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W16a

SLT-NOID-0006-23

(North Coastal San Luis Obispo County Regional Ecological Strategy for Improving Landscapes Project)

AUGUST 13, 2025

EXHIBITS

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Source: Adapted by Ascent in 2025.

Figure 1-1 Regional Location

NOID

Upper Salinas-Las Tablas
Resource Conservation District
5905 Capistrano Avenue, Suite F
Atascadero, CA 93422
805.460.7272 x2

Date: June 30, 2025

To: California Coastal Commission and Interested Parties

From: Spencer Gordon, Project Manager, Upper Salinas-Las Tablas Resource Conservation District

Subject: Notice of Impending Development for the North Coastal San Luis Obispo County Regional Ecological Strategy for Improving Landscapes Project (SLT-NOID-0006-25)

Pursuant to Public Resources Code Section 30606 and California Coastal Commission (Coastal Commission) Regulations Section 13358 and Section 13359, this letter is presented to provide Notice of Impending Development (NOID) for the North Coastal San Luis Obispo County Regional Ecological Strategy for Improving Landscapes Project in San Luis Obispo County (SLO-RESIL or proposed project). Such notice must be submitted to the Coastal Commission before a public agency proposing a public works project pursuant to a certified Public Works Plan (PWP) may commence with implementation of the project.

Project Description

Under the proposed project, the Upper Salinas-Las Tablas Resource Conservation District (USLTRCD) is proposing vegetation treatments on up to 88,151 acres of USLTRCD's jurisdictional boundary within the California Coastal Zone, from the northern San Luis Obispo County line to Toro Creek near Morro Bay. Implementation of treatments would be phased over several years; implementation timing would be based on the availability of funding and other resources. The proposed project area encompasses both private and public lands, excluding federally owned and managed lands and excluding existing, previously approved vegetation treatment projects within its bounds (i.e., Hearst Ranch Forest Health Fuels Reduction Project, Covell Ranch Forest Health Fuels Reduction Project, and Cambria Reserves Restoration and Vegetation Treatment Project). An objective of the proposed project is to expand on and increase the efficacy of ecologically restorative forest health projects previously approved by the Coastal Commission and successfully implemented under the existing USLTRCD Forest Health and Fire Resilience PWP. Approval of the project would allow for the landscape-level planning needed to increase the pace and scale of vegetation treatments.

The proposed treatment types are ecological restoration and fuel break. The majority of treatments in the project area would be ecological restoration and could occur across 84,757 acres. Additionally, a mixture of shaded and non-shaded fuel breaks could be implemented across 3,394 acres. It is not expected that all acres in the project area would be treated; instead, treatments would be implemented in strategic locations across the project area as funding and other resources allow. Initial phases of treatments would focus on ecological restoration of Monterey pine stands near the towns of Cambria and San Simeon, and priority, strategic shaded and non-shaded fuel breaks identified by fire agencies and qualified professionals (e.g., CAL FIRE, San Luis Obispo Fire Safe Council). The proposed treatment activities consist of mechanical treatments, manual treatments, prescribed burning (pile burning and broadcast burning), targeted

herbicide application, and prescribed herbivory. Portable biomass processing technologies (e.g., air curtain burners, carbonator) may be used in place of pile burning. These technologies are designed to consume biomass quickly and efficiently with a substantial reduction in smoke compared to pile burning. Targeted herbicide application may be implemented where nonnative or invasive species are present, or to maintain fuel breaks. Herbicides would be used only if this treatment activity is the least environmentally damaging feasible alternative. Implementation of treatments may necessitate the periodic use of noise-generating mechanical equipment during daylight hours. Noise-sensitive receptors (e.g., residences, schools, places of worship) may want to close windows to reduce noise exposure. Ongoing maintenance of initial treatments would involve the same vegetation treatment types and activities used in the initial treatment, as funding and other approvals allow. Proposed treatments would be implemented consistent with the Coastal Vegetation Treatment Standards (Coastal VTS) and Project Standards under the USLTRCD Forest Health and Fire Resilience PWP to protect sensitive resources. In addition, the vegetation treatments would be consistent with the objectives and requirements of the California Vegetation Treatment Program (CalVTP).

Future vegetation treatments would be planned on an annual basis, to the extent feasible, or as far in advance as possible pending funding availability, landowner support, and operational feasibility. Treatment planning would be strategic and result in implementation of more treatments aimed toward achieving objectives primarily related to promoting forest health than treatments with objectives primarily related to preventing the ignition and spread of wildfire. USLTRCD would provide a public posting to the San Luis Obsipo Monterey Pine Restoration Project (SLOMPRP) website (https://slomprp.org/) showing treatments implemented during the previous year (treatment type, acres, and a map) and the anticipated treatments to be implemented in the coming year.

Environmental Documents

The USLTRCD Forest Health and Fire Resilience PWP was certified by the Coastal Commission in 2021. The PWP provides an efficient mechanism for Coastal Act compliance in combination with the California Environmental Quality Act (CEQA) compliance process facilitated by the CalVTP Program Environmental Impact Report (Program EIR) for vegetation treatment projects within the Coastal Zone of a portion of San Luis Obispo County. The PWP requires that projects adhere to the Coastal VTS approved as part of the PWP.

The CalVTP Program EIR was certified by the California Board of Forestry and Fire Protection in 2019 to provide an efficient mechanism for CEQA compliance for vegetation treatment projects. It evaluates the potential environmental effects of implementing qualifying vegetation treatments to reduce the risk of wildfire and increase resilience throughout California. It was designed for use by many state and local agencies and special districts to accelerate vegetation treatment project approvals by finding them to be within the scope of the Program EIR through the preparation of a Project-Specific Analysis (PSA). The PSA must demonstrate that the proposed treatment types and activities align with those in the CalVTP, the effects of proposed vegetation treatment are consistent with those analyzed in the Program EIR, and Standard Project Requirements (SPRs) and mitigation measures from the Program EIR will be integrated into the treatment to avoid and minimize impacts.

Where differences between the Program EIR coverage and the proposed project arise, they can be addressed in an Addendum to the Program EIR, if they do not result in new significant impacts or a substantial increase in severity of significant impacts identified in the EIR. The PSA and Addendum can be prepared as a joint document.

A joint PSA and Addendum to the CalVTP Program EIR (PSA/Addendum) was prepared for the proposed project that evaluates this project as a later activity covered by the CalVTP Program EIR. The proposed treatment types and the treatment activities are consistent with those evaluated in the CalVTP Program EIR. The PSA/Addendum includes information that demonstrates the project's consistency with the Coastal VTS, as required pursuant to the Coastal Act and PWP. Direct response to the Coastal VTS for the proposed project can be found in Attachment B of the PSA/Addendum. The PSA/Addendum and supporting materials are available at: https://www.us-ltrcd.org/fire-prevention-and-forest-health.

This NOID, as well as all supporting environmental documents, including the PSA/Addendum and the Coastal VTS, are available for public review at the Coastal Commission office located at 455 Market Street, Suite 300, San Francisco, California 94105, beginning June 30, 2025 and continuing through the Coastal Commission's hearing for this matter at its August 13-15, 2025 meeting. At least 10 days prior to the Coastal Commission's August 13-15 meeting, the documents will also be available for review and download online on the Coastal Commission's Agenda webpage, found under Meetings, Monthly Agenda online at: https://www.coastal.ca.gov/.

Consistency with PWP

The Final USLTRCD Forest Health and Fire Resilience PWP was approved by the USLTRCD Board on September 16, 2021, and certified by the Coastal Commission on October 15, 2021. The project will be carried out pursuant to and consistent with the PWP as documented in the PSA/Addendum and the Coastal VTS. The PWP is available on the USLTRCD website here: https://www.us-ltrcd.org/forest-health-and-fire-resilience-public-works-plan.

Approval Process

As defined in the CalVTP Program EIR and the PSA/Addendum, the project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. USLTRCD is the lead agency pursuant to CEQA and the project proponent. USLTRCD will facilitate the implementation of the treatments. For Coastal Act compliance, USLTRCD is responsible for implementing the procedures in the PWP and is responsible for maintaining oversight to confirm consistency with PWP processes.

The USLTRCD Board approved this project at a Board meeting on June 25, 2025 (Resolution 2025-01). The USLTRCD staff contact for this project is:

Spencer Gordon
Project Manager, Upper Salinas-Las Tablas Resource Conservation District
sloresilvtp@gmail.com
805.460.7272 x2

Consistent with the requirements of the PWP, the USLTRCD notified the Coastal Commission in advance of its intent to submit a NOID for the project. After receiving the NOID, the Coastal Commission has five days to deem the NOID complete and filed or request additional information. The Coastal Commission is also responsible for reviewing the PSA/Addendum and response to the Coastal VTS, and for determining whether the project is consistent with the PWP in its role as a responsible agency under CEQA. Coastal Commission review of a proposed project is deemed complete on the date that the project is determined to be consistent with the PWP. The Coastal Commission meeting at which it will consider the PSA/Addendum as well as whether to approve the proposed project and act on the NOID for this project begins on August 13, 2025, and extends through August 15, 2025. The specific date that this item will be considered by the Coastal Commission can be found by viewing the Coastal Commission's Agenda webpage, found under Meetings, Monthly Agenda online at: https://www.coastal.ca.gov/. The Coastal Commission staff contact for this project is:

Erin Prahler
Statewide Planning Manager, California Coastal Commission
7575 Metropolitan Drive, Suite 103
San Diego, California 92108
fireresiliency@coastal.ca.gov

CalVTP PROJECT-SPECIFIC ANALYSIS AND ADDENDUM TO THE PROGRAM EIR

North Coastal San Luis Obispo County Regional Ecological Strategy for Improving Landscapes (SLO-RESIL)

CalVTP Project ID: 2025-09

Prepared for:

UPPER SALINAS-LAS TABLAS RESOURCE CONSERVATION DISTRICT

Upper Salinas-Las Tablas Resource Conservation District

June 2025

Exhibit 3
Project-Specific Analysis and Addendum

CALVTP PROJECT-SPECIFIC ANALYSIS AND ADDENDUM TO THE PROGRAM EIR

North Coastal San Luis Obispo County Regional Ecological Strategy for Improving Landscapes (SLO-RESIL)

CalVTP Project ID: 2025-09

Prepared for:

Upper Salinas-Las Tablas Resource Conservation District
5905 Capistrano Avenue, Suite F
Atascadero, CA 93422

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June 2025

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LIST OF ABBREVIATIONS

Board	California Board of Forestry and Fire Protection
CAAQS	California ambient air quality standard
CalVTP	California Vegetation Treatment Program
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	California Natural Diversity Database
Coastal Commission	California Coastal Commission
Coastal VTS	the Coastal Vegetation Treatment Standards
CWHR	California Wildlife Habitat Relationship
dbh	diameter at breast height
DMR	Dwarf Mistletoe Rating
DPS	California Distinct Population Segment
EPA	US Environmental Protection Agency
ESA	Endangered Species Act
ESHA	environmentally sensitive habitat area
FRAP	Fire and Resource Assessment Program
GHG	greenhouse gas
GIS	Geographic Information Systems
HCP	habitat conservation plan
LRA	Local Responsibility Area
MCV2	second edition of the Manual of California Vegetation
MMPA	Marine Mammal Protection Act
MMRP	Mitigation Monitoring and Reporting Program
MP	Monterey Pine
NAAQS	national ambient air quality standard
NCCP	natural community conservation plan
NOA	naturally occurring asbestos
NO_X	nitrous oxide
NWI	National Wetland Inventory
PM	particulate matter
Program EIR	Program Environmental Impact Report

proposed project PSA	North Coastal San Luis Obispo County Regional Ecological Strategy for Improving Landscapes Project-Specific Analysis
PSA/Addendum	addendum to the Program EIR
PSI	pounds per square inch
PWP	Public Works Plan
ROG	reactive organic gas
SENL	Single-Event Noise Level
SLO FSC	San Luis Obispo County Fire Safe Council
SLOAPCD	San Luis Obispo County Air Pollution Control District
SLO-RESIL	North Coastal San Luis Obispo County Regional Ecological Strategy for Improving Landscapes
SOD	Sudden Oak Death
SPR	CalVTP standard project requirement
SR	State Route
SRA	State Responsibility Area
TAC	toxic air contaminants
TPA	trees per acre
UAV or drone	Unmanned Aerial Vehicle
USFWS	US Fish and Wildlife Service
USGS	US Geological Survey
USLTRCD	Upper Salinas-Las Tablas Resource Conservation District
VMT	vehicle miles traveled
WLPZ	Watercourse and Lake Protection Zone
WUI	wildland-urban interface

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1 INTRODUCTION

1.1 PROJECT OVERVIEW AND DOCUMENT PURPOSE

1.1.1 CEQA and Coastal Act Compliance

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

The Upper Salinas-Las Tablas Resource Conservation District's (USLTRCD) certified Forest Health and Fire Resilience Public Works Plan (PWP) is a companion to the CalVTP that provides a streamlined mechanism for Coastal Act compliance within the Coastal Zone of a portion of San Luis Obispo County (USLTRCD 2021). The PWP requires adherence to the Coastal Vegetation Treatment Standards (Coastal VTS) approved as part of the PWP and additional information about project design within the Coastal Zone. This PSA addresses the components of the CalVTP as required pursuant to CEQA and includes information that responds to the Coastal VTS as required pursuant to the Coastal Act and PWP.

1.1.2 Proposed Project

USLTRCD is proposing the North Coastal San Luis Obispo County Regional Ecological Strategy for Improving Landscapes (SLO-RESIL or proposed project). The proposed project consists of vegetation treatments on up to 88,151 acres of USLTRCD's jurisdictional boundary within the California Coastal Zone, from the northern San Luis Obispo County line to Toro Creek near Morro Bay (Figure 1-1, "Regional Location"). The project area encompasses both private and public lands, excluding federally managed lands and existing, previously approved CalVTP projects within its bounds (i.e., Hearst Ranch Forest Health Fuels Reduction Project, Covell Ranch Forest Health Fuels Reduction Project, and Cambria Reserves Restoration and Vegetation Treatment Project). An objective of the proposed project is to expand on and increase the efficacy of ecologically restorative forest health projects previously approved by the California Coastal Commission (Coastal Commission) and successfully implemented under the existing USLTRCD Forest Health and Fire Resilience PWP.

As discussed further in Section 2, "Treatment Description," the proposed treatment types are fuel break and ecological restoration. The proposed treatment activities consist of mechanical treatments, manual treatments, prescribed burning, herbicide application, and prescribed herbivory. Ongoing maintenance of initial treatments would involve the same vegetation treatment types and activities used in the initial treatment, as funding and other approvals allow. The treatment types and activities included in the proposed project are consistent with those evaluated in the CalVTP.

Source: Adapted by Ascent in 2025.

Figure 1-1 Regional Location

1.1.3 Agency Roles

For the purposes of the CalVTP Program EIR and this PSA/Addendum, a project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. This document is being prepared for USLTRCD to comply with CEQA for the implementation of vegetation treatments that require a discretionary action by a state or local agency. USLTRCD is the project proponent and CEQA lead agency. In addition, the Coastal Commission is a responsible agency under CEQA; the Coastal Commission will review the PSA and response to the Coastal VTS in determining whether the proposed project is consistent with the PWP. Coastal Commission review of a proposed project is deemed complete on the date of a Coastal Commission determination that the project is consistent with the PWP, though the Coastal Commission retains enforcement authority through its review of monitoring reports.

USE OF THE PSA/ADDENDUM BY OTHER AGENCIES

This PSA/Addendum, in conjunction with the CalVTP Program EIR, may be used for CEQA compliance by other public agencies acting in a responsible agency role, when a discretionary approval is needed pertaining to covered activities in the project area, including for public funding through other sources. For example, CAL FIRE or California State Parks may implement vegetation treatments in the project area and would therefore be a responsible agency that could use this PSA/Addendum for CEQA compliance for treatments carried out by the agency. CAL FIRE or California State Parks would also be the "implementing entity" for implementation of these treatments. In the future, agencies other than CAL FIRE or California State Parks could use this PSA/Addendum for CEQA compliance in similar circumstances.

A responsible agency would consider its action in light of the PSA/Addendum, and confirm its environmental effects are covered. If so, and in conformance with State CEQA Guidelines Section 15096, the responsible agency would adopt its findings, using the USLTRCD findings as a guide if desired, adopt the MMRP as it pertains to their project-related approval, and file a Notice of Determination regarding their project-related approval.

In the circumstance where another public agency seeks to use the PSA/Addendum for CEQA compliance for implementing vegetation treatments, USLTRCD would partner with the other agency to implement the procedures in the PWP for Coastal Act compliance. USLTRCD is responsible for maintaining oversight to confirm consistency with PWP processes.

1.1.4 Purpose of This PSA/Addendum

This document serves as a PSA to evaluate whether the proposed treatments would be within the scope of the CalVTP Program EIR. As stated above, the treatment types and treatment activities are consistent with the CalVTP. The CalVTP Program EIR includes wildland-urban interface (WUI) fuel reduction, fuel breaks, and ecological restoration treatment types and mechanical, manual, prescribed burning, herbicide, and prescribed herbivory treatment types. As stated above, the treatment types (fuel break and ecological restoration) and treatment activities (mechanical, manual, prescribed burning, herbicide, and prescribed herbivory) proposed to implement the project are consistent with the CalVTP. If a proposed vegetation treatment project is covered by the evaluation of environmental effects in the Program EIR, it may be approved using a finding that the project is within the scope of the Program EIR for its CEQA compliance, consistent with CEQA Guidelines Section 15168(c)(2).

An Addendum to an EIR is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts, consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In this case, there are no changed circumstances, but the proposed revisions or changes in the project, compared to the Program EIR, are the

inclusion of areas outside of the CalVTP treatable landscape, and revisions to five SPRs and one mitigation measure of the CalVTP Program EIR.

The PSA checklist (refer to Chapter 4, "Project-Specific Analysis/Addendum") includes the criteria to support an Addendum to the CalVTP Program EIR for the inclusion of treatment areas outside the CalVTP treatable landscape. The checklist evaluates each resource in terms of whether the later treatment project, including the "changed condition" of additional geographic area, would result in significant impacts that would be substantially more severe than those covered in the Program EIR or would result in any new impacts that were not covered in the Program EIR. If a new impact arises, the checklist analysis would provide substantial evidence about whether it would be a significant or potentially significant impact. If the new impact would not be significant, it could be addressed in the addendum to the Program EIR.

This document serves as both a PSA and an Addendum to the CalVTP Program EIR for USLTRCD review and analysis under CEQA regarding the SLO-RESIL within and outside the treatable landscape covered by the Program EIR. It provides environmental information supported by substantial evidence to USLTRCD in its consideration of approving grant funding allocations and implementation of the work by USLTRCD or its contractor(s). The project-specific Mitigation Monitoring and Reporting Program (MMRP), which identifies the CalVTP standard project requirements (SPRs) and mitigation measures applicable to the proposed project is presented in Attachment A. The SPRs identified in the MMRP have been incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation.

