavily used by deer in late winter and late spring. Younger stands of buck brush provide for highest quality forage, where mature and denser stands are not utilized. Buck brush is dependent on fire for seed scarification (Tehama Wildlife Area Deer Herd Plan, 1983). The full range of treatment types would therefore be utilized within shrub dominated vegetation, including mechanical and manual treatments, prescribed and pile burning, herbivory, and herbicide application.

Ecological restoration would also apply to forest types present, including blue oak woodlands, blue oak – foothill pine, montane hardwood, montane hardwood – conifer, and Valley Foothill riparian forests. Within riparian forests, 75% or more of the overstory would be retained, and at least 50% of the understory canopy would be retained. Additionally, as needed large snags and downed woody debris would be retained for wildlife purposes.

2.3 PROPOSED TREATMENT ACTIVITIES

Proposed treatment activities include manual and mechanical treatments, prescribed and pile burning, herbicide application, and prescribed herbivory. Each of these treatment types are described in detail below, consistent with the treatment activities discussed and analyzed in the CalVTP Programmatic EIR.

Treatments would occur at various times during the year, as appropriate for best practices regarding the specific treatment type. Treatment activities would occur Monday through Sunday between 2:00am and 7:00pm, or when relative humidity is above 20% for prescriptive fire and pile burn treatments. Where feasible, manual, mechanical, and prescribed and pile burning treatments would occur outside of the nesting bird season (February 1 – August 31 or extended limited operating period for raptors as determined by a qualified RPF or biologist), or bird surveys would be completed in the treatment area prior to disturbance. Treatment activities are summarized in Table 2 below.

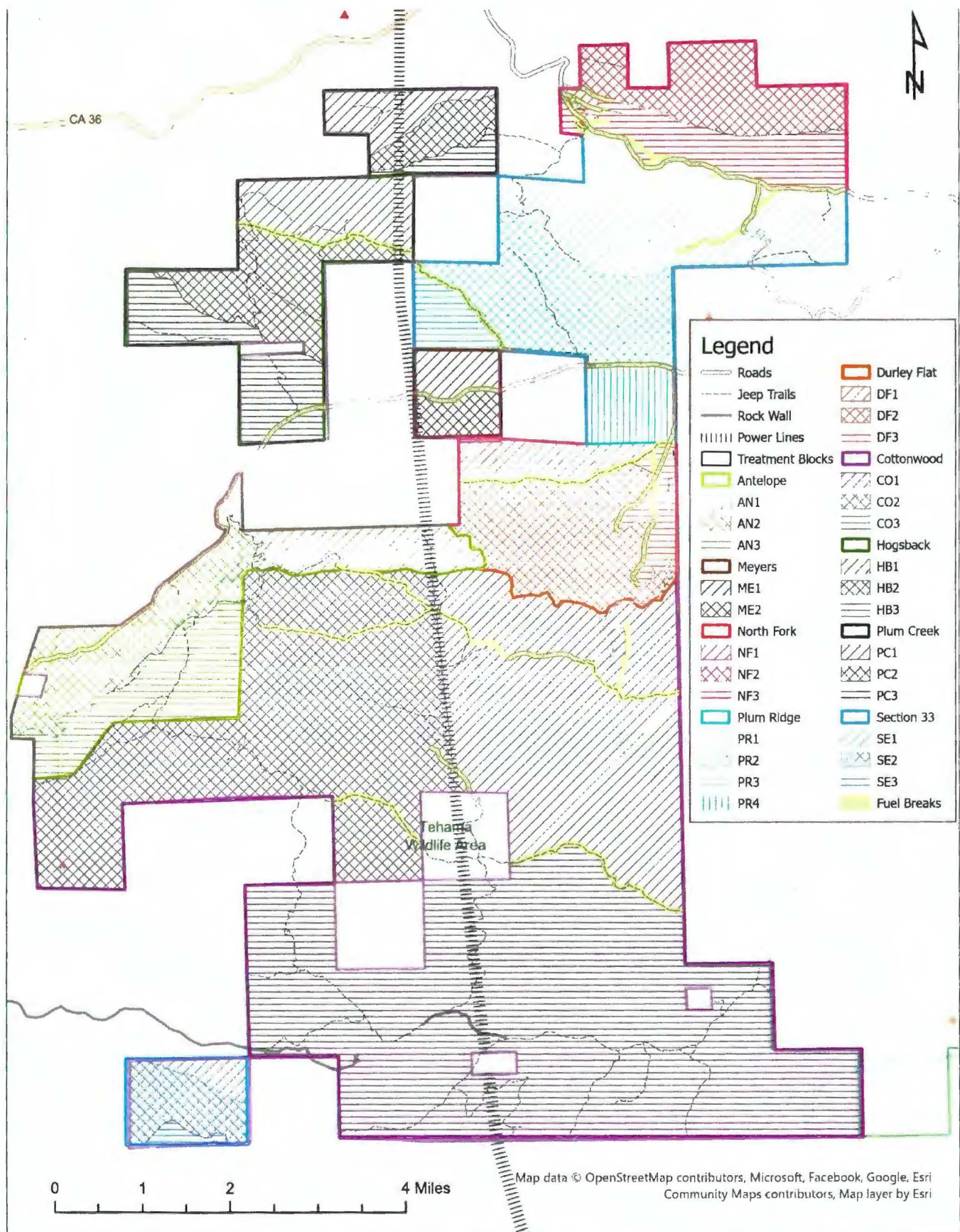


Figure 2. Project map.

Table 2. Tehama Wildlife Area VTP Treatment Activities.

CalVTP Treatment Activity	Typical Equipment Used	Typical Treatment Duration	Maximum Treatment Acres
Manual Treatment	Chainsaws, hand saws, hand lopping tools, hand mowers, shovels, Pulaskis, McClouds, weed eaters, machetes, pruning shears	3-6 months	20,000
Mechanical Treatment	Masticators, skidders, excavators, chippers	1 week to 6 months	30,000
Prescribed Burning: Broadcast Burning	Hand tools, drip torches, fusees, tractors/bulldozers, fire engines/water tenders, helicopters with helitorches, excavators	1 day to 1 week	35,000
Prescribed Burning: Pile Burning or Other Biomass Processing	Hand tools, drip torch, excavator, tractor, water tender, bulldozer, feller/buncher, biomass processing equipment	1 day to 1 month	20,000
Herbicide Application	Batch truck, passenger vehicle, ATV and mounted equipment, backpack spray equipment	1 day to 1 month	40,327
Prescribed Herbivory	Livestock, wildlife-friendly fencing, related vehicles and equipment, watering infrastructure, food and mineral supplements, herding animals	1 week to 4 months	40,327

2.3.1 Vegetation Treatment

Manual vegetation treatments are proposed on up to 20,000 acres of the project area. Manual vegetation treatment will apply in sensitive habitats such as, but not limited to, riparian and wet areas, on slopes over 45%, around structures, in areas inaccessible to vehicles and equipment, and in other areas where ground disturbance should be avoided to protect resources. Manual treatments would typically be implemented with hand crews of between 8-20 members using hand operated equipment such as, but not limited to, chainsaws, hand saws, hand lopping tools, hand mowers, shovels, Pulaskis, McClouds, weed eaters, machetes, and pruning shears. Typically, hand treatments may take 3-6 month increments to complete, depending on treatment strategy, size, slope steepness, access, equipment used, and vegetation density and type. Material produced by manual treatments may be lopped and scattered, placed into burn piles for burning when conditions permit, or drug by hand to a chipper where it will be chipped with the chips either being scattered on site or removed via dump truck, pickup or trailer.

Some manual vegetation treatment activities may include:

- Mowing and weedeating around structures and in camp areas
- Hand pulling of invasive weeds
- Understory thinning of trees and brush with loppers, chainsaws and pruners
- Shrub thinning and/or pruning to reduce height and density

2.3.2 Mechanical Vegetation Treatment

Mechanical treatment is proposed on up to 30,000 acres. Mechanical treatments would be accomplished with equipment such as masticators, skidders, excavators, and chippers, and would typically occur in flat areas and areas of slopes less than 45%, and outside of sensitive areas such as riparian areas or wetlands, or other sensitive habitats or resource areas.

Some mechanical treatment activities may include but are not limited to:

- Dozer created control lines around prescriptive fire areas
- Chaparral crushing, masticating, and chipping
- Use of excavators to pile woody debris for pile burning

2.3.3 Prescribed Burning

Prescribed broadcast burning is proposed on up to 35,000 acres, and prescribed pile burning or other biomass processing is proposed on up to 20,000 acres.

Prescribed broadcast burning would use low-intensity, ground-level fire across a specific area. Prescribed broadcast burning would apply to areas where sufficient fuel is available and arranged to carry the fire, to carry out ecological restoration goals such as mosaic pattern shrub treatment and non-native grasslands treatment. Understory burn prescriptions would apply in forested areas. Typical equipment used includes hand tools, drip torches, fusees, tractors/bulldozers, fire engines/water tenders, helicopters with helitorches, and excavators. Individual burn units may take from a day up to a week or more, depending on acreage, terrain, and vegetation present. Prescribed burning typically requires control lines, a burn plan, air quality clearance and conformance, and a specially trained crew of 10-50 members led by a burn boss.

Pile burning or other biomass processing may occur in areas where significant woody debris is present due to wildfire impacts, significant blow down events, disease, or resulting from mechanical or manual vegetation treatment. Woody debris is piled with mechanical equipment or by hand, and burned. Typical equipment includes hand tools, drip torch, excavator, tractor, water tender, bulldozer, feller/buncher, and/or biomass processing equipment, and treatments may take between 1 day and 8 months depending on area, access, crew size, air quality requirements, and fuel present.

2.3.4 Herbicide Application

Targeted herbicide treatments may occur anywhere as needed in the project area. Herbicide application is typically applied to reduce fuel density, target invasive, non-native plant populations, or restore appropriate species composition. Only targeted, ground-level application would occur, either from equipment on vehicles or by manual application – there would be no aerial application of herbicide. Herbicides that may be used are consistent with those allowable per the CalVTP Programmatic EIR and include the following:

Borax (tetraborate decahydrate);
 Clopyralid (monoethanolamine salt);
 Glyphosate (isopropylamine salt, potassium salt, dimethylamine salt & diammonium salt);
 Hexazinone;
 Imazapyr (isopropylamine salt);
 Sulfometuron Methyl;
 Triclopyr (butoxyethyl ester & triethylamine salt);
 Nonylphenol 9 Ethoxylates (NP9E);

Cleantraxx (penoxsulam & oxyfluorfen);
Velpar (hexazinone); and
Indaziflam.

Herbicide application may include the use of a batch truck, passenger vehicle, ATV and mounted equipment, and/or backpack spray equipment, and application may take between a day and a month, depending on application area, access, and equipment and crews used.

2.3.5 Prescribed Herbivory

Prescribed herbivory may occur anywhere in the project area and would involve the use of domestic livestock to accomplish specific vegetation management objectives in targeted areas, using livestock, wildlife-friendly fencing, related vehicles and equipment, watering infrastructure, food and mineral supplements, and herding animals as needed. Prescribed herbivory is used for reducing fine fuel loads or populations of specific plant species, slowing re-establishment of shrubs on burned or thinned sites, and improving plant community structure for wildlife habitat value. Livestock type and herd numbers are selected according to the site conditions, treatment area, and types of vegetation that need to be managed. Prescribed herbivory would adhere to seasonal restrictions and exclusion from sensitive areas would be incorporated to protect riparian zones and other sensitive areas.

2.4 TREATMENT MAINTENANCE

Maintenance treatments would occur as follow up in areas treated in order to maintain treatment objectives over time. The interval between the initial treatment and follow-up treatments would be based on appropriate cycles for vegetation management, funding, prioritization, and other factors as appropriate. Maintenance treatments may differ from initial treatments in the same area if a different treatment type is determined to be more appropriate and effective to achieve fire resiliency and ecological restoration goals or would be better suited to protect resources. Often, maintenance treatment may be different from the original treatment, such as a prescribed burn followed by herbicide application to control invasive plant sprouts, or manual understory thinning followed by periodic prescribed understory burning.

When implementing maintenance treatments, CDFW would verify that the measures taken would be within the scope of the Tehama Wildlife Area VTP and LMP.

3 ENVIRONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

1. Project Title: Tehama Wildlife Area Vegetation Treatment Project
2. CEQA Lead: Resource Conservation District of Tehama County
202 Walnut St, Red Bluff, CA 96080
3. Contact Person Information and Phone Number: Jon Barrett, District Manager
Jbarrett@tehamacountyrca.org
530-727-1280
4. Landowner: California Department of Fish and Wildlife
601 Locust Street, Redding, CA 96001
5. Contact Person Information and Phone Number: Teresa Spade, Environmental Scientist
teresa.spade@wildlife.ca.gov
530-225-2300
6. Project Location: 30490 Plum Creek Road, Paynes Creek, Tehama County, CA 96075
Coordinates 40.31222, -121.8909
7. Total Area to be Treated (acres) 40,327

8. Description of Project:

Initial Treatment

Initial treatments would include mechanical and manual treatments, prescribed burning, targeted herbicide application, and prescribed herbivory. See Chapter 2, Project Description, for additional information.

Treatment Types

- ☐ Wildland-Urban Interface Fuel Reduction
- ☒ Fuel Break 36 linear miles fuel break
- ☒ Ecological Restoration

Treatment Activities

- ☒ Prescribed Burning (Broadcast), 35,000 acres
- ☒ Prescribed Burning (Pile Burning), 20,000 acres
- ☒ Mechanical Treatment, 30,000 acres
- ☒ Manual Treatment, 20,000 acres
- ☒ Prescribed Herbivory, 40,327 acres

☒ Herbicide Application, 40,327 acres

Fuel Type

☒ Grass Fuel Type

☒ Shrub Fuel Type

☒ Tree Fuel Type

Treatment Maintenance

Maintenance treatments would occur as follow up in areas treated in order to maintain treatment objectives over time. The interval between the initial treatment and follow-up treatments would be based on appropriate cycles for vegetation management, funding, prioritization, and other factors as appropriate. See Section 2.4, above, for details.

Use of the PSA for Treatment Maintenance

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

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

7. Regional Setting and Surrounding Land Uses:

The Tehama Wildlife Area is located about 17 miles east of Red Bluff, in the foothills of the Cascade Range. The Lassen National Forest is located to the east of the property. Dye Creek Preserve is to the south, and privately owned properties are present on the north and west sides. Surrounding land uses include agricultural uses, national forest land, recreational uses, and natural preserve land.

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

- Tehama County Air Pollution Control District – Smoke Management Plan
- Tehama County Air Pollution Control District – Burn Permit
- CalFire – Burn Permit
- Tehama County Agricultural Commissioner – Pesticide Application Permit

Coastal Act Compliance

☒ The proposed project is NOT within the Coastal Zone

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

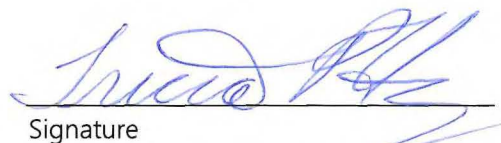
consultation before the release of the environmental document and must follow the requirements of the cited PRC sections.

Pursuant to SPR CUL-2, letters were sent to Native American Tribes in Tehama County during the week of Sept 29 – October 3, 2025. Letters were sent to: Grindstone Rancheria of Wintun-Wailaki, Paskenta Band of Nomlaki Indians, Redding Rancheria, and Round Valley Reservation / Covelo Indian Community. Refer to Section 4.4, Archaeological, Historical and Tribal Cultural Resources, for more information about Native American Consultation for this project.

DETERMINATION (To be completed by the project proponent)

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

- ☒ I find that all of the effects of the proposed project (a) have been covered in the CalVTP PEIR, and (b) all applicable Standard Project Requirements and mitigation measures identified in the CalVTP PEIR will be implemented. The proposed project is, therefore, **WITHIN THE SCOPE** of the CalVTP PEIR. **NO ADDITIONAL CEQA DOCUMENTATION** is required.
- ☒ I find that the presence of proposed project areas outside the CalVTP treatable landscape and proposed revisions to SPRs will not result in substantial changes in the project, no substantial changes in circumstances have occurred, and no new information of substantial importance has been identified. The inclusion of project areas outside the CalVTP treatable landscape and revisions to SPRs will not result in any new or substantially more severe significant impacts. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred; therefore, an **ADDENDUM** is adopted to address the project areas outside the geographic extent presented in the Program EIR and revisions to SPRs.
- ☐ 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

3/4/2020
Date

TRICIA HAMELBERG
Printed Name

PRESIDENT
Title

RCDTC
Agency

EVALUATION OF ENVIRONMENTAL IMPACTS

1.2 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	AD-4 AES-2 AQ-2 AQ-3 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-4 REC-1 AES-1 AES-3	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	Yes	N/A	MM AES-3	SU	No	Yes

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

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

Discussion

Impact AES-1, 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

Public viewpoints at Tehama Wildlife Area include the public roadways, trails, campgrounds and other areas accessible to the public for hunting, camping, and wildlife viewing. There are no State Scenic Highways in or within viewing distance to the project area (Caltrans Designated and Eligible State Scenic Highways Table, 2019), and none of the waterbodies that flow through the Tehama Wildlife Area are designated as Wild and Scenic Rivers (National Wild and Scenic River System, 2025). Initial and maintenance treatments would include mechanical treatment, manual treatment, prescribed broadcast fire, pile burning, and prescribed herbivory. These treatment types have the potential to result in short term degradation of the visual character or quality of public views however potential for these treatment activities to result in aesthetic impacts was considered in the CalVTP EIR and Standard Project Requirements (SPRs) have been developed to minimize impacts. Herbicide application and prescribed herbivory would occur intermittently and move through a project area, but are not expected to block views, dominate a viewshed or significantly disrupt a scenic vista. Equipment and vehicles associated with manual and mechanical treatments, herbicide application, and prescribed burning could temporarily be visible to public viewers, with impacts lasting from 1 week to 6 months. Implementation of SPR AES-2 (Avoid staging within viewsheds) would avoid and minimize visual impacts from the presence of treatment equipment. Smoke from prescribed burns would be temporary, lasting up to one week but typically only one day. Prescribed burns would need to adhere to a Smoke Management Plan pursuant to SPR AQ-2, and a Burn Plan (SPR AQ-3) which would specify conditions in which prescribed burning can occur to reduce the generation and visibility of smoke. Therefore, smoke impacts from prescribed burning would be minimized and insignificant. Additionally, SPR REC-1 (Notify Recreational Users of Temporary Closures) and SPR AD-4 (Public Notifications for Prescribed Burning) would require that agencies notify potential recreation users prior to the beginning of prescribed burning, which would reduce exposure through notification.

Activities proposed and the potential for those activities to result in short-term impacts to aesthetic resources are consistent with the Program EIR because they are within the scope of impacts analyzed. Inclusion of additional portions of the wildlife area that are outside of the mapped CalVTP treatable landscape constitutes a change in geographic extent to the Program EIR. Aesthetic resources of the wildlife area are essentially the same, both in and out of the CalVTP treatable landscape, and for this reason, short term impacts are also essentially the same.

As proposed, the project is consistent with the Program EIR, and would not result in a substantially more significant short term impact to aesthetic resources than what was covered in the Program EIR.

Impact AES-2, 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

Public viewpoints at Tehama Wildlife Area include the public roadways, trails, campgrounds and other areas accessible to the public for hunting, camping, and wildlife viewing. There are no State Scenic Highways in or within viewing distance to the project area. Initial and maintenance treatments would include areas of ecological restoration, unshaded and shaded fuel break treatment types. These treatment types have the potential to result in long term degradation of the visual character or quality of public views.

The potential for these treatment activities to result in long term aesthetic impacts was considered in the Program EIR, and Standard Project Requirements (SPRs) have been developed to minimize impacts. SPR AES-1, Vegetation Thinning and Edge Feathering, will apply, minimizing the contrast of a distinct clearing, as the edges of the clearing will be thinned and feathered to mimic forms of natural clearings as reasonable or appropriate for the vegetative conditions. SPR AES-3, Provide Vegetation Screening, will additionally apply, preserving sufficient vegetation within, at the edge of or adjacent to treatment areas to screen views from public view areas.

Activities proposed and the potential for those activities to result in long-term impacts to aesthetic resources are consistent with the Program EIR because they are within the scope of impacts analyzed. Inclusion of additional portions of the wildlife area that are outside of the mapped CalVTP treatable landscape constitutes a change in

geographic extent to the Program EIR. Aesthetic resources of the wildlife area are essentially the same, both in and out of the CalVTP treatable landscape, and for this reason, long-term impacts are also essentially the same.

As proposed, the project is consistent with the Program EIR and would not result in a substantially more significant long-term impact to aesthetic resources than what was covered in the Program EIR.

Impact AES-3, 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

Non-shaded fuel breaks are proposed on ridgetops in areas that are currently largely devoid of vegetation due to the 2024 Park Fire. Areas where ridgetop fuel breaks are proposed were not heavily tree dominated before the fire so fuel breaks will not create drastic changes over historical conditions. Mechanical and manual treatments will be used to create and maintain these features. Public view areas include campgrounds and roadways within the wildlife area which are utilized by members of the visiting public. There are no State Scenic Highways in or within view of the project area.

The non-shaded fuel break treatment type was considered in the Program EIR relative to long term visual impacts and was found to be a significant and unavoidable impact, as it is infeasible to relocate a non-shaded fuel break out of public view while still achieving treatment objectives. Mitigation Measure MM AES-3 will apply to the project in areas where non-shaded fuel breaks may be implemented in brush vegetation or other areas, resulting in potential long-term damage to scenic resources where such a break in vegetation may degrade the character of a scenic vista. In this manner, any feasible locations that do not detract from views but achieve the same result would be implemented rather than placing the non-shaded fuel break where it would detract from public views, and a shaded fuel break would be used instead if it would achieve the same objective. Further, adjacent vegetation to the non-shaded fuel break would be thinned and feathered to break up linear edges.

The potential for non-shaded fuel breaks to result in long-term impacts to aesthetic resources are consistent with the Program EIR because they are within the scope of impacts analyzed. Inclusion of additional portions of the wildlife area that are outside of the mapped CalVTP treatable landscape constitutes a change in geographic extent to the Program EIR. Aesthetic resources of the wildlife area are essentially the same, both in and out of the CalVTP treatable landscape, and for this reason, aesthetic impacts from non-shaded fuel breaks are also essentially the same.

As proposed, the project is consistent with the Program EIR, and would not result in a substantially more significant long term impact to aesthetic resources than what was covered in the Program EIR.

New Aesthetic and Visual Resource Impacts

The proposed treatment types and activities are consistent with those that are covered in the CalVTP Program EIR, and site-specific characteristics of the Tehama Wildlife Area are consistent with the environmental and regulatory conditions considered in the CalVTP Program EIR. This includes land within the project area that is outside of the CalVTP treatable landscape. Within the boundaries of the project area, the aesthetic resources are essentially the same both in and out of the mapped CalVTP treatable area. No changed circumstances are present within added geographic areas to be covered by the addendum to the Program EIR. For this reason, no new impact related to aesthetics or visual resources would occur.

1.3 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	No	N/A	N/A	No Impact	No	Yes

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

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

Discussion

Impact AG-1

Woodlands on the property are largely oak woodlands, with some conifers also present. The property is not managed for commercial timber harvest operations, and is not zoned forest lands or TPZ. Grazing occurs property wide, however grazing is used solely as a management tool to enhance deer habitat, which is the primary focus of the wildlife area. The property is not zoned agricultural, is not enrolled in the Williamson Act, and is not designated as Prime Farmland or Farmland of Statewide Importance, but is designated as grazing land according to the Department of Conservation.

According to the Department of Conservation's Farmland Mapping and Monitoring Program, 2020 California Important Farmland mapping layer, with the exception of a small area in the vicinity of the Calfire and CDFW administrative buildings which is mapped as "Urban and Built Up Land," Tehama Wildlife Area is otherwise entirely mapped as "grazing land," meaning that it is land on which the existing vegetation is suited to the grazing of livestock. Tehama Wildlife Area was purchased in 1941 to preserve the winter range habitat for the Eastern Tehama Mule Deer Herd. Prior to purchase, the land was used for grazing of cattle and sheep. The land continues to be managed as mule deer habitat, and limited, low-impact cattle grazing is used as a management tool to enhance deer habitat throughout the wildlife area. Those areas that are low impact grazed are equally in and out of the CalVTP treatable area, and while grazing does occur, the primary purpose of those areas is habitat for deer, and fuel treatments in these areas is expected to be carried out in a manner that reduces catastrophic wildfire, enhances mule

deer habitat, is compatible with and compliments cattle grazing, and facilitates a shift back to a more natural fire regime.

The CalVTP Programmatic EIR indicates that wildfire risks within agricultural lands are considered negligible, and for that reason it is assumed that vegetation treatment would not occur on land under active agricultural treatment. As discussed in CalVTP EIR Section 3.3.1, Environmental Setting, the Treatable Landscape includes land enrolled under Williamson Act in each of the designated farmland categories, however in these cases treatment would not change the land use. For the subject property, fire resiliency treatment is proposed in a manner that will enhance deer habitat, and will be compatible with the low impact grazing that is currently in place.

New Agriculture and Forestry Resource Impacts

Areas both in and outside of the CalVTP treatable landscape, to be included in the subject VTP, are designated grazing land, and are equally utilized for deer habitat. Low impact cattle grazing is used as a management tool to enhance deer habitat property wide, so equally in and out of the CalVTP treatable landscape. The property is not utilized for commercial timber harvesting either inside or outside of the CalVTP treatable landscape. For these reasons, no new agricultural or forestry resource impacts would occur as a result of the additional areas proposed in this plan to be included for fire resiliency treatments, beyond that which is covered in the Program EIR.

1.4 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 AQ-2 AQ-3 AQ-4 AQ-6	MM AQ-1	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 NOI-5	MM AQ-1	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	No Impact	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	AQ-2 AQ-6 AD-4	N/A	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 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	AQ-2 AQ-3 AQ-6 AD-4	N/A	SU	No	Yes

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

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

Discussion

The project area is within the jurisdiction of the Tehama County Air Pollution Control District (TCAPCD). As specified below, TCAPCD requirements will be met through SPRs applied to the project.

Impact AQ-1: Generate Emissions of Criteria Air Pollutants During Treatment Activities that would Exceed CAAQS or NAAQS

Implementation of project components involving prescriptive or pile burning, prescribed herbivory, mechanical or manual treatment, could result in emissions of criteria pollutants that exceed the California Air Quality Standard (CAAQS) or National Ambient Air Quality Standard (NAAQS) thresholds. The potential for exceeding these standards was considered, however, in the Program EIR, and project emissions are within the scope of those considered in the Program EIR. Project emissions include dust resulting from operating equipment and driving vehicles on dirt roads, emissions associated with the use of vehicles and equipment, and smoke generated by the combustion of vegetation during prescribed and pile burns.

As discussed in and consistent with the CalVTP EIR, the following emissions generating activities may occur: Mechanical treatments may be completed with heavy equipment such as tractors, excavators, feller/bunchers, skidders, masticators or other specially designed heavy equipment. Haul trucks may be used to transport waste biomass from the site to processing facilities.

- Manual treatments may include one or two hand crews (20-40 crew members) typically using 4-8 chainsaws. Masticators and chippers may also be used at some manual treatment sites to assist with biomass disposal.
- Prescribed herbivory may require the use of vehicles for transporting or herding livestock, or for transporting fencing and other materials.
- Herbicide application may require vehicles or heavy equipment for transportation or application.
- Prescribed burns may require heavy equipment to create fuel breaks, as well as fire engines and , water trucks on site for safety. Hand tools used for prescribed burn ignition may include drip torches and Terra torches, which contain a blend of diesel fuel and gasoline. A helicopter equipped with a helitorch may also be used. Combustion of vegetation during prescribed burns produces emissions of criteria air pollutants.
- Worker trips will also result in exhaust emissions and fugitive dust emissions.

Consistent with the CalVTP EIR, SPRs apply to the project to reduce potential air quality impacts including emissions generation during treatment activities that exceed air quality standards. SPR AQ-4 reduces dust emissions by limiting the speed of vehicles and equipment on dirt roads to minimize dust, and requires treatment crews to wet unpaved roads if excessive dust is created during road use; To protect from smoke emissions, SPR AD-4 requires public notice and signage about prescribed burns, and the public would be restricted from areas where active burning is taking place. SPR AQ-2 requires a Smoke Management Plan, which identifies areas in proximity where people may be present and outlines measures to minimize smoke to those areas. SPR AQ-3 requires completion of a Burn Plan, which reduces public exposure to smoke and prioritizes public safety. SPR AQ-6 applies, requiring that Prescribed Burns planned and managed by non-CalFire crews will follow all safety procedures required of CalFire crews, thereby assuring that health and safety measures are in place to protect crews from emissions related health impacts. SPR AQ-1 requires that the project will comply with all applicable air quality requirements of the air districts having jurisdiction over the project area. Mitigation Measure MM AQ-1 requires, where feasible, that emission reduction techniques are implemented to reduce exhaust emissions from off-road equipment.

California Department of Fish and Wildlife proposes to revise SPR AQ-4 to limit equipment and vehicle speeds on unpaved roadways to 25 miles per hour, unless fugitive dust emissions are visibly occurring (then vehicle speeds would be reduced to no more than 15 mile per hour), and to remove dust, silt, and mud from public paved roadways any time it is visibly being tracked out onto public paved roadways when entering or exiting Tehama Wildlife Area, in accordance with Vehicle Code Section 23113. All other elements of SPR AQ-4 would remain the same as presented in the CalVTP EIR. These revisions are consistent with the intent and purpose of SPR AQ-4 and would maintain the

overall requirements of avoiding and minimizing the creation of fugitive dust, as required by SPR AQ-4. As described, the proposed revisions to SPR AQ-4 would not result in a substantially more significant effect related to emissions of criteria air pollutants than what was covered in the Program EIR.

Inclusion of additional portions of the wildlife area that are outside of the mapped CalVTP treatable landscape constitutes a change in geographic extent to the Program EIR. The potential for exceeding state or national air quality standards are essentially the same, both in and out of the CalVTP treatable landscape, as project components are essentially the same. For this reason, the change in geographic extent to the mapped CalVTP treatable landscape will not result in changes to the project that would increase or decrease the potential for exceeding state or national air quality standards.

Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk

As analyzed in the Program EIR, implementation of treatment activities under the CalVTP would result in exhaust emissions of diesel particulate matter from off-road equipment and vehicles associated with treatment activities, however because of the short duration of treatment activities, and because treatments would not take place near the same people for an extended period of time, diesel PM impacts would be less than significant. Additionally, SPR HAZ-1 requires proper maintenance of diesel and gasoline powered equipment, preventing the occurrence of higher exhaust emissions resulting from poorly functioning equipment; SPR NOI-4 requires treatment activities to be as far as possible from noise-sensitive receptors such as residential land uses, schools, hospitals, and places of worship; and SPR NOI-5 restricts motor idle time. Mitigation Measure MM AQ-1 additionally applies, requiring, where feasible, that emission reduction techniques are implemented to reduce exhaust emissions from off-road equipment.

The proposed plan is within the scope of the CalVTP Programmatic EIR treatment analysis, both in and out of the CalVTP treatable area, and for this reason, impacts associated with exposure to diesel particulate matter and related health risk have been determined to be less than significant.

Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk

The CalVTP Program EIR has analyzed the potential for exposure to fugitive dust emissions containing naturally occurring asbestos, and the related health risk. According to the Department of Conservation's list of asbestos sites in California, there are no known naturally-occurring or other asbestos sites in Tehama County. Further, many of the SPRs that already apply to this project would limit exposure to fugitive dust emissions that could potentially include naturally occurring asbestos. For these reasons, impacts from exposure to fugitive dust emissions containing naturally occurring asbestos, and the related health risk, has been determined to be less than significant, and no additional SPRs or mitigation measures are warranted or apply. This is true for project areas both in and out of the mapped CalVTP treatable landscape.

Impact AQ-4. Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk.

The CalVTP Program EIR has analyzed the potential for exposure to prescribed burn related toxic air contaminants to result in a health risk to people, and has determined that this would be a potentially significant impact, specifically due to exposure to PM_{2.5}. Due to the potential for this risk, CalFire and other agencies that implement prescribed burns have planning tools, safety documents, public notification protocols, and best management practices to reduce safety risks and protect both workers and the public from excessive smoke exposure. These protocols and measures include items outlined in SPRs AQ-6, requiring all non-CalFire crews to follow all CalFire safety procedures, AD-4, requiring public notice, and AQ-2, requiring a smoke management plan. The CalVTP Program EIR indicates that because prescribed burns do not always go to plan, that exposure of people to toxic air contaminants and associated health risk remains a potentially significant and unavoidable impact. There are no additional Mitigation Measures that apply, because all feasible measures to prevent and minimize smoke emissions are already implemented. This is the case for project areas both inside and outside of the CalVTP mapped treatable landscape.

Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust

The CalVTP Program EIR analyzed the potential for significant exposure of objectionable odors from diesel exhaust. It was determined that during project activities performed under the CalVTP, people could be exposed to temporary

emissions of odorous exhaust, that those exposures would not be excessive, nor would the impacts affect a substantial number of people. For the subject VTP, use of diesel fueled equipment and vehicles would be as analyzed in the CalVTP Program EIR, both inside and outside of the CalVTP treatable landscape. For this reason, it is not expected that the project will result in significant exposure to objectionable odors from diesel exhaust. SPR HAZ-1 requires proper maintenance of diesel and gasoline powered equipment, preventing the occurrence of higher exhaust emissions resulting from poorly functioning equipment. SPR NOI-4 requires treatment activities to be as far as possible from noise-sensitive receptors such as residential land uses, schools, hospitals, and places of worship, and SPR NOI-5 restricts motor idle time. These measures, as applied to the project, are consistent with the CalVTP Programmatic EIR, and will assure impacts from exposure to objectionable odors will be insignificant. Project activities will be similar both in and out of the mapped CalVTP treatable landscape, so inclusion of those additional lands outside of the mapped treatable landscape is not expected to result in more significant exposure of people to objectionable odors from diesel exhaust.

Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning

Prescribed burns are proposed both inside and outside of the CalVTP mapped treatable area. The CalVTP Program EIR analyzed the potential for exposure to objectionable odors from smoke during prescribed burning and determined that prescribed burns conducted under the CalVTP could result in the short-term exposure, for a substantial number of people, to odorous smoke, and this could be a potentially significant impact. Due to the potential for this risk, CalFire and other agencies that implement prescribed burns have planning tools, safety documents, public notification protocols, and best management practices to reduce safety risks and protect both workers and the public from excessive smoke exposure.

These protocols and measures include items outlined in SPRs AQ-6, requiring all non-CalFire crews to follow all CalFire safety procedures, AD-4, requiring public notice, AQ-3, requiring a burn plan, and AQ-2, requiring a smoke management plan. Because prescribed burns do not always go to plan, that exposure of people to objectionable odors from smoke during prescribed burning remains a potentially significant and unavoidable impact. There are no Mitigation Measures that apply, because all feasible measures to prevent and minimize smoke emissions are already implemented.

Inclusion of additional portions of the wildlife area that are outside of the mapped CalVTP treatable landscape constitutes a change in geographic extent to the Program EIR. The potential for exposure of people to objectionable odors from smoke during prescribed burns are essentially the same, both in and out of the CalVTP treatable landscape, as project components are essentially the same. For this reason, the change in geographic extent to the mapped CalVTP treatable landscape will not result in changes to the project that would increase or decrease the potential for exposure to smoke from prescribed burning.

New Air Quality Impacts

The CalVTP Program EIR considered potential impacts from treatment of approximately 250,000 acres annually within the 20.3 million acre treatable landscape. Activities proposed for the subject VTP are consistent with those analyzed in the CalVTP Program EIR, and no additional activities are proposed that would result in new air quality impacts beyond that which was analyzed in the CalVTP Program EIR.

The subject VTP includes an expanded area, beyond that which is included in the mapped CalFire CalVTP Treatable Landscape. The subject plan covers an area of approximately 40,000 acres, 48% of the treatable acres (excluding areas covered by water, barren, or developed) were initially included in the CalVTP treatable landscape, so about 20,875.5 acres are represented in the subject plan as additional to the CalVTP treatable landscape. Since 20% or less of the plan would be implemented annually, this is an addition of approximately 4,175 annual treated acres or less. As discussed in the Program EIR, however, wildfires are generally far more likely to result in adverse air quality and public health impacts than prescribed burns, which is the largest project contributor to air quality emissions. Plan implementation, regardless of incremental increase in acreage to be treated annually, will decrease the potential for catastrophic wildfire and those associated impacts that are expected to have a larger air emission impact.

1.5 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL 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	N/A	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 CUL-2 CUL-3 CUL-4 CUL-5 CUL-8	MMCUL-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 CUL-2 CUL-3 CUL-4 CUL-5 CUL-6 CUL-8	N/A	LTS	No	Yes
Impact CUL-4: Disturb Human Remains	LTS	Impact CUL-4, p. 3.5-18	Yes		MMCUL-4			
New Archaeological, Historical, and Tribal Cultural Resource Impacts: Would the treatment result in other impacts to archaeological, historical, and tribal cultural resources that are not evaluated in the CalVTP PEIR?				☐ Yes ☒ No		If yes, complete row(s) below and discussion		
				Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant		
[Identify new impact here, if applicable; add rows as needed]				☐	☐	☐		

Discussion

Environmental Setting and Regulatory Context

The Tehama Wildlife Area is located within a region of Northern California that is known to contain significant archaeological resources and an extremely high potential for sensitive prehistoric cultural resources. Archaeological sites are present on record within the Tehama Wildlife Area, and environmental factors such as proximity to water sources, topographic variability, and long-term human land use indicate that both prehistoric and historic-period cultural resources may be present throughout the project area.

Based on the history of archaeological surveys, records checks, and known resources within the Tehama Wildlife Area, it is estimated that recorded archaeological sites represent only a fraction of the cultural resources that exist on the

landscape (Tehama Wildlife Area Management Plan, 1990). As a result, both recorded and previously unidentified cultural resources may be present within areas proposed for vegetation treatment.

The California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR) evaluated potential impacts to archaeological resources, historical resources, Tribal Cultural Resources, and human remains associated with vegetation treatment activities statewide. The CalVTP PEIR established Standard Project Requirements (SPRs) and mitigation measures to ensure that cultural resources are identified, avoided, and protected to the extent feasible during project implementation.

Records Review, Tribal Consultation, and Survey Approach

At the time of preparation of this Project-Specific Analysis (PSA) and Addendum, a formal cultural resources records search and site-specific field surveys have not yet been completed for the Tehama Wildlife Area Vegetation Treatment Project. These efforts are planned to occur prior to implementation of any ground-disturbing vegetation treatment activities, contingent upon the availability of funding for project implementation.

Consistent with CalVTP SPRs CUL-1 through CUL-5 and CUL-8, cultural resources compliance will occur at the implementation stage and may include a records search, Native American consultation pursuant to Assembly Bill 52, archaeological field surveys where appropriate, and development of avoidance or protection measures for identified resources. No ground-disturbing activities will occur until applicable cultural resources requirements have been completed and incorporated into project implementation.

Tribal Cultural Resources

The CalVTP PEIR completed statewide consultation with California Native American Tribes pursuant to Public Resources Code Section 21080.3.1 (AB 52). For this project, Native American consultation will be conducted at the project implementation stage in accordance with CalVTP SPR CUL-2. If a Tribe requests consultation, the Resource Conservation District of Tehama County (RCDTC), as CEQA Lead Agency, will consult in good faith to identify Tribal Cultural Resources and determine appropriate avoidance, protection, or treatment measures. Identified Tribal Cultural Resources will be protected in accordance with CalVTP requirements.

For clarity, Standard Project Requirements (SPRs) and mitigation measures are distinct regulatory tools under the California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR). SPRs are mandatory components of the project description established by the CalVTP PEIR, while mitigation measures are project-specific requirements applied where necessary to reduce significant impacts. In this Project-Specific Analysis (PSA), SPR CUL-4 addresses archaeological survey requirements, whereas Mitigation Measure CUL-4 addresses procedures for the inadvertent discovery of human remains and is separate and distinct from SPR CUL-4.

Human Remains

Ground-disturbing activities associated with vegetation treatments have the potential to encounter previously unknown human remains. Compliance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 provides mandatory procedures to protect human remains and ensure consultation with the Native American Heritage Commission and the Most Likely Descendant, as applicable. These procedures are incorporated into project implementation through Mitigation Measure CUL-4.

Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources

Proposed treatments that could damage built historical resources present include mechanical treatments utilizing heavy machinery, or other use of vehicles or equipment in a manner that causes substantial ground disturbance during treatment activities. These impacts are within the scope of the Program EIR because these treatment activities and their potential to result in detrimental impacts to historical resources was examined in the Program EIR. SPRs that apply to the project include SPR CUL-1, which requires a sufficiently recent records search for historical resources; SPR CUL-7, which requires the avoidance of known built historical resources, and avoidance of built environment structures that have not yet been evaluated for historical significance; and SPR CUL-8, requiring that workers are trained regarding the protection of historical resources. These measures will minimize the potential for substantial adverse change in significance of built historical resources.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change in the geographic area presented in the Program EIR. Areas of CDFW ownership both inside and outside of the mapped CalVTP treatable area which are included in this plan have equal potential for presence of both known and unknown historic resources.

Impact CUL-2. Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources

While the proposed CalVTP project primarily involves treatment activities that require no soil disturbance or very shallow soil disturbance, there is a potential for disturbance of unique archaeological resources or subsurface historical resources during project activities. These activities that may result in disturbance include mechanical treatments that could result in churning up the surface of the ground during treatment as vegetation is removed. This potential for impacts has been considered in the Program EIR and SPRs apply in order to reduce impacts to less than significant, including: SPR CUL-1, which requires a sufficiently recent records search for historical resources; SPR CUL-2 which requires tribal notification and request for information regarding potential impacts of the proposed project; SPR CUL-3 requires pre-treatment records review and research to be conducted by the qualified archaeological professional; SPR CUL-4 requires site-specific surveys of the treatment area by a qualified archaeological professional; SPR CUL-5 requires consultation with culturally affiliated tribe/s and development of effective protective measures for important tribal cultural resources located within the project area when resources are identified and cannot be avoided; and SPR CUL-8, requiring that workers are trained regarding the protection of historical resources. These measures will minimize the potential for substantial adverse change in significance of built historical resources.

The Program EIR acknowledges that despite implementation of SPRs, there is still a potential for inadvertent damage to unique archaeological resources or subsurface historical resources during project implementation under the CalVTP program. For this reason, the program EIR has determined that projects under the CalVTP program could potentially have a significant impact on unique archaeological resource or subsurface historical resources. For this reason, Mitigation Measure CUL-2 is applied to the project. MM CUL-2 is a discovery clause, requiring that ground-disturbing operations cease in the vicinity of the discovered archaeological or subsurface historical resource, and that the area is assessed and cleared by a qualified archaeologist.

The proposed project falls within the scope of impacts considered under the CalVTP Program EIR in that ground disturbing impacts expected to occur are within the scope of those considered. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change in the geographic area presented in the Program EIR. Areas of CDFW ownership both inside and outside of the mapped CalVTP treatable area which are included in this plan have equal potential for presence of unique historical resources or subsurface historical resources, and therefore there is no change in conditions for those areas that lie outside of the CalVTP mapped treatable area that would be outside of the scope analyzed in the Program EIR.