Given the limited spatial resolution of publicly accessible land ownership boundaries, the potential exists that during pretreatment field layout, the RPF or qualified professional may determine that treatment area boundaries need to shift slightly from the project area identified in this PSA/Addendum to meet treatment objectives and reflect on-the-ground conditions. The RPF or qualified professional will determine if all resources in the area outside the PSA/Addendum project boundary were considered in the PSA/Addendum or are substantially the same as those considered in the PSA/Addendum, including that the cultural records search encompassed any expanded area. If resources are present that were not considered in the PSA/Addendum, additional CEQA documentation (e.g., revised PSA/Addendum) must be prepared to document whether a new significant impact or substantial increase in the severity of an identified significant impact would occur from treatments in the area outside the PSA/Addendum project boundary. All relevant SPRs and mitigation measures will be applied throughout the entire treatment area.

PROPOSED PROJECT REVISIONS

Project Area Outside the CalVTP Treatable Landscape

Among the criteria for determining whether a treatment project is within the scope of the CalVTP Program EIR is whether it is within the CalVTP treatable landscape (i.e., the geographic extent of analysis covered in the Program EIR). While most of the project area would be inside the treatable landscape, portions of it extend outside of the treatable landscape described in the CalVTP Program EIR. In total, the areas outside the treatable landscape encompass approximately 26,783 acres of the 88,151-acre project area (Figure 1-2, "CalVTP Treatable Landscape within the Project Area"). These include small and dispersed discontinuous patches throughout the project area as well as some larger patches primarily along the coast and foothills in the northern half of the project area.

The scattered array of acres outside of the mapped CalVTP treatable landscape is due the digital expression of the CalVTP treatable landscape that resulted in a pixelated mapping resolution. Using desktop applications to apply buffers around geographic and topographic features and demarcate jurisdictional boundaries (i.e., SRA and LRA), the method resulted in some treatable landscape areas that are shown on maps to be disjoined and scattered and some that are inheld areas surrounded by the mapped treatable landscape. Other areas were excluded from the treatable landscape because they were not modeled as a treatable fuel type, but are indeed suitable for treatment. If the areas of the proposed project outside of the CalVTP treatable landscape have essentially the same, or at least substantially similar, landscape conditions as the adjacent areas within the treatable landscape, the environmental analysis in the Program EIR would be applicable to the adjacent areas.

Source: Data received from BOF in 2019; adapted by Ascent in 2025.

Figure 1-2 CalVTP Treatable Landscape within the Project Area

Proposed Revisions to CalVTP SPRs

While the proposed treatment types and treatment activities are consistent with the CalVTP, USLTRCD has determined that certain requirements of CalVTP, specifically SPR CUL-4, SPR GEO-1, SPR HAZ-1, SPR HYD-4, and SPR NOI-6, are not warranted to maintain the impact significance conclusions in the CalVTP Program EIR, and, if implemented as presented in the Program EIR, would prevent USLTRCD from meeting treatment objectives due to unnecessary loss of work time. Because SPRs are part of the CalVTP Program Description and are incorporated into later activities as a standard part of treatment design and implementation, revisions (beyond clarifying edits) would constitute a change to the CalVTP.

The proposed revisions to SPRs are described below. These proposed changes would not result in any new or substantially more severe significant impacts on any of the resources evaluated in the Program EIR and described in this PSA/Addendum. Evidence to explain this conclusion is presented under each applicable resource, as summarized below and presented throughout Chapter 4, "Project-Specific Analysis/Addendum."

SPR CUL-4: Archaeological Surveys

SPR CUL-4, as presented in the CalVTP Program EIR, requires the project proponent to complete a site-specific survey and archaeological survey report for all treatment activities and treatment types, including treatments that do not result in ground disturbance or other risk of impact to archaeological or historical resources (e.g., manual treatments and targeted herbicide application).

The application of SPR CUL-4 to all treatment activities, particularly those that do not result in any ground disturbance, is unnecessary to avoid impacts. Conducting a site-specific survey and archaeological survey report for areas designated for manual treatments and targeted herbicide application that have no potential for ground disturbance would result in unnecessary loss of work time. Therefore, USLTRCD proposes to conduct archaeological surveys only for treatment activities that involve ground disturbance (i.e., treatments that include the use of heavy equipment) and prescribed burning. This revision to SPR CUL-4 would help to prevent unnecessarily slowing down project implementation while maintaining the overall intent of SPR CUL-4 in areas where ground disturbance activities are more likely to affect archaeological artifacts.

Potential impacts resulting from revisions to SPR CUL-4 are discussed below under Section 4.4, "Archaeological, Historical, and Tribal Cultural Resources." As explained in these sections, the proposed revisions to SPR CUL-4 would not result in any new or substantially more severe significant impacts than were analyzed in the CalVTP Program EIR. Impacts on other resources would not occur as a result of these revisions because SPR CUL-4 is not required to reduce environmental effects on any other resources from implementation of the project. The proposed revisions to SPR CUL-4 are shown in the MMRP (Attachment A).

SPR GEO-1: Suspend Disturbance during Heavy Precipitation

SPR GEO-1, as presented in the CalVTP Program EIR, requires suspension of treatment activities, including mechanical treatments, targeted herbicide application, and prescribed herbivory, during heavy precipitation (i.e., if the National Weather Service forecast is a "chance" [30 percent or more] of rain within the next 24 hours). As described in the CalVTP Program EIR, mechanical treatments, prescribed herbivory, and targeted herbicide application conducted during precipitation events can result in soil disturbance, erosion, increased runoff, soil destabilization, and water quality impacts.

USLTRCD proposes to suspend mechanical and herbivory treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical treatment or prescribed herbivory activities, and proposes to suspend targeted herbicide application if the National Weather Service forecast is a "chance" (30 percent or more averaged over each hour) of rain within the next operational day's 12-hour period between 6:00 a.m. and 6:00 p.m. USLTRCD proposes to implement this SPR only for prescribed herbivory activities associated with goats, sheep, and llama; no prescribed herbivory activities associated with cattle are proposed. In the coastal region of the project area, forecasts often include a chance of rain; however, precipitation sometimes does not materialize. Therefore, suspension of mechanical treatment activities in these cases could result in unnecessary loss of work time. Without this revision to SPR GEO-1, the project objectives may not be achieved. In addition, defining the 12-hour window that would be used to calculate the next day's average precipitation potential would ensure a consistent methodology for the implementing entity.

Potential impacts resulting from revisions to SPR GEO-1 are discussed below under Section 4.5, "Biological Resources"; Section 4.6, "Geology, Soils, Paleontology, and Mineral Resources"; and Section 4.10, "Hydrology and Water Quality." As explained in these sections, the proposed revisions to SPR GEO-1 would not result in any new or substantially more severe or significant impacts than were analyzed in the CalVTP Program EIR. Impacts on other resources would not occur as a result of these revisions because SPR GEO-1 is not required to reduce environmental effects on any other resources from implementation of the project. The proposed revisions to SPR GEO-1 are shown in the MMRP (Attachment A).

SPR HAZ-1: Maintain All Equipment

SPR HAZ-1, as presented in the CalVTP Program EIR, requires that the project proponent inspect all equipment for leaks prior to the start of treatment activities and everyday thereafter until equipment is removed from the site, and requires any equipment found leaking be promptly removed.

USLTRCD proposes to promptly stabilize any equipment found leaking and fix it on-site or remove the leaking equipment from the treatment area, outside of the Watercourse and Lake Protection Zones (WLPZs). This revision gives the project proponent the flexibility to fix equipment on-site if feasible and continue treatment rather than requiring all leaking equipment be removed from the site. This revision would help prevent unnecessarily slowing down project implementation while maintaining the overall intent of SPR HAZ-1 to minimize hazardous material released in treatment areas from equipment use.

Potential impacts resulting from revisions to SPR HAZ-1 are discussed below under Section 4.3, "Air Quality"; Section 4.9, "Hazardous Materials"; and Section 4.10, "Hydrology and Water Quality." As explained in these sections, the proposed revisions to SPR HAZ-1 would not result in any new or substantially more severe significant impacts than were analyzed in the CalVTP Program EIR. Impacts on other resources would not occur as a result of these revisions because SPR HAZ-1 is not required to reduce environmental effects to any other resources from implementation of the project. The proposed revisions to SPR HAZ-1 are shown in the MMRP (Attachment A).

SPR HYD-4: Identify and Protect Watercourse and Lake Protection Zones

SPR HYD-4, as presented in the CalVTP Program EIR, requires that the project proponent establish WLPZs on either side of Class I, Class II, Class III, and Class IV watercourses, as defined by California Code of Regulations (CCR), Title 14, Section 916.5 of the California Forest Practice Rules.

USLTRCD proposes to establish the WLPZ buffers for only the watercourses within 300 feet of the manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments including access roads, equipment trails, and staging areas. This revision would limit the amount of time spent by the project proponent identifying and delineating WLPZs, as well as limit the amount of high-visibility flagging used throughout the project area. This revision would help ensure that all WLPZs in proximity to a treatment area are recently flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area, while maintaining overall intent of SPR HYD-4 to prevent degradation of watercourses during implementation of manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments.

Potential impacts resulting from revisions to SPR HYD-4 are discussed below under Section 4.5, "Biological Resources," Section 4.6, "Geology, Soils, Paleontology, and Mineral Resources," Section 4.9, "Hazardous Materials," and Section 4.10, "Hydrology and Water Quality." As explained in these sections, the proposed revisions to SPR HYD-4 would not result in any new or substantially more severe significant impacts than were analyzed in the CalVTP Program EIR. Impacts on other resources would not occur as a result of these revisions because SPR HYD-4 is not required to reduce environmental effects to any other resources from implementation of the project. The proposed revisions to SPR HYD-4 are shown in the MMRP (Attachment A).

SPR NOI-6: Notify Nearby Off-Site Noise-Sensitive Receptors

SPR NOI-6, as presented in the CalVTP Program EIR, requires that the project proponent notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) within 1,500 feet of mechanical treatment activities utilizing heavy equipment and that the notification provides details on anticipated work schedules, contact information, and interior noise level reduction recommendations (e.g., closing windows and doors). For the proposed

project, notification will be mailed to noise-sensitive receptors within 1,500 feet of the treatment activity, pursuant to the requirements of SPR NOI-6 as presented in the CalVTP Program EIR, except for residents in the Cambria Community Services District Area; Cayucos; and San Simeon Village Reserve. USLTRCD proposes an alternative notification approach for residents in these three communities.

For notification of residents within these three communities, USLTRCD proposes modified requirements under SPR NOI-6 to refine the approach for notification during mechanical treatment activities utilizing heavy equipment. For notification of residents within the Cambria Community Services District Area; Cayucos; and San Simeon Village Reserve, public notices will be placed at key public facing locations (e.g., post office, library, fire station; see detailed requirements in Attachment A) to inform residents about treatment activities as well as provide additional project notification and outreach through websites, social media, and monthly public meetings. This revision would help ensure a more effective and feasible method of notification in these small communities where many residents rely on post office (PO) boxes rather than direct residential mail delivery. Based on the USLTRCD's experience with mailings for previous projects, a substantial number of residents in the project area do not have direct residential mail delivery. Alternative notification strategies—physical public postings, digital outreach, and community engagement—remain available to ensure sensitive receptors receive accurate information about planned periods of temporarily elevated noise levels during treatment. This revision remains consistent with the intent of SPR NOI-6, which is to minimize noise disturbances during mechanical treatment activities utilizing heavy equipment through proactive communication by notifying nearby noise-sensitive receptors. For the reasons described above, the proposed revisions to SPR NOI-6 would not result in a substantially more severe significant effect related to noise impacts than what was covered in the CalVTP Program EIR.

Potential impacts resulting from revisions to SPR NOI-6 are discussed below under Section 4.12, "Noise." As explained in Section 4.12, the proposed revision to SPR NOI-6 would not result in any new or substantially more severe or significant impacts than were analyzed in the CalVTP Program EIR. Impacts on other resources would not occur as a result of these revisions because SPR NOI-6 is not required to reduce environmental effects on any other resources from implementation of the project. The proposed revisions to SPR NOI-6 are shown in the MMRP (Attachment A).

Proposed Revisions to CalVTP Mitigation Measure BIO-4

While the proposed treatment types and treatment activities are consistent with the CalVTP, USLTRCD has deemed that certain requirements of Mitigation Measure BIO-4 are not warranted to maintain the impact significance conclusions in the Program EIR, and, if implemented as presented in the Program EIR, would prevent USLTRCD from meeting treatment objectives to control invasive woody plants, improve native grassland habitats, and reduce fine fuels within grassland habitats. CEQA Guidelines Section 15168(c)(3) requires incorporation of feasible mitigation when approving later activities. If the mitigation measure is simply "incorporated" (i.e., without revision), it would contribute to a within the scope finding. If revisions to a mitigation measure are proposed, it could be evaluated within an Addendum pursuant to CEQA Guidelines Section 15164. This can occur either because the change is simply a clarification or other revision that does not meet the requirements for supplemental or subsequent review in CEQA Guidelines Section 15162; or it is a case, as explained in CEQA Guidelines Section 15162(a)(3)(D), where a mitigation measure is "considerably different" from those in the Program EIR, would substantially reduce significant effect(s), and the proponent will adopt it as part of the project.

As presented in the Program EIR, Mitigation Measure BIO-4 contains a prohibition of broadcast burning within wetlands when special-status species are present. USLTRCD is proposing to revise Mitigation Measure BIO-4 to allow broadcast burning within vernal pools if vernal pool fairy shrimp are present or assumed to be present pursuant to SPR BIO-10. The use of broadcast burning in vernal pools that provide suitable habitat for vernal pool fairy shrimp would allow for restoration of vernal pools where these species are present and would avoid the need for additional control lines to prevent broadcast burning from entering these vernal pools, thereby reducing ground disturbance.

Potential impacts resulting from revisions to Mitigation Measure BIO-4 are discussed below under Section 4.5, "Biological Resources." As explained in this section, the proposed revisions to Mitigation Measure BIO-4 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. Impacts on other resources would not occur as a result of this revision, because Mitigation Measure BIO-4 is not required to reduce environmental effects to any other resources from implementation of the project. The proposed revisions to Mitigation Measure BIO-4 are shown in the MMRP (Attachment A).

2 PROJECT DESCRIPTION

2.1 SETTING

Located in northern San Luis Obispo County, the SLO-RESIL project area covers 88,151 acres and occupies most of the Coastal Zone Public Works Plan area of 93,000 acres in the USLTRCD region. The majority of the project area (84,757 acres) is designated as the CalVTP ecological restoration treatment type and 3,394 acres are designated as the CalVTP fuel break treatment type, with a mixture of shaded and non-shaded fuel breaks Initial treatments would focus on priority strategic shaded and non-shaded fuel breaks identified by fire agencies and qualified professionals and ecologically restorative treatments in stands of Monterey pine (*Pinus radiata*) in general proximity to the towns of Cambria and San Simeon. Although this PSA/Addendum considers the entire project area, it is not expected that all acres in the project area would be treated; instead, treatments would be implemented in strategic locations across the project area, allowing for landscape-level planning needed to increase the pace and scale of vegetation treatments.

This area is known for scenic stretches of California Coastline between Ragged Point at its northern extent and the town of Cayucos at the southern extent. Easterly, the project area is bound by the coastal ridge including state historic resources such as Hearst Castle and significant cultural resources from indigenous peoples. The area is also known for important sensitive natural communities including one of five native Monterey pine stands left in the world. Generally, rocky cliffs at the ocean transcend this landscape to grasslands, oak woodlands and Monterey pine stands, intermixed with chaparral and coastal scrub habitats, on to higher elevation stands of ponderosa pine (*P. ponderosa*), Jeffrey (*P. jefferyi*), and gray pines (*P. sabiniana*) at the ridgelines. Rare stands of Santa Lucia (bristlecone) fir (*Abies bracteata*) and other unique conifer assemblages also occur along these ridges. Average annual precipitation for this area can range from 20 to 40 inches per year relative to orographic rainfall from low to higher elevations. Average annual temperatures range from 50 degrees to 90 degrees and the area experiences the seasonal influences of fog. The elevational range of the project area is from sea level to Granite Peak at 2,397 feet.

It is estimated that tens of thousands of Native American Chumash and Salinan peoples inhabited the coastal areas around San Luis Obispo for thousands of years prior to the arrival of Europeans in the 16th, 17th, and 18th centuries. A Spanish land expedition led by Gaspar de Portolá in 1776 took port near San Simeon and as they made their way north along the coast, they encountered the Native American communities that were well established in the area. Implementation of the Spanish Mission system was already underway in California at this time and much of the coastal landscape had been occupied by missionaries. Mission San Luis Obispo de Tolosa was founded in 1772, just a few years prior to Portolá's arrival on the central coast. The traditional knowledge and long-standing culture of the Chumash and Salinan tribes began to deteriorate as the Spanish explorers carried out their mission to convert the Native Americans to Christianity. Prior to European development on the Central Coast, it has been documented that the landscape in the area "resembled a garden or park with large open meadows and oak trees, free of brush and undergrowth" (Taylor n.d.) likely related to the use of low-intensity ground fire to maintain ecosystem health, outlawed in the late 1800s.

As settlers began heading west during the mid-19th century, it was not until the California Gold Rush of 1849 that hundreds of thousands of weary pioneers migrated to the west coast in a great migration with hopes of striking it rich in California's gold laden hills. The population of California increased dramatically, and it became quickly apparent that securing land on which to build a homestead would be a competitive process for the masses. Early into the 1850s, squatting became the principal way in which land was claimed under the 1854 Preemption Act that allowed pioneers to settle on public lands prior to official land surveys being carried out by the U.S. government. This period of time on the north coast of San Luis Obispo County was occupied predominantly by dairies, cattle grazing, and forest harvesting of Monterey pines.

Following the indigenous period, recent history and changing climates have altered this landscape forever.
The ambition of the SLO-RESIL is to expand on and increase the efficacy of ecologically restorative forest health projects previously approved by the California Coastal Commission and successfully implemented under the existing USLTRCD Forest Health and Fire Resilience Public Works Plan (PWP). Since the outset of the approved PWP in

October 2021, over 1,700 acres of priority lands within the San Luis Obispo County Coastal Zone have been permitted for shovel-ready forest health fuels reduction treatments under the CalVTP on Covell Ranch, Hearst Ranch, and Rancho Marino and Cambria Pines Ecological Reserves; most of which have undergone a series of initial treatments or are planned for treatment in 2025.

In an effort to effectively extend these restorative measures to the landscape scale, the long-term goals, objectives, and treatment approaches set forth in SLO-RESIL mimic those included in the aforementioned approved projects, the goals of the PWP, and look to enhance ecological resiliency across the greater Cambria, San Simeon, and Cayucos region.