Impact CUL-3. Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource

While the proposed CalVTP project primarily involves treatment activities that require no soil disturbance or very shallow soil disturbance, there is a potential for disturbances that could result in a substantial adverse change in the significance of a tribal cultural resource. These activities that may result in disturbance include mechanical treatments that could result in churning up the surface of the ground during treatment as vegetation is removed. This potential for impacts has been considered in the Program EIR and SPRs apply in order to reduce impacts to a level of less than significant, including: SPR CUL-1, which requires a sufficiently recent records search for historical resources; SPR CUL-2 which requires tribal notification and request for information regarding potential impacts of the proposed project; SPR CUL-3 requires pre-treatment records review and research to be conducted by the qualified archaeological professional; SPR CUL-4 requires site-specific surveys of the treatment area by a qualified archaeological professional; SPR CUL-5 requires consultation with culturally affiliated tribe/s and development of effective protective measures for important tribal cultural resources located within the project area when resources are identified and cannot be avoided; and SPR CUL-8, requiring that workers are trained regarding the protection of historical resources. These measures will minimize the potential for substantial adverse change in significance of built historical resources.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change in the geographic area presented in the Program EIR. Areas of CDFW ownership both inside and outside of the

mapped CalVTP treatable area which are included in this plan would equally have SPRs apply, reducing impacts to less than significant for project areas both in and outside of the CalVTP treatable landscape.

Impact CUL-4. Disturb Human Remains:

Ground disturbing vegetation treatments proposed have the potential to result in disturbance of human remains. The CalVTP Program EIR considered the potential for presence of previously unknown marked or unmarked prehistoric or historical human interments or cremated remains, and determined that with compliance with California Health and Safety Code Sections 7050.5 and 7052, and PRC Section 5097. The Project EIR has determined that in complying with those California law code sections in the event of a discovery,, the impact of a CalVTP project would be less than significant.

Impacts associated with this project are in the scope of the analysis of the Project EIR because the treatment activities and intensity of ground disturbance are consistent with those analyzed.

The inclusion of land in the proposed project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. The potential for encountering human remains is essentially the same for areas of the proposed project both in and out of the CalVTP treatable landscape. For this reason, inclusion of land outside of the CalVTP treatable landscape will not result in impacts outside of the scope of analysis of the CalVTP Program EIR.

Compliance with California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 provides mandatory procedures to protect human remains and ensure consultation with the Native American Heritage Commission and the Most Likely Descendant, as applicable. These procedures are incorporated into project implementation through Mitigation Measure CUL-4.

New Archaeological, Historical, and Tribal Cultural Resource Impacts

The project does not propose any aspects that would result in new archaeological, historical, or tribal resource impacts beyond those identified in the CalVTP Program EIR. The proposed treatment is consistent with the types of treatments and activities considered under the CalVTP Program EIR, and site conditions are consistent with those analyzed. The boundary of the project area includes areas outside of the CalVTP treatable landscape, which constitutes a change to the geographic extent presented in the Program EIR. Those areas both inside and outside of the CalVTP treatable landscape are similar in terms of proposed activities, potential for resources to be present, and, what the response would be if resources were known to be present or were discovered. In this way there are no additional impacts to consider

1.6 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	AQ-3 AQ-4 BIO-1 BIO-2 BIO-7 BIO-9 GEO-1	BIO1a BIO1b BIO1c	LTSM	No	Yes

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
				GEO-3 GEO-4 GEO-5 GEO-7 HYD-5				
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	BIO-1 BIO-2 BIO-3 BIO-4 BIO-10 BIO-11 HAZ-5 HAZ-6 HYD-1 HYD-3 HYD-4 HYD-5	BIO-2a BIO-2b BIO-2c BIO-2d BIO-2e BIO-2g BIO-3a BIO-3b BIO-3c BIO-4	LTSM	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function	LTS	Impact BIO-3, pp 3.6-186-3.6-191	Yes	BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-6 BIO-9 HYD-4 HYD-5	BIO-3a BIO-3b BIO-3c	LTSM	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTS	Impact BIO-4, pp 3.6-191-3.6-192	Yes	BIO-1 HYD-1 HYD-3 HYD-4	BIO-4	LTSM	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	BIO-1 BIO-4 BIO-5 BIO-10 BIO-11 HYD-1 HYD-4	BIO-5	LTSM	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197-3.6-198	Yes	BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-12	N/A	LTS	No	Yes

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	No Impact	Impact BIO-7, pp 3.6-198-3.6-199	Yes	AD-3	N/A	LTS	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	N/A	N/A	LTS	No	Yes

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

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

Discussion

The Tehama Wildlife Area is located in the Sierra Nevada Foothills, roughly 17 miles east of Red Bluff, in Tehama County. The wildlife area is bordered by US Forest Service Lassen National Forest on the east side, the Nature Conservancy Dye Creek Preserve to the south, and private lands to the west and north. The elevation ranges roughly from around 1,000' to 2,500'. The terrain is characterized by a series of north/south facing rocky slopes divided by small to medium sized streams. Vegetation is largely non-native grasslands and blue oak woodlands, with smaller areas of chaparral, valley foothill riparian, and montane hardwood. The Wildlife Area, which was historically used to graze cattle and sheep, was purchased incrementally, starting in 1941, to preserve the winter range for the Eastern Tehama Mule Deer Herd, which is the largest migratory population of mule deer in California. Two anadromous fish streams are present, Antelope Creek and Mill Creek, which provide habitat for special status spring-run chinook salmon, Central Valley DPS steelhead, Foothill legged frog, and Northwestern pond turtle. The wildlife area also provides public access for hunting, fishing, camping, and wildlife viewing. Tehama Wildlife Area is protected Open Space Lands.

Data review of biological resources for the project included review of habitat and vegetation types, special status wildlife and plant scoping, wetland, riparian areas and streams mapping, deer migration and overwintering data, and review of Tehama Wildlife Area Land Management and Deer Management Plans.

The Tehama Wildlife Area is located in the Sierra Nevada Foothills ecoregion. The Lassen Foothills VegCamp Layer was utilized in determining vegetation types present. The VegCamp mapped natural communities were divided into CWHR Vegetation Types utilizing the metadata associated with the Lassen Foothills VegCamp GIS data, and those natural communities were further divided in to grass, tree or shrub, utilizing the CNPS-AIS Lassen Foothills Final Report, 2009. Vegetation types and sensitivity status are shown in Table 3.

Special status plant scoping was reviewed utilizing numerous sources, including a subject and surrounding quad plant searches of the California Native Plant Society (CNPS) Rare Plant Inventory and the California Natural Diversity Database (CNDDDB). The CDFW Bios map was consulted, and iNaturalist and CalFlora records were reviewed. Past available botanical survey lists were additionally reviewed.

Past studies included a botanical study and plant list from 1983, in association with the Tehama Wildlife Area Deer Herd Plan, Appendix 10 to the 1990 Tehama Wildlife Area Management Plan; plant species identified in association with the 1990 Tehama Wildlife Area Management Plan, and the Lassen Foothills Vegetation Mapping Project Final Vegetation Map and Classification Report, Aerial Information Systems and California Native Plant Society, 2009.

A scoping summary, and CNDDDB and CNPS 9 Quad Search results are included as Attachment B.

Two California Endangered plant species have potential for presence, one CNPS 1B.1 species is documented as present, and 18 additional CNPS 1B or 2B plant species have potential for presence.

Potentially Present Federal and State Protected Plant Species – There are no known populations of federal or state protected plant species found at Tehama Wildlife Area. The following two protected plant species have a low potential for presence within mesic areas of the property:

Boggs Lake hedge-hyssop (*Gratiola heterosepala*) is a California Endangered species found in clay soils, in marshes and swamps and at lake margins, and in vernal pools. Slender Orcutt grass (*Orcuttia tenuis*) is a Federally Threatened and California Endangered species found in vernal pools, often gravelly.

CNPS Special Status Plant Species – A population presumed to be a yellow variant of Callahan's mariposa lily (*Calochortus syntrophus*, CNPS 1B.1) was observed on the Wildlife Area, along Ishi Road. Callahan's mariposa lily is found in vernal mesic cismontane woodlands, and valley and foothill grasslands.

Other potentially present CNPS list 1 and 2 species include: Adobe-lily (*Fritillaria pluriflora*), Ahart's paronychia (*Paronychia ahartii*), Baker's navarettia (*Navarettia leucocephala* ssp. *bakeri*), blushing wild buckwheat (*Eriogonum ursinum* var. *erubescens*), brownish beaked-rush (*Rhynchospora capitellata*), dwarf downingia (*Downingia pusilla*), finger rush (*Juncus digitatus*), Hall's rupertia (*Rupertia hallii*), legenere (*Legenere limosa*), maverick clover (*Trifolium piorkowskii*), rattlesnake fern (*Botrypus virginianus*), Red Bluff dwarf rush (*Juncus leiospermus* var. *leiospermus*), red-flowered bird's foot trefoil (*Acmispon rubriflorus*), Sanford's arrowhead (*Sagittaria sanfordii*), Shasta clarkia (*Clarkia borealis* ssp. *arida*), Stony Creek spurge (*Euphorbia ocellata* ssp. *rattanii*), watershield (*Brasenia schreberi*), and white-stemmed clarkia (*Clarkia gracilis* ssp. *albicaulis*).

Wildlife scoping included CNDDDB subject and surrounding quad search, iNaturalist records, eBird records, BIOS deer migration mapping, and Tehama Wildlife Area management document review. Scoping results for potentially present wildlife species are included as Attachment B.

Table 3. Mapped Natural Communities and Associated Habitat Sensitivity Measures.

CWHR Vegetation Types	VegCamp Mapped Natural Communities		Habitat Sensitivity Measures
Annual Grassland	California Annual or Perennial Grassland Mapping Unit	Grass	
Blue Oak Woodland	Quercus douglasii Alliance	Tree	Where 10% or more tree cover is oak
	Quercus douglasii/Aesculus californica/Herbaceous Association	Tree	Where 10% or more tree cover is oak
	Quercus douglasii/Arctostaphylos manzanita/Herbaceous Association	Tree	Where 10% or more tree cover is oak
	Quercus douglasii/Annual - Perennial Herbaceous Sub-Alliance	Tree	Where 10% or more tree cover is oak
	Quercus douglasii/Ceanothus cuneatus/Herbaceous Association	Tree	Where 10% or more tree cover is oak
	Quercus douglasii/Juniperus californica (Ceanothus cuneatus) Herbaceous Association	Tree	Where 10% or more tree cover is oak
	Quercus wislizeni - (Quercus douglasii) Super Alliance	Tree	Where 10% or more tree cover is oak
Blue Oak - Foothill Pine	Quercus wislizeni - (Quercus douglasii) - Pinus sabiniana Association	Tree	Where 10% or more tree cover is oak
	Quercus douglasii - Pinus sabiniana Mapping Unit	Tree	Where 10% or more tree cover is oak
	Pinus sabiniana Alliance	Tree	
	Pinus sabiniana/Ceanothus cuneatus Association	Tree	
Montane Hardwood	Aesculus californica Alliance	Tree	
	Quercus chrysolepis Alliance	Tree	Where 10% or more tree cover is oak
	Quercus wislizeni Alliance	Tree	Where 10% or more tree cover is oak
	Quercus wislizeni - (Quercus douglasii) Aesculus californica Mapping Unit	Tree	Where 10% or more tree cover is oak
	Quercus kelloggii Alliance	Tree	Where 10% or more tree cover is oak
	Umbellularia californica - Quercus wislizeni Mapping Unit	Tree	G4 S3; Where 10% or more tree cover is oak
Montane Hardwood - Conifer	Quercus kelloggii/Pinus ponderosa Association	Tree	Where 10% or more tree cover is oak
Mixed Chaparral	(Ceanothus cuneatus) - Eriodictyon californicum Mapping Unit	Shrub	Chaparral protections from conversion
	Ceanothus cuneatus Alliance	Shrub	Chaparral protections from conversion
	Ceanothus cuneatus/Herbaceous Association	Shrub	Chaparral protections from conversion
	Mixed Scrub-Oak Chaparral Super Alliance	Shrub	Chaparral protections from conversion
	Northern Mixed Mesic Chaparral Mapping Unit	Shrub	Riparian habitat type: chaparral protections from conversion
Montane Chaparral	Quercus garryana Alliance	Shrub	Chaparral protections from conversion
Valley Foothill Riparian	Mixed Shrub Willow Thicket Mapping Unit	Shrub	
	North American Temperate Riparian Woodlands & Forests Mapping Unit	Tree	Riparian habitat type
Wet Meadow	Seasonally Flooded Wetland Herbaceous Mapping Unit	Grass	Riparian habitat type
Riverine	Stream Beds and Flats		Riparian habitat type
Lacustrine	Water		Wetlands and waters
Barren	Cliffs - Rock Outcrops - Steep Eroded Slopes		
Urban	Built-up		

Federal and State Protected Wildlife Species –

The following federal and/or state protected wildlife species are found at Tehama Wildlife Area:

- Chinook salmon – Central Valley spring-run ESU (*Oncorhynchus tshawytscha*, pop. 11) is a Federally Threatened and California Threatened anadromous fish species present in Antelope Creek and Mill Creek, within the boundaries of the Tehama Wildlife Area.
- Steelhead – Central Valley DPS (*Oncorhynchus mykiss irideus*, pop. 11) is a Federally Threatened anadromous fish species present at Tehama Wildlife Area. Both Antelope Creek and Mill Creek are critical habitat streams for Central Valley DPS steelhead.
- Golden eagle (*Aquila chrysaetos*), is a California Fully Protected wildlife species known to utilize Tehama Wildlife Area for forage. There are no documented golden eagle nests recorded, however golden eagles have been observed, including a note in the 1990 Tehama Wildlife Area Management Plan, that golden eagle is a species known to use the wildlife area, and an eBird observation recorded in 2021 by Daniel Bye, who observed a golden eagle at Fischer Campground

The following federal or state protected species have not been observed at Tehama Wildlife Area but could potentially be present based on habitat and range conditions:

- Crotch's bumble bee (*Bombus crotchii*) is a State Candidate species found in open grassland and scrub habitats. Tehama Wildlife Area is within the current range for this species and habitat is present. There is one observation of Crotch's bumble bee from 1956 in the Red Bluff East quad, a surrounding quad to the quads associated with Tehama Wildlife Area.
- Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*) is a Federal Threatened species found on elderberry in the valley floor and low foothills. The Tehama Wildlife Area is within range for this species, and elderberry plants are present at the wildlife area. While there are no observations of Valley elderberry longhorn beetle at the Tehama Wildlife Area, the closest observation is north of the Wildlife Area near Paynes Creek.
- Vernal pool fairy shrimp (*Branchinecta lynchi*) is a Federal Threatened species found in ephemeral freshwater vernal pools. There are approximately 300 acres of vernal pools according to CNDDDB, located on the west side of Tehama Wildlife Area, which may provide habitat for this species.
- Vernal pool tadpole shrimp (*Lepidurus packardii*) is a Federal Endangered species found in vernal pools and seasonal wetlands of the Central Valley. There are approximately 300 acres of vernal pools according to CNDDDB, located on the west side of Tehama Wildlife Area as well as other areas of seasonal wetlands, which may provide habitat for this species.
- Bald eagle (*Haliaeetus leucocephalus*) is a California Endangered/Fully Protected species with potential for presence. According to the 1990 Tehama Wildlife Area Management Plan, bald eagles were at the time of that writing, an occasional winter visitor along watercourses in the area. There are no recorded observations on bald eagle on CNDDDB within the Tehama Wildlife Area.
- Burrowing owl (*Athene cunicularia hypugaea*) is a State Candidate species that resides in dry grasslands and deserts, and open areas of pinon-juniper and Ponderosa pine habitats. There are CNDDDB observations of this species on surrounding quads, and also a 2023 observation at Dye Creek Preserve (south of Tehama Wildlife Area), on iNaturalist. Habitat for this species is present at Tehama Wildlife Area.

The following Federal Candidate and/or California Species of Special Concern wildlife are found at Tehama Wildlife Area:

- Foothill yellow legged frog – north coast DPS (*Rana boylei* pop.1) is a California Species of Special Concern present in Plum Creek and Little Antelope Creek within the boundaries of the Tehama Wildlife Area.

- Northwestern pond turtle (*Actinemys marmorata*) is a Federal Candidate and California Species of Special Concern found in Plum Creek and Antelope Creek within the boundaries of the Tehama Wildlife Area.
- Yellow warbler (*Setophaga petechia*) is a California Species of Special Concern observed in several locations of the Tehama Wildlife Area according to eBird observations recorded by Michele Swartout in 2020 and 2024.
- Yellow-breasted chat (*Icteria virens*) is a California Species of Special Concern observed in several locations of the Tehama Wildlife Area according to eBird observations recorded by Michele Swartout in 2020, and 2022.
- Pallid bat (*Antrozous pallidus*) is a California Species of Special Concern observed at Tehama Wildlife Area in April of 2023 according to a research grade identification on iNaturalist by Kimberly Vargas.
- Western red bat (*Lasiurus frantzii*) is a California Species of Special Concern observed at Tehama Wildlife Area in April of 2023 according to a research grade identification on iNaturalist by Kimberly Vargas.

The following Federal Candidate and/or California Species of Special Concern wildlife have not been found at Tehama Wildlife Area but could potentially be present:

- Monarch butterfly (*Danaus Plexippus Plexippus*) is a Federal Candidate species that breeds wherever milkweed is found. Monarchs overwinter in coastal California, and in Mexico. They forage from a wide variety of plant species for nectar. Observations of heart-leaf milkweed (*Asclepias cordifolia*), a native species of milkweed, is found at Tehama Wildlife Area as recorded on iNaturalist and CalFlora. Tehama Wildlife Area is located within the spring and summer breeding range for Monarch butterfly.
- Spotted bat (*Euderma maculatum*) is a California Species of Special Concern found in a variety of habitat types, that requires rock crevices in cliffs or caves for roosting. Although there are no observations of spotted bat at Tehama Wildlife Area, there are rock crevices in cliffs and caves for roosting present, and the closest observation is about a mile east of Tehama Wildlife Area along Hogsback Ridge at Finley Lake in the Lassen National Forest.
- Townsend's big-eared bat (*Corynorhinus townsendii*) is a California Species of Special Concern found in all but alpine and sub-alpine habitats in California. This species roosts in man-made structures, caves, mines, and tunnels. It is most abundant near mesic habitats. Although Townsend's big-eared bat has not been observed at Tehama Wildlife Area, caves are present as are mesic areas. The closest observation of Townsend's big-eared bat is about 2.5 miles southwest of the wildlife area, at Dye Creek Preserve.
- Western mastiff bat (*Eumops perotis californicus*) is a California Species of Special Concern found in a wide range of habitats, which uses crevices in cliff faces, high buildings, trees, and tunnels for nesting. Suitable habitat includes extensive open areas with abundant roost locations. Although there are no observations of Western mastiff bat at Tehama Wildlife Area, it is in the current range for this species and habitat is present.

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

Vegetation treatment activities including maintenance activities have the potential to result in direct removal, destruction, indirect death, or reduced vigor of special status plants through habitat modifications. All proposed treatment activities, including prescribed herbivory, mechanical and manual treatments, prescribed burns and pile burning, and herbicide use, have potential for detrimental impacts to special status plants through crushing, breaking, scorching, burning, trampling, uprooting, or habitat modifications.

The ecological restoration treatment type is applied to restore degraded, damaged, or destroyed ecosystems and habitats in fire adapted vegetation types by returning them to their natural fire regimes. This is expected to have an overall beneficial effect on special status plants. Similarly, shaded fuel breaks will result in fuels reduction in the understory which is expected to provide for new vegetation gaps where species diversity can increase.

The non-shaded fuel break type has the greatest potential for substantial impacts on special status plants because it would remove most of the vegetation from the treatment area. At Tehama Wildlife Area, non-shaded fuel breaks would most often be applied in locations where common species of brush vegetation dominate, however there is still

potential for detrimental impacts to special status plants resulting from creation and maintenance of non-shaded fuel breaks.

Potential impacts to special status plants are within the scope of those considered in the CalVTP Programmatic EIR because treatment types and activities are consistent with those analyzed and those special status plants present or with potential presence were similarly considered in the CalVTP Programmatic EIR. The inclusion of land in the proposed project area that is outside of the CalVTP mapped treatable landscape does constitute a change to the geographic extent presented in the CalVTP Program EIR. The project area, both inside and outside of the CalVTP mapped treatable landscape is similar in terms of vegetation alliances present and potential for special status plants, and in this way there is no difference in potential impact. SPR's and Mitigation Measures proposed to reduce entailed impacts to a level of less than significant would be applied similarly both within and outside of the CalVTP mapped treatable landscape. Inclusion of lands outside of the CalVTP treatable landscape therefore does not result in a substantially more significant impact than what was considered in the CalVTP Programmatic EIR.

SPRs apply to the project in order to minimize potential impacts to special status plants. SPR BIO-1 requires data review and reconnaissance surveys to identify documented occurrences of special status plants and their habitats. SPR BIO-7 requires surveys for special status plants that have potential to occur in the project area. SPR BIO-2 requires training for workers to make them aware of the special status plants present and measures that apply to protect them. SPR BIO-9 requires Best Management Practices to prevent the spread of invasive and noxious plants that could adversely affect special status plants and their habitats. SPRs AQ-3, AQ-4, GEO-1, GEO-3, GEO-4, GEO-5, and GEO-7 require measures to minimize soil erosion and dust, reducing impacts on special status plants from erosion and dust impacts. HYD-5 would require buffers for herbicide use near special status plants, and measures to prevent drift and other non-target application.

Even with implementation of SPRs, some proposed treatments at sites where special status plants occur could result in direct removal of special status plants or habitat modifications that reduce or eliminate special status plant habitat. This would be a potentially significant impact, and Mitigation Measures apply as follows:

MM BIO-1a would require a protective buffer for ESA or CESA listed plant species. MM BIO-1b requires protective measures to apply to non-ESA or CESA plant species and their habitats, and MM BIO-1c requires compensation for loss of ESA or CESA plant species that cannot feasibly be avoided.

Impact BIO-2. Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications.

Treatment activities proposed including prescribed burning, pile burning, mechanical and manual treatment, prescribed herbivory, and herbicide treatment, could result in adverse impacts to special status wildlife species.

Potential impacts to special status wildlife are within the scope of those considered in the CalVTP Programmatic EIR because treatment types and activities are consistent with those analyzed and those special status wildlife species present or with potential presence were similarly considered in the CalVTP Programmatic EIR. The inclusion of land in the proposed project area that is outside of the CalVTP mapped treatable landscape does constitute a change to the geographic extent presented in the CalVTP Program EIR. The project area, both inside and outside of the CalVTP mapped treatable landscape is similar in terms of vegetation alliances present and potential for special status wildlife species, and in this way there is no difference in potential impact. SPR's and Mitigation Measures proposed to reduce entailed impacts to a level of less than significant would be applied similarly both within and outside of the CalVTP mapped treatable landscape. Inclusion of lands outside of the CalVTP treatable landscape therefore does not result in a substantially more significant impact than what was considered in the CalVTP Programmatic EIR.

The CalVTP Programmatic EIR divides wildlife species into life history groupings or guilds, and SPRs and Mitigation Measures are applied relative to the guild to which the wildlife species is assigned. Table 4 illustrates the various guilds that the present and potentially present wildlife species is assigned, and the associated SPR and Mitigation Measures that apply for each guild.

Tree Nesting/Cavity Nesting: Bald Eagle (*Haliaeetus leucocephalus*, CE, FP) and Golden Eagle (*Aquila chrysaetos*, FP)

Tehama Wildlife Area is within the year-round range for both bald and golden eagles, and both have been observed foraging at the wildlife area on occasion. There are no historic or current observations of nests for either bald or golden eagle at Tehama Wildlife Area. While eagle nests are unlikely at Tehama Wildlife Area due to lack of nesting habitat, should nests be encountered, SPR BIO-1 applies to the project requiring data review and reconnaissance level surveys prior to submittal of the Project-Specific Analysis (PSA) and treatment. SPR BIO-2 applies, requiring biological resources training for workers. SPR BIO-10 applies, requiring surveys for special status wildlife and nursery sites. SPR BIO-11 applies, requiring the installation of wildlife-friendly fencing for proposed herbivory. SPR HAZ-5 applies, requiring a spill prevention and response plan for herbicide treatment. SPR HAZ-6 applies, requiring compliance with herbicide regulations for herbicide treatment. SPR HYD-5 applies, requiring protection of non-target vegetation and special status species during herbicide treatment. MM BIO-2a applies, requiring the avoidance of mortality, injury or disturbance to, and maintenance of, habitat function for all ESA, CESA and Fully Protected species. MM BIO-2c applies, requiring compensation for mortality, disturbance, injury and loss of habitat function for special status wildlife if applicable.

Shrub Nesting: Valley Elderberry Longhorn Beetle, Yellow Warbler, Yellow Breasted Chat

Valley Elderberry Longhorn Beetle (*Desmocerus californicus dimorphus*, FT) is found on elderberry in the valley floor and low foothills, from Shasta County south through Madera County. Tehama Wildlife Area is within the range for this species and elderberry plants are present. There are no current or historic observations of Valley Elderberry Longhorn Beetle at Tehama Wildlife Area, and the closest historic observations are near Paynes Creek, north of the wildlife area. Although potential for presence is low, fire resiliency treatments, including all treatment types and treatment maintenance, have the potential to result in detrimental impacts to Valley Elderberry Longhorn Beetle and its habitat. These impacts were considered in the CalVTP EIR and avoidance and mitigation measures apply in order to reduce impacts to a level of less than significant. Those measures include SPR BIO-1, requiring data review and reconnaissance level surveys prior to submittal of the Project-Specific Analysis (PSA) and treatment; SPR BIO-2 requiring biological resources training for workers; SPR BIO-3, requiring protocol level surveys for sensitive natural communities and other sensitive habitats; SPR BIO-4 requiring that treatments be designed to protect riparian habitat function; SPR BIO-10, requiring surveys for special status wildlife and nursery sites; SPR HAZ-5, requiring a spill prevention and response plan for herbicide treatment; SPR HAZ-6, requiring compliance with herbicide regulations for herbicide treatment; and SPR HYD-5 applies, requiring protection of non-target vegetation and special status species during herbicide treatment. Additionally, Mitigation Measure (MM) BIO-2a requires the avoidance of mortality, injury or disturbance to, and maintenance of, habitat function for all ESA, CESA and Fully Protected species; MM BIO-2c requires compensation for mortality, disturbance, injury and loss of habitat function for special status wildlife if applicable; and MM BIO-2d requires implementation of protective measures for Valley Elderberry Longhorn Beetle.

Yellow Warbler (*Setophaga petechia*, SSC), Yellow Breasted Chat (*Icteria virens*, SSC)

Fire resiliency treatments, including all treatment types and treatment maintenance, occurring during the bird nesting season (February 1-August 31) could result in the direct loss of active nests or other impacts from nearby disturbance that could cause abandonment and loss of eggs or chicks. The potential for detrimental impacts to non-ESA/CESA birds including special status Species of Special Concern birds, from project activities, was considered in the CalVTP EIR, and avoidance measures apply in order to reduce impacts to less than significant.

Consistent with the language of SPR BIO-1, adverse effects can be avoided by conducting treatment outside of special status bird nesting season. If it is not possible to conduct treatment outside of special status bird nesting season, further review and surveys will be conducted consistent with SPRs BIO-1 and BIO-10. Mitigation Measure 2B additionally applies, outlining avoidance measures for non-ESA/CESA special status species to avoid mortality, injury, or disturbance, and maintain habitat function. These measures require field delineation of a buffer of at least 100 feet to the occupied nest (as appropriate), and identification and protection of any habitat features necessary for survival.

Burrowing or Denning: Burrowing Owl (*Athene cunicularia hypugaea*, SC)

Fire resiliency treatments, including all treatment types and treatment maintenance, occurring during the bird nesting season (February 1-August 31) could result in the direct loss of active nests or other impacts that from nearby

disturbance that could cause abandonment and loss of eggs or chicks. The potential for detrimental impacts to non-ESA/CESA birds including special status State Candidate birds, from project activities, was considered in the CalVTP EIR, and avoidance measures apply in order to reduce impacts to less than significant.

Consistent with the language of SPR BIO-1, adverse effects can be avoided by conducting treatment outside of special status bird nesting season. If it is not possible to conduct treatment outside of special status bird nesting season, further review and surveys will be conducted consistent with SPRs BIO-1 and BIO-10. SPR BIO-2 also applies, requiring biological resources training for workers. SPR HAZ-5 applies, requiring a spill prevention and response plan for herbicide treatment; SPR HAZ-6 applies, requiring compliance with herbicide regulations for herbicide treatment; and SPR HYD-5 applies, requiring protection of non-target vegetation and special status species during herbicide treatment. MM BIO-2a applies, requiring the avoidance of mortality, injury or disturbance to, and maintenance of, habitat function for all ESA, CESA and Fully Protected species. MM BIO-2c applies, requiring compensation for mortality, disturbance, injury and loss of habitat function for special status wildlife if applicable.

Insects/Terrestrial Invertebrates: Crotch's Bumble Bee (*Bombus crotchii*, SC), Monarch Butterfly (*Danaus plexippus* *Plexippus*, FC)

Crotch's Bumble Bee is found in open grassland and scrub habitats. They are short- to medium tongued nectar generalists, known to utilize snapdragons (*Antirrhinum* sp.), milkweeds (*Asclepias* sp.), dustymaidens (*Chaenactis* sp.), clarkia (*Clarkia* sp.), bush poppy (*Dendromecon* sp.), buckwheat (*Eriogonum* sp.), poppy (*Eschscholzia* sp.), lupin (*Lupinus* sp.), burclover (*Medicago* sp.), phacelia (*Phacelia* sp.), and sage (*Salvia* sp.) plant species (Williams et al, 2014, Koch et al, 2012). They nest underground. There are no current or historic observations of Crotch's bumble bee at Tehama Wildlife Area, however the project is within range and habitat is present. Fire resiliency treatment, including all treatment types and treatment maintenance, could result in detrimental impacts to Crotch's bumble bee through destruction of nests or overwintering sites, or removal of floral resources. These potential impacts were considered in the CalVTP EIR, and measures apply to reduce these impacts to less than significant. SPR BIO-1 applies to the project requiring data review and reconnaissance level surveys prior to submittal of the Project-Specific Analysis (PSA) and treatment. SPR BIO-2 applies, requiring biological resources training for workers. SPR BIO-10 applies, requiring surveys for special status wildlife and nursery sites. HAZ-5 applies, requiring a spill prevention and response plan for herbicide treatment. SPR HAZ-6 applies, requiring compliance with herbicide regulations for herbicide treatment. SPR HYD-5 applies, requiring protection of non-target vegetation and special status species during herbicide treatment. Additionally, Mitigation Measure MM BIO-2g applies, requiring design treatment to avoid mortality, injury, or disturbance to, and to maintain habitat function for, special status bumble bees.

Monarch Butterfly (*Danaus Plexippus*, FC)

Tehama Wildlife Area is within the spring and summer breeding range for monarch butterfly. Monarchs breed in a variety of habitats where milkweed is found, and heart-leaf milkweed (*Asclepias cordifolia*) is present at the wildlife area. Although there are no known observations of monarch butterfly at the Tehama Wildlife Area, there is potential for presence.

Fire resiliency treatment during the monarch breeding season (April 1-October 31) (Xerces 2019), including mechanical, manual, herbicide treatment and prescriptive fire treatment types, and associated treatment maintenance, could result in detrimental impacts to monarch butterfly where milkweed is present. Prescribed herbivory is not expected to result in detrimental impacts because heart-leaf milkweed is thought to be toxic to cattle and sheep (USDA Plant Guide).

These potential impacts were considered in the CalVTP EIR, and measures apply to reduce these impacts to less than significant. Consistent with the language of SPR BIO-1, adverse effects can be avoided by conducting treatment outside of the monarch breeding season. If it is not possible to conduct treatment outside of the monarch breeding season, further review and surveys will be conducted consistent with SPRs BIO-1 and BIO-10. Additionally, Mitigation Measure MM BIO-2e applies, retaining milkweed host plants during treatment activities. To protect against herbicide impacts, HAZ-5 applies, requiring a spill prevention and response plan for herbicide treatment, SPR HAZ-6 applies,

requiring compliance with herbicide regulations for herbicide treatment, and SPR HYD-5 applies, requiring protection of non-target vegetation and special status species during herbicide treatment.

Bats: Spotted Bat (*Euderma maculatum*, SSC), Pallid Bat (*Antrozous pallidus*, SSC), Townsend's Big-Eared Bat (*Corynorhinus townsendii*, SSC), Western Mastiff Bat (*Eumops perotis californicus*, SSC), Western Red Bat (*Lasiurus frantzii*, SSC)

Pallid bats and western red bats have been observed at Tehama Wildlife Area, and Townsend's big-eared bats, western mastiff bats, and spotted bats could also potentially be present. Roosting habitat includes rocky areas, caves and man-made structures, and woodland and forest areas.

Prescribed burning, and mechanical and manual treatments can result in direct and indirect detrimental impacts to roosting bats if conducted during the bat roosting period (April 1-August 31). Herbicide use can harm bats if bats ingested insects or vegetation with herbicide, or come into direct contact with herbicides. Additionally, bats can be alarmed by presence of equipment and personnel associated with herbicide treatment and may abandon the colony and young, resulting in potential mortality. Prescribed herbivory is not expected to have detrimental impacts on bat roosting or roosting habitat, as herbivory is already occurring throughout the wildlife area and bats present are already adapted to the presence of herbivores and associated infrastructure.

Potential impacts to special status bats were considered in the CalVTP EIR, and measures apply to reduce these impacts to less than significant. Consistent with the language of SPR BIO-1, adverse effects can be avoided by conducting treatment outside of the bat roosting period. If it is not possible to conduct treatment outside of the bat roosting period, further review and surveys will be conducted consistent with SPRs BIO-1 and BIO-10. SPR BIO-2 applied, requiring crew members and contractors to receive training so that they are aware of potential special status wildlife in the treatment area, and measures to avoid detrimental impacts. Additionally, Mitigation Measure MM BIO-2b applies, requiring avoidance of mortality, injury, or disturbance to, and maintenance of habitat function for non-ESA/CESA special status wildlife. To protect against herbicide impacts, HAZ-5 applies, requiring a spill prevention and response plan for herbicide treatment, SPR HAZ-6 applies, requiring compliance with herbicide regulations for herbicide treatment, and SPR HYD-5 applies, requiring protection of non-target vegetation and special status species during herbicide treatment.

Fish/Aquatic Invertebrates: Chinook Salmon, Central Valley spring-run ESU (*Oncorhynchus tshawytscha* pop. 11, FT, CT), Steelhead (*Oncorhynchus mykiss irideus* pop. 11, FT, SSC), Vernal Pool Fairy Shrimp (*Branchinecta lynchi*, FT), Vernal Pool Tadpole Shrimp (*Lepidurus packardii*, FE)

Chinook salmon and steelhead are present in Antelope Creek and Mill Creek at Tehama Wildlife Area – both of these streams are designated as critical habitat streams for Central Valley DPS Steelhead.

Vernal pool fairy shrimp and Vernal pool tadpole shrimp have not been observed at Tehama Wildlife Area, however there is potential for presence as the wildlife area is within the range of these species, and habitat is present. Vernal pool fairy shrimp are found in ephemeral freshwater vernal pools and vernal pool tadpole shrimp are found vernal pools and other seasonal wetlands and ephemeral freshwater habitats. Tehama Wildlife Area is outside of the mapped critical habitat for vernal pool fairy and tadpole shrimp and is more than 3.5 miles east of the closest mapped critical habitat area or observed population, however the far westerly side of the wildlife area contains roughly 300 acres of mapped vernal pools and is within the range for these species.

The CalVTP EIR mapped treatable landscape does not include wetlands or waters, however many wetlands are present at a finer scale than the CalVTP treatable landscape mapping. Additionally, treatments in upland habitats near wetlands or waters may have the potential for detrimental impacts from project activities such as prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, or herbicide use. Prescribed burning could directly impact smaller unmapped wetlands, or could result in instability or erosion impacts to aquatic habitat from adjacent upland areas. The use of fire accelerants in or near small wetlands and waters may pose a risk to aquatic species. Mechanical or manual treatment could result in erosion or sediment impacts to streams and wetlands from adjacent upland areas. Prescribed herbivory has the potential to result in inadvertent trampling or fill of wetlands or other

smaller aquatic features. Herbicide use in or adjacent to small aquatic features could result in toxicity to aquatic species present. These potential impacts have been considered in the CalVTP programmatic EIR, and avoidance and mitigation measures apply to reduce potential for impacts to less than significant.

SPR BIO-1, requires data review and reconnaissance level surveys prior to submittal of the Project-Specific Analysis (PSA) and treatment; SPR BIO-2 requires biological resources training for workers; SPR BIO-3, requires protocol level surveys for sensitive natural communities and other sensitive habitats; SPR BIO-4 requires that treatments be designed to protect riparian habitat function; SPR BIO-10, requires surveys for special status wildlife and nursery sites; HAZ-5 applies, requiring a spill prevention and response plan for herbicide treatment. SPR HAZ-6 applies, requiring compliance with herbicide regulations for herbicide treatment. SPR HYD-1 applies, requiring compliance with state and regional water quality requirements. SPR HYD-3 prohibits prescribed herbivory treatments within sensitive waterbodies, wetlands, or riparian areas. SPR HYD-4 requires implementation of WLPZs on each side of watercourses identified within treatment areas and prohibits fire ignitions (and associated accelerants) within WLPZs. SPR HYD-5 would reduce potential impacts to special-status aquatic species by limiting herbicide use within riparian habitat. Per the CalVTP EIR, implementation of these SPRs will reduce the potential for impacts to special-status fish species, and other special-status aquatic wildlife.

Mitigation measures additionally apply in order to reduce impacts to less than significant, including Mitigation Measures MM BIO 2a, MM BIO-2c, MM BIO-3a, MM BIO-3b, MM BIO-3c, and MM BIO-4. Mitigation Measure (MM) BIO-2a requires the avoidance of mortality, injury or disturbance to, and maintenance of, habitat function for all ESA, CESA and Fully Protected species; MM BIO-2c requires compensation for mortality, disturbance, injury and loss of habitat function for special status wildlife if applicable. MM BIO-3a, BIO-3b and BIO-3c require that fire resiliency treatments avoid the loss of sensitive natural communities and oak woodlands, compensate for any loss of natural communities or oak woodlands, and compensate for any unavoidable loss of riparian habitat. MM BIO-4 specifies avoidance of state and federally protected wetlands, (including vernal pools that may provide habitat for vernal pool fairy and tadpole shrimp), and establishment of a minimum 25-foot protective buffer.

Amphibians/Reptiles: Northwestern Pond Turtle (*Actinemys marmorata*, FC, SSC), Foothill Yellow Legged Frog, North Coast DPS (*Rana boylei* pop. 1, SSC)

Foothill yellow-legged frogs and northwestern pond turtles are present in and adjacent to Plum Creek, Antelope Creek, and Little Antelope Creek, within the boundaries of Tehama Wildlife Area.

The CalVTP EIR mapped treatable landscape does not include wetlands or waters, however many wetlands are present at a finer scale than the CalVTP treatable landscape mapping. Additionally, treatments in upland habitats near wetlands or waters may have the potential for detrimental impacts from project activities such as prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, or herbicide use. Prescribed burning could directly impact smaller unmapped wetlands, or could result in instability or erosion impacts to aquatic habitat from adjacent upland areas. The use of fire accelerants in or near small wetlands and waters may pose a risk to aquatic species. Mechanical or manual treatment could result in erosion or sediment impacts to streams and wetlands from adjacent upland areas. Prescribed herbivory has the potential to result in inadvertent trampling or fill of wetlands or other smaller aquatic features. Herbicide use in or adjacent to small aquatic features could result in toxicity to aquatic species present. These potential impacts have been considered in the CalVTP programmatic EIR, and avoidance and mitigation measures apply to reduce potential for impacts to less than significant.

SPR BIO-1, requires data review and reconnaissance level surveys prior to submittal of the Project-Specific Analysis (PSA) and treatment; SPR BIO-2 requires biological resources training for workers; SPR BIO-3, requires protocol level surveys for sensitive natural communities and other sensitive habitats; SPR BIO-4 requires that treatments be designed to protect riparian habitat function; SPR BIO-10, requires surveys for special status wildlife and nursery sites; HAZ-5 applies, requiring a spill prevention and response plan for herbicide treatment. SPR HAZ-6 applies, requiring compliance with herbicide regulations for herbicide treatment. SPR HYD-1 applies, requiring compliance with state and regional water quality requirements. SPR HYD-3 prohibits prescribed herbivory treatments within sensitive waterbodies, wetlands, or riparian areas. SPR HYD-4 requires implementation of WLPZs on each side of watercourses

identified within treatment areas and prohibits fire ignitions (and associated accelerants) within WLPZs. SPR HYD-5 would reduce potential impacts to special-status aquatic species by limiting herbicide use within riparian habitat. Per the CalVTP EIR, implementation of these SPRs will reduce the potential for impacts to special-status amphibians and reptiles, and other special-status aquatic wildlife.

Mitigation measures additionally apply in order to reduce impacts to less than significant, including Mitigation Measures MM BIO-2b, MM BIO-3a, MM BIO-3b, MM BIO-3c, and MM BIO-4. Mitigation Measure (MM) BIO-2b requires the avoidance of mortality, injury or disturbance to, and maintenance of, habitat function for all non-ESA/CESA species; MM BIO-3a, BIO-3b and BIO-3c require that fire resiliency treatments avoid the loss of sensitive natural communities and oak woodlands, compensate for any loss of natural communities or oak woodlands, and compensate for any unavoidable loss of riparian habitat. MM BIO-4 specifies avoidance of state and federally protected wetlands, and establishment of a minimum 25-foot protective buffer.

Table 4. Present and potentially present wildlife species of concern, and applicable avoidance and mitigation measures.

Guilds	CESA/ESA	SSC/FC	SPRs	Mitigation Measures
Tree Nesting/Cavity Nesting	Bald Eagle, Golden Eagle		BIO-1, BIO-2, BIO-10, BIO-11, HAZ-5, HAZ-6, HYD-5	BIO-2a, BIO-2c
Shrub Nesting	Valley Elderberry Longhorn Beetle	Yellow Warbler, Yellow Breasted Chat	BIO-1, BIO-2, BIO-3, BIO-4, BIO-10, HAZ-5, HAZ-6, HYD-5	BIO-2a, BIO-2b, BIO-2c, BIO-2d,
Burrowing or Denning	Burrowing Owl		BIO-1, BIO-2, BIO-10, HAZ-5, HAZ-6, HYD-5	BIO-2a, BIO-2c
Insects/Terrestrial Invertebrates	Crotch Bumble Bee	Monarch Butterfly	BIO-1, BIO-2, BIO-10, HAZ-5, HAZ-6, HYD-5	BIO-2e, BIO-2g
Bats		Spotted Bat, Pallid Bat, Townsend's Big-Eared Bat, Western Mastiff Bat, Western Red Bat	BIO-1, BIO-2, BIO-10, HAZ-5, HAZ-6, HYD-5	BIO-2b
Fish/Aquatic Invertebrates	Chinook Salmon, Steelhead, Vernal Pool Fairy Shrimp, Vernal Pool Tadpole Shrimp		BIO-1, BIO-2, BIO-3, BIO-4, BIO-10, HAZ-5, HAZ-6, HYD-1, HYD-3, HYD-4, HYD-5	BIO-2a, BIO-2c, BIO-3a, BIO-3b, BIO-3c, BIO-4
Amphibians/Reptiles		Northwestern Pond Turtle, Foothill Yellow Legged Frog	BIO-1, BIO-2, BIO-3, BIO-4, BIO-10, HAZ-5, HAZ-6, HYD-1, HYD-3, HYD-4, HYD-5	BIO-2b, BIO-3a, BIO-3b, BIO-3c, BIO-4

Impact BIO-3. Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function

Vegetation treatments have the potential to result in direct loss or degradation of riparian habitat or other sensitive natural communities, leading to loss of habitat function. Sensitive communities are assemblages of vegetation that are considered rare or vulnerable to loss. Removal of dominant or characteristic vegetation in such an assemblage, or a change in site characteristics resulting from vegetation removal could result in loss of that sensitive natural community. Mechanical treatments and fuel breaks can increase the risk of invasive plant intrusion into sensitive natural communities by exposing areas of bare soil. While some natural communities may benefit from prescribed fire and other treatment activities that return the community to a state more in line with the historic fire regime, some treatments may not be compatible with all sensitive vegetation communities, and may result in type-conversion or loss of definitive components of the community. These potential detrimental effects to riparian habitats or other sensitive natural communities were considered in the CalVTP EIR, and avoidance and mitigation measures apply to the project in order to reduce these potential impacts to a level of less than significant. SPR BIO-1 requires scoping and reconnaissance to identify riparian and other sensitive natural communities and habitats present, SPR BIO-2 requires biological resource training for workers, so that they are aware of riparian and other sensitive natural communities and applicable protection measures, SPR BIO-3 requires that sensitive vegetation communities and riparian areas are surveyed for and mapped, SPR BIO-4 requires treatments to be designed to avoid detrimental impacts to riparian areas, SPR BIO-5 requires treatments to be designed to prevent type conversion to chaparral, SPR BIO-6 requires BMPs to prevent the spread of plant pathogens, SPR BIO-9 requires BMPs to prevent the spread of

invasive plants and noxious weeds, SPR HYD-4 requires identification and protection of Watercourse and Lake Protection Zones (WLPZs), and SPR HYD-5 protects non-target vegetation and special status species from herbicides.