2.2 PROBLEM STATEMENT

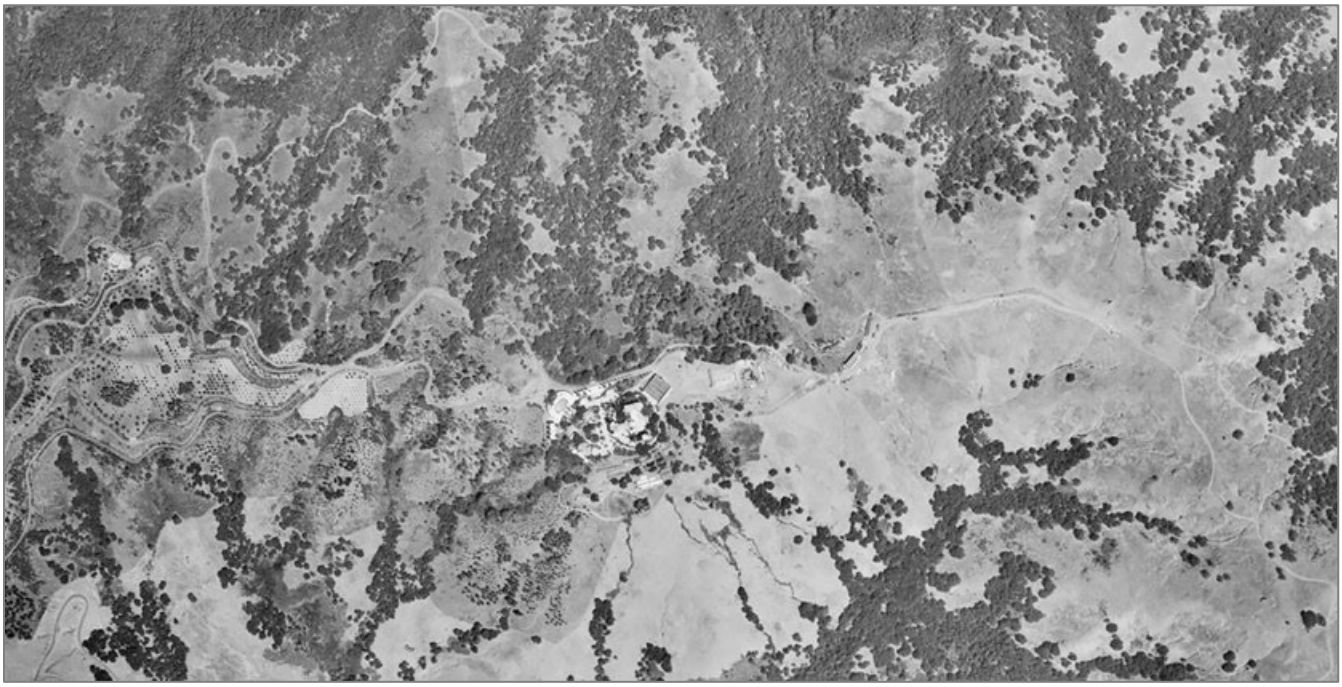
The effects of fire suppression and climate change have altered and continue to impact the landscape of California. This combination of stressors has resulted in sensitive habitats that have both declined substantially in habitat quality and increased their vulnerability to severe wildfire (Ayars et al. 2023; Stephens et al. 2022). Of particular concern are the increasing loss of native coastal grasslands and vulnerability of native Monterey pine stands recovering from a severe die off from significant outbreaks of pitch canker and a drought-induced beetle epidemic circa 2015 (Figure 2-1). These impactful conditions have been exacerbated by additional stressors, such as drought, increasing yearly average temperatures, and fewer fog days. Most of these dead trees have now fallen to the forest floor and become entangled with regenerating understory vegetation creating very hazardous fuels accumulation for local communities and increasing the likelihood of high severity wildfire.

Source: Photograph taken by Dan Turner – Firesafe SLO in 2020.

Figure 2-1 2015 Monterey Pine Tree Mortality in Cambria, CA

Vegetation communities in this region, including Monterey pine forests, hardwood forest, and grasslands, face these significant ecological stressors and potentially impactful outcomes that have caused changes in vegetation composition, structure, and density resulting in increased fuel loads, which reduce the health and resilience of these habitats and increase the potential risk of catastrophic wildfires.

Several aerial photos (Figures 2-2 and 2-3) provide snapshots of vegetation encroachment into grasslands and other habitat types displaying increased vegetation densities and communities reaching into the Monterey pine forest in the last seven to eight decades.

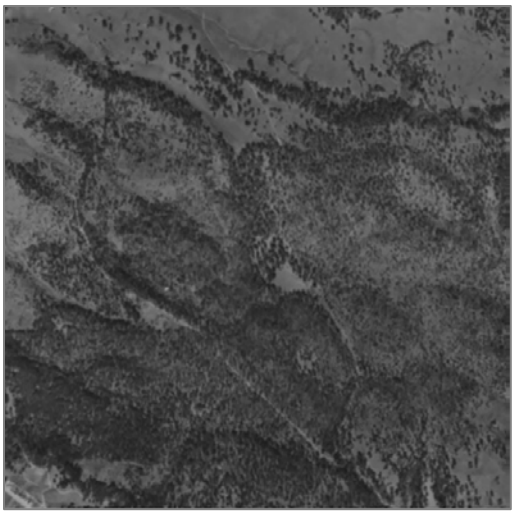


Source: UC Santa Barbara Library – Aerial Photography 2025.

Figure 2-2 Aerial Photo of Vegetation Density and Encroachment into Grasslands Around Hearst Castle in 1949

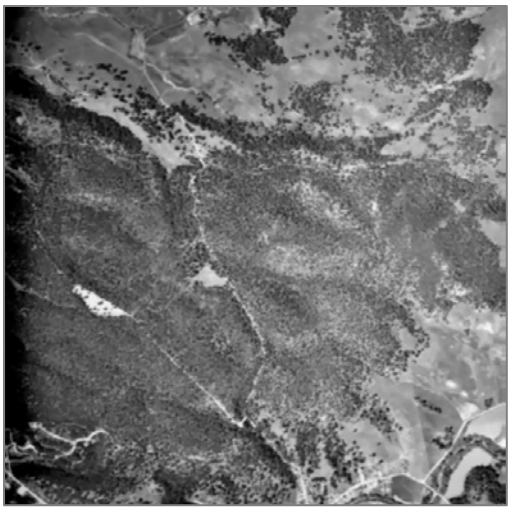
Source: Google Earth 2025.

Figure 2-3 Aerial Photo of Vegetation Density and Encroachment into Grasslands Around Hearst Castle in 2023



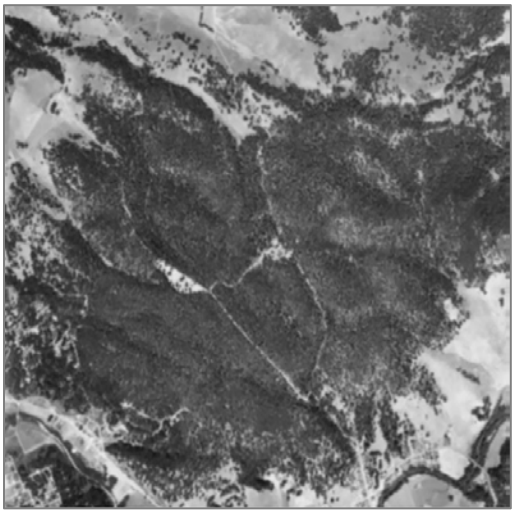
Source: UC Santa Barbara Library – Aerial Photography 2021.

Figure 2-4 1937 Cambria, CA



Source: UC Santa Barbara Library – Aerial Photography 2021.

Figure 2-5 1949 Cambria, CA

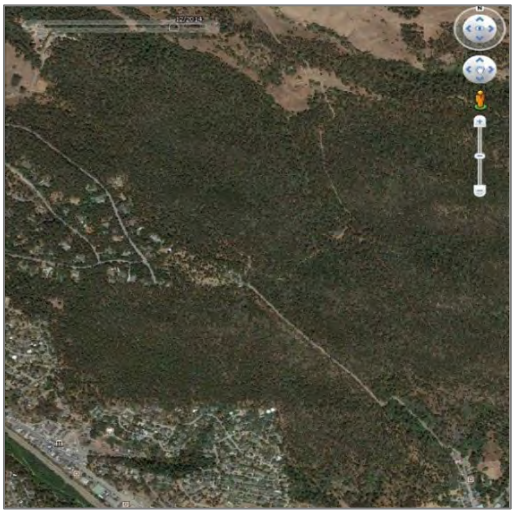


Source: UC Santa Barbara Library – Aerial Photography 2021.

Figure 2-6 1956 Cambria, CA

Source: UC Santa Barbara Library – Aerial Photography 2021.

Figure 2-7 1996 Cambria, CA



Source: Google Earth 2021.

Figure 2-8 2014 Cambria, CA

Source: Google Earth 2021.

Figure 2-9 2021 Cambria, CA

Figures 2-4 through Figure 2-9 indicate that the density of Monterey Pine has increased significantly between the 1937 photo to the 2021 photo. Like many other communities in California, the community of Cambria is built out into a fire adapted Monterey pine forest ecosystem. This forest is in critical need of ecologically restorative actions to support the conservation of one of five native Monterey pine stands in the world following the 2015 mortality event with areas of unnaturally high forest densities and tree diseases such as dwarf mistletoe, western gall rust, and pitch canker still prevalent.

Figures 2-10 and 2-11 show the impaired, diseased, and overstocked forest conditions from the ground that this effort seeks to address.

Source: Photograph taken by Riley McFarland – ARC in 2025.

Figure 2-10 Overstocked Less than 8 Inches Diameter Monterey pine

Source: Photograph taken by Riley McFarland – ARC in 2025.

Figure 2-11 Dwarf Mistletoe on Monterey pine

Like many areas of the state, forest, woodland, and grassland landscapes across the San Luis Obispo County Coast are undergoing significant change. The climate is becoming warmer and drier, endemic species are at risk, invasive species are on the move. Altered fire regimes and increased fuel loads are driving larger and more catastrophic wildfires. The result has been damaging changes to ecosystems that require environmentally sensitive landscape-level treatments to redirect the path of both changing climates and ecological conditions impacting the area.

2.3 OBJECTIVES STATEMENT

The overall objectives of this project are the same as those objectives set forth in the USLTRCD PWP approved by the California Coastal Commission in October of 2021 and include:

- promote a mosaic of native vegetation types to support diverse native floral, faunal, and fungal assemblages and are resilient to climate change;
- improve habitat for rare, threatened, and endangered plant and animal species where they are present;
- Increase the ability to safely manage wildfire and restore use of prescribed burning;
- reduce impacts to natural and cultural resources;
- maintain important cultural landscapes;
- significantly reduce loss of life and property from catastrophic wildfire; and
- educate the public about the role of fire in California's landscapes and their role in it.

These objectives acknowledge that complete re-establishment of fire regimes that existed during the evolutionary history of the plants and animals found within the San Luis Obispo Coastal Region cannot be replicated under current conditions. These natural communities have been so altered that, even if historic fire regimes were re-established, it is expected that the effects of these fire patterns would not restore the native states of most of these communities.

Given these constraints, where possible, evolutionary appropriate fire regimes or surrogates (i.e. mechanical, manual, prescribed burning, prescribed herbivory, and targeted herbicide application) for those regimes should be enacted or maintained to restore resilience. The following literature provides peer-reviewed support for the approach to treatment design described in this PSA/Addendum: Native American Impacts on Fire Regimes of the California Coastal Ranges (Keeley 2002); The Effects of Forest Fuel Reduction Treatments in the United States (Stephens et al. 2012); and Effect of Fuel Treatments on Fuels and Potential Fire Behavior in California, USA, National Forests (Vailiant et al. 2009).

2.4 PROPOSED TREATMENTS

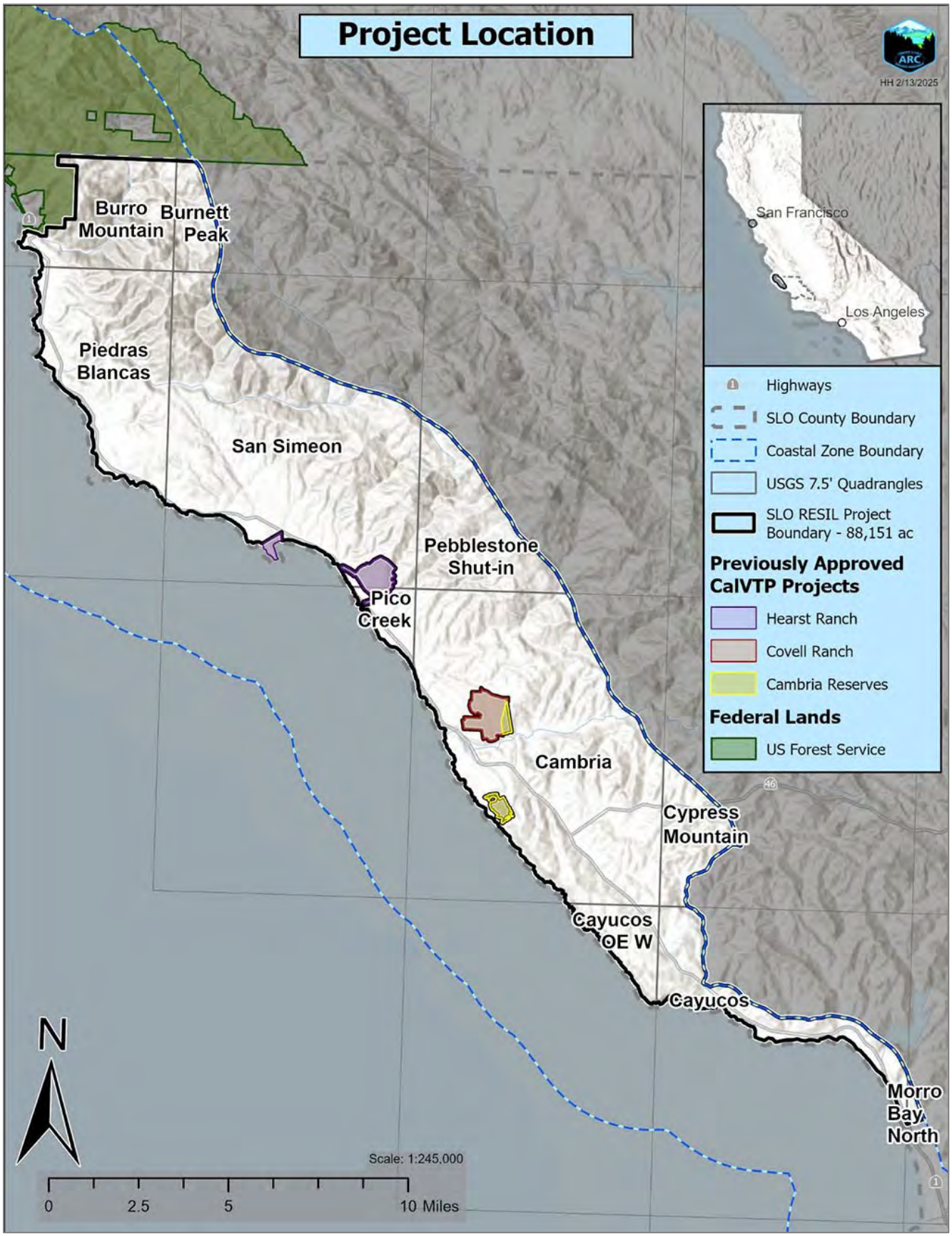
The ecological restoration and fuel break CalVTP treatment types would be implemented across the SLO-RESIL project (Figure 2-12) to enhance natural habitats by restoring ecological conditions and natural and cultural processes that promote vegetation community regeneration, healthy habitat structure, density, and composition, promote community safety, and reduce impacts from wildfire. The proposed treatment activities are manual treatments, mechanical treatments, prescribed burning, prescribed herbivory, and targeted herbicide application (Figures 2-13 and 2-14). Proposed treatments would be implemented consistent with the Coastal VTS and Project Standards under the USLTRCD Forest Health and Fire Resilience PWP.