The inclusion of land in the proposed project area that is outside of the CalVTP mapped treatable landscape does constitute a change to the geographic extent presented in the CalVTP Program EIR. The project area, both inside and outside of the CalVTP mapped treatable landscape is similar in terms of potential for riparian habitat and sensitive natural communities, and in this way there is no difference in potential impact. SPR's and Mitigation Measures proposed to reduce impacts to a level of less than significant would be applied similarly both within and outside of the CalVTP mapped treatable landscape. Inclusion of lands outside of the CalVTP treatable landscape therefore does not result in a substantially more significant impact than what was considered in the CalVTP Programmatic EIR.

Sensitive Natural Communities

The Tehama Wildlife Area was surveyed for floristic vegetation types as a part of the Lassen Foothills Vegetation Mapping Project by the California Native Plant Society, local field botanists and ecologists, and Aerial Information Systems, as contracted by the Tehama County Resource Conservation District in 2007. The mapping effort covered the entire Tehama Wildlife Area, and surrounding private and public lands. Much of the area was mapped to vegetation alliance or association, while some areas such as upland grasslands were identified on a coarser scale and were not mapped to alliance or association. For this reason, information on present sensitive natural communities at Tehama Wildlife Area is largely delineated, however there may be sensitive alliances present on a smaller scale that would need to be identified and at the time of specific project planning. The protection measures specified in the CalVTP EIR provide for the identification and protection of special status plant communities as part of the project-specific survey process.

One known special status vegetation association was identified at Tehama Wildlife Area in association with the Lassen Foothills Vegetation Mapping Project – the *Umbellularia californica* – *Quercus wislizeni* mapping unit is ranked G4 S3, an indication that this vegetation alliance is globally secure but vulnerable in California. About 8.5 acres within Tehama Wildlife Area are mapped within this sensitive vegetation association. The overstory of this association is co-dominated by California bay and interior live oak. California bay has a highly variable fire regime, depending on whether stands occur near chaparral, evergreen, or riparian forests. The interval can vary between 30-100 years. California bay sprouts after fire, allowing it to grow in areas of frequent fire. Interior live oak also sprouts after fire (Manual of California Vegetation Online, 2025). The areas of *Umbellularia californica* – *Quercus wislizeni* mapping unit at Tehama Wildlife Area appear to be on a 30 to 45 year fire interval based on the CalFire fire perimeter GIS layer. Other sensitive natural communities may potentially also be present, but due to the scale of the mapping effort, may not have been mapped to alliance or association.

These present and potentially present sensitive natural communities would be identified and mapped on a project-specific basis and protections would be applied consistent with the measures outlined in the CalVTP EIR: SPR BIO-3 applies, requiring survey, mapping and recording of sensitive natural communities and habitats, and Mitigation Measure MM BIO-3a requires the design of treatments in sensitive and oak woodland communities to restore the natural fire regime, and applies restrictions on vegetation removal for fire breaks within sensitive and oak woodland communities. Timing restrictions are additionally applied for the use of prescribed herbivory, and the use of fire prescriptions is to be used as a primary treatment in sensitive natural communities that are fire dependent. Mitigation Measure BIO-3b requires compensation for any unavoidable loss of sensitive natural communities or oak woodlands.

Oak Woodlands

Oak Woodlands are abundant at Tehama Wildlife Area, including woodlands dominated or co-dominant with blue oak (*Quercus douglasii*), black oak (*Quercus kelloggii*), canyon live oak (*Quercus chrysolepis*), Oregon white oak (*Quercus garryana*), interior live oak (*Quercus wislizeni*), Inland scrub oak (*Quercus berberidifolia*), and valley oak (*Quercus lobata*). Roughly 17,700 acres, or 42% of the project area, is vegetated by oak woodlands. Areas with over 10% oak tree cover are considered sensitive oak woodlands according to the CalVTP EIR, and are therefore subject to additional protections including SPR BIO-6 which requires Best Management Practices (BMPs) to minimize the spread

of oak pathogens, SPR BIO-9, requiring BMPs to minimize the spread of invasive plants and noxious weeds, Mitigation Measure MM BIO-3a to design treatments to avoid the loss of sensitive natural communities and oak woodlands, and MM BIO-3b to compensate for any unavoidable loss of sensitive natural communities and oak woodlands.

Chaparral

Chaparral community types are present within the mixed chaparral and Montane chaparral CWHR vegetation types present, comprising about 6,500 acres, or 16%, of the project area. These areas of chaparral present are typically dominated by buckbrush (*Ceanothus cuneatus*) or less often, other types of ceanothus, however may also be dominated by Inland scrub oak (*Quercus berberidifolia*), or Brewer oak (*Quercus garryana* var. *breweri*), or may contain other chaparral species such as silktassel (*Garrya* spp.), manzanita (*Arctostaphylos* spp.), flannelbrush (*Fremontodendron californicum*), and birch-leaf mountain mahogany (*Cercocarpus betuloides* var. *betuloides*).

Buckbrush, which typically dominates chaparral at Tehama Wildlife Area, is an obligate seeder, and heat breaks seed dormancy. Most seedlings emerge after a fire event, and buckbrush is highly flammable. Fire return interval is 20-100 years (Manual of California Vegetation Online, 2025). Shortened fire return interval has been identified as the main driver of type conversion from chaparral to non-native herbaceous vegetation in Southern California, according to the CalVTP EIR, and for this reason, protections are included to ensure treatments in chaparral do not result in type conversion, including SPR BIO-5, which requires treatments to avoid environmental effects of type conversion in chaparral and coastal sage scrub habitats.

Riparian Habitats

Approximately 725 acres of riparian habitat is present in and around numerous streams and wetlands at Tehama Wildlife Area. Removal of vegetation within riparian areas has the potential to detrimentally impact habitat function for numerous common and special status wildlife species present in streams and riparian zones. SPR BIO-4 is included to reduce some potential detrimental impacts to riparian areas, such as avoiding the removal of vegetation that shades streams, or contributes to large woody debris for salmonids. Mitigation Measure MM BIO-3c would require compensation for unavoidable loss of riparian habitat.

Impact BIO-4. Substantially Affect State or Federally Protected Wetlands

State and federally protected wetlands are present at Tehama Wildlife Area, and detrimental impacts could potentially occur to state or federally protected wetlands from project activities. The CalVTP EIR allows for prescribed burning to occur in state and federally protected wetlands. Other treatment types are not allowable in state or federally protected wetlands, however smaller wetlands may not be delineated and could inadvertently be included in other treatment activities. Prescribed burning also has the potential to result in removal of wetland vegetation that could reduce wetland functions and values, which would be a potentially significant impact. These potential impacts were considered in the CalVTP EIR, and measures are included to ensure state and federal wetlands are protected during project implementation. SPRs BIO-1 and HYD-4 require that potential wetlands be identified and protected prior to treatment. HYD-1 and HYD-3 require water quality protections. Additionally Mitigation Measure MM BIO-4 requires the avoidance of state and federally protected wetlands with no-disturbance buffers, or would require that prescribed burns be conducted to avoid loss of wetland functions and values.

The inclusion of land in the proposed project area that is outside of the CalVTP mapped treatable landscape does constitute a change to the geographic extent presented in the CalVTP Program EIR. The project area, both inside and outside of the CalVTP mapped treatable landscape is similar in terms of potential for impacts to state and federally protected wetlands and in this way there is no difference in potential impact. SPR's and Mitigation Measures proposed to reduce impacts to a level of less than significant would be applied similarly both within and outside of the CalVTP mapped treatable landscape. Inclusion of lands outside of the CalVTP treatable landscape therefore does not result in a substantially more significant impact than what was considered in the CalVTP Programmatic EIR.

Impact BIO-5. Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries

Vegetation treatment activities including initial treatment and maintenance have the potential to result in impediment to wildlife movement within corridors, or use of wildlife nurseries. Tehama Wildlife Area provides substantial winter range for the East Tehama Deer Herd, which migrates to and through Tehama Wildlife Area at the westernmost side of the 100 mile migratory route for this deer herd. Streams and riparian zones provide nursery habitat for special status salmonids, amphibians, and reptiles, and many other common wildlife species.

The CalVTP EIR considered these potential impediments and impacts, and determined that in general, treatments would be unlikely to impede an entire corridor such that wildlife could not traverse around the treatment area during migration, however some treatments may have the potential to result in detrimental impacts to nursery sites. Both short term and long-term effects to wildlife corridors and nursery sites were considered, and avoidance measures apply to reduce most effects to a level of less than significant. SPRs BIO-1, BIO-4, BIO-5, BIO-10, BIO-11, HYD-1, and HYD-4 provide for identification of nursery sites prior to treatment, prevention of aquatic and riparian degradation, installation of wildlife-friendly fencing to facilitate wildlife migration and movement, compliance of water quality regulations, and protection of salmonid migratory and nursery sites through retention of overstory vegetation and woody debris, and delineation of WLPZs to protect habitat. The potential for impacts to wildlife nursery sites is additionally mitigated through MM BIO-5, which requires the retention of nursery habitat and implementation of buffers to avoid nursery sites.

The inclusion of land in the proposed project area that is outside of the CalVTP mapped treatable landscape does constitute a change to the geographic extent presented in the CalVTP Program EIR. The project area, both inside and outside of the CalVTP mapped treatable landscape is similar in terms of presence of migration corridors for deer, and riparian zones for special status and common species migration and nursery sites. In this way there is no difference in potential impact. SPR's and Mitigation Measures proposed to reduce impacts to a level of less than significant would be applied similarly both within and outside of the CalVTP mapped treatable landscape. Inclusion of lands outside of the CalVTP treatable landscape therefore does not result in a substantially more significant impact than what was considered in the CalVTP Programmatic EIR.

Impact BIO-6. Substantially Reduce Habitat or Abundance of Common Wildlife, Including Nesting Birds

Common wildlife and nesting birds are present at Tehama Wildlife Area. The CalVTP EIR considered the potential for project activities to result in habitat loss that would cause common wildlife populations to drop below self-sustaining levels. The Migratory Bird Treaty Act protects common species of nesting birds during bird nesting.

On a project level, implementation of the subject project would result in temporary impacts, and would occur in units that are small enough in size that substantial habitat loss to common populations would not occur. Further, the purpose of the project is to improve ecological conditions and to minimize the potential for a high intensity wildfire event with greater potential to temporarily reduce common wildlife habitat.

Per the CalVTP EIR, avoidance measures are included to ensure the project does not result in substantial impacts to common wildlife species or nesting birds. Many of these SPRs are specific to protection of special status wildlife and their habitats, but also protect those same habitats for common species. This includes SPR BIO-1 which requires identification of special status wildlife habitat, SPR BIO-2 which requires contractor training to understand the natural resources present and avoidance measures that apply, SPR BIO-3, BIO-4, and BIO-5 for retention of habitat function in sensitive natural communities, riparian habitat, and chaparral. SPR BIO-12 requires avoidance of impacts to common nesting birds during the bird nesting season, or surveys and protection of identified nests. These measures will be sufficient to assure this impact is less than significant.

The inclusion of land in the proposed project area that is outside of the CalVTP mapped treatable landscape does constitute a change to the geographic extent presented in the CalVTP Program EIR. The project area, both inside and outside of the CalVTP mapped treatable landscape is similar in terms of presence of habitats and common species, and potential for impacts. SPR's and Mitigation Measures proposed to reduce impacts to a level of less than significant would be applied similarly both within and outside of the CalVTP mapped treatable landscape. Inclusion of

lands outside of the CalVTP treatable landscape therefore does not result in a substantially more significant impact than what was considered in the CalVTP Programmatic EIR.

Impact BIO-7. Conflict with Local Policies or Ordinances Protecting Biological Resources

The CalVTP EIR considered the potential for projects implemented under the CalVTP to conflict with local policies or ordinances.

No local policies or ordinances were identified to be in conflict with the proposed project, however SPR AD-3 applies to the project to ensure consistency with local plans, policies and ordinances, should any new ordinances be identified over the course of the project period that would apply and require consideration. The inclusion of land in the proposed project area that is outside of the CalVTP mapped treatable landscape does constitute a change to the geographic extent presented in the CalVTP Program EIR, however this change does not result in the need for additional analysis or consideration relative to local policies and ordinances.

Impact BIO-8. Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan

Both Antelope Creek and Mill Creek are critical habitat streams for Central Valley DPS steelhead. Tehama Wildlife Area is additionally managed for the protection of winter range habitat for the East Tehama Deer Herd as outlined in the 1990 Tehama Wildlife Area Management Plan. Ecological restoration activities outlined in the Tehama Wildlife Area Vegetation Treatment Plan are intended to improve habitat conditions for the East Tehama Deer Herd, and protection measures incorporated into the plan consistent with the CalVTP EIR provide protections for these habitats.

Management goals in the 1990 Tehama Wildlife Area Management Plan include protecting and maintaining habitat for special status wildlife and plant species, and providing excellent winter range habitat for the East Tehama Deer Herd. Goals additionally include provision of consumptive and non-consumptive public uses, and maintenance of existing roads, buildings, and structures.

Objectives include maintaining a minimum of 500 acres containing browse in age class of 4 years or less, through brush crushing, lopping, burning, and seeding; developing at least one water source per year, increasing grass and forb forage, maintaining and improving oak mast production, and minimizing human interference with normal deer activities during winter.

Buck brush (*Ceanothus cuneatus*), forbs, oak mast and leaves are described in the Management Plan as comprising the bulk of food used by deer at Tehama Wildlife Area. Decadent stands of brush are burned to encourage growth of new plants, providing more nutritional food. According to the Management Plan, the Tehama Wildlife Area personnel are to meet with USFS annually in the spring to plan and coordinate controlled burns on the Wildlife Area and adjacent Lassen National Forest.

Relevant protective measures include burns done in a mosaic pattern to leave islands of untouched vegetation; no heavy equipment use on steep slopes subject to erosion, protection of stream zones from fire and equipment operation; compliance with air quality requirements, limiting grazing in riparian areas; implementing grazing based on best available information, and providing fencing, and allowing grazing only when in support of basic management goals.

The CalVTP EIR has considered the potential for conflicts with provisions of approved habitat plans and has determined that the design, approval and permitting of vegetation treatment projects under CalVTP within an area with a habitat plan must comply with the legal requirements to be consistent with such plans. This is the case for Tehama Wildlife Area, in that actions taken, including actions under the proposed Vegetation Treatment Plan, must be consistent with the Tehama Wildlife Area Management Plan and management for improvement and maintenance of excellent winter range habitat for the East Tehama Deer Herd. Additionally, Antelope and Mill Creek are protected as critical habitat streams for Central Valley DPS Steelhead under the Endangered Species Act as well as by the numerous measures outlined in the subject Vegetation Treatment Plan. The inclusion of land in the proposed project area that is outside of the CalVTP mapped treatable landscape does constitute a change to the geographic extent presented in the CalVTP Program EIR, however this additional inclusion of lands does not complicate or change in

any way the need to adhere to the requirements of the Tehama Wildlife Area Management Plan or Endangered Species Act relative to habitat management for species present.

New Biological Resource Impacts

The proposed fire resiliency treatments are consistent with the treatment types and activities specified in the CalVTP EIR. Biological resources with the potential for presence were all considered in the CalVTP EIR and no new biological resources or impacts were identified that are outside of the scope of the CalVTP EIR analysis. The inclusion of areas outside of the CalVTP mapped treatable landscape does not introduce any new habitat types or impacts to biological resources that have not otherwise been considered and addressed through avoidance measures and mitigations measures as outlined in the above discussion.

1.7 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 GEO-2 GEO-3 GEO-4 GEO-5 GEO-6 GEO-7 GEO-8 AQ-3 AQ-4 HYD-3 HYD-4	N/A	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	GEO-3 GEO-4 GEO-7 GEO-8 AQ-3	N/A	LTS	No	Yes

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

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

Discussion

Tehama Wildlife Area is located in the Cascade Range geomorphic province. The dominant rock type is volcanic rock, and topography is characterized by the presence of volcanic peaks with deeply incised rivers. The treatable landscape includes both mountainous and low-lying areas. Soils are typically inceptisols, lacking significant clay accumulation in the subsoil. The project area is comprised of a wide range of soil types, typically rocky and stony loams, with smaller percentages of riverwash, rockland, and rubbleland. Toomes rocky loam, very rocky loam, and extremely rocky loam cover the greatest area, comprising about 70% of the mapped soils. The typical soil profile is very stony loam from around 0-12 inches with unweathered bedrock underlying. Potential for damage by fire is typically low, with about 4,000 acres moderately to well-suited for mechanical site preparation and shredder use, corresponding largely to the brush covered areas in the northeastern portion of the property, between Plum Creek and Oat Creek. Erosion hazard rating for off-road, off-trail soil disturbance is slight to moderate, with no areas indicated as severe or very severe erosion hazard potential (Web Soil Survey, 2025).

Impact GEO-1. Result in Substantial Erosion or Loss of Topsoil

Proposed treatment types, with the exception of manual treatment, have the potential to result in substantial erosion impacts and/or loss of topsoil. Mechanical treatment has the greatest potential for impacts, especially on steep slopes or during saturated conditions. Prescribed herbivory can cause compaction of soil, particularly in wet conditions, and can reduce soil cover or change drainage patterns. Prescribed burning and pile burning under high burn severity can increase water repellency and reduce the infiltration rate, and under low severity, fire can increase erosion due to decreased vegetation cover. Equipment associated with herbicide application could contribute to erosion impacts, and areas treated with herbicide could have decreased vegetative cover that could contribute to erosion impacts. These potential impacts were considered in the CalVTP EIR and SPRs apply that are expected to reduce potential impacts to a level of less than significant.

Applicable SPRs include SPR GEO-1, suspending mechanical equipment use and other soil disturbing impacts during precipitation and soil saturation; SPR GEO-2, limiting high ground pressure vehicles; SPR GEO-3, requiring stabilization of disturbed areas of soil; SPR GEO-4 requiring inspection of disturbed areas of ground prior to seasonal rains and immediately following the first rain event; SPR GEO-5 requiring water breaks for stormwater drainage to decrease channelized erosion; SPR GEO-6, specifying a maximum burn pile size to minimize soil burn severity; SPR GEO-7 minimizing erosion from use of heavy equipment on slopes; SPR GEO-8, requiring evaluation of treatment areas with slopes greater than 50% for unstable areas, SPR AQ-3, requiring creation of a burn plan to minimize burn severity; SPR AQ-4, requiring slowing or wetting of dirt roads to minimize dust; SPR HYD-3, requiring soil stability protections during prescribed herbivory, and SPR HYD-4, requiring WLPZs to protect watercourses and wet areas from erosion and sediment impacts.

The inclusion of land that is outside of the mapped CalVTP treatable area constitutes a change to the geographic extent presented in the CalVTP EIR. Within the boundaries of the project, areas inside and outside of the mapped CalVTP treatable landscape are essentially the same relative to proposed treatment types and their potential for erosion or topsoil loss impacts, and SPRs will be applied equally to all project areas. In this way, the addition of lands outside of the CalVTP treatable landscape does not constitute new impacts or impacts that are not covered by the proposed SPRs.

Impact GEO-2. Increase Risk of Landslide

Removal of vegetation associated with this project could result in increased potential for landslides resulting from a decrease in root structures stabilizing the soil, and an increase in water retention in the soil due to decreased vegetation water uptake. These impacts could result from all vegetation removal treatment types that are ground disturbing, removing soil surface ground cover and root systems. These potential impacts were considered in the CalVTP EIR, and SPRs apply that reduce these impacts to less than significant. Relevant SPRs include GEO-3, stabilization of disturbed soil; GEO-4, erosion inspections; GEO-7, prohibiting mechanical equipment on steep slopes; GEO-8, requiring additional analysis for treatment areas on slopes over 50% with unstable areas; and AQ-3, minimizing burn severity.

Additionally, the CalVTP EIR notes that the primary purpose of the treatments under the CalVTP EIR is to reduce high severity wildfire risk in California. Moderate to high severity wildfire can greatly increase landslide potential, and treatments as proposed are expected to result in an overall reduction in that risk.

The inclusion of land that is outside of the mapped CalVTP treatable area constitutes a change to the geographic extent presented in the CalVTP EIR. Within the boundaries of the project, areas inside and outside of the mapped CalVTP treatable landscape are essentially the same relative to proposed treatment types, the ranges of slopes, and their potential for landslide impacts, and SPRs will be applied equally to all project areas. In this way, the addition of lands outside of the CalVTP treatable landscape does not constitute new impacts or impacts that are not covered by the proposed SPRs.

New Geology, Soils, Paleontology, and Mineral Resource Impacts

The proposed treatments are consistent with those considered in the CalVTP EIR, and site-specific characteristics are within the range considered relative to erosion, landslide, or other soils or mineral impacts. There are no new impacts or conditions to consider for the subject project that were not considered in the CalVTP EIR. The addition of areas outside of the CalVTP treatable landscape constitutes a change to the geographic extent of the area presented in the CalVTP EIR, however this change does not result in a greater potential for detrimental impacts to geological resources, as SPRs will be applied equally to all project components, thereby reducing potential impacts to less than significant for the entire project.