Table 2-1 Proposed CalVTP Treatments

CalVTP Treatment Type	CalVTP Treatment Activities	Treatment Size (acres)	Timing of CalVTP Treatments
Ecological Restoration	Prescribed burning (i.e., broadcast burning, pile burning, and portable biomass processing technologies), mechanical, manual, prescribed herbivory, and herbicide	Up to 84,757 acres	Year-round, most likely to occur during dry months or outside critical periods of avoidance for sensitive species
Fuel Break (shaded and non-shaded)	Prescribed burning (i.e., broadcast burning, pile burning, and portable biomass processing technologies), mechanical, manual, prescribed herbivory, and herbicide	Up to 3,394 acres	Year-round, most likely to occur during dry months or around critical periods of avoidance for sensitive species

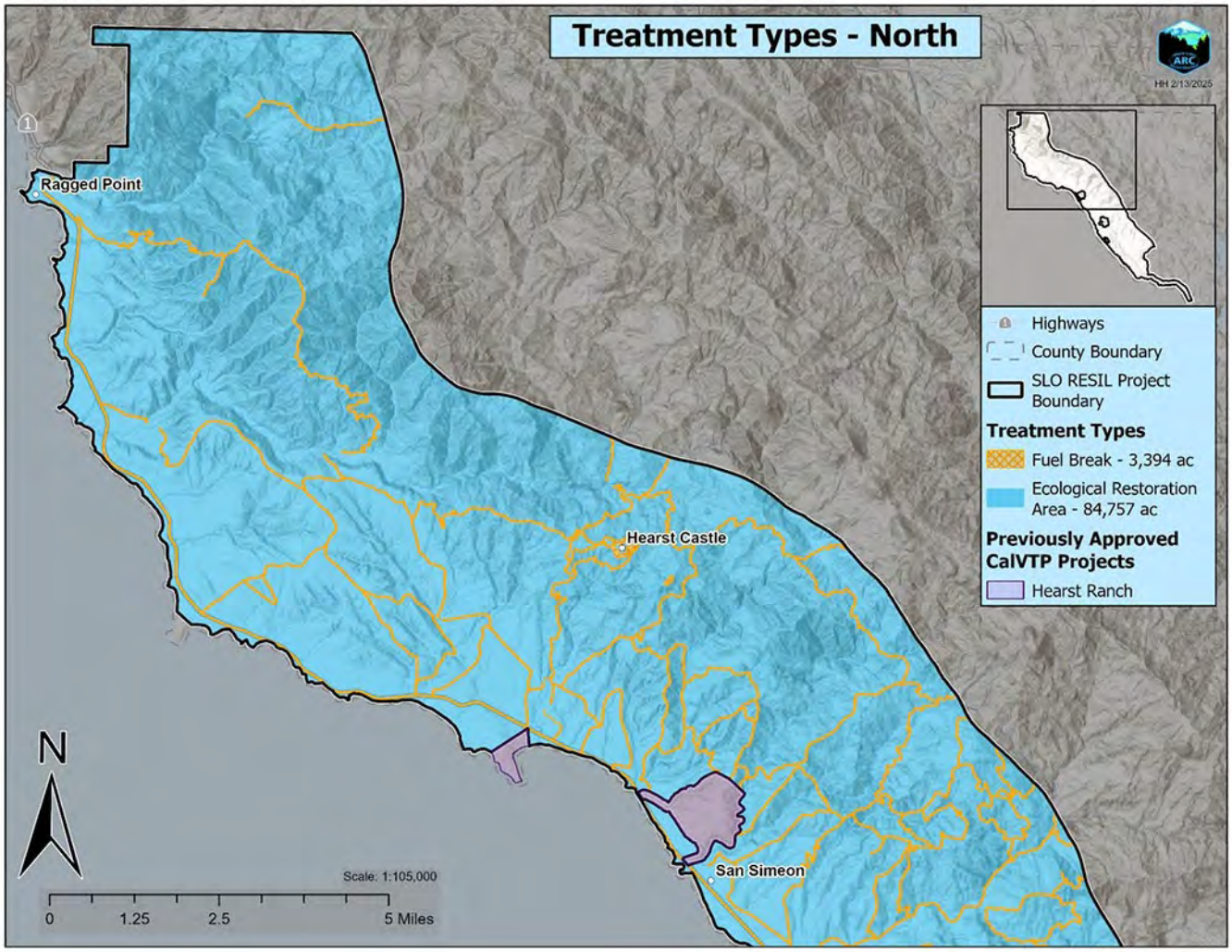
Implementation of treatments would require between 1 and 20 crew members depending on the treatment activity, along with their associated vehicles to travel to and from the treatment areas. Up to four crews may be conducting treatments simultaneously throughout the project area. Treatment activities would occur during the daytime consistent with San Luis Obispo county noise ordinance, typically between approximately 7:00 a.m. and 9:00 p.m. Monday through Friday, and 8:00 a.m. and 5:00 p.m. on Saturdays and Sundays, except for broadcast and cultural burning. It is anticipated that helicopter operations would occur within the same working hours as well and would not occur during nighttime hours. It is possible on occasion that some activities associated with prescribed burning and prescribed herbivory may occur outside these hours which would involve staying out at night to manage burns and grazing livestock for prescribed herbivory. Staffing levels during prescribed burns would be determined in a prescribed burn plan specific to each burn unit and would be sufficient to ensure that safety and burn objectives are met. Staffing levels would be consistent with the number of workers assumed in the CalVTP Program EIR.

Treatments would be scheduled annually during the term of the project, scheduled to begin in the fall of 2025 depending on funding, equipment/contractor availability, weather conditions, and other restrictions. Treatments could occur on any date that offers suitable conditions during the year, except during seasonal avoidance of sensitive resources. Targeted herbicide applications would generally avoid the wet season but could occur on any date that offers suitable conditions during the year, in accordance with the CalVTP SPRs, MMRP, Coastal VTS, and other applicable laws, and regulations. Prescribed burning may occur throughout the year, but would typically occur in fall, winter, or spring.



Source: ARC 2025.

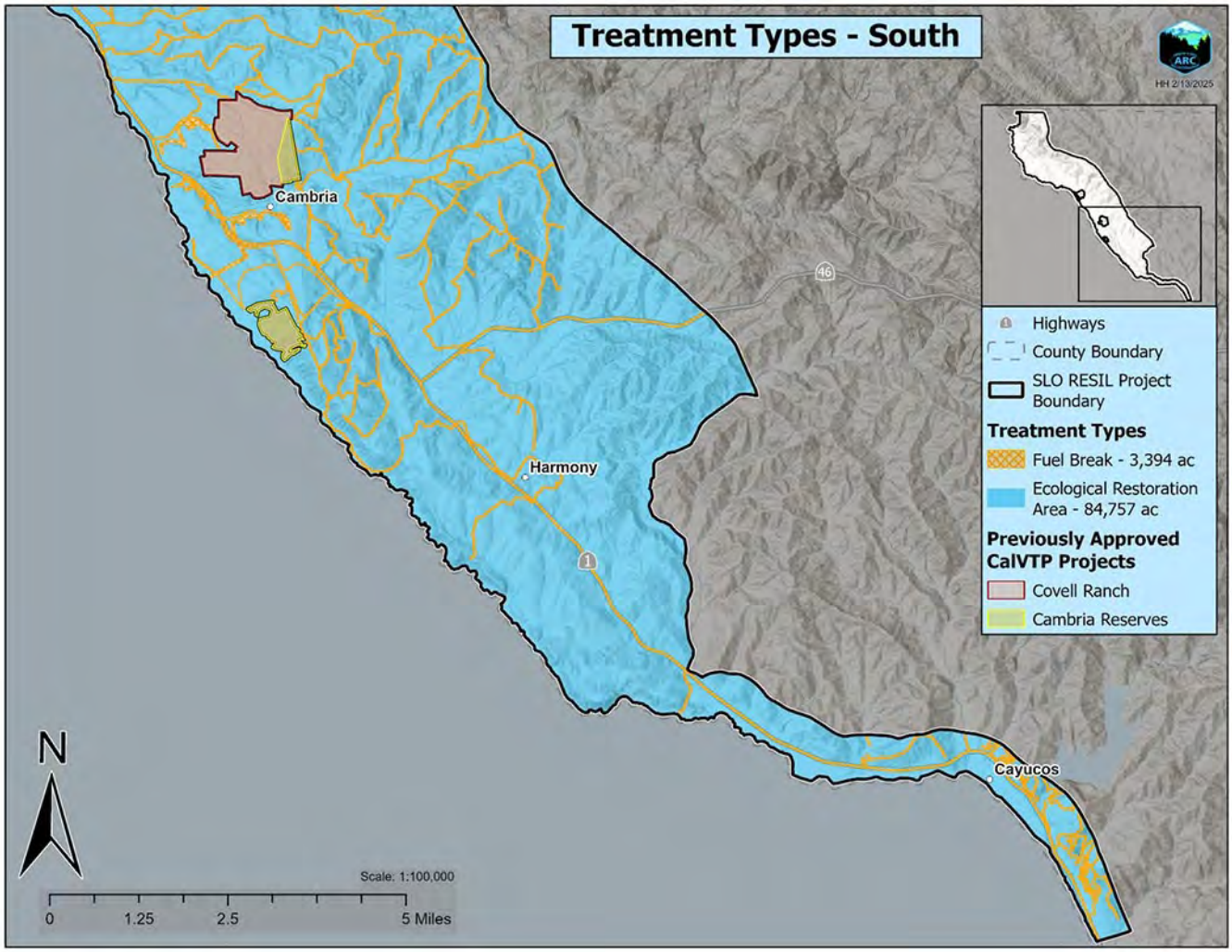
Figure 2-12 SLO-RESIL Treatment Boundary with Overlapping USGS 7.5-minute Quadrangles Labeled



Source: ARC 2025.

Figure 2-13 SLO-RESIL Treatment Types Map (Northern Extent)

Future treatment operations would be planned on a yearly basis, to the extent feasible, or as much in advance as possible pending funding availability, landowner support, and operational feasibility. Treatment planning would be strategic and result in implementation of (on balance) more treatments aimed toward achieving objectives primarily related to promoting forest health than treatments with objectives primarily related to preventing the ignition and spread of wildfire. USLTRCD would provide a public posting to the San Luis Obispo Monterey Pine Restoration Project (SLOMPRP) website (https://slomprp.org/) showing treatments implemented during the previous year (treatment type, acres, and a map) and the anticipated treatments to be implemented in the coming year. USLTRCD would balance the number of acres treated for forest health and fire prevention purposes over a 3-year period. The balance between the forest health treatments and fire prevention treatments would be tracked on an annual basis on the SLOMPRP website, which is publicly available. A 3-year period is appropriate to achieve the balance of at least 51 percent forest health treatments in total because planning to develop, fund, and conduct treatments requires more than one year. Also, implementation timing and duration is often controlled by working around weather and critical sensitive resources, which requires flexibility in planning over periods longer than one year.



Source: ARC 2025.

Figure 2-14 SLO-RESIL Treatment Types Map (Southern Extent)

Monterey Pine Habitat and Treatment

Monterey pine (*Pinus radiata*) forests and individual stands within the project area are highly variable but frequently observed as overstocked with excessive tree densities comprised of homogenous or dichotomous age structures and high loading of dead fuels. Reconnaissance level plot sampling in 2010 estimated average tree stocking levels of 400-500 trees per acre (TPA) in contiguous Monterey pine forest areas of Cambria (Staub et al. 2011). Landscape-level reconnaissance in November 2024 conducted by ARC Forestry indicated density levels of up to 1,000 TPA in some Monterey pine forests. Dense thickets of seedlings are often observed in sunlit openings (McDonald and Laacke n.d.). Understory composition in dense Monterey pine stands often exhibit low biodiversity and lack of natural regeneration due to crown densities limiting light penetration to the forest floor. This lack of sunlight coupled with significant competition for available nutrient and water sources typically produces mid-crown die off within the interior of the stand and an accumulation of downed, dead fuels on the forest floor. Duff accumulation in overstocked Monterey pine forests, without intermittent and historic low intensity fire, commonly exhibit depths of 6 inches above the topsoil surface (McDonald and Laacke n.d.), but fuel depths of 2-3 feet have been observed in dense stands with virtually complete canopy closure. Vertical and horizontal fuel continuities are evident and may be contiguously intermixed with hardwoods and other woody vegetation, exacerbating the risk of wildfire ignition and rapid spread.

Implementing treatments such as mechanical mulching of downed, dead, and high densities of live fuels, selective thinning, manual treatments supported by tracked chipping, or prescribed burning to achieve ideal residual spacing (10-

20 feet residual spacing, i.e., 10-20 feet between tree boles) and promote an ecological mosaic across treated areas would facilitate the long-term resilience and health of these rare forest types. Ecologically restorative treatments would be designed to protect and restore wildlife habitat by maintaining or creating a diverse range of habitat types, including older Monterey pines that promote future snag habitat and riparian corridors while also promoting the growth of native understory species, such as ferns, wildflowers, and shrubs, by creating canopy openings that allow sunlight to penetrate to the forest floor to create a more diverse and complex forest structure. Restoring a natural fire regime by conducting prescribed burning or allowing natural fires to occur in a controlled manner would help to reduce fuel loading, promote ecosystem diversity, maintain fire-resilience, and facilitate natural, fire-adapted ecological processes.

Mixed Conifer Habitat and Treatment

Mixed conifer forest habitat types in northern San Luis Obispo County are predominantly characterized by ponderosa pine and Jeffrey pine, intermixed with occurrences of gray pine, coulter pine (*Pinus coulteri*), incense cedar (*Calocedrus decurrens*), and white fir (*Abies concolor*). These forests typically occur on rugged terrain, with elevations ranging from 1,000 to 3,000 feet.

Conditions frequently observed in these forest types include high fuel loading and excessive accumulation of dead and live fuels, including dead trees, branches, and leaf litter, creating a continuous fuel bed that can support high-intensity, fast-moving wildfires. The understory is comprised of a dense layer of shrubs and small diameter (less than 8 inches diameter at breast height [dbh]) trees, often intermixed by shrub species like chamise (*Adenostoma fasciculatum*) and manzanita (*Arctostaphylos spp.*), which can serve as ladder fuels and facilitate fire spread into the crown. Many stands exhibit signs of declining forest health, high densities (approximately 500-700 TPA in some areas based on observations from landscape-level reconnaissance conducted in 2024), climatic stress, disease, and insect infestation, which can increase the stand's vulnerability to catastrophic wildfire. The lack of frequent, low-severity fires has led to a buildup of dead fuels and scarcity of natural regenerative processes dependent on disturbance, affecting the resilience and future composition and structure of these forest types. The combination of high fuel loading, dense understory, poor forest health, and limited natural regeneration creates an environment that is highly conducive to catastrophic wildfires and less resilient in the face of changing climates and increasing disturbance scales.

Reducing fuel loading through treatments such as mechanical mulching of downed, dead, and overly accumulated concentrations of fuels, selective thinning, pruning, and prescribed burning while maintaining an ecologically diverse, heterogenous mosaic and healthy residual spacing (10-20 ft between tree boles) can help reduce the risk of catastrophic wildfires and promote the long-term resilience and diverse composition of these mixed conifer forests.

Hardwood Forest Habitat and Treatment

Hardwood forests in northern San Luis Obispo County are primarily composed of coast live oak (*Quercus agrifolia*), valley oak (*Quercus lobata*), and blue oak (*Quercus douglasii*). These forests typically occur on gentle slopes and valley bottoms, with elevations ranging from 500 to 1,500 feet. The overstory is dominated by mature coast live oak and valley oak, with scattered blue oak and interior live oak (*Quercus wislizeni*). The understory is characterized by a mix of native shrubs, including toyon (*Heteromeles arbutifolia*), coffeeberry (*Rhus integrifolia*), and poison oak (*Toxicodendron diversilobum*). Tree spacing varies, but mature trees are typically spaced 20-40 feet apart, with a more open canopy structure allowing for a diverse understory. Smaller diameter oaks (less than 8 inches dbh) may be frequent in the mid- and lower-canopy ranges, connecting horizontal continuities of vegetation. Dead limbs on oaks in these stands are a common occurrence and often fall to the forest floor or remain locked up in the crown of the live portion of the tree. This provides both opportunities for habitat feature retention but also increased accumulation of ground and overstory fuels. A balanced approach to ecological restoration would promote and enhance hardwood forest regeneration and resilience.

Hardwood forests in northern San Luis Obispo County are often intermixed with other forest types, including mixed conifer forests dominated by ponderosa pine and Jeffrey pine at higher elevations. Chaparral, dominated by chamise and scrub oak (*Quercus berberidifolia),* on steeper slopes and drier sites, intermittently interact with hardwood-dominated forest types occurring on similar site conditions. Additionally, hardwood forests in this region are encroaching on native

grasslands, potentially shading out sensitive species and altering ecosystem processes. This encroachment is often driven by fire suppression and reduced fire frequency at low-intensities, and changes in land use and management practices.

Additionally, observable declines in the health of some hardwood-dominated forests within the project area may be due to the presence of Sudden Oak Death (SOD) *Phytophthora ramorum*. Recent data from SOD blitz show no positive results for SOD in 2024 (UC Berkeley 2025), and San Luis Obispo is currently not considered part of the Zone of Infestation on CAL FIRE Forest and Rangeland Assessment Program (FRAP) maps. There is some indication that it may have been found on California bay (*Umbellaria californica*) in 2016 and 2017 but appears unconfirmed on oak trees (*Quercus spp.)*. The reconnaissance survey identified some oaks that could be suffering from SOD but without more extensive sampling and tests, it is unknown how deep the spread may or may not be in San Luis Obispo County. Prescribed burn treatments (i.e., pile burning and broadcast burning) may be used in hardwood-dominated forests to promote forest health and native flora, improve resilience, mitigate disease, and reduce biomass and fuels. Prescribed burn areas may be treated with manual and mechanical treatments prior to burning to reduce fuel loads.

Overall, hardwood forests in northern San Luis Obispo County are complex ecosystems that provide important habitat for a variety of wildlife species. However, they are also at risk of stand-replacing wildfires and are encroaching on native grasslands, highlighting the need for sustainable management practices that balance ecosystem conservation with wildfire risk reduction. A healthy, resilient hardwood forest following treatment would exhibit characteristics of variable forest structure and residual densities ranging from 50-100 TPA, a diverse mosaic of native understory species, including wildflowers, grasses, and shrubs such as toyon and coffeeberry (*Rhus integrifolia*), and a diverse range of wildlife habitat features and refugia such as tree cavities, snags, mature trees, and riparian corridors.

Grass and Shrubland Habitat and Treatment

Grasslands and shrublands within the project area are both extensive and highly variable in terms of composition, topography, and history of land use. Historic Native American burning practices played a significant role in shaping the grasslands of northern San Luis Obispo County as an effort to promote food sources and maintain ecological balance in the region across centuries. Much of the existing grassland habitat today is characterized by more recent land use practices and climatic factors, primarily grazing by domestic livestock and intermittent drought. Common grasses that occupy these landscapes include purple needlegrass (*Stipa pulchra*), red fescue (*Festuca rubra*), and other native species. Wildflowers commonly observed include California poppy (*Eschscholzia californica*), lupine (*Lupinus spp.*), and owl's clover (*Castilleja, Orthocarpus, Triphysaria spp.*). Lower elevation grasslands and rangelands typically occur at 500-700 feet above sea level, whereas montane grassland communities in the region can be found at elevations up to 2,500-3,000 feet. Mid-elevation grasslands and meadows occur scattered throughout the project area as well. A vernal pool complex was observed within lower elevation grasslands at one location during SPR BIO-1 surveys; however, vernal pools are not common within the project area.

Treatments that would mimic the beneficial effects of a low to moderate intensity wildfire, would protect, expand, and improve native grassland habitats and reduce fuels through the removal of thatch, encroaching coyote brush (*Baccharis pilularis*), and invasive woody plants (e.g., French broom [*Genista monspessulana],* blue gum [*Eucalyptus globulus*]). Managed disturbance through prescribed burning and herbivory produce added benefits of nutrient cycling, phosphorous mobilization, and nitrogen fixation as a product of fire-following species regeneration. An additional component to ecologically restorative treatments in both grassland and shrubland communities is targeted invasive species removal and limited herbicide application to promote native species composition and regeneration.

The shrubland habitat in northern San Luis Obispo County has become densely overgrown, commonly observed as a monoculture of chamise or other shrub species dominating the landscape. Many areas currently dominated by chaparral and other shrublands exist on lands historically composed of native grasslands. Lack of frequent disturbance in these fire-adapted landscapes has resulted in vegetative characteristics involving high fuel loading, excessive accumulation of dead and dying shrubs creating a continuous fuel bed that can support intense wildfires, and a dense, impenetrable thicket that hinders wildlife movement and promotes fast fire spread in the region's predominant northwest-prevailing winds. Low biodiversity is common among homogenous shrubland stands with few native herbaceous species remaining. In general, the combination of high fuel loading, dense shrub cover, and low biodiversity has created a high-risk fire scenario, threatening local ecosystems, wildlife, and communities.