1.8 GREENHOUSE GAS EMISSIONS

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

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

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

Discussion

Impact GHG-1. Conflict with an Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of Greenhouse Gasses

Prescriptive and pile burning, the use of vehicles and mechanical equipment, and other project components such as prescribed herbivory will result in greenhouse gas emissions. Consistency with applicable plans, policies and regulations aimed at reducing greenhouse gas emissions was considered in the CalVTP EIR. Although greenhouse gas emissions would result from the project, the intent of the project is to reduce wildfire risk and improve carbon sequestration over time through retention of vegetation, which is consistent with the overall intent of plans and policies adopted for the purpose of reducing impacts from greenhouse gasses. Impacts from project treatments are consistent with those analyzed in the CalVTP EIR, and will not result in more severe impacts than those analyzed in the CalVTP EIR.

The inclusion of land that is outside of the mapped CalVTP treatable area constitutes a change to the geographic extent presented in the CalVTP EIR. Project components both in and outside of the mapped CalVTP treatable area are subject to the same plans, policies, and regulations adopted for the purpose of reducing greenhouse gas emissions, and the greenhouse gas impact is also expected to be the same. SPR GHG-1 is not applicable to the project as CDFW is not a reporting agency for AB 1504, and the project is not a registered project subject to AB 1504 reporting.

Impact GHG-2. Generate Greenhouse Gas Emissions through Treatment Activities

Prescribed and pile burning, the use of vehicles, and mechanical equipment, and other treatment activities will result in greenhouse gas emissions. The potential for these various treatments and treatment maintenance to generate greenhouse gas emissions was considered under the CalVTP EIR. SPR AQ-3, which would include feasible measures to reduce greenhouse gasses as part of the burn plan, and mitigation measure MM GHG-2, which would reduce emissions as feasible in association with prescribed burning, would be implemented, consistent with measures to reduce impacts as outlined in the CalVTP EIR, however the impact would remain potentially significant and unavoidable as determined in the CalVTP EIR.

The inclusion of land that is outside of the mapped CalVTP treatable area constitutes a change to the geographic extent presented in the CalVTP EIR. Landscape conditions and proposed treatments both inside and outside of the CalVTP mapped treatable area are essentially the same, however, and are expected to have the same potential for greenhouse gas emissions, and will be similarly mitigated by the included SPR and Mitigation Measure. For these reasons, generation of greenhouse gas emissions will be similar both inside and outside of the CalVTP treatable area.

New Impacts Related to GHG Emissions

The proposed treatments and equipment to be used are consistent with those specified in the CalVTP EIR, and the vegetation types to be treated are also as considered in the CalVTP EIR. No new impacts related to greenhouse gas emissions have been identified. The boundary of the project area has been expanded to include portions of the Tehama Wildlife Area that are not included in the CalVTP treatable landscape as mapped. Those added portions constitute a change in the geographic extent beyond that which the CalVTP EIR considered. Those added areas are similar in topography and vegetative cover to those areas included in the treatable landscape, and there are no new impacts identified associated with the inclusion of these new lands.

1.9 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

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

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

Discussion

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

Energy consumption will occur in association with project activities, including fuel use associated with vehicles and equipment during treatments as well as providing transportation for workers and equipment to and from the project location. This would include fuel use for vehicles and equipment associated with all treatment types, and treatment maintenance. The use of fuels in association with the project was considered in the CalVTP EIR. The types of activities and associated equipment use is consistent with that analyzed in the CalVTP EIR. According to the CalVTP EIR, the primary objective of the CalVTP program is to reduce wildfire risk. Wildfire suppression, containment, and cleanup efforts require response of emergency personnel and equipment often well beyond local resources. Often equipment and personnel come from all over the state, and at times, equipment and personnel are obtained from other states and other countries for wildfire suppression efforts. The energy consumption associated with wildfire exceeds that associated with vegetation treatment, and in this way, project treatments are expected to result in an overall decrease in energy consumption. For this reason, no SPRs or mitigation measures apply to reduce impacts further.

The inclusion of lands outside of the CalVTP treatable landscape constitutes a change in the geographic extent presented in the CalVTP EIR. Fuels consumption will essentially be the same both in and out of the CalVTP mapped treatable landscape as project activities and vegetation types are essentially the same. This change will not result in a substantially more significant impact than that which is covered by the CalVTP EIR.

New Energy Resource Impacts

The treatments proposed are consistent with those considered in the CalVTP EIR, and energy impacts are within the parameters of those considered. No new energy resource impacts were identified that were not already considered in the CalVTP EIR. The inclusion of land outside of the CalVTP treatable landscape constitutes a change in the

geographic extent of the project area presented in the CalVTP EIR, however those lands included in the project that are both inside and outside of the CalVTP mapped landscape are essentially the same relative to vegetation coverage, topography, and other physical aspects, and project activities will be applied similarly both in and out of the areas mapped as part of the CalVTP treatable landscape. Project wide, energy impacts are expected to result in a decrease in overall energy expenditure, as the intent of the project is to reduce wildfire potential, which is expected to have an overall reduction in energy use impact.

1.10 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 HYD-4	N/A	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 HAZ-6 HAZ-7 HAZ-8 HAZ-9	N/A	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	N/A	HAZ-3	LTSM	No	Yes

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

New Hazardous Materials, Public Health and Safety Impacts: Would the treatment result in other impacts related to hazardous materials, public health and safety that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[Identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact HAZ-1. Create a Significant Health Hazard from the Use of Hazardous Materials

The project includes treatment types, including mechanical, manual, prescribed and pile burning, and herbicide application, which require the use of fuels and accelerants, which are hazardous materials. The potential for project activities to cause a significant health hazard from the use of hazardous materials was considered in the CalVTP EIR. The potential for impacts from the subject project is consistent with those impacts considered in the CalVTP EIR because the types of treatments and associated hazardous materials associated with the subject project are consistent with those analyzed in the CalVTP EIR. SPR HAZ-1 will apply to the project, requiring that all diesel and gas fuel powered equipment is properly maintained per the manufacturer's specifications, and requiring inspections for any leaks, and prompt removal of any leaking equipment from the project site. Given the size and remoteness of the Tehama Wildlife Area, removal of leaking equipment from the project site may have a greater detrimental impact

than fixing equipment promptly on-site. Some portions of the wildlife area are so remote and the terrain is so rough that it takes over four hours to get to various locations. For this reason, CDFW proposes a revision to SPR HAZ-1 to allow for the prompt stabilization and repair of leaking equipment on-site if feasible, otherwise equipment would be promptly removed.

Additionally, SPR HYD-4 will apply to the project, requiring that accelerants used to implement prescribed burns would not be used in protection zones for watercourses.

The inclusion of land in the proposed project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the CalVTP EIR. The use of fuels and accelerants, which are considered hazardous materials, will be similar both in and out of the treatable landscape, therefore the potential for impacts is similar both within and outside of the treatable landscape.

Impact HAZ-2. Create a Significant Health Hazard from the Use of Herbicides

The proposed project includes the use of herbicide as a fire resiliency treatment. This is expected to result in transport, storage, use, and disposal of herbicides, which have the potential to result in health hazard risks. Potential for health hazard risks associated with herbicide use was considered in the CalVTP EIR, and the project incorporates SPRs to reduce those risks to a level of less than significant. These include preparation of a Spill Prevention and Response Plan (SPRP) prior to herbicide treatment activities to protect onsite workers, the public and the environment from accidental leaks or spills of herbicide per SPR HAZ-5; compliance with herbicide regulations per SPR HAZ-6; triple rinsing herbicide containers prior to disposal or recycling per SPR HAZ-7; minimizing herbicide drift to public areas per SPR HAZ-8, and notification to the public regarding use of herbicides in the vicinity of public areas per SPR HAZ-9.

The inclusion of land in the proposed project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the CalVTP EIR. The use of herbicides, and the application of avoidance measures, will be similar both in and out of the treatable landscape, therefore the potential for impacts is similar both within and outside of the treatable landscape.

Impact HAZ-3. Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites

Proposed initial treatments and maintenance activities will result in soil disturbance and prescribed burning, which have the potential to expose workers, the public, and/or the environment to hazardous materials if a hazardous materials site is present. The potential for such exposure was considered in the CalVTP EIR, and this was identified as a potentially significant impact. Mitigation Measure HAZ-3 requires database searches for known hazardous materials sites within the project area. Consistent with this requirement, database searches of the project area were conducted on February 19, 2025, including searches of the DTSD Envirostor database, and DTSC's Cortese List. The closest site found was on the DTSD Envirostor database, located in the town of Paynes Creek, about 1.3 miles north of the Wildlife Area, and consisted of a school cleanup of elevated levels of arsenic and lead in contaminated soil around a debris pile. The site was cleaned up in 2006. There is one site in Tehama County on the Cortese List, and that is in the City of Red Bluff, at 609 Walnut Street (about 11.75 miles southwest of the Tehama Wildlife Area), consisting of PCE soil and groundwater contamination associated with a past dry cleaning use. No sites were identified in or within ¼ mile of the project area. This impact is therefore less than significant.

The inclusion of land in the proposed project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the CalVTP EIR. The database search for known hazardous materials sites included the entirety of the proposed project area, and no known hazardous materials sites were identified within or near the project area, including areas outside of the geographic extent presented in the CalVTP treatable landscape.

New Hazardous Materials, Public Health and Safety Impacts

The proposed treatments are consistent with the treatments and activities analyzed in the CalVTP EIR, and characteristics of the site are similar to those presented in the CalVTP EIR. No new potential for hazardous materials impacts were identified that could pose a risk to the health of workers, the public or the environment.

The inclusion of land in the proposed project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the CalVTP EIR, however existing environmental and regulatory conditions are essentially the same for proposed project areas both within and outside of the mapped CalVTP treatable landscape, and this change does not result in new hazardous materials impacts.

A revision is proposed to SPR HAZ-1, allowing for prompt stabilization and repair on site of any identified leaking equipment, as an option if feasible. This change is needed due to the remoteness, roughness of terrain, and large size of the Tehama Wildlife Area, as prompt removal of leaking equipment may have a greater detrimental impact on the environment than prompt stabilization and repair on site. This revision is expected to help minimize any detrimental impacts from hazardous materials by providing an option to immediately address equipment leaks when this option is more likely to result in a reduction in impacts over prompt removal of equipment from the project area, which could take several hours.

1.11 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 BIO-4 BIO-5 GEO-4 GEO-6 HYD-4	BIO-3b	LTS	No	Yes
Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities	LTS	Impact HYD-2, pp. 3.11-27 – 3.11-29	Yes	BIO-1 GEO-1 GEO-2 GEO-3 GEO-4 GEO-7 GEO-8 HAZ-1 HAZ-5 HYD-1 HYD-4 HYD-5	N/A	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	HYD-3	N/A	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 HYD-5 HAZ-5 HAZ-7	N/A	LTS	No	Yes

Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
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-5 HYD-4 HYD-6	N/A	LTS	No	Yes

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

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

Discussion

Tehama Wildlife Area is located in the Lower Sacramento River hydrological region, which is characterized by high spring runoff from snowmelt, and flooding in lowland areas. Surface water issues in the region typically include erosion and sedimentation from roads, dairies, and other agriculture, and stormwater runoff non-point source pollution. Groundwater issues can include drinking water impairment, salinity, agriculture related pollutants, overdraft, and fuel tank leaks. Erosion and sediment issues are typically low due to stability of geologic and vegetation features, however a combination of land use practices, heavy precipitation, and saturated soils, may result in high erosion and sediment yields.

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

The proposed project includes prescriptive burning. The CalVTP EIR analyzed the potential for prescriptive burning to result in detrimental impacts to water quality, including potential for violation of water quality standards, or waste discharge requirements, or substantial degradation of surface or groundwater quality, or conflicts with or obstructions of water quality control plan implementation. The CalVTP EIR analysis describes how high severity wildfires have a much higher potential for detrimental water quality impacts than low-severity burns, which tend to retain more surface organic material and vegetation, resulting in a much lower rate of sedimentation and pollution runoff, and faster overall vegetation recovery rates. SPRs and a mitigation measure will additionally apply to prescriptive fire activities, assuring that the project impacts will be less than significant. Measures that apply include SPR GEO-6, limiting burn pile size; SPR HYD-4, prohibiting placement of burn piles in stream and watercourse buffers; SPR AQ-3, development of a burn plan with fire behavior modeling to reduce the risk of high severity burns or burning within stream or watercourse buffers; SPR BIO-4 and MM BIO-3b, reducing riparian vegetation loss and requiring restoration where that loss is unavoidable; SPR GEO-4, requiring erosion control measures and inspections, and SPR BIO-5, protecting chaparral through timing intervals and minimum cover requirements.

The inclusion of land in the proposed project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the CalVTP EIR, however treatments proposed, and topographic and vegetative conditions are similar both in and outside of the CalVTP mapped treatable area, and protective measures will equally applied in all locations. The inclusion of new areas is not expected to result in impacts that were not considered or minimized per the CalVTP EIR.

Impact HYD-2. Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Groundwater Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities

The proposed plan includes manual and mechanical treatment activities to reduce wildfire risk. The CalVTP considered the potential for these treatment activities to result in detrimental impacts to water quality, including the potential for violation of water quality standards or waste discharge requirements, substantial degradation of surface or groundwater quality, or conflicts with, or obstruction to, the implementation of a water quality control plan. Avoidance measures apply per the CalVTP EIR analysis, in order to reduce impacts to a level of less than significant. These measures include SPR HYD-4 to protect stream and watercourse buffers from erosion and sediment impacts; SPR GEO-5 for waterbreaks to divert water from fuel breaks and roads to natural infiltration areas; SPR BIO-1 to identify and avoid impacts to wet meadows, riparian zones, and wetlands; SPRs GEO-1 and GEO-2, limiting ground disturbance during saturated soil conditions; SPRs GEO-7 and GEO-8 to reduce erosion potential on slopes; SPRs GEO-3 and GEO-4 to stabilize and inspect areas of disturbed soils; SPR HYD-1, requiring compliance with all applicable state and regional water quality requirements, SPR HYD-5, requiring that equipment is fueled outside of stream, watercourse, and wetland setbacks, SPR HAZ-1, requiring inspection and maintenance of equipment to prevent leaks; and HAZ-5, requiring a spill prevention plan and kit.

The inclusion of land in the proposed project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the CalVTP EIR, however treatments proposed, and topographic and vegetative conditions are similar both in and outside of the CalVTP mapped treatable area, and protective measures will equally applied in all locations. The inclusion of new areas is not expected to result in impacts that were not considered or minimized per the CalVTP EIR.

Impact HYD-3. Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Groundwater Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan through Prescribed Herbivory

The proposed project includes prescribed herbivory to reduce fuels. The potential for prescribed herbivory to result in detrimental water quality impacts was considered in the CalVTP EIR, and SPR HYD-3 is applied to the project, consistent with the CalVTP EIR, to reduce potential water quality impacts to less than significant. SPR HYD-3 requires water quality protections from grazing including active herding, riparian exclusion buffers, stream fencing, providing supplemental water sources, and limiting stream access and crossing points.

The inclusion of land in the proposed project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the CalVTP EIR, however prescribed herbivory treatments would occur in similar topographic and vegetative conditions both in and out of the CalVTP treatable landscape, and avoidance measures would apply project wide. The inclusion of new areas is not expected to result in impacts that were not considered or minimized per the CalVTP EIR.

Impact HYD-4. Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Groundwater Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan through the Ground Application of Herbicides

The proposed project includes the ground application of herbicides to reduce fuel loads. The potential for ground application herbicide use to result in detrimental impacts to water quality, including potential for violations of water quality standards or waste discharge requirements, substantial degradation of surface or groundwater quality, or conflicts with, or obstruction to, the implementation of a water quality control plan through the ground application of herbicides was considered in the CalVTP EIR, and SPRs apply as recommended in the CalVTP EIR, in order to reduce impacts to a level of less than significant. Those SPRs include SPR-5, prohibiting herbicide application when it could

be impacted by rain events, the prohibition of use of non-aquatic herbicides in riparian, wetland, or stream buffers, and low speeds, under 7 mph, for ATV or tractor attached boom herbicide applicators; SPRs BIO-4 and HYD-5 require hand application only of herbicides in riparian areas; SPR HAZ-5 requires a spill prevention plan and spill kit; and SPR HAZ-7 requires rinsing and disposal of herbicide containers in a manner that protects water resources.

The inclusion of land in the proposed project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the CalVTP EIR, however prescribed herbivory treatments would occur in similar topographic and vegetative conditions both in and out of the CalVTP treatable landscape, and avoidance measures would apply project wide. The inclusion of new areas is not expected to result in impacts that were not considered or minimized per the CalVTP EIR.

Impact HYD-5. Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area

Proposed fuel reduction treatments and maintenance could potentially result in alterations to existing drainage patterns of a treatment site or area. Potential for project activities to alter existing drainage patterns was considered in the CalVTP EIR, and avoidance measures apply to reduce impacts to a level of less than significance. Those measures include SPR GEO-5, requiring the use of waterbreaks; HYD-4, prohibiting placement of burn piles in WLPZs, and HYD-6, preventing diversion of runoff or disturbance of existing drainage systems.

The inclusion of land in the proposed project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the CalVTP EIR, however no new conditions were identified in the areas added for treatment that would present new drainage issues not considered in the CalVTP EIR. The inclusion of new areas is not expected to result in impacts that were not considered or minimized per the CalVTP EIR and applicable SPRs.

New Hydrology and Water Quality Impacts

The proposed treatment types and activities are consistent with those considered in the CalVTP EIR. The site characteristics of the project area are consistent with those considered in the CalVTP EIR as well. The inclusion of land in the proposed project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the CalVTP EIR, however within the boundary of the project area, existing environmental and regulatory conditions pertinent to water quality and hydrology are essentially the same both inside and outside of the mapped CalVTP treatable landscape. For this reason, no changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape will not result in any new significant impacts.

1.12 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	N/A	N/A	LTS	No	Yes

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

New Land Use and Planning, Population and Housing Impacts: Would the treatment result in other impacts to land use and planning, population and housing that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[Identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact LU-1. Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation

The project is not located in the Coastal Zone.

The proposed plan would be implemented on lands owned by California Department of Fish and Wildlife (CDFW). CDFW has drafted a land management plan for Tehama Wildlife Area. The plan is being developed by CDFW to be consistent with the applicable land management plan, and each treatment proposal will be reviewed by CDFW in light of land management goals and policies. In this way the project is expected to be consistent with the land management plan for Tehama Wildlife Area. Other applicable plans include the 2011 Tehama Wildlife Area Vegetation and Fuels Management Plan, prepared by the Resource Conservation District of Tehama County in cooperation with CDFW, the 2017 Tehama East and Tehama West Community Wildlife Protection Plan Update, prepared by the Resource Conservation District of Tehama County, and 2023 Unit Strategic Fire Plan, Tehama Glenn Unit, prepared by CalFire. The CalVTP EIR considered the potential for plans proposed under the CalVTP EIR to be in conflict with applicable land use plans, policies or regulations, and SPR AD-3 is included as a requirement that the project is designed and implemented in a manner consistent with applicable plans to the extent that the project is subject to them.

The inclusion of land in the proposed project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the CalVTP EIR, however all areas of the project, including those within the CalVTP treatable landscape and the added areas are equally applicable to the Tehama Wildlife Area Management

Plan, 2011 Tehama Wildlife Area Vegetation and Fuels Management Plan, prepared by the Resource Conservation District of Tehama County in cooperation with CDFW, the 2017 Tehama East and Tehama West Community Wildlife Protection Plan Update, prepared by the Resource Conservation District of Tehama County, and 2023 Unit Strategic Fire Plan, Tehama Glenn Unit, prepared by CalFire. The inclusion of new areas is not expected to result in impacts that were not considered or minimized per the CalVTP EIR and applicable SPRs.

Impact LU-2. Induce Substantial Unplanned Population Growth

The potential for projects implemented under the CalVTP EIR to result in substantial unplanned population growth was considered in the CalVTP EIR, and it was determined that population growth due to implementation and treatment is not expected to be substantial, and no measures are needed to reduce impacts to a level of less than significant. Short term impacts may include the need for workers to implement the project, however those impacts are within the scope of impacts considered by the CalVTP EIR to be insignificant. Long term impacts may result in at most, one or two new employees at Tehama Wildlife Area or surrounding areas, however that is not within the realm of substantial unplanned growth. Implementation of the subject project is not expected to result in substantial unplanned population growth.

New Land Use and Planning, Population and Housing Impacts

The proposed treatment types and activities are consistent with those considered in the CalVTP EIR. The site characteristics of the project area are consistent with those considered in the CalVTP EIR as well. The inclusion of land in the proposed project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the CalVTP EIR, however within the boundary of the project area, existing environmental and regulatory conditions pertinent to land use planning, population, and housing, are essentially the same both inside and outside of the mapped CalVTP treatable landscape. For this reason, no changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape will not result in any new significant impacts.

1.13 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 NOI-2 NOI-3 NOI-4 NOI-5 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

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

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

Discussion

Impact NOI-1. Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation

Initial and maintenance treatments would require the use of heavy, noise-generating equipment. Manual, mechanical, and prescribed burning treatment activities as well as chipping/mastication and pile burning occurring adjacent to sensitive land uses could temporarily expose those receptors to noise levels that exceed local standards. The potential for a substantial short-term increase in exterior ambient noise levels during treatment was examined in the CalVTP EIR, and avoidance measures apply to reduce impacts to a level of less than significant.

As discussed in the CalVTP EIR, noise levels generated by individual equipment range from 75-87.9 dB at 50 feet from the noise source, with the loudest source of noise being a helicopter. Though multiple equipment items generating noise would often be operated at the same time during treatment implementation, these items would likely be spread out, over 100 feet from each other, rather than operating next to each other. Treatments would also be dispersed such that short-term impacts to any one receptor would be limited. SPRs that apply, reducing noise impacts to less than significant include: SPR AD-3, assuring consistency with applicable local plans, policies and ordinances; SPR NOI-1, limiting heavy equipment use to daytime hours; SPR NOI-2, requiring that equipment is maintained properly, including being maintained and equipped with noise reduction mufflers and shrouds where applicable; SPR NOI-3 requiring that engine shrouds be closed during equipment operation; SPR NOI-4, requiring

that staging areas are located away from noise sensitive land uses; SPR NOI-5, requiring that equipment idle time is restricted, and equipment is shut down when not in use; and SPR NOI-6 requiring notification of mechanical treatment activities to occur within 1,500 feet of sensitive receptors such as residences, schools, hospitals, or places of worship.

The inclusion of land in the proposed project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the CalVTP EIR. However within the boundary of the project area, the exposure potential to any sensitive receptors in areas outside of the treatable landscape are essentially the same as those within the treatable landscape; therefore the noise impact is also the same. This determination is consistent with the CalVTP EIR and would not constitute a substantially more severe significant impact than was covered in the CalVTP EIR.

Impact NOI-2. Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities

Initial and maintenance treatments would involve large trucks hauling heavy equipment to the project area. These haul trips would be dispersed on area roadways providing access to the project area, including but not limited to CA-36, CA-99, CA-32, CA-89, I-5, Plum Creek Road, and other local roads. Vehicle traffic on highways is not expected to generate a noticeable increase in traffic-related noise because it would be dispersed, infrequent, and not a substantial increase over existing conditions. Haul trucks on local roads would pass by residential receptors and the event of each truck passing by could increase the Single-Event Noise Level. The potential for a substantial short-term increase in Single-Event Noise Level was examined in the CalVTP EIR. The anticipated impact is within the scope of the CalVTP EIR because the number and types of equipment proposed are consistent with those analyzed in the CalVTP EIR. SPR NOI-1 applies to the project, limiting heavy equipment use to daytime hours. This determination is consistent with the CalVTP EIR and would not constitute a substantially more severe significant impact than what was covered in the CalVTP EIR.

The inclusion of land in the proposed project area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the CalVTP EIR. However, within the boundary of the project area, the exposure potential is essentially the same within and outside the CalVTP mapped treatable landscape, therefore the noise impact is the same.

New Noise Impacts

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

1.14 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	REC-1	N/A	LTS	No	Yes

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

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

Discussion

Tehama Wildlife Area is a popular public access location for wildlife viewing, fishing, hunting, and camping. Camping is primarily at Fischer Campground and Facht Place Campground. Access to these areas is by unimproved road only. There are also several unimproved "jeep trails," which are only suitable for off-road vehicles, and there are numerous dirt foot trails. Most trails are not accessible to mobility impaired persons. Seasonal gates throughout the wildlife area may be closed in order to restrict access to certain areas on a seasonal basis.

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

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

This impact is within the scope of the CalVTP EIR because the availability of recreational resources and the treatment activities and intensity are consistent with those analyzed in the CalVTP EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the CalVTP EIR. However, the availability of recreational resources is essentially the same within and outside of the treatable landscape; therefore, the impact on recreation is also the same, as described above. The SPR applicable to this treatment is REC-1. This determination is consistent with the CalVTP EIR and would not constitute a substantially more significant impact than covered in the CalVTP EIR.

New Recreation Impacts

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

1.15 TRANSPORTATION

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures	LTS	Section 3.15.2; Impact TRAN-1 pp. 3.15-9 – 3.15-10	Yes	AD-3 TRAN-1	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	PSU	Impact TRAN-3 pp. 3.15-11 – 3.15-13	Yes	N/A	AQ-1	PSU	No	Yes

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

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

Discussion

Impact TRAN-1. Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures

Initial and maintenance treatments would temporarily increase vehicular traffic along roadways throughout the project area, including SR 32, SR 36, SR 172, and various other public and private roadways. The potential for a temporary increase in traffic to conflict with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures was examined in the Program EIR. The proposed treatments would be short term, and temporary increases in traffic related to treatments are within the scope of the Program EIR because the treatment duration and limited number of vehicles (i.e., heavy equipment transport, crew vehicles for crew members) associated with the proposed treatments are consistent with those analyzed in the Program EIR. In addition, the proposed treatments would not all occur concurrently, and increases in vehicle trips associated with the treatments would be dispersed on multiple roadways. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing transportation conditions (e.g., roadways and road use) present in the areas

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

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

Initial and maintenance treatments would not require the construction or alteration of any roadways. However, the proposed treatments would include prescribed burning, which would produce smoke and could potentially affect visibility along nearby roadways such that a transportation hazard could occur. The potential for smoke to affect visibility along roadways during implementation of the treatment project was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the burn duration is consistent with that analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing transportation conditions (e.g., roadways and road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above. SPRs applicable to this treatment are AD-3, HYD-2, and TRAN-1. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Impact TRAN-3. Result in a Net Increase in VMT for the Proposed CalVTP

Treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the proposed project would require vehicle trips to transport crew members and equipment to the treatment areas. The project would be implemented to the extent feasible by existing on-site workers and permanent and seasonal staff, however workers and equipment coming from off-site would likely also be used. This impact was identified as potentially significant and unavoidable in the Program EIR because implementation of the CalVTP would result in a net increase in VMT.

Manual and mechanical treatments and prescribed burning under the proposed treatment project would typically require between eight and 50 crew members depending on the treatment. The potential for an increase in VMT on affected roadways during implementation of the treatment project was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the size and number of crews is consistent with that analyzed in the Program EIR. The increase in vehicle trips over existing conditions would be small, temporary, and dispersed over multiple roadways. A temporary increase in VMT is within the scope of the activities and impacts addressed in the Program EIR because the number and duration of increased vehicle trips attributable to the project are consistent with those analyzed in the Program EIR. The proposed project would contribute to the cumulative increase in VMT attributable to implementation of the CalVTP. Mitigation Measure AQ-1 applies, encouraging workers to carpool to work sites, and/or use public transportation, which could result in a reduction of vehicular trips associated with vegetation treatments, and a potential associated decrease in Vehicle Miles Traveled. Due to the nature of the treatable landscape and the number of employees required and equipment types utilized, it would not be feasible to reduce VMT generated under the CalVTP beyond encouraging workers to carpool or use public transportation. For these reasons, and as explained in the Program EIR, this impact would remain significant and unavoidable.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the transportation-related conditions in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above. No SPRs are applicable to this project. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

New Transportation Impacts

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

1.16 PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs	LTS	Section 3.16.1 pp. 3.16-2 – 3.16-3; Impact UTIL-1 p. 3.16-9	Yes	N/A	N/A	LTS	No	Yes
Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	PSU	Section 3.16.1 pp. 3.16-3 - 3.16-5; Impact UTIL-2 pp. 3.16-10 – 3.16-12	Yes	UTIL-1	N/A	PSU	No	Yes
Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste	LTS	Section 3.16.2 pp. 3.16-6 – 3.16-7; Impact UTIL-2 p. 3.16-12	Yes	UTIL-1	N/A	LTS	No	Yes

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

New Public Services, Utilities and Service System Impacts: Would the treatment result in other impacts to public services, utilities and service systems that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	
[Identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Impact UTIL-1. Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including related Infrastructure Needs

Initial and maintenance treatment would include mechanical treatment, manual treatment, prescribed burning, and targeted ground application of herbicides. Prescribed burning would require an on-site water supply (i.e., water trucks) to be available as a safety precaution. If needed to extinguish a burn, water would be supplied from water trucks. The potential increased demand for water was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the size of the area proposed for prescribed burning treatments, amount of water required for prescribed burning, and water source type are consistent with those

analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the water supply impact is also the same, as described above. No SPRs are applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Impact UTIL-2. Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity

Initial and maintenance treatments would generate biomass as a result of vegetation removal within the treatment areas. Biomass generated by mechanical and manual treatments would primarily be disposed of by pile burning. However, chipped or lopped and scattered debris may be left on-site, removed to a biomass facility, or piled for wildlife habitat. This impact was identified as potentially significant and unavoidable in the Program EIR because biomass hauled off-site in some parts of the treatable landscape could exceed the capacity of existing infrastructure for handling biomass. For the proposed treatment project, some plant biomass could be hauled off-site to an appropriate waste collection facility. While the amount of biomass generated is not expected to exceed the capacity of existing local infrastructure in Tehama County, because the project would generate biomass that could be hauled off-site for disposal, it would contribute to the environmental significance conclusion in the Program EIR; therefore, the purposes of CEQA compliance, this PSA/Addendum notes the impact as potentially significant and unavoidable. SPR UTIL-1 would be applicable to the proposed treatments if biomass is hauled off-site.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, conditions related to biomass in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, impacts related to biomass are also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Impact UTIL-3. Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste

As discussed above, initial and maintenance treatments would generate biomass as a result of vegetation removal within the project area, which would be disposed of primarily through pile burning. However, there is the potential for a small amount to be disposed of off-site at an appropriate waste collection facility. The implementing entity would comply with all federal, state, and local management and reduction goals, statutes, and regulations related to solid waste. Compliance with reduction goals, statutes, and regulations related to solid waste was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the types and amount of biomass that may need to be hauled off-site are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the biomass conditions in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, impacts related to biomass are also the same, as described above. SPR UTIL-1 would be applicable to the proposed treatments if biomass is hauled off-site. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

New Impacts to Public Services, Utilities, and Service Systems

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.16.1, "Environmental Setting," and Section 3.16.2, "Regulatory Setting," in Volume II of the Final Program EIR).

Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing

environmental conditions pertinent to public services, utilities, and service systems that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the Program EIR. Therefore, no new impact related to public services, utilities, or service systems would occur that is not covered in the Program EIR.

1.17 WILDFIRE

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project ¹	List MMs Applicable to the Treatment Project ¹	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Section 3.17.1; Impact WIL-1 pp. 3.17-14 – 3.17-15	Yes	AD-3 AQ-3 HAZ-2 HAZ-3 HAZ-4	N/A	LTS	No	Yes
Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides	LTS	Section 3.17.1; Impact WIL-2 pp. 3.17-15 – 3.17-16	Yes	AQ-3 GEO-3 GEO-4 GEO-5 GEO-8	* N/A	LTS	No	Yes

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

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

Discussion

Impact WIL-1. Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire

Proposed vegetation treatments would include fuel breaks (shaded and non-shaded) and ecological restoration through use of mechanical treatment, manual treatment, prescribed burning, and targeted herbicide application. Vegetation treatment involving motorized equipment could pose a risk of accidental ignition. Temporary increases in risk associated with uncontrolled fire from prescribed burns could also occur. As discussed in Section 3.17.1, "Environmental Setting," in Volume II of the Final Program EIR, under "Prescribed Burn Planning and Implementation," implementing a prescribed burn requires extensive planning, including the preparation of prescription burn plans, smoke management plans, site-specific weather forecasting, public notifications, safety considerations, and ultimately favorable weather conditions so a burn can occur on a given day. Prior to implementing a prescribed burn, fire containment lines would be established by clearing vegetation surrounding the designated burn area to help prevent the accidental escape of fire. Water trucks and safety equipment would be staged on-site as necessary.

The potential increase in exposure to wildfire during implementation of treatments was examined in the Program EIR. Increased wildfire risk associated with the use of heavy equipment in vegetated areas and during prescribed burns is within the scope of the Program EIR because the types of equipment and treatment duration and the types of prescribed burn methods proposed as part of the project are consistent with those analyzed in the Program EIR.

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

risk is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above.

SPRs applicable to this treatment are AD-3, AQ-3, HAZ-2, HAZ-3, and HAZ-4. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Impact WIL-2. Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides

Vegetation treatment activities include mechanical treatment, manual treatment, prescribed burning, and targeted herbicide application, which could exacerbate fire risk as described in Impact WIL-1 above. The potential for post-fire landslides and flooding was evaluated in the Program EIR. The potential exposure of people or structures to post-fire landslides and flooding are within the scope of the activities and impacts covered in the Program EIR because the equipment types and duration, and methods of prescribed burn implementation are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the wildfire risk of the project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above.

SPRs applicable to this impact are AQ-3, GEO-3 through GEO-5, and GEO-8. Although most mechanical treatment would occur from existing roads or skid trails or on flat to moderate slopes, SPR GEO-8 would apply if a treatment area contains steep slopes. Furthermore, because the treatments reduce wildfire risk, they would also decrease post wildfire landslide and flooding risk in areas that could otherwise burn in a high-severity wildfire without treatment. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

New Impacts to Wildfire

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

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ATTACHMENT A - MITIGATION MONITORING AND REPORTING PROGRAM

Note: Standard Project Requirements (SPRs) CUL-1 through CUL-8 are mandatory elements of the project description under the CalVTP PEIR. Mitigation Measure CUL-4 (Human Remains) is a project-specific measure and is distinct from SPR CUL-4 (Archaeological Surveys).

INTRODUCTION and PURPOSE

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

This MMRP has been prepared to facilitate the implementation of SPRs and mitigation measures. The attached table presents the text of each SPR and mitigation measure from the CalVTP PEIR that is applicable to the project, 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 PSA are not duplicated in the MMRP. Instructions for project-specific implementation of certain SPRs and Mitigation Measures have been added to tailor the specific impact avoidance and minimization actions relevant to the proposed treatments, agency standard practices, and the conditions and resources present within each treatment site. In addition, non-substantive clarifying edits to mitigation measures in the PEIR are shown in underline and strikethrough. In all cases, the additional project-specific implementation instruction and clarifying edits to mitigation measures maintain the SPRs and mitigation measures as equivalent or more effective than those presented in the PEIR

ROLES AND RESPONSIBILITIES

Unless otherwise specified herein, California Department of Fish and Wildlife (CDFW) is responsible for taking all actions necessary to implement the mitigation measures under its jurisdiction according to the specifications provided for each measure and for demonstrating that the action has been successfully completed. CDFW will be responsible for implementation of mitigation measures pursuant to Section 15097 of the State CEQA Guidelines.

QUALIFICATIONS REQUIREMENTS FOR BIOLOGICAL AND CULTURAL RESOURCE MEASURES

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

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

Qualified Archaeologist: To be qualified, an archaeologist would hold a Prehistoric Archeology, Historic Archeology, Conservation, Cultural Anthropology, or Curation degree from an accredited university and meet the Secretary of

Interior's Qualifications Standards (36 CFR Part 61). The project proponent will review the resume and approve the qualifications of the archaeologists.

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

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

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Administrative Standard Project Requirements				
SPR AD-1 Project Proponent Coordination: For treatments coordinated with CAL FIRE, CAL FIRE will meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable mitigation measures; identify any sensitive resources onsite; and discuss resource protection measures. For any prescribed burn treatments, CAL FIRE will also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	CDFW	CDFW
SPR AD-4 Public Notifications for Prescribed Burning: At least 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.	Initial Treatment: Y Treatment Maintenance: Y	At least 3 days prior to prescribed burn activities	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.	Initial Treatment: Y Treatment Maintenance: Y	One to three days prior to the treatment activities	CDFW	CDFW
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. Information on proposed projects (PSA in progress): ▶ 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. 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 no later than two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent's own website). Information on approved projects (PSA complete): ▶ A completed PSA Environmental Checklist; ▶ A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); ▶ GIS data that include a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction). Information on completed projects: ▶ 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)	Initial Treatment: Y Treatment Maintenance: Y	Prior to, during, and following treatment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
► A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes ▪ Size of treated area (typically acres); ▪ Treatment types and activities; ▪ Dates of work; ▪ A list of the SPRs and mitigation measures that were implemented ▪ Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). This SPR applies to all treatment activities and all treatment types, including treatment maintenance.				
Aesthetic and Visual Resource Standard Project Requirements				
SPR AES-1 Vegetation Thinning and Edge Feathering: The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	CDFW	CDFW
Air Quality Standard Project Requirements				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to prescribed burn activities	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to prescribed burn activities	CDFW	CDFW
SPR AQ-4 Minimize Dust: To minimize dust during treatment activities, the project proponent will implement the following measures: ▶ Limit the speed of vehicles and equipment traveling on unpaved areas to 15-25 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol, unless fugitive dust emissions are visibly occurring, then vehicle speeds would be reduced to no more than 15 miles per hour. ▶ 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.	Initial Treatment: Y Treatment Maintenance: Y	During Treatment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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. ▶ Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property," per Health and Safety Code Section 41700. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR AQ-6: Prescribed Burn Safety Procedures. Prescribed burns planned and managed by non-CAL FIRE crews will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP). The IAP will include the burn dates; burn hours; weather limitations; the specific burn prescription; a communications plan; a medical plan; a traffic plan; and special instructions such as minimizing smoke impacts to specific local roadways. The IAP will also assign responsibilities for coordination with the appropriate air district, such as conducting onsite briefings, posting notifications, weather monitoring during burning, and other burn related preparations. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During prescribed burn treatment activities	CDFW	CDFW
Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements				
SPR CUL-1 Conduct Record Search: An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	CDFW	CDFW
SPR CUL-2 Contact Geographically Affiliated Native American Tribes: The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the project proponent will notify the California Native American Tribes in the counties where the treatment activity is located. The notification will contain the following:	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ A written description of the treatment location and boundaries. ▶ Brief narrative of the treatment objectives. ▶ A description of the activities used (e.g., prescribed burning, mastication) and associated acreages. ▶ A map of the treatment area at a sufficient scale to indicate the spatial extent of activities. ▶ A request for information regarding potential impacts to cultural resources from the proposed treatment. ▶ A detailed description of the depth of excavation, if ground disturbance is expected. In addition, the project proponent will contact the NAHC for a review of their Sacred Lands File. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	CDFW	CDFW
SPR CUL-5 Treatment of Archaeological Resources: If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. The project proponent, in consultation with culturally affiliated tribe(s), will develop effective	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
protection measures for important cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. These protection measures will be written in clear, enforceable language, and will be included in the survey report in accordance with applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR CUL-6 Treatment of Tribal Cultural Resources: The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity to submit comments and participate in consultation to resolve issues of concern. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW
SPR CUL-8 Cultural Resource Training: The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Biological Resources Standard Project Requirements				
SPR BIO-1: Review and Survey Project-Specific Biological Resources. The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this 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:	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	CDFW	CDFW
1. Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided. If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment: a. by physically avoiding the suitable habitat, or	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites). Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist. 2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided. Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-Protocols. Specific survey requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
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	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Sensitive Natural Communities and Other Sensitive Habitats				
SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats. If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, the project proponent will: ► require a qualified RPF or biologist to perform a protocol-level survey following the CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of <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. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	CDFW	CDFW
SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions by implementing the following within riparian habitats: ► Retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within the limits of riparian habitat identified and mapped during surveys conducted pursuant to SPR BIO-3. Native riparian vegetation will be retained in a well distributed multi-storied stand composed of a diversity of species similar to that found before the start of treatment activities. ► Treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the riparian vegetation types characteristic of the region. This includes hand removal (or mechanized removal where topography	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
► In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment goals objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, different protection measures and design standards will only be approved when the treatment plan incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR BIO-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). 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. For all treatment types in chaparral and coastal sage scrub, the project proponent, in consultation with a qualified RPF or qualified biologist will: ► 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	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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 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. ▶ 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. These SPR requirements apply to all treatment activities and all treatment types, including treatment maintenance. Additional measures will be applied to ecological restoration treatment types: ▶ 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. Biological considerations that may inform a deviation from the minimum 35 percent relative cover retention include but are not limited to soil moisture				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
requirements, increased soil temperatures, changes in light/shading, presence of sufficient seed plants and nurse plants, erosion potential, and site hydrology. ► 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. These SPR requirements apply to all treatment activities and only the ecosystem restoration treatment type, including treatment maintenance. 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.				
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): ► 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	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
► 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>Phytoptheras</i> in Native Habitats 2016). This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Special-Status Plants				
SPR BIO-7: Survey for Special-Status Plants. If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities." Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status. If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS. For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances: ► If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. ► If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to treatment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Invasive Plants and Wildlife				
SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife. The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail): ▶ clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, or invasive wildlife; ▶ for all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species; ▶ inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas; ▶ stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area; ▶ identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys 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 Managers" (Cal-IPC 2012, or current version).	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Wildlife				
SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites. If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries, monarch overwintering sites) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. The qualified RPF or biologist will determine if following an established protocol is required, and the project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	No more than 14 days prior to treatment unless otherwise specified by protocol	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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: ▶ 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. This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prior to prescribed herbivory treatment	CDFW	CDFW
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. 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., CNDDDB, 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 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	Initial Treatment: Y Treatment Maintenance: Y	Avoid nesting season or perform bird survey within 3 weeks prior to treatment. If active nest is observed, implement avoidance strategies prior to and during treatment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following: ► Establish Buffer. The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. Treatment activities will be implemented outside of the buffer. The buffer location will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. ► Modify Treatment. The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment methods). Treatment modifications will be determined by the project proponent in coordination with the qualified RPF or biologist. ► Defer Treatment. The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests: ► Monitor Active Raptor Nest During Treatment. A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases. ► Retention of Raptor Nest Trees. Trees with visible raptor nests, whether occupied or not, will be retained. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
Geology, Soils, and Mineral Resource Standard Project Requirements				
SPR GEO-1 Suspend Disturbance during Heavy Precipitation: The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate	Initial Treatment: Y Treatment Maintenance: Y	During Treatment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.				
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	During mechanical, prescribed herbivory, and prescribed burn treatment activities that result in exposure of bare soil over 50% or more of treatment area	CDFW	CDFW
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	Initial Treatment: Y Treatment Maintenance: Y	Inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season; if erosion control measures are not	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.		properly implemented, remediate prior to the first rainfall event; inspect for evidence of erosion after the first large storm or rainfall event (ie greater than 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		
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.	Initial Treatment: Y Treatment Maintenance: Y	During mechanical, manual, and prescribed burn treatment activities	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	During mechanical, manual, and prescribed burn treatment activities	CDFW	CDFW
SPR GEO-7 Minimize Erosion: To minimize erosion, the project proponent will: (1) Prohibit use of heavy equipment where any of the following conditions are present: (i) Slopes steeper than 65 percent. (ii) Slopes steeper than 50 percent where the erosion hazard rating is high or extreme.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
(iii) Slopes steeper than 50 percent that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake. (2) On slopes between 50 percent and 65 percent where the erosion hazard rating is moderate, and all slope percentages are for average slope steepness based on sample areas that are 20 acres, or less, heavy equipment will be limited to: (i) Existing tractor roads that do not require reconstruction, or (ii) New tractor roads flagged by the project proponent prior to the treatment activity. (3) Prescribed herbivory treatments will not be used in areas with over 50 percent slope. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.				
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment on slopes greater than 50%	CDFW	CDFW
Hazardous Material and Public Health and Safety Standard Project Requirements				
SPR HAZ-1 Maintain All Equipment: The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect every day thereafter until equipment is removed from the site. Any equipment found leaking will be promptly stabilized and repaired on-site if feasible, otherwise equipment would be promptly removed from the site. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Inspect all equipment for leaks prior to treatment; inspect everyday thereafter until equipment is removed from the site; promptly remove any leaking equipment; maintain all diesel- and gasoline powered equipment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
		per manufacturer's specifications and in compliance with all state and federal emissions requirements during treatment		
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.	Initial Treatment: Y Treatment Maintenance: Y	During manual treatments	CDFW	CDFW
SPR HAZ-3 Require Fire Extinguishers: The project proponent will require tree cutting crews to carry one fire extinguisher per chainsaw. Each vehicle would be equipped with one long-handled shovel and one axe or Pulaski consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During manual treatments	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment activities	CDFW	CDFW
SPR HAZ-5 Spill Prevention and Response Plan: The project proponent or licensed Pest Control Advisor (PCA) will prepare a Spill Prevention and Response Plan (SPRP) prior to beginning any herbicide treatment activities to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. The SPRP will include (but not be limited to): ▶ a map that delineates staging areas, and storage, loading, and mixing areas for herbicides; ▶ a list of items required in an onsite spill kit that will be maintained throughout the life of the activity; ▶ procedures for the proper storage, use, and disposal of any herbicides, adjuvants, or other chemicals used in vegetation treatment. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prepare SPRP prior to herbicide treatment activities, and implement measures during herbicide treatment activities	CDFW	CDFW
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:	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during herbicide treatment activities	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
► 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.				
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.	Initial Treatment: Y Treatment Maintenance: Y	During herbicide treatment	CDFW	CDFW
SPR HAZ-8 Minimize Herbicide Drift to Public Areas: The project proponent will employ the following herbicide application parameters during herbicide application to minimize drift into public areas: ► application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ► spray nozzles will be configured to produce the largest appropriate droplet size to minimize drift; ► low nozzle pressures (30-70 pounds per square inch) will be utilized to minimize drift; and ► spray nozzles will be kept within 24 inches of vegetation during spraying. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	During herbicide treatment	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.	Initial Treatment: Y Treatment Maintenance: Y	Prior to, during, and at least 72 hours after herbicide treatments within 500 feet of public areas	CDFW	CDFW
Hydrology and Water Quality Standard Project Requirements				
SPR HYD-1 Comply with Water Quality Regulations: Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the 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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	CDFW	CDFW

Standard Project Requirements					Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity										
SPR HYD-3 Water Quality Protections for Prescribed Herbivory: The project proponent will include the following water quality protections for all prescribed herbivory treatments: ▶ 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. This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.					Initial Treatment: Y Treatment Maintenance: Y	During prescribed herbivory treatment	CDFW	CDFW										
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. Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths <table><tr><th>Water Class</th><th>Class I</th><th>Class II</th><th>Class III</th><th>Class IV</th></tr><tr><td>Water Class Characteristics or Key Indicator Beneficial Use</td><td>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</td><td>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</td><td>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</td><td>Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.</td></tr></table>					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	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	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	Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment near watercourses and lakes	CDFW	CDFW
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	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	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	Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.														