Ecological restoration treatments to promote a healthy and diverse mosaic of vegetation and mitigate the threat of wildfire in shrubland habitats may include selective manual and mechanical shrub thinning to reduce dense fuel continuities that limit native herbaceous species growth and dynamic wildlife habitat. Reduction of dead fuels and competition for water and nutrients among live vegetation may also be achieved through prescribed broadcast or pile burning to process treated material, ultimately promoting a diversity of ecological disturbance processes and maintaining fire-resilient vegetation. Installation of strategic fuel breaks in shrubland types is an added treatment approach necessary to maintain ingress and egress for fire suppression resources to protect the sensitive natural communities and habitats associated with these landscapes. Strategic fuel breaks allow for abatement opportunities in the event of fast-moving, high intensity fire behavior common in these vegetation types. Post-treatment characteristics of a healthy shrubland habitat include variable, well-distributed shrub cover across the landscape in a mosaic pattern that promotes biodiversity, patchy wildlife habitat and refugia, and efficient ecosystem function (e.g., competition dynamics, nutrient cycling, water flow, and soil formation processes).

Healthy, resilient grassland and shrubland habitats following ecologically restorative treatments play a crucial role in the landscape-scale, ecological mosaic of northern San Luis Obispo County. The dependence of the forested environment on these sensitive landscapes relates to the biodiversity, ecosystem connectivity, balanced fire regimes, carbon sequestration, and water and soil nutrient cycling processes they provide. Ecological restoration and fuel break treatments within these landscapes are designed to maintain and protect those ecosystem services and contribute to greater environmental resilience across the project area.

2.4.1 Treatment Type – Ecological Restoration

The ecological restoration treatment type is proposed for up to 84,757 acres within the project area. Ecological restoration treatment seeks to restore ecosystem processes, native forestland, meadowland and shrubland communities, and improve ecosystem resiliency through the removal of dead, dying, diseased, and unnaturally high-density forests, invasive species, and dense understory fuels. The proposed vegetation treatment activities for this treatment type are manual treatments, mechanical treatments, prescribed burning, prescribed herbivory, and targeted herbicide application.

Over the past 100 years, large extents of forestland, shrub communities, and oak woodlands within the project area have not experienced consistent, low-intensity fire within their natural fire return intervals. Many of these vegetation communities exhibit high forest density stand characteristics that include a high density of understory fuels and are transitioning towards less resilient systems (Cocking et al. 2012). The overaccumulation of fuels and vegetation in these contemporary ecosystems—resulting from a lack of historically-occurring disturbance (i.e., fire)—creates increased competition for the available water, nutrients, and sunlight, resulting in impaired or unhealthy vegetation that is more susceptible to environmental stressors (e.g., drought, disease, pests, and fire). Consequently, these vegetation communities may become more prone to cascading impacts that can reduce biodiversity, ecosystem function, and resilience to future, higher intensity disturbance. Therefore, the reduction of vegetative competition through ecologically restorative treatments would encourage natural forest succession by way of manageable disturbance, a diverse understory, and restored plant community types and native ecological conditions.

Additionally, reducing competition and increasing resource availability stimulates the growth of dominant and co-dominant trees, thereby influencing an increase in carbon storage in the larger diameter trees that comprise the residual forest (Dale et al. 2000). Furthermore, the implementation of proposed treatments can modify existing fuel loads to reduce the risk of stand-replacing fire events, in addition to inhibiting vegetation encroachment and transition. This would ultimately support the restoration of native vegetation, sensitive natural communities, and habitat conditions, such as improving habitat quality and re-establishing natural, low-intensity fire regimes.

In non-forested systems and ecologically sensitive communities, meadows, grasslands, and coastal shrubland, treatments focused on protecting or enhancing these habitat types may occur on a site-specific basis and could include activities designed to mitigate specific ecological impairments.

Treatment objectives may include reducing tree encroachment into coastal scrub communities and native grasslands, maintaining or enhancing the extent and resiliency of sensitive and rare habitat types such as Monterey pine and

Santa Lucia fir (*Abies bracteata*), and facilitating or maintaining natural fire return intervals in rare vegetative alliances and assemblages (e.g., *Arctostaphylos ssp.*). Ecological restoration treatments would provide ecological benefits and improve the habitat's fire resiliency and therefore are considered Forest Health treatments in the USLTRCD PWP. Additional detail is provided below for mechanical and manual treatment activities; additionally, ecological restoration treatments may include prescribed burning, prescribed herbivory, and targeted herbicide application (see Section 2.4.4, "Treatment Activities," for descriptions).

ECOLOGICAL RESTORATION TREATMENT TYPE: MECHANICAL PRESCRIPTION

The ecological restoration treatment type prescription applies to all vegetation types and was developed based on guidance from "Wildlife-Friendly Fuels Reduction in Dry Forest of the Pacific Northwest," from *Woodland Fish & Wildlife* (Strong and Bevis 2016), a document supported by multiple Pacific Northwest state and federal agencies, including the US Fish and Wildlife Service. Figure 2-15 depicts a representative example of the outcome of ecological restoration treatments.

Note: Example of a forest that has experienced decades of fire suppression and lack of ecological disturbance (left), compared to an example of a forest treated for resilience and habitat enhancement (right). Components retained in the treated stand include snags, legacy trees, openings, and patches of understory.

Source: Strong and Bevis 2016.

Figure 2-15 Representative Example of Ecological Restoration Treatments Outcome

The ecological restoration treatment type, consistent with the Coastal VTS, is designed to maintain or enhance habitat function for wildlife, protect special-status species and sensitive natural communities, and restore health and resilience to forested and non-forested landscapes pursuant to the following treatment prescription for mechanical treatment activities:

- Selectively remove live trees up to 8 inches diameter at breast height (dbh) with the goal of achieving a 10- to 20-foot residual spacing;
  - retain select healthy, live trees to reduce competition for available resources and reduce vertical and horizontal fuel connectivity;
  - thin stands made up of only trees less than 8 inches dbh to a spacing of approximately 10 to 20 feet apart to disconnect horizontal and vertical fuel continuity;
- retain existing habitat trees consisting of standing dead, snags, or live trees with dead portions of stems or branches, to provide habitat for wildlife (e.g., birds and beneficial insects) and a food source for birds and other wildlife. Where snags do not present a safety hazard, approximately four to six foraging snags (less than 14 inches dbh) and one to two cavity nesting snags (greater than 16 inches dbh) would be retained per acre;

- retain healthy hardwoods and conifers greater than 8 inches dbh with appropriate canopy spacing to achieve site goals (e.g., reduce fuel connectivity or increase the amount of sunlight on the forest floor);
- retain downed woody debris in strategic locations to maintain forest floor complexity, with a preference for larger, complex logs totaling approximately 10 tons per acre, while reducing fuel connectivity;
    - target retention for downed woody debris may also be considered as four larger logs (large end greater than approximately 16 inches dbh, approximately 15 feet long);
- prune lower branches of trees 6 to 15 feet from the ground, but do not prune more than 33 percent of the tree's crown where feasible;
- retain micro-stands of oak trees (i.e., young oak stands that do not have an established, dominant overstory) with a cluster radius of approximately 15 to 25 feet (30- to 50-foot diameter) and spaced approximately 75 to 100 feet apart, where feasible, with consideration given to steepness or whether this retention could exacerbate fire behavior, or fire behavior proximal to key infrastructure and assets;
- retain micro-stands of understory vegetation cover and composition that are characteristic of the vegetation alliance as described in the Manual of California Vegetation (Sawyer et al. 2009 or current version, including updated natural communities' data at http://vegetation.cnps.org/). Leave root systems intact for resprouting to achieve a horizontal crown separation of approximately 25 to 75 feet between clusters depending on site-specific characteristics relative to the vegetation alliance being treated, important habitat values, and potential fire behavior. Overall, a minimum of 10 to 25 percent absolute cover per acre of understory vegetation would be retained while maintaining the existing vegetation alliance as described in the Manual of California Vegetation. The percentage retained would depend on if exacerbated fire behavior is expected in proximity to key infrastructure and assets. Patches or clumps of vegetation would be retained across the treatment area to create a mosaic pattern to provide heterogeneity and maintain habitat quality (Strong and Beavis 2016);
- for appropriate chaparral and coastal sage scrub communities that are not sensitive natural communities, retain vegetation at a minimum of approximately 35 percent and a target of 50 percent in any chaparral-dominated area within the immediate contiguous stand boundary of the vegetation type within a treatment polygon in a mosaic pattern of patches or shrub islands to maintain a varied level of habitat continuity throughout the polygon, subject to retention standards required pursuant to treatment type, CalVTP SPRs and mitigation measures, and Coastal VTS. Additional considerations are required for sensitive natural communities.
- maintain root systems intact, where feasible, to allow for resprouting; mechanical treatments would target above-ground vegetation with the intent of keeping masticating heads out of duff layers and minimizing direct disturbance to subsurface soil layers, allowing intact root systems to resprout and minimizing impacts to burrowing wildlife;
- chipped biomass would generally average 3 inches in depth and not exceed approximately 6 inches in depth, off of roads and trails;
    - placement of chipped residual material would be prioritized on roads and trails where feasible and minimized in forest gaps or openings where increased biodiversity of herbaceous understory regeneration is more likely;
- mechanical treatments would not be conducted within wet meadows or WLPZs,
- treatments would be avoided within 300 feet of breeding habitat for northern elephant seals during the pupping season; however, if adequate natural visual or auditory buffers are provided by vegetation, topography, or other features, treatments may be conducted up to 50 feet from breeding habitat as determined by a qualified biologist;
- equipment may operate on slopes less than 50 percent;
- remove any dead, dying, and diseased trees pursuant to the vegetation hierarchy identified in the Coastal VTS; and
- prepare burn units for prescribed burning.

ECOLOGICAL RESTORATION TREATMENT TYPE: MANUAL PRESCRIPTION

The ecological restoration treatment type prescription applies to all vegetation types and was developed based on guidance from "Wildlife-Friendly Fuels Reduction in Dry Forest of the Pacific Northwest," from *Woodland Fish & Wildlife* (Strong and Bevis 2016), a document supported by multiple Pacific Northwest state agencies and federal agencies including the US Fish and Wildlife Service. Figure 2-15 depicts a representative example of the outcome of ecological restoration treatments.

The ecological restoration treatment type is designed to maintain or enhance habitat function for wildlife, protect special-status species and sensitive natural communities, and restore health and resilience to forested and non-forested landscapes pursuant to the following treatment prescription for manual treatment activities.

- Selectively remove live trees up to 8 inches dbh with the goal of achieving a 10- to 20-foot residual spacing;
  - retain select healthy, live trees to reduce competition for available resources and reduce vertical and horizontal fuel connectivity;
  - thin stands made up of only trees less than 8 inches dbh to a spacing of approximately 10 to 20 feet apart to disconnect horizontal and vertical fuel continuity;
- retain existing habitat trees consisting of standing dead, snags, or live trees with dead portions of stems or branches, to provide habitat for wildlife (e.g., birds and beneficial insects), and provide a food source for birds and other wildlife. Where snags do not present a safety hazard, approximately four to six foraging snags (less than 14 inches dbh) and one to two cavity nesting snags (greater than 16 inches dbh) would be retained per acre;
- retain healthy hardwoods and conifers greater than 8 inches dbh with appropriate canopy spacing to achieve site goals (e.g., reduce fuel connectivity or increase the amount of sunlight on the forest floor);
- retain downed woody debris in strategic locations to maintain forest floor complexity, with a preference for larger, complex logs, totaling approximately 10 tons per acre, while reducing fuel connectivity;
  - target retention for downed woody debris may also be considered as four larger logs (large end greater than 16 inches dbh, approximately 15 feet long);
- retain micro-stands of oak trees (i.e., young oak stands that do not have an established, dominant overstory) with a cluster radius of approximately 15 to 25 feet (30- to 50-foot diameter) and spaced approximately 75 to 100 feet apart, where feasible, with consideration given to steepness or whether this retention could exacerbate fire behavior, or fire behavior proximal to key infrastructure and assets;
- prune lower branches of trees 6 to 15 feet above the ground, but would not prune more than 33 percent of the tree's crown where feasible;
- retain micro-stands of understory vegetation cover and composition that are characteristic of the vegetation alliance level standards (membership rules) as described in the Manual of California Vegetation (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/) to avoid unintended habitat conversion. Leave root systems intact for resprouting to achieve a horizontal crown separation of approximately 25 to 75 feet between clusters depending on site specific characteristics relative to the vegetation alliance being treated, important habitat values, and potential fire behavior. Overall retention per acre would be a minimum of 10 to 25 percent absolute cover per acre of understory vegetation would be retained while maintaining the existing vegetation alliance as described in the Manual of California Vegetation. The percentage retained would depend on if exacerbated fire behavior is expected or proximity to key infrastructure and assets. Patches or clumps of vegetation would be retained across the treatment area to create a mosaic pattern to provide heterogeneity and maintain habitat quality (Strong and Beavis 2016);
- for appropriate chaparral and coastal sage scrub communities that are not sensitive natural communities, retain vegetation at a minimum of approximately 35 percent and a target of 50 percent in any chaparral-dominated area within the immediate contiguous stand boundary of the vegetation type within a treatment polygon in a mosaic pattern of patches or shrub islands, to maintain a varied level of habitat continuity throughout the

polygon, subject to retention standards required pursuant to treatment type, CalVTP SPRs and mitigation measures, and Coastal VTS. Additional considerations are required for sensitive natural communities.

- maintain root systems intact, where feasible, to allow for resprouting, allowing intact root systems to resprout and minimizing impacts to burrowing wildlife;
- chipped biomass would generally average 3 inches in depth and not exceed approximately 6 inches in depth off of roads and trails;
    - placement of chipped residual material would be prioritized on roads and trails where feasible, and minimized in forest gaps or openings where increased biodiversity of herbaceous understory regeneration is more likely;
- manual treatments would be conducted within wet meadows or WLPZs;
- treatments would be avoided within 300 feet of breeding habitat for northern elephant seals during the pupping season; however, if natural buffers are provided by provided by vegetation, topography, or other features, treatments may be conducted up to 50 feet from breeding habitat as determined by a qualified RPF or biologist;
- may remove any dead, dying, and diseased trees pursuant to the vegetation hierarchy identified in the Coastal VTS; and
- prepare burn units for prescribed burning.

2.4.2 Treatment Type – Fuel Breaks

Fuel breaks create zones of vegetation removal, often in a linear layout, which reduces wildfire risk and support fire suppression efforts by providing responders with a staging area or access to a remote landscape for fire control actions. Fuel breaks also provide safe emergency access/egress during wildfires, can reduce high severity fire exposure to homes, reduce the likelihood of severe fire occurring within treated areas by minimizing ignition potential, and serve to reduce environmentally sensitive habitat areas (ESHAs) from experiencing significant ecological damage by reducing contiguous vegetation across ridges and also vegetation continuity across roads.

A Geographic Information Systems (GIS) analysis was conducted across 88,151 acres to identify important locations to consider the placement of strategic fuel breaks based on prevailing wind, population density, access for firefighting equipment and personnel, critical infrastructure, topography, vegetation types, protection of sensitive natural communities, watercourses, and slope, resulting in a draft map that was considered and reviewed by CAL FIRE and other fire behavior specialists. Based on their comments, additional changes were made to create a final proposed fuel break map (see Treatment Types map; Figures 2-13 and 2-14). It can be assumed that not all of these fuel breaks would be installed or maintained over time. Instead, it can be expected that critical fuel breaks would be identified within the fuel break treatment type mapped for this project and treated and maintained over time, not exceeding 3,394 acres representing less than 4 percent of the total project area.

Fuel breaks would be established and maintained using varying combinations of manual treatments, mechanical treatments, prescribed burning, prescribed herbivory, and targeted herbicide treatments. Larger healthy trees would be promoted and remain as shade in forested areas of fuel breaks allowing for the removal of dead, dying and diseased trees. Within non-shaded fuel breaks, it can be expected that treatments in the understory or shrubland communities would be more frequent and remain in a regenerative state where treatments may occur there with greater frequencies (i.e., three, five, or ten years) than with ecological restoration or shaded fuel break treatments. These treatment areas would maintain, or restore, current habitat types and vegetation conversion shall not occur. Essentially, understory treatment areas in non-shaded fuel breaks would be maintained in a younger regenerative state exhibiting fresh young growth from remaining root systems. This younger vegetative state is much less likely to burn at high fire severities expected from fire behavior out of older stands of shrubland. Most, if not all, stands of shrubland in the project area are well outside of natural fire return intervals, with significant fuel accumulations including duff and downed woody debris layers that would exacerbate fire severity and fire spread across the landscape through excessive ember cast.

NON-SHADED FUEL BREAKS

Non-shaded fuel breaks are proposed in strategic locations as a crucial component of SLO-RESIL to create opportunities where fire can be stopped from spreading from one watershed to the next to reduce devastating impacts not only to human populations but to sensitive habitats, forested and non-forested, and the plants and wildlife that depend on these habitats. Non-shaded fuel breaks along ridges, roads, and trails promote access (ingress/egress) or escape routes for fire suppression resources and residential communities in strategic areas.

Non-shaded fuel break treatments in the project area would be approximately 100 feet wide, 50 feet radially from roads, or 100 feet wide up or downslope from residential communities. In addition, there are several critical locations near communities and historic structures (e.g., Hearst Castle and adjacent to human communities) where fuel break treatments would be up to 300 feet wide (wider treatment areas identified on the Treatment Types map consist of approximately less than 200 acres total out of the entire 88,151 project area acres; Figures 2-13 and 2-14). The width of a fuel break is relative to the potential losses of critical assets as determined by fire professionals (i.e., historic irreplaceable structures or infrastructure including homes or human life). Non-shaded fuel breaks are proposed on up to 2,758 acres of the 3,394 acres of fuel breaks and are proposed along main highways, next to residential communities, and along primary access routes. Non-shaded fuel breaks would occur exclusively in non-forested areas without an existing overstory (i.e., predominantly grassland [2,125 acres]) and would not be implemented in forested areas with an existing overstory where shaded fuel breaks might occur (greater than 10 percent canopy cover). A minimal amount of chaparral (60 acres) and coastal scrub (339 acres) vegetation types may be included in the non-shaded fuel break treatments if they are not sensitive natural communities with S1, S2, or S3 rarity ranks, which are excluded, to the extent feasible, from fuel break treatments by the SPRs and Coastal VTS. Non-shaded fuel breaks would be implemented and maintained through a combination of manual treatments, mechanical treatments, prescribed burning, prescribed herbivory, or targeted herbicide application.

Within non-shaded fuel breaks selective shrubs would be retained at densities that allow for the purpose and efficacy of this treatment type. Spacing of retained shrubs would be dependent on site-specific conditions (slope, aspect) and would be determined based on the flame length, fuel loading, and species composition within the existing alliance. In addition, the root systems of removed shrubs would be retained. Retaining the existing vegetation in a regenerative state by removing select shrubs and leaving root systems predominantly intact following initial and maintenance treatments would promote natural regeneration and is intended to mimic post-fire conditions. Non-shaded fuel breaks would also be cleared of standing dead, dying, and diseased vegetation including downed woody debris.

Non-shaded fuel breaks would primarily remove flammable vegetation to slow wildfire spread, create staging areas for safe firefighting efforts, and protect adjacent habitat, while also providing ecological benefits such as removal of nonnative species. Residual vegetation following initial and maintenance treatments would likely have greater spacing than that of an area treated under the ecological restoration treatment type and would be subject to applicable CalVTP SPRs and mitigation measures and the Coastal VTS. It can be expected that maintenance treatments in non-shaded fuel breaks would be more frequent than in ecological restoration treatment types with the intent of maintaining the purpose and efficacy of this treatment type; however, maintenance frequency would be timed to allow sufficient regeneration to allow the seedbank to persist.

Some non-shaded fuel break buffers would extend slightly into forested areas because of their strategic locations. In these forested areas, there may be less retention in fuel break treatment types than in the ecologically restorative treatment type with additional understory tree and vegetation treatments.

Non-shaded Fuel Break Treatment Type – Mechanical Prescription

- Remove any dead, dying, and diseased shrubs or trees;
- remove live trees up to 8 inches dbh;
- prune lower branches of trees;
- selectively remove shrubs leaving root systems intact;
- masticate or chip biomass for disposal;
- retain chipped biomass at an average of 3 inches in depth and not exceed approximately 6 inches in depth off of roads and trails;

- placement of chipped material would be prioritized on roads and trails where feasible, and minimize chipped residual material in openings where increased biodiversity of herbaceous understory regeneration is more likely;

- do not conduct mechanical treatments within wet meadows or WLPZs unless equipment can reach from an existing road; and
- treatments would be avoided within 300 feet of breeding habitat for northern elephant seals during the pupping season; however, if natural buffers are provided by provided by vegetation, topography, or other features, treatments may be conducted up to 50 feet from breeding habitat as determined by a qualified RPF or biologist.

Non-shaded Fuel Break Treatment Type – Manual Prescription

- Remove any dead, dying, and diseased trees;
- remove live trees up to 8 inches dbh;
- prune lower branches of trees;
- selectively remove shrubs leaving root systems intact;
- masticate or chip biomass for disposal;
- retain chipped biomass at an average of 3 inches in depth and not exceed approximately 6 inches in depth off of roads and trails;
    - placement of chipped residual material would be prioritized on roads and trails where feasible, and minimized in openings where increased biodiversity of herbaceous understory regeneration is more likely;
- treatments would be avoided within 300 feet of breeding habitat for northern elephant seals during the pupping season; however, if natural buffers are provided by provided by vegetation, topography, or other features, treatments may be conducted up to 50 feet from breeding habitat as determined by a qualified RPF or biologist; and
- conduct manual treatments within wet meadows and WLPZs.

SHADED FUEL BREAKS

Shaded fuel breaks are proposed on up to 636 acres of the 3,394 acres of fuel breaks along main highways, next to residential communities, and along primary access or escape routes. Shaded fuel break treatments in the project area would be approximately 100 feet wide, 50 feet radially from roads, or 100 feet wide up or downslope from communities. In addition, there are several critical locations near communities and historic structures (e.g., Hearst Castle and adjacent to human communities) where shaded fuel break treatments may occur on up to 300 feet wide (wider treatment areas identified on the Treatment Types map consist of approximately less than 200 acres total out of the entire 88,151 project area acres; Figures 2-13 and 2-14). Shaded fuel break areas promote residual forest conditions that would further support the establishment of control lines for prescribed burning and/or improve ingress and egress for emergency vehicles and protect evacuation routes for forested residential communities.

Shaded fuel breaks are designed to retain an overstory canopy. Larger healthy trees would be promoted and remain as shade in forested and riparian areas following the selective thinning of smaller diameter trees, dense accumulations of live understory fuels, and dead, dying, and diseased trees and shrubs. Small diameter trees, shrubs, and intermittent downed woody material would be retained in a mosaic pattern that promotes wildlife refugia and habitat while also maintaining the efficacy of the fuel break. Enhanced shaded conditions in the correct conditions can reduce the light penetration through the retained canopy to the ground, which would further support the establishment of control lines for prescribed burning and improve ingress and egress for emergency vehicles and community evacuation routes. Shaded fuel breaks provide cooler understory conditions with higher soil moisture content than that of non-shaded fuel breaks, and are more conducive to shade-dependent herbaceous plants and hydrophytic species such as ferns, sedges, and native forbs. Shaded fuel breaks also provide post-disturbance ecological benefits (edge effect, succession, and landscape heterogeneity) and improve the habitat's fire resiliency; therefore, these treatments are considered Forest Health treatments in the USLTRCD PWP.

Shaded Fuel Break Treatment Type – Mechanical and Manual Prescription

Mechanical and manual treatment prescriptions will follow the treatment prescriptions under ecological restoration for mechanical and manual treatment activities, as provided above under Section 2.4.1, "Treatment Type – Ecological Restoration."

2.4.3 Consistency with Coastal Vegetation Treatment Standards

The CalVTP Program EIR provides an efficient mechanism for CEQA compliance for vegetation treatment projects. USLTRCD's PWP is a companion to the CalVTP that provides Coastal Act compliance for ecological restoration projects that meet certain standards for protection of sensitive coastal resources (i.e., Coastal Vegetation Treatment Standards [VTS]). The PWP requires compliance with the Coastal VTS, which details additional information about project design standards for projects within the Coastal Zone. All projects undertaken through the PWP would adhere to the Coastal VTS for projects in the Coastal Zone and all other Project Standards in Chapter 4 of the PWP. These standards were developed through extensive collaboration between USLTRCD, Coastal Commission staff, San Luis Obispo County Planning and Building Department, CAL FIRE, and the San Luis Obispo County Fire Safe Council (SLO FSC). This PSA/Addendum addresses the components of the CalVTP as required pursuant to CEQA and includes information that responds to the Coastal VTS for USLTRCD as required pursuant to the Coastal Act and PWP. Attachment B of this PSA/Addendum provides documentation that the proposed project is consistent with the Coastal VTS.

2.4.4 Treatment Activities

The proposed ecological restoration treatment activities are manual treatments, mechanical treatments, prescribed burning, prescribed herbivory, and herbicide application (Table 2-2). Although it may be used as an initial treatment activity, prescribed herbivory would predominantly be used as a maintenance treatment. Biomass would be disposed of through masticating, chipping, mulching, piling and burning, lopping and scattering, broadcast burning, air curtain burning, or hauling to an area outside the treatment area. Each of these activities is included in the CalVTP Program EIR and is described in more detail below. Treatments would be implemented with adherence to environmentally protective CalVTP SPRs and mitigation measures and the Coastal VTS per the approved PWP. These measures may include surveys, no-disturbance spatial buffers, limited operating periods, additional habitat retention requirements, and engagement with state and federal wildlife agencies. Additionally, treatments would be subject to other project requirements for tribal consultation, sensitive natural communities, and neighboring communities.

Table 2-2 CalVTP Treatment Activity Descriptions and Proposed Acreages

CalVTP Treatment Activity	Equipment Used for Treatments	Typical Duration of Treatments	Maximum Treatment Size (acres)
Manual Treatment	Chainsaws, hand saws, brush cutters, pole saws, hand lopping tools, shovels, weed wrenches, weed whips, machetes, pruning shears, other hand tools and hand-operated power tools, and passenger vehicle(s)/all-terrain vehicle(s).	1 week to 6 months	88,151
Mechanical Treatment	Tracked or wheeled masticators (i.e., skid steers or excavators with masticating heads), tracked and tow behind chippers, bull dozer or tractor with brush rake, feller buncher, crushing roller, loader with bucket and thumb attachments to pile material for burns or chipping, wheeled skidders, fire suppression vehicles and equipment (i.e., water apparatus, hand tools, etc.), and passenger vehicle(s)/all-terrain vehicle(s). The acreage excludes slopes greater than 50% and wetland and riparian areas.	1 week to 1 year	61,867
Prescribed Burning – Broadcast Burning	Drip torch/terra torch, aerial ignition devices, water tender, excavator, fire suppression vehicles and equipment (i.e., water apparatus, fire engines, bull dozers, tractors, skidders, mowers, loader, excavator, hand tools, etc.), and passenger vehicle(s)/all-terrain vehicle(s).	1 day to 2 weeks	88,151

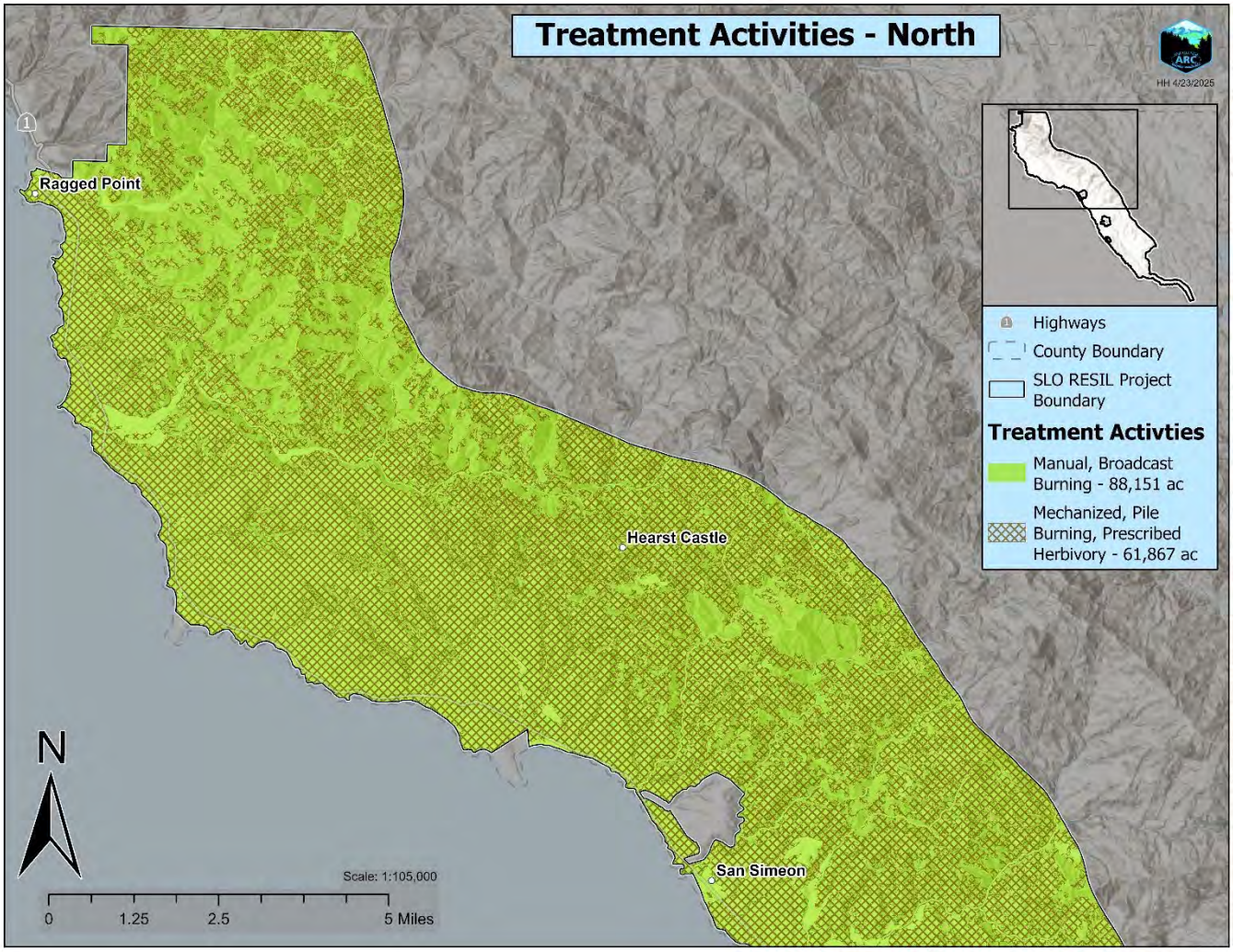
CalVTP Treatment Activity	Equipment Used for Treatments	Typical Duration of Treatments	Maximum Treatment Size (acres)
Prescribed Burning – Pile Burning and Portable Biomass Processing Technologies	Drip torch/terra torch, aerial ignition devices, water tender, excavator, fire suppression vehicles and equipment (i.e., water apparatus, fire engines, bull dozers, tractors, skidders, mowers, loader, excavator, hand tools, etc.), air curtain burner, carbonator, and passenger vehicle(s)/all-terrain vehicle(s). The acreage excludes slopes greater than 50% and wetland and riparian areas.	1 day to 1 month	61,867
Prescribed Herbivory	Electric fencing, 10 to 500 head of livestock, water trailer, herding animals (i.e., dogs), and passenger vehicle(s)/all-terrain vehicle(s). The acreage excludes wetland and riparian areas. The acreage excludes slopes greater than 50% and wetland and riparian areas.	1 day to 1 week	61,867
Herbicide Application	Batch truck, application devices (i.e., backpack sprayer, manual brush applicator), and passenger vehicle(s)/all-terrain vehicle(s).	1 day to 2 weeks	Up to 3,394*

*Targeted herbicide application may be considered to manage nonnative or invasive species, often through cut stump treatments, and is predominantly expected to occur in the fuel break treatment type near roads and trails. Therefore, the actual treatment area for herbicide application may be substantially less than 3,394 acres. Herbicides would not be applied within wet meadows or Watercourse and Lake Protection Zones and generally are a last effort when other treatment activities are not effective.

MECHANICAL TREATMENTS

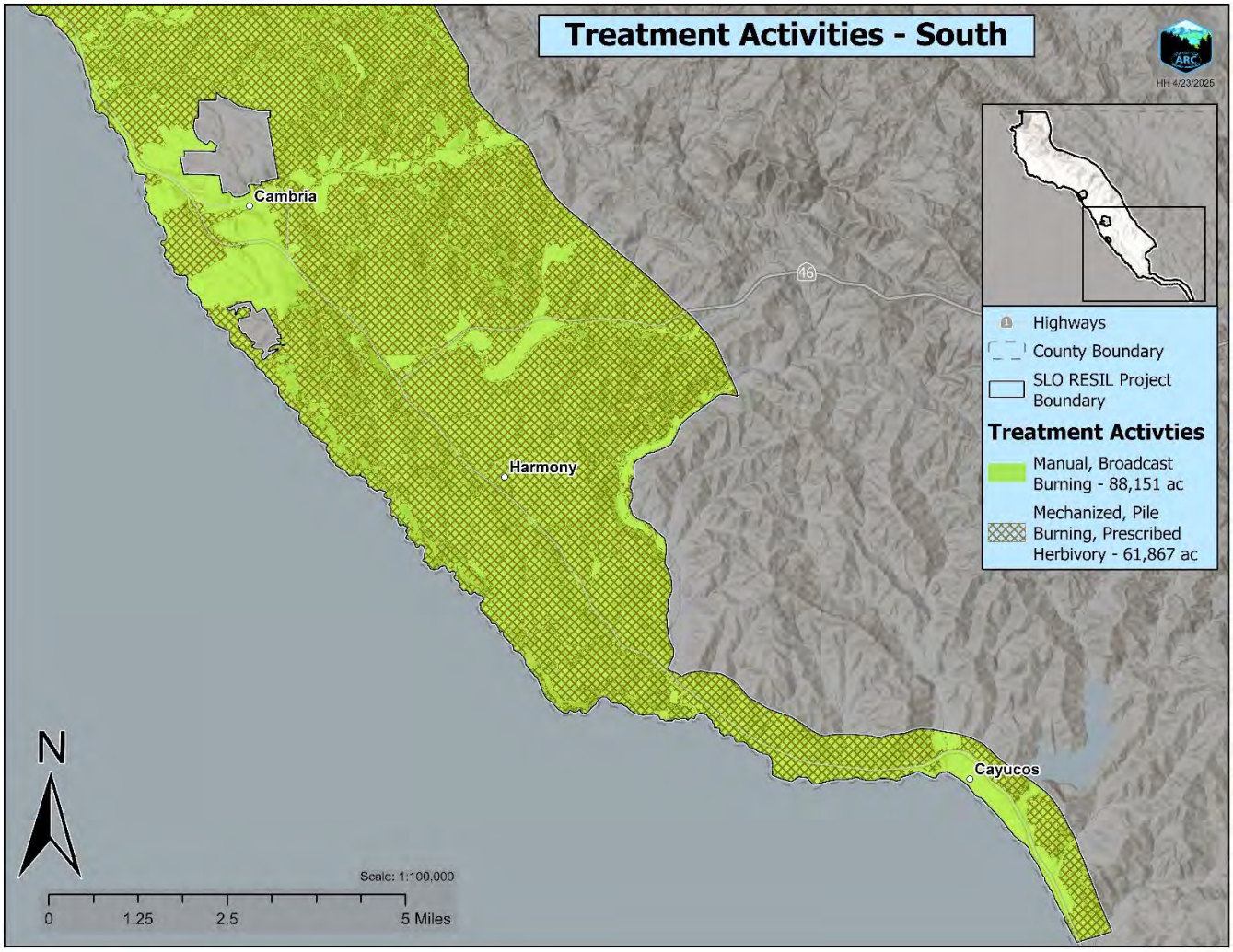
Mechanical treatments (Figure 2-18) could occur on up to 61,867 acres proposed for treatment over the lifetime of the project (Figures 2-16 and 2-17) and would primarily include understory thinning with a processing feller buncher, skidder, skid steer, excavator with masticating head, tracked or tow-behind chipper, crushing masticator, or dozer. Mechanical treatments would typically require between one and 50 crew members, and multiple crews could be active simultaneously depending on production objectives and treatment area sizes.

Low-pressure, smaller tracked equipment (30,000 pounds) may be utilized when operating from existing roadways or where access limitations of smaller equipment prevents operators from maintaining a level of operational efficiency. Although mechanized equipment for these types of projects can weigh between 15,000 – 60,000 pounds on average, the weight is distributed evenly through the large surface area of the equipment's tracks, resulting in relatively low ground pressure; typically ranging between 4-8 pounds per square inch (PSI). For context, the average human produces roughly 8 psi, a sedan produces 30 psi, and a mountain bike tire produces 40 psi. Furthermore, masticators would access treatment areas from existing roads and in certain situations operate on slopes up to 50%. Resulting mastication would leave a layer of mulch behind to minimize erosion and suppress weed invasion, while allowing existing native species to resprout and colonize the area. Operators working in smaller enclosed air-conditioned cabs are nimbler in the forest, resulting in lower damage to the residual forest stand and increasing worker safety. General production rates average approximately one acre per day, per piece of tracked equipment. Current costs have recently ranged between $2,000 - $4,000 per acre (prevailing wage indicated on the upper end). Typical equipment types suitable for ecologically restorative mechanical treatment operations are shown in Figures 2-19 and 2-20.



Source: ARC – ESRI 2025.

Figure 2-16 SLO-RESIL Treatment Activities (Northern Extent)



Source: ARC – ESRI 2025.