Standard Project Requirements					Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
	migration and spawning.	tributary to Class I waters.	timber operations.					
WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ								
< 30 % Slope	75	50	Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.					
30-50 % Slope	100	75						
> 50 % Slope	150	100						
Source: 14 CCR Section 916.5 [936.5, 956.5] (February 2019 version)								
The following WLPZ protections will be applied for all treatments:								
▶ Treatment activities with WLPZs will retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced a qualified RPF will provide the project proponent with a site- and/or treatment activity-specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version). ▶ Equipment, including tractors and vehicles, must not be driven in wet areas or WLPZs, except over existing roads or watercourse crossings where vehicle tires or tracks remain dry. ▶ Equipment used in vegetation removal operations will not be serviced in WLPZs, within wet meadows or other wet areas, or in locations that would allow grease, oil, or fuel to pass into lakes, watercourses, or wet areas. ▶ WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately. ▶ Burn piles will be located outside of WLPZs. ▶ No fire ignition (nor use of associated accelerants) will occur within WLPZs however low intensity backing fires may be allowed to enter or spread into WLPZs.								

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of soil into water bodies and may include but are not limited to mulching, rip-rap, grass seeding, or chemical soil stabilizers. ▶ Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse. ▶ Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes. ▶ Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water. This SPR applies to all treatment activities and treatment types, including treatment maintenance.				
SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides: The project proponent will implement the following measures when applying herbicides: ▶ Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway. ▶ Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry. ▶ No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ provided that the project proponent notifies the applicable regional water quality control board no fewer than 15 days prior to herbicide application. The feasibility of avoiding herbicide	Initial Treatment: Y Treatment Maintenance: Y	During herbicide treatment activities	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
application within WLPZ of Class I and II watercourses will be determined by the project proponent and may be based on whether doing so will preclude achieving CalVTP program objectives, including, but not limited to, protection of vulnerable communities. The reasons for infeasibility will be documented in the PSA. ▶ No herbicides will be applied within a 50-foot buffer of ESA or CESA listed plant species or within 50 feet of dry vernal pools. ▶ For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray. ▶ Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ▶ No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities. This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.				
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.	Initial Treatment: Y Treatment Maintenance: Y	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 preproject drainage conditions	CDFW	CDFW
Noise Standard Project Requirements				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	CDFW	CDFW
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.	Initial Treatment: Y Treatment Maintenance: Y	During treatment	CDFW	CDFW
SPR NOI-6 Notify Nearby Off-Site Noise-Sensitive Receptors: For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors	Initial Treatment: Y Treatment Maintenance: Y	Prior to mechanical treatment within 1500	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
(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.		feet of noise sensitive receptors		
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.	Initial Treatment: Y Treatment Maintenance: Y	At least 14 days prior to treatment where public closure applies	CDFW	CDFW
Transportation Standard Project Requirements				
SPR TRAN-1 Implement Traffic Control during Treatments: Prior to initiating vegetation treatment activities the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. A TMP will be needed if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments. If needed, a TMP will be prepared to provide measures to reduce potential traffic obstructions, hazards, and service level degradation along affected roadway facilities. The scope of the TMP will depend on the type, intensity, and duration of the specific treatment activities under the CalVTP. Measures included in the TMP could include (but are not be limited to) construction signage to provide motorists with notification and information when approaching or traveling along the affected roadway facilities, flaggers for lane closures to provide temporary traffic control along affected roadway facilities, treatment schedule restrictions to avoid seasons or time periods of peak vehicle traffic, haul-trip, delivery, and/or commute time restrictions that would be implemented to avoid peak traffic days and times along affected roadway facilities. If the TMP identifies impacts on transportation facilities outside of the jurisdiction of the project proponent, the TMP will be submitted to the agency with jurisdiction over the affected roadways prior to commencement of vegetation treatment	Initial Treatment: Y Treatment Maintenance: Y	Prepare TMP prior to treatment and implement during treatment only when treatment would result in obstructions, hazards, or delays exceeding jurisdictional standards to roadway facilities.	CDFW	CDFW

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
projects. This SPR applies to all treatment activities and treatment types, including treatment maintenance. Smoke generated during prescribed burn operations could potentially affect driver visibility and traffic operations along nearby roadways. Direct smoke impacts to roadway visibility and indirect impacts related to driver distraction will be considered during the planning phase of burning operations. Smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations will be identified and addressed within the TMP. The TMP will include measures to monitor smoke dispersion onto public roadways, and traffic control operations will be initiated in the event burning operations could affect traffic safety along any roadways. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.				
Public Services and Utilities Standard Project Requirements				
SPR UTIL-1: Solid Organic Waste Disposition Plan. For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. The Solid Organic Waste Disposition Plan will include the amount (e.g., tons) of solid organic waste to be managed onsite (i.e., scattering of wood materials, generating unburned piles, and pile burning) and transported offsite for processing (i.e., biomass power plant, wood product processing facility, composting). If the project proponent intends to transport solid organic waste offsite, the Solid Organic Waste Disposition Plan will clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials. This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	Initial Treatment: Y Treatment Maintenance: Y	Prepare Organic Waste Disposition Plan prior to mechanical or manual treatment resulting in disposal outside of treatment area; implement plan during mechanical or manual treatment activities as applicable.	CDFW	CDFW
Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Aesthetics and Visual Resources				
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	Initial Treatment: Y Treatment Maintenance: Y	Conduct visual reconnaissance prior to implementing non-shaded fuel breaks; implement feasible	CDFW	CDFW

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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.		mitigation prior to and during treatment		
Air Quality				
Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment. It is acknowledged that due to cost, availability, and the limits of current technology, there may be circumstances where implementation of certain emission reduction techniques will not be feasible. The project proponent will document the emission reduction techniques that will be applied and will explain the reasons other techniques that could reduce emissions are infeasible. Techniques for reducing emissions may include, but are not limited to, the following: ▶ Diesel-powered off-road equipment used in construction will meet EPA's Tier 4 emission standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. Tier 3 models can be used if a Tier 4 version of the equipment type is not yet produced by manufacturers. This measure can also be achieved by using battery-electric off-road equipment as it becomes available. Prior to implementation of treatment activities, the project proponent will demonstrate the ability to supply the compliant equipment. A copy of each unit's certified tier specification or model year specification and operating permit (if applicable) will be available upon request at the time of mobilization of each unit of equipment. ▶ Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria:	Initial Treatment: Y Treatment Maintenance: Y	During treatment activities	CDFW	CDFW

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
- 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				
Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist will assess the significance of the find. The qualified archaeologist will work with the project proponent to develop a primary records report that will comply with applicable state or local agency procedures. If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan will be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or tribal cultural resource), the archaeologist will work with the project proponent to develop appropriate procedures to protect the integrity of the resource. Procedures could include preservation in place (which is the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or recovery of scientifically consequential information from and about the resource. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center.	Initial Treatment: Y Treatment Maintenance: Y	During ground disturbing activities	CDFW	CDFW
Mitigation Measure CUL-4: In the event that human remains are discovered during any ground-disturbing activities associated with the Tehama Wildlife Area Vegetation	Initial Treatment: Y Treatment Maintenance: Y	During ground disturbing activities	CDFW	CDFW

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Treatment Project, all work shall immediately cease within a minimum 100-foot radius of the discovery. The Resource Conservation District of Tehama County (RCDTC) Project Manager shall be notified immediately and shall contact the Tehama County Coroner in accordance with California Health and Safety Code Section 7050.5. No further disturbance shall occur until the Coroner has made a determination regarding the origin of the remains. If the Coroner determines that the remains are Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours pursuant to Public Resources Code Section 5097.98. The NAHC shall designate a Most Likely Descendant (MLD), who shall be provided the opportunity to recommend appropriate treatment and disposition of the remains and any associated grave goods. Project implementation in the vicinity of the discovery shall not resume until consultation with the MLD has been completed and the RCDTC, as CEQA Lead Agency, determines that recommended treatment measures have been implemented to avoid significant impacts to the human remains. This mitigation measure is separate and distinct from Standard Project Requirement (SPR) CUL-4 (Archaeological Surveys) under the CalVTP Program Environmental Impact Report.				
Biological Resources				
Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway), exceptions to this requirement are listed later in this measure. The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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 (nor use of associated accelerants) will occur within 50 feet of listed plants. For species listed under ESA or CESA, if the project proponent cannot avoid loss by implementing no-disturbance buffers, the project proponent will implement Mitigation Measure BIO-1c. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist, in consultation with CDFW and USFWS, as appropriate depending on species status and location, that the listed plants would benefit from treatment in the occupied habitat area even though some of the listed plants may be lost during treatment activities. For a treatment to be considered beneficial to listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to listed plants, no compensatory mitigation for loss of individuals will be required.				
Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement the following measures to avoid loss of individuals and maintain habitat function of occupied habitat: ► Physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape. ▶ Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank. ▶ Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the special-status plant itself, habitat function would be diminished and the treatment would need to be modified or precluded from implementation. ▶ No fire ignition (nor use of associated accelerants) will occur within the special-status plant buffer. A qualified RPF or botanist with knowledge of the special-status plant species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment would not maintain habitat function of the special-status plant habitat (i.e., the habitat would be rendered unsuitable) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If the project proponent determines the impact on special-status plants would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required.				
Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment. The first priority for compensatory mitigation will be preserving and enhancing existing populations outside of the treatment area in perpetuity, or if that is not an option because existing populations that can be preserved in perpetuity are not available, one of the following mitigation options will be implemented by the project proponent instead: ▶ creating populations on mitigation sites outside of the treatment area through seed collection and dispersal (annual species) or transplantation (perennial species); ▶ purchasing mitigation credits from a CDFW- or USFWS-approved conservation or mitigation bank in sufficient quantities to offset the loss of occupied habitat; and ▶ if the affected special-status plants are not listed under ESA or CESA, compensatory mitigation may include restoring or enhancing degraded habitats so that they are made suitable to support special-status plant species in the future. If relocation efforts are part of the Compensatory Mitigation Plan, the plan will include details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the	Initial Treatment: Y Treatment Maintenance: Y	Prior to, during, and after treatment	CDFW	CDFW

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
initial effort fail to meet long-term monitoring requirements. The following performance standards will be applied for relocation: ▶ the extent of occupied area will be substantially similar to the affected occupied habitat and will be suitable for self-producing populations. Re-located/re-established populations will be considered suitable for self-producing when: ▶ habitat conditions allow for plants to reestablish annually for a minimum of 5 years with no human intervention, such as supplemental seeding; and ▶ reestablished habitats contain an occupied area comparable to existing occupied habitat areas in similar habitat types in the region. If preservation of existing populations or creation of new populations is part of the mitigation plan, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands and actions (e.g., the number and type of credits, location of mitigation bank or easement, restoration or enhancement actions), parties responsible for the long-term management of the land, and the legal and funding mechanisms (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity. If mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, funding assurances, and success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations. If mitigation includes restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat. 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. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for				

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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 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.				
Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities) If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following. <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> ► The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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). ▶ No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, or other occurrence is no longer active; or reducing the buffer would not likely result in disturbance, mortality, or injury. A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species. ▶ For prescribed burning, the project proponent will implement the treatment outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, the qualified RPF or biologist will determine the period of time within which prescribed burning could occur that will avoid or minimize mortality, injury, or disturbance of the species. The project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate limited operating periods. <u>Maintain Habitat Function</u>				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
► For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following: ■ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; tree snags; large raptor nests [including inactive nests]; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. ■ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained. ► A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function. A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If the project proponent determines the impact on special-status wildlife would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented.				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or 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.				
Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities) 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 species that is at least equivalent to the habitat function removed or degraded as a result of the treatment. Compensation may include: 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). 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:	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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. Review requirements are as follows: ▶ 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. ▶ 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. 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.				
Mitigation Measure BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities) 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 Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (USFWS 2017) per SPR BIO-10, the following protective	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
measures will be implemented to avoid and minimize impacts to valley elderberry longhorn beetle: ▶ 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. ▶ If elderberry shrubs are located within 165 feet of the treatment area, the following measures will be implemented: ▪ 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: – 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. 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.				
Mitigation Measure BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities) 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: ▶ Treatment areas within the range of these species will be surveyed for the host plant for each species (Table 3.6-34).	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ 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. 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. 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. 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				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the 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.				
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	seacliff 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			

Mitigation Measures		Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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	seacliff buckwheat, seaside buckwheat (<i>Eriogonum latifolium</i>)				
Quino checkerspot butterfly	dwarf plantain, purple owl's clover				

Mitigation Measures		Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities) 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: ▶ 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). CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of feasible avoidance measures (potentially including others not listed		Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
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. 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 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. 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.				
Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3: ▶ Reference the <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/).				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
► Time prescribed herbivory to occur when non-target vegetation is not susceptible to damage (e.g. non-target vegetation is dormant or has completed its reproductive cycle for the year). For example, use herbivores to control invasive plants growing in sensitive habitats or sensitive natural communities when sensitive vegetation is dormant but invasive plants are growing. Timing of herbivory to avoid non-target vegetation will be determined by a qualified botanist, RPF, or biologist based on the specific vegetation alliance being treated, the life forms and life conditions of its characteristic plant species, and the sensitivity of the non-target vegetation to the effects of herbivory. The feasibility of implementing the avoidance measures will be determined by the project proponent based on whether implementation of this mitigation measure will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. If the avoidance measures are determined by the project proponent to be infeasible, the project proponent will document the reasons implementation of the avoidance strategies are infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). A qualified RPF or botanist with knowledge of the affected sensitive natural community will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat functions of the sensitive natural community or oak woodland. If the project proponent determines the impact on sensitive natural communities or oak woodlands would be less than significant, no further mitigation will be required. If the project proponent determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-3b will be implemented. 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				

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

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
agency's requirements (e.g., permits, approvals) within the plan. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., Lake and Streambed Alteration Agreement), if these requirements are equally or more effective than the mitigation identified above.				
Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands Impacts to wetlands will be avoided using the following measures: ▶ The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented. ▶ The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures).	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW
▶ A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified RPF or biologist and will depend on the type of wetland present (e.g., seasonal wetland, wet meadow, freshwater marsh, vernal pool), the timing of treatment (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the species' vulnerability to the treatment activities, environmental conditions and terrain, and the treatment activity being implemented. ▶ A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. ▶ Within this buffer, herbicide application is prohibited. ▶ Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical treatments, prescribed herbivory, equipment and vehicle access or staging. ▶ Only prescribed (broadcast) burning may be implemented in wetland habitats if it is determined by a qualified RPF or biologist that: ▪ No special-status species are present in the wetland habitat ▪ The wetland habitat function would be maintained.	Initial Treatment: Treatment Maintenance:			

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ 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 (nor use of associated accelerants) will occur within the wetland buffer				
Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites The project proponent will implement the following measures while working in treatment areas that contain nursery sites identified in surveys conducted pursuant to SPR BIO-10: ▶ Retain Known Nursery Sites. A qualified RPF or biologist will identify the important habitat features of the wildlife nursery and, prior to treatment activities, will mark these features for avoidance and retention during treatment ▶ Establish Avoidance Buffers. The project proponent will establish a non-disturbance buffer around the nursery site if activities are required while the nursery site is active/occupied. The appropriate size and shape of the buffer will be determined by a qualified RPF or biologist, based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors. No treatment activity will commence within the buffer area until a qualified RPF or biologist confirms that the nursery site is no longer active/occupied. Monitoring of the effectiveness of the non-disturbance buffer around the nursery site by a qualified RPF, biologist, or biological technician during and after treatment activities will be required. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to special-status species.	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW
Greenhouse Gas Emissions				
Mitigation Measure GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns When planning for and conducting a prescribed burn, project proponents implementing a prescribed burn will incorporate feasible methods for reducing GHG emissions, including the following, which are identified in the National Wildfire Coordinating Group Smoke Management Guide for Prescribed Fire (NWCG 2018): ▶ reduce the total area burned by isolating and leaving large fuels (e.g., large logs, snags) unburned; ▶ reduce the total area burned through mosaic burning;	Initial Treatment: Y Treatment Maintenance: Y	Prior to and during treatment	CDFW	CDFW

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ burn when fuels have a higher fuel moisture content; ▶ reduce fuel loading by removing fuels before ignition. Methods to remove fuels include mechanical treatments, manual treatments, prescribed herbivory, and biomass utilization; and ▶ schedule burns before new fuels appear. As the science evolves, other feasible methods or technologies to sequester carbon could be incorporated, such as conservation burning, a technique for burning woody material that reduces the production of smoke particulates and carbon released into the atmosphere and generates more biochar. Biochar is produced from the material left over after the burn and spread with compost to increase soil organic matter and soil carbon sequestration. Technologies to reduce greenhouse gas emissions may also include portable units that perform gasification to produce electricity or pyrolysis that produces biooil that can be used as liquid fuel and/or syngas that can be used to generate electricity. The project proponent will document in the Burn Plan required pursuant to SPR AQ-3 which methods for reducing GHG emissions can feasibly be integrated into the treatment design.				
Hazardous Materials, Public Health and Safety				
Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments) or prescribed burning, CAL FIRE and other project proponents will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials. If it is determined that hazardous materials sites could be located within the boundary of a treatment site, the project proponent will conduct a DTSC EnviroStor web search (https://www.envirostor.dtsc.ca.gov/public/) and consult DTSC's Cortese List to identify any known contamination sites within the project site. If a proposed mechanical treatment or prescribed burn is located on a site included on the DTSC Cortese List as containing potential soil contamination that has not been cleaned up and deemed closed by DTSC, the area will be marked and no prescribed burning or soil disturbing treatment activities will occur within 100 feet of the site boundaries. If it is determined through coordination with landowners or after review of the Cortese List that no potential or known contamination is located on a project site, the project may proceed as planned.	Initial Treatment: Y Treatment Maintenance: Y	During PSA preparation Database searches are complete; see PSA/Addendum for results	CDFW	CDFW

CEQA Determination and Adoption

The Resource Conservation District of Tehama County (RCDTC), as California Environmental Quality Act (CEQA) Lead Agency, has reviewed the Project-Specific Analysis (PSA) and Addendum prepared by the California Department of Fish and Wildlife on behalf of RCDTC for the Tehama Wildlife Area Vegetation Treatment Project and finds that:

1. The project is within the scope of the California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR);
2. No substantial changes to the project, circumstances, or new information of substantial importance would require preparation of a Subsequent or Supplemental Environmental Impact Report; and
3. An Addendum to the CalVTP PEIR pursuant to CEQA Guidelines Section 15164 is the appropriate level of CEQA documentation.

RCDTC hereby adopts this PSA and Addendum and the associated Mitigation Monitoring and Reporting Program. RCDTC and the California Department of Fish and Wildlife, as implementing agencies, are responsible for ensuring that all applicable Standard Project Requirements and mitigation measures are fully implemented.

Adopted by:

Resource Conservation District of Tehama County

By: Jon Barrett 
Title: District Manager
Date: 3-4-2026