Figure 2-17 SLO-RESIL Treatment Activities (Southern Extent)

Source: Photographs taken by Riley McFarland – ARC in 2022.

Figure 2-18 Example of mechanized treatments before (left) and after (right) implementation at Covell Ranch in Cambria, CA

Source: Photographs taken by Shelby Kranich – ARC in 2022.

Figure 2-19 Examples of Mechanized Equipment: Fecon FTX 128 Series Compact Track Loader with Masticating Head Attachment (Left) and Morbark Beever M15R Tracked Chipper (Right)

Source: Photograph taken by Shelby Kranich – ARC in 2024.

Figure 2-20 Example of Mechanized Equipment: Link-Belt 145 x 4 Excavator with Masticating Head Attachment

MANUAL TREATMENTS

Manual treatments (Figures 2-21 and 2-22) would occur on up to 88,151 acres proposed for treatment over the lifetime of the project. Treatment methods would primarily include hand thinning and pruning target vegetation to reduce ladder fuels and increase space between trees, as well as hand piling removed vegetation. Equipment would include chain saws, pole saws, weed trimmers, and other hand-operated tools as well as remote- or manually-operated tracked chippers. Manual treatments would typically require between one and 50 crew members; however, crews would typically include between two and 10 personnel. Chippers may also be used.

Manual treatments consist of conducting physical labor to remove trees and shrubs as well as understory vegetation with various hand operated equipment. This type of treatment is often utilized in sensitive areas around watercourses, often steeper slopes (>40%), near cultural resources, sensitive natural communities, or other key aesthetic areas. General production rates average approximately ½ to 1 acre per day for a crew of approximately 10 to 20 people. Current costs have ranged between $5,000 and $18,000 per acre (prevailing wage indicated on the upper end). Manual treatments are favored when sensitivity is required over a relatively small operational treatment area, or where access of larger equipment is infeasible. Specifically, manual treatment can be favored when fine-scale shifts in treatments are required, such as preparing prescribe fire burn plots or operating around sensitive infrastructure and resources. Since prescribed burning treatments often utilize existing topographical features (e.g., ridgetops) for control lines, and because control lines can be tailored to the fuel size and expected flame lengths, manual treatments can allow for these fine-scale shifts in control line width or when specific trees or other vegetation need to be removed, modified, or retained.

Source: Photograph taken by Riley McFarland – ARC in 2022.

Figure 2-21 Example of Post-Manual-Treatments at Covell Ranch in Cambria, CA Utilizing Chainsaws and a Tracked Chipper

Source: Photograph taken by Spencer Gordon – USLTRCD in 2024

Figure 2-22 Example of Post-Manual-Treatments at Rancho Marino Reserve in Cambria, CA Utilizing Chainsaws and Piling for Burning

PRESCRIBED BURNING

Prescribed burning, which consists of pile burning on up to 61,867 acres and broadcast burning on up to 88,151 acres, over the lifetime of the project. Use of prescribed burning would be used to promote ecosystem health and native flora and reduce biomass and fuel loading in grassland, woodland, shrubland, and forest vegetation. Pretreatment of vegetation using mechanical or manual activities may occur, where necessary, in areas proposed for broadcast burning. Broadcast burning may also require the use of helicopters equipped with a helitorch for aerial ignition. Broadcast burning across ecosystem types in the project area would help restore historic fire intervals, reduce fuel loads, and rejuvenate diverse understory species.

Barriers to prescribed burning include a lack of fire trained personnel, inconsistent and infrequent weather windows, as well as the risk and liability associated with the practice. In order for prescribed burning operations to occur successfully, the management entity needs to have an approved burn plan, the appropriate equipment, trained personnel, and specific environmental conditions to achieve management goals.

USLTRCD or CAL FIRE would only implement prescribed burning during appropriate burn windows (typically fall, winter, spring, and early summer) when environmental conditions (windspeed, weather forecast, fuel moisture) are conducive. Air Pollution Control District and CAL FIRE would issue permits as necessary and be notified prior to all prescribed burning activities implemented under this project. Prescribed burning involves the use of intentionally ignited fire, under predetermined environmental conditions, to meet predetermined management objectives. Treatments would be avoided within 300 feet of breeding habitat for northern elephant seals during the pupping season; however, if natural buffers are provided by provided by vegetation, topography, or other features, treatments may be conducted up to 50 feet from breeding habitat as determined by a qualified RPF or biologist.

Broadcast Burning

Broadcast burning involves spreading fire through a continuous, or nearly continuous, fuel bed consisting of slash, surface litter, duff, or other vegetative biomass. Broadcast burning (Figure 2-23) utilizes well defined boundaries including roads, trails, control lines, or distinct environmental shifts to apply fire generally to the entirety of a predetermined area. Costs for prescribed burning operations are extremely variable based upon the size, type, and complexity of vegetation being burned from $2,600 per acre to $18,000 per acre. Typically, the cost per acre of broadcast burns decreases significantly as you increase the size of the burn or if CAL FIRE implements the burn. However, when completed successfully, broadcast burning can occur generally irrespective of slope and access and can allow land managers to effectively manage lands that would otherwise be infeasible with handwork or mechanized equipment, and in a manner that minimizes soil disturbance and other adverse environmental impacts.

Understory burns would be implemented in accordance with a Burn Plan that defines the desired maximum flame lengths and fire spread rates based on the fuel types, weather, slopes, aspect, staffing levels, and containment lines. Interior portions of prescribed burns may exceed the prescribed flame lengths planned at the control lines, but the overall prescription would be designed to safely contain the fire within the planned fire perimeter.

Broadcast burning would require between 10 and 60 crew members, depending on size and site characteristics of the burn unit. Typically, each burn would last one day to two weeks. Most burns would likely not exceed 1,000 acres in size, and many would be substantially smaller. Equipment would include dozers, water trucks, fire engines, and chainsaws. All burning would occur in accordance with regulations regarding the use of prescribed burning and pursuant to an approved burn plan and smoke management permit.

Firing devices may include drip torches and other industry standard and accepted firing devices, such as a Terra Torch, aerial ignition devices attached to an Unmanned Aerial Vehicle (UAV or drone) or the bottom of a helicopter (e.g., Heli-Torch), or aerially applying fuel-filled ping pong balls that ignite when they make ground contact (e.g., Plastic Sphere Dispenser) and other commonly used forms of ignition starts for prescribed burning. Additionally various sizes of fire engines may be utilized as control measures, as well as heavy equipment staged along control line roads in the event emergency measures are required. (More information on these types of equipment can be found at https://www.youtube.com/watch?v=aVX638rlpoY; https://www.youtube.com/watch?v=kxXMEglpJD8; https://www.youtube.com/watch?v=3iPNOw-oQgo.)

Vegetative outcomes of prescribed broadcast burning are variable depending upon the pre-existing conditions and timing of application. Typically, understory broadcast burn operations occur in late Fall or early Winter, with the goal of reducing understory vegetation and duff and litter depths. Grassland burns typically occur in Fall, following slight precipitation, with the goal of burning the thatch layer of annual grasses and promoting native perennial grass and forb growth. Finally, chaparral burns typically occur in late Spring, when live fuel moisture is high, but dead fuels are dry enough to facilitate consumption. However, burns would occur throughout the year opportunistically as conditions allow.

Source: Photograph taken by Alex Michelle – Central Coast Prescribed Burn Association in 2022.

Figure 2-23 Example of Broadcast Burning in Oak Woodland at Santa Lucia Conservancy in Carmel Valley, CA

Pile Burning

Biomass from mechanical and manual treatments could be piled using equipment (e.g., skid steer, tractor, bulldozer, excavator) or hand crews and burned appropriately (Figure 2-24). Machine pile burning would occur in areas with little to no live overstory, and hand piles would be placed to avoid adverse effects on desired retention tree species. Machine piles would be limited to approximately 12 piles per acre in coastal prairie. The number of piles per acre in other ecosystems would depend on the amount of biomass to be piled and the spacing from other piles and residual trees and vegetation. Generally, machine piles would be approximately 20 feet by 20 feet in area and 15 feet in height. Pile burning would not occur in wet meadows or within WLPZs.

Fire exclusion over the past century has conditionally created increased vegetation and stem densities across all habitat types, including coastal prairies. While efforts would be made to reduce soil impacts from piles burned in these coastal prairies, some burning would be required to protect these meadows from further conifer and shrub encroachment. Hand piles would be approximately 10 feet by 10 feet in area and 10 feet in height and would be placed away from the dripline of trees and outside of special-status plant buffers.

Source: Photograph taken by Chloe Knowd – ARC in 2024.

Figure 2-24 Example of Pile Burning in Redwood Forest at Soquel Demonstration State Forest in Santa Cruz County, CA

Additionally, portable biomass processing technologies (e.g., air curtain burners, carbonator) may be used. They are designed to consume biomass quickly and efficiently with a substantial reduction in smoke compared to pile burning (refer to additional information in Section 4.3, "Air Quality," and 4.7, "Greenhouse Gas Emissions"). Mitigation Measure GHG-2 in the CalVTP Program EIR requires project proponents to implement feasible methods, including the use of air curtain burners or other portable biomass processing technologies, to reduce the greenhouse gas (GHG) emissions from pile burning. See "Biomass Disposal" discussion below for additional information.

PRESCRIBED HERBIVORY

Prescribed herbivory may occur on up to 61,867 acres, although this acreage would likely be less once areas are excluded from treatment due to sensitive resources, watercourses, etc. Prescribed herbivory (also known as "targeted grazing") is the use of domestic livestock, in this case sheep, goats, or other similar domestic species, to accomplish specific and measurable vegetation management objectives. Objectives may include removing herbaceous biomass (e.g., fine fuel loads) and woody biomass; reducing populations of specific plant species; slowing the re-establishment of shrubs on ungrazed, burned, or mechanically thinned sites; and improving plant community structure for wildlife habitat values. Sheep or goats would be used for prescribed herbivory, depending on the target treatment area and goals. The type of animal used would depend on the site conditions, vegetation community being targeted, and dietary preferences of the grazing animal. All prescribed herbivory conducted under the proposed project would occur within seasonally appropriate periods based on vegetation type and excluded from certain areas to protect

sensitive species. Prescribed herbivory would occur only if it were found to be the least environmentally damaging feasible alternative to achieving project goals. Prescribed herbivory would be conducted pursuant to a plan that ensures protection of habitat and other coastal resources, including sensitive natural communities. Before prescribed herbivory treatment activities occur, a grazing plan would be submitted to Coastal Commission staff.

Cattle grazing is an existing activity that is ongoing within some of the treatment areas for natural resources purposes such as maintaining grasslands, enhancing wildlife habitat, and reducing fine fuel loads. Cattle grazing is not included in the proposed project or analysis because cattle grazing is already occurring on some of these properties, and the practice would not be expanded or changed from the existing condition.

A herder, fencing, mineral block, and/or a watering site may be required to keep the grazing animals within the desired area; typically, professional herders or portable electric fencing would be used during prescribed herbivory treatments. Herds may be moved as often as every one to seven days and one to two workers would be required on average to implement this treatment activity. Control of livestock movement and prevention of overgrazing is critical for the successful use of this treatment method.

Prescribed herbivory is nonselective and therefore would not be implemented in sensitive habitat areas or areas potentially containing special-status plant species or cultural resources if prescribed herbivory would have an adverse effect on the resource. Prescribed herbivory is effective at reducing flashy fuels and brush intrusion. Any prescribed herbivory in forested habitat that targets understory materials would include protection measures for selected native understory vegetation to prevent girdling, trampling, and browsing on special-status species. Forest understory vegetation would be maintained in ecological restoration areas consistent with the understory descriptions in the Manual of California Vegetation (Sawyer et al. 2009). Prescribed herbivory would generally not be implemented in riparian woodlands and may only be used along the margins of these areas. Prescribed herbivory would be confined to the dry season only, and exclusion zones consistent with CalVTP Program EIR specifications (e.g., SPR HYD-3 and Mitigation Measure BIO-4) around aquatic habitats would be created to minimize potential impacts on these areas from prescribed herbivory activities.

Sheep

Sheep eat both forbs and grasses, graze steeper slopes, and eat shrubs (Figure 2-25). Their herding instinct allows for prescribed herbivory without the installation and maintenance of fences but requires that a shepherd and trained, professional dogs are present. Sheep grazing requires that drinking water sources be present, which would be provided through hauled water tanks or on-site developed livestock water sources (troughs). A combination of sheep and goats can be a viable option when a mixture of grass, noxious or invasive weeds, and shrubs are present in the area to be treated.

Goats

Goats prefer to browse on woody vegetation (e.g., tree leaves, twigs, vines, shrubs) and eat materials up to 6 feet above the ground. This grazing pattern creates a desirable vertical separation between the canopy and ground cover but is best used in areas with low numbers of plants intended for retention because goats may indiscriminately damage non-target plants; however, some plant species such as milkweed and coffeeberry are generally avoided by goats altogether. Goat grazing is also preferable in areas of steeper terrain, where other grazing animals are less suited for the topographic conditions and are therefore less effective in grazing to achieve the desired vegetation management results.

Portable electric fences would be used to help control the herd and the outcome of their grazing and are not expected to be more than 1-2 miles at any point across the project area and would be moved frequently as vegetation is consumed reducing wildlife disruptions. It can be expected that most prescribed herbivory would also occur during drier months. Measures may also be taken to prevent girdling of small trees that can result from goats browsing on tree bark. Herd movement has the advantage of breaking off dead material in a stand, as well as punching a humus layer into the soil (if the ground is somewhat moist) and thereby removing available fuel.

Source: Photograph taken by Chloe Knowd – ARC in 2023.

Figure 2-25 Example of Prescribed Herbivory Utilizing Sheep in Oak Woodland Habitat

TARGETED HERBICIDE APPLICATION

Targeted herbicide application may be considered where non-native or invasive species are present or expected to occur, or to maintain non-shaded fuel breaks on up to 3,394 acres to promote regeneration of native species, reduce the spread of invasive vegetation, and maintain fuel breaks for wildland fire control or prescribed burning. Targeted herbicide treatment (Figure 2-26) may occur utilizing only types listed as suitable in the CalVTP Program EIR as needed to manage invasive species, but is predominantly expected to occur near roads, fuel breaks, trails, and in annual grasslands to promote growth of native grasslands or restore degraded coastal prairie communities where increased sunlight is present, which may substantially reduce the actual acreage to which herbicide is applied. Herbicides would not be utilized within wet meadows, equipment exclusion zones, or WLPZs. Herbicides would be avoided to the maximum extent feasible and would be used only if such treatment activity is the least environmentally damaging feasible alternative. Herbicide treatments would typically use a two- to four-person crew.

Section 2.5.2 of the CalVTP Program EIR indicates that herbicide application may only be implemented at ground-level from equipment on vehicles or by manual application devices and must comply with the US Environmental Protection Agency (EPA) directions, as well as California Environmental Protection Agency and Department of Pesticide Regulation label standards. While herbicide application is not anticipated to be a primary treatment activity for ecological restoration treatments, it may be used in conjunction with other treatment activities to control the colonization and spread of invasive plants following initial treatments and to maintain fuel breaks. More detailed information on herbicide activities can be found in Chapter 3, "Environmental Checklist," below.

Source: Photograph taken by David Van Lennep – ARC in 2024.

Figure 2-26 Example of Targeted Herbicide Application on a Cut Eucalyptus Stump

SENSITIVE NATURAL COMMUNITIES

The vegetation and land use composition of the region has been heavily shaped by indigenous use, historic settlement, lack of disturbance (e.g., low-intensity ground fire), development, and climatic changes. Although these lands have undergone substantial changes and habitat degradation in the last 175 years as a result, many sensitive communities remain and would be maintained and restored through the SPRs, ecologically restorative and fuel break treatment prescriptions, Coastal VTS (Attachment B), and mitigation and monitoring and reporting program (Attachment A) in this PSA/Addendum, including the following measures.

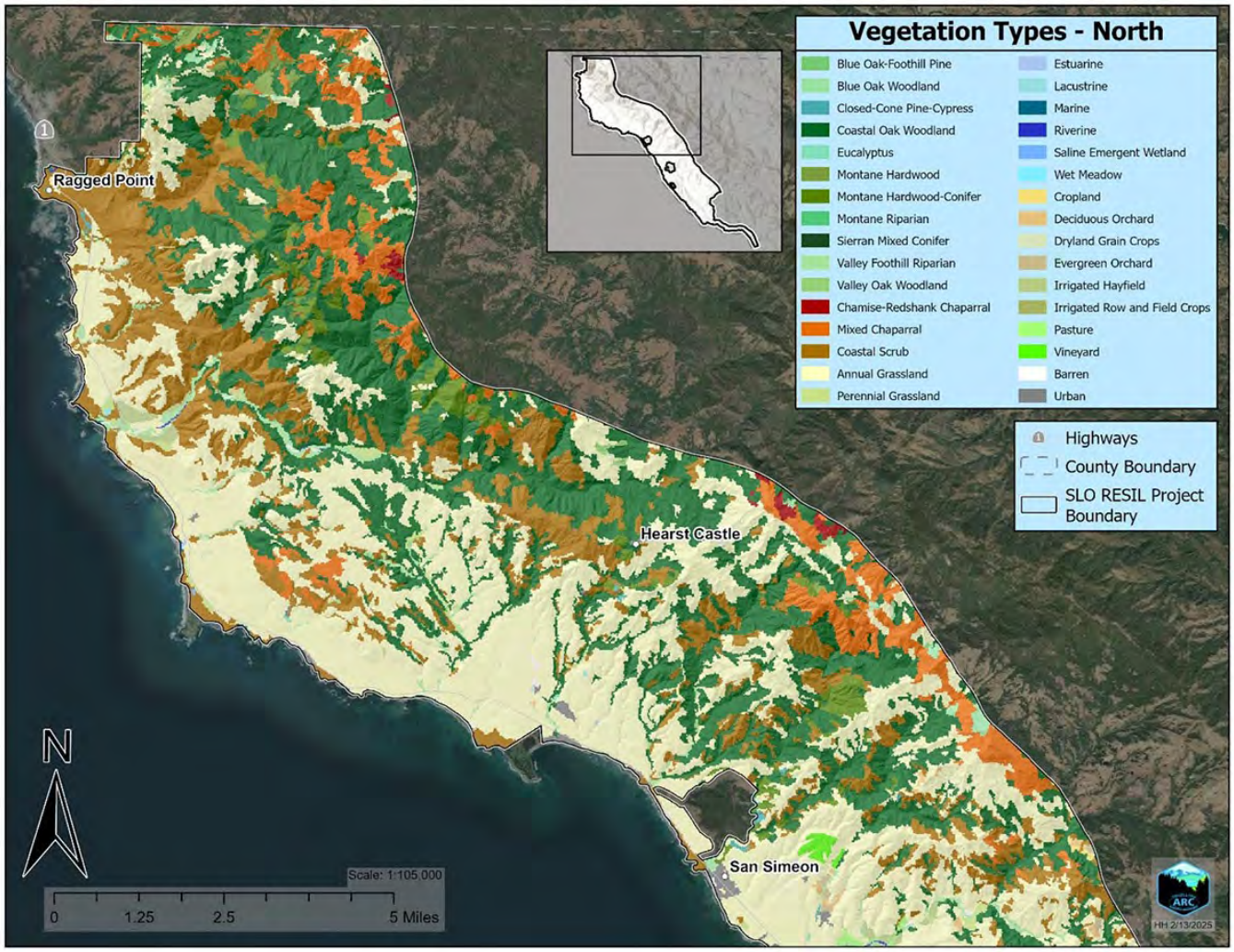
Standard Project Requirements and Mitigation Measures

The following SPRs, mitigation measures, and Coastal VTS are directly related to the protection and restoration of sensitive natural communities. The full text of each measure can be found in Attachment A.

- SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats

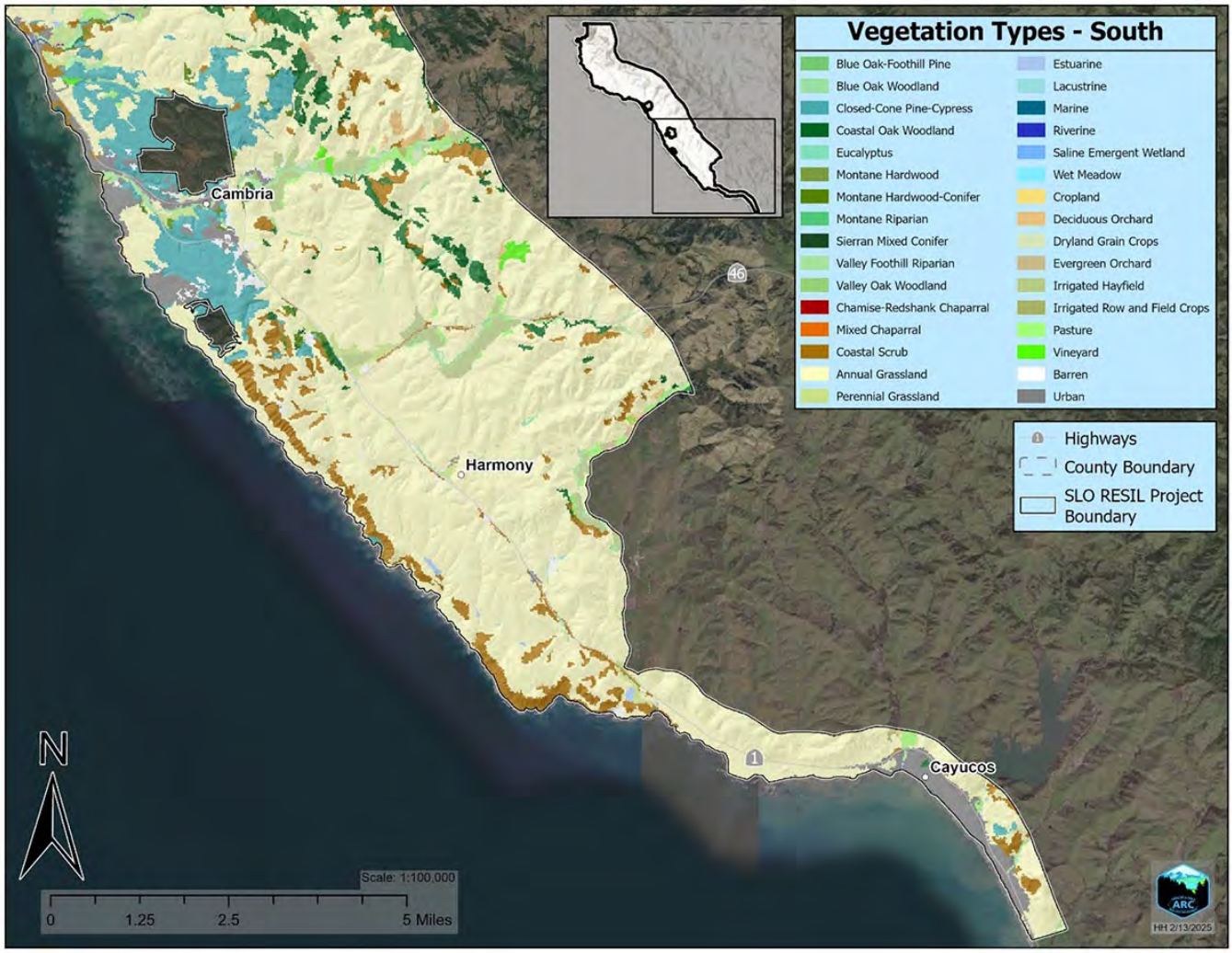
- SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub
- SPR BIO-8: Identify and Avoid or Minimize Impacts in Coastal Zone ESHAs
- SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife
- Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- Coastal VTS 6: Protect ecosystems, which includes that forest health projects shall maintain vegetation cover and composition to comply with the standards (membership rules) set forth in the Manual of California Vegetation to avoid unintended habitat conversion.

A general vegetation map is also provided (Figures 2-27 and 2-28) in northern and southern extents to support future surveys and identification of sensitive natural communities. In addition, it is expected that fine scale mapping data for San Luis Obispo may be ready as soon as 2026 which would be used to inform treatment design and implementation pursuant to this PSA.



Source: CAL FIRE FRAP, California Vegetation by Wildlife Habitat Relationship Type 2022; adapted by ARC 2025.

Figure 2-27 Vegetation Types in the Northern Extent of the Project Area



Source: CAL FIRE FRAP, California Vegetation by Wildlife Habitat Relationship Type 2022; adapted by ARC 2025.

Figure 2-28 Vegetation Types in the Southern Extent of the Project Area

BIOMASS DISPOSAL

Vegetation removed during implementation of the proposed treatments described above would primarily be processed using the following methods. A percent of biomass to be treated through each processing method is estimated for analysis purposes, but may be adjusted given the extensive geographic and temporal scale of the proposed project:

- Piling and Burning (20 percent of biomass): Pile burning may be used to dispose of slash and chipped and masticated materials. Piles would be limited to approximately 12 piles per acre in coastal prairies. Piling would not occur in wet meadows or within WLPZs.
- Masticating (37.5 percent of biomass): Vegetative debris would be removed and placed on the ground concurrently with vegetation removal and the biomass remaining after mastication would be no more than 6 inches in depth.
- Chipping (20 percent of biomass): Chipped biomass would be spread over treatment areas and would not exceed 4 inches in depth in coastal prairies, 2 inches in depth in wet meadows and riparian habitats, and an average of 3 inches and not more than 6 inches in depth in other habitats (i.e., forests, shrublands). Chipped residual material should be minimized in forest gaps or openings where increased biodiversity of herbaceous understory regeneration is more likely.

- Crushing (10 percent of biomass).
- Lop and Scatter (10 percent of biomass): Cut vegetation would be scattered within the treatment area at a target maximum depth of 12 inches. Under certain site conditions or in cases where biomass density is too high to meet the target, maximum depth would be 18 to 24 inches.
- Air Curtain Burner and Carbonization (1 percent of biomass): Biomass may be processed through use of an air curtain burner or carbonator. Although not currently available, a gasifier may be used in the future if feasible.
- Biomass Hauling (2.5 percent of biomass): Only local distribution of chips hauled off site shall be considered for farms, ranches, or other localized biomass processing or repurposing facilities within the pitch canker quarantine zone.
    - Invasive plant and noxious weed biomass would be treated onsite to eliminate seed and propagules or would be disposed of offsite at an appropriate landfill to prevent reestablishment or spread of invasive plants and noxious weeds. Invasive plants and noxious weeds may be chipped and spread, scattered, or mulched back into the sites they currently occupied as much as feasible. Preferably chipping, spreading, and scattering should occur prior to spring each year before seed has set.

Specialized Biomass Processing Technologies

Specialized biomass processing technologies, such as air curtain burning and carbonization, may be used as an alternative to pile burning in some areas. The intent of using these technologies is to sequester carbon for soil amendments, reduce the production of smoke particles, and reduce GHG emissions released into the atmosphere to the extent feasible. Biomass processing technologies have been designed to consume biomass quickly and efficiently with a substantial reduction in smoke compared to pile burning (refer to additional information in Section 4.3, "Air Quality" and Section 4.7, "Greenhouse Gas Emissions"). Mitigation Measure GHG-2 in the CalVTP Program EIR requires project proponents to implement feasible methods, including the use of air curtain burners and carbonators, to reduce GHG emissions from pile burning. The use of these technologies is proposed in compliance with Mitigation Measure GHG-2.

Direct Combustion – Air Curtain Burners

Air curtain burners use direct combustion to process biomass. Combustion is an exothermic (heat-producing) reaction between oxygen and the hydrocarbon in biomass. The biomass is converted into heat, water, carbon ash, and carbon dioxide. Air curtain burners are operated by depositing biomass in the firebox, an open top metal container, within which the biomass is set alight. The air curtain filter (i.e., fast-moving curtain of air) is drawn over the firebox while a blower circulates the air and smoke within the firebox, subjecting it to repeated cycles of burning in the flames. The blower creates a high temperature vortex inside the chamber to accelerate biomass combustion, more completely combust the material, and keep most pollutants from escaping the firebox into the atmosphere. The air curtain at the top of the firebox acts as a filter to reduce any particulate matter emissions from the resulting exhaust.

Air curtain burners would be set up on existing roads, landings, or other disturbed areas and would only be used in locations meeting any county, state, or federal requirements for their safe use. An example of a small air curtain burner that may be used is the BurnBoss T24. This unit is towable with a standard heavy-duty pickup truck. The size is approximately 20 feet in length, 8 feet in width, and 6 feet in height. A small EPA Tier 4 diesel engine powers the air curtain fan. The BurnBoss T24 consumes 5 to 10 cubic yards of biomass per hour and up to a third of a gallon of diesel fuel per hour. Larger air curtain burners may be used as well.

Pyrolysis/Carbonization

Pyrolysis (or carbonization) can be performed in a variety of ways, from simple oxygen-depriving designs, such as an Oregon kiln, which can process up to several cubic yards at a time, to modular and portable carbonation units, to more complex large-scale pyrolysis chamber systems in a fixed location that can process hundreds of tons of biomass per day (these large-scale systems would not be used as a component of the proposed project). Pyrolysis involves the conversion of biomass into hydrocarbon liquids, gases, or solids (or all three) in the total absence of oxygen at temperatures ranging from 400 to 900 degrees Celsius. Only smaller scale, portable carbonators would be used as part of the proposed project. An example of a carbonator that may be used is the Tigercat 6050 Carbonator. This portable facility is approximately 40 feet in length, 12 feet in width, and 12 feet in height. Several Tigercat 6050

Carbonators may be used at one central location near several treatment areas. Pyrolysis/carbonization would be set up on existing roads, landings, or other disturbed areas and would only be used in locations meeting any county, state, or federal requirements for their safe use.

Gasifier

Gasification is defined as a high-temperature conversion of carbonaceous materials (biomass) into a combustible gas mixture under reducing conditions. Through gasification, biomass can be converted into gaseous fuels intermediate (producer gas and syngas) that can be used for heating, industrial processes, electricity generation, and liquid fuel production. The catalyst required for gasification typically consists of air, oxygen, steam, or a mixture of those three. A key benefit of using biomass as an energy source is the fact that the components, when released, do not constitute a net carbon contribution back into the atmosphere. Additionally, the use of biomass as energy reduces the dependence of non-renewable or imported fuel sources.

In the future, US-LT RCD may obtain a gasifier to process woody biomass. Suitable processing locations near existing electrical infrastructure would allow electricity generated to be directed into the electrical grid. The electricity generated from gasification could also be stored in batteries for future use by US-LT RCD. Current advancements in electrifying equipment used for fuels management activities could allow for the power generated from gasification to charge the equipment used to perform the work associated with the project.

2.4.5 Pests and Disease

PITCH CANKER

A disease caused by the pathogenic fungus *Fusarium circinatum*; Pitch canker occurs primarily in pine trees but is also known to infect Douglas-fir in northern California. Monterey pine is the most widely affected host of this disease and seedling infection is possible through the presence of inoculum on seeds, soil, or ground litter. Monterey pine has shown varying levels of resistance to this disease in monitoring plot studies, and it is estimated that approximately 10 percent of Monterey pine trees along the California coast are at least somewhat resistant to pitch canker (Staub et al. 2011). Primary symptoms of pitch canker involve girdling of branches, exposed roots, and main stems, wilting of stems and branches, foliar dieback, and chlorosis in needles and fascicles. Cyclical mortality is possible as a result of pitch canker, but studies show even heavily affected individuals may recover completely from an infestation and develop resistance to the disease over time (Bonello et al. 2001), warranting a conservative approach to the removal of infected species. However, where pitch canker infection is heavy, as is the case across Covell Ranch, many dead or dying trees must be removed to stimulate medium-scale ecological processes in environmentally sensitive areas (Cambria Forest Committee 2002). Fire is an effective, two-fold process as it can eliminate the inoculum of the pathogen on soil and litter surfaces and promote the natural regeneration of the Monterey pine forest (Gordon et al. 2001). In addition to SPR BIO-6 and other applicable requirements, measures would be taken to prevent the spread of this pathogen from areas identified as zones of infestation to non-infested areas. These measures may include, but are not limited to, avoiding the movement of material from infested areas to non-infested areas and sanitation of hand tools, boots, and mechanized equipment. Further information regarding the management of pitch canker can be found at the California Forest Pest Council Pitch Canker Taskforce website (California Forest Pest Council 2025).

DWARF MISTLETOE

Arceuthobium spp. (dwarf mistletoe) is an obligate parasitic organism and the most widely dispersed forest pathogen in the western United States. The native Monterey pine stand at Cambria has been identified as having the highest levels of western dwarf mistletoe (*Arceuthobium campylopodum*) infection of the three native Monterey pine populations in California. A 1990 sampling effort on the Covell Ranch estimated dwarf mistletoe witches' brooms may affect growth and vigor of host trees, produce hazardous ladder fuels, and cause mortality in severe, long-term infections (Staub et al. 2011). Management strategies specific to dwarf mistletoe infections may involve selective removal of infected trees based on the Dwarf Mistletoe Rating (DMR) System (Hawksworth 1977), implementing

prescribed burning on infected landscapes, commercial thinning, or application of chemical growth regulators to slow the spread of the pathogen (USFS 2014). More information on the management of this pathogen can be found from the US Forest Service (US Forest Service 2025).

WESTERN GALL RUST

A forest disease caused by the fungus *Endocronartium harknessii*, western gall rust is a serious concern in the Monterey pine forest at Cambria, as studies have declared the Cambria and Monterey populations to be the most susceptible of the five native populations in the world. Western gall rust generally manifests in rounded swellings (galls) on the stems and branches of infected hosts, causing deformities in tree growth or girdling the branch or stem to mortality. The infection does not typically migrate from the gall or zone of infection, but wind-driven fungal spores can easily transfer from host to host and typically causes substantial mortality to young trees in dense or overstocked pine stands where competition for water and nutrients is already high. The disease cycle requires a live host and may proceed for one to two years after infection or until the formation of blister pustules containing spores. Based on reconnaissance level surveys, western gall rust is significantly widespread throughout the Monterey pine forest in the project area and on the Covell Ranch. A 1990 sampling effort on the Covell ranch determined up to 60 percent of the pine basal area to be severely infected (Staub et al. 2011). Management of western gall rust may involve, but is not limited to, the selective thinning and removal of infected trees to promote adequate spacing and species diversity (USFS 2014). Heavily infected trees may display multiple galls or trunk dieback and it is recommended that individuals under these conditions are destroyed prior to sporulation in the spring (Rajotte 2017). More information on the management of this pathogen can be found from the US Department of Agriculture (US Department of Agriculture 1960).

SUDDEN OAK DEATH

The pathogen, *Phytophthora ramorum*, commonly referred to as Sudden Oak Death (SOD), infects coastal forests throughout California and Oregon and kills susceptible species including tanoak, coast live oak, California black oak, Shreve's oak, canyon live oak, and madrone saplings. Non-oak foliar host species within the project area include California bay and Pacific madrone. Along with the mitigation measures under project activities and treatment prescription, to avoid the spread of this pathogen, all hand equipment, including boots, would be sanitized and heavy equipment hosed off prior to operations in areas where the spread of SOD is possible. The California Oak Mortality Task Force website contains additional information regarding treatment and disposal measures for plants infected with SOD (California Oak Mortality Task Force 2025).

INVASIVE SPECIES

French broom

French broom is a problematic invasive species due to its ignitability, ability to carry fire into tree canopies, shading of seedlings, and ability to replace native plants and forage species. This species has a large seed bank and re-sprouts readily from the root after cutting, freezing, and fire (California Invasive Plant Council 2020). Cal IPC recommends pulling French broom to remove the entire plant including its roots to eliminate resprouting. The University of California Weed Research & Information Center (USWRIC) recommends the following chemical treatments that may be applied under the CalVTP (CalVTP Final Program EIR Volume II Table 3.10-1): Glyphosate (Roundup and Roundup Pro Max), Imazapyr (Arsenal, Chopper, Habitat, Stalker, and Polaris), and Triclopyr (Garlon 3A and Garlon 4) (DiTomaso, et al., 2013). Application methods may vary between chemicals, however, the UCWRIC recommends cut stump and basal bark application immediately following the cut. The removal of this species is a priority due to its increased fire hazard and adverse impacts to habitat and aesthetics. Additional information about French broom control and treatments are located on the Cal IPC website (California Invasive Plant Council 2025).

Cape Ivy

Cap Ivy (*Delairea odorata*) is an invasive species that occupies over 500,000 acres in California, primarily occurring in coastal forests from Del Norte County to San Diego County. This invasive plant was introduced in California in the 1950s as an ornamental species. Cape ivy readily smothers other vegetation in its proximity, forming a solid cover over neighboring plants and blocking sunlight. Large portions of cape ivy can easily take over plant and animal habitats, rendering protected natural reserves useless when occupied by the invasive. Cape ivy contains pyrrolizidine alkaloids such as retronecine that are known to be toxic to some insects and wildlife. Due to its shallow root system, cape ivy can contribute to substantial stream bank erosion when riparian areas are infested and colonized by the plant. Removal of cape ivy is difficult due to fragmenting of plant parts when pulled and its ability to grow from any remaining fragment of the plant. Management is timing-based, as the plant produces rapid growth from February to June and experiences some dieback due to lack of constant water during July to October.

Cal IPC recommends management and control of cape ivy can be physical, biological, or chemical. Physical management involves the labor-intensive manual removal of both invasive and native plant material to gain visual and physical access to cape ivy stems. Roots and stems must be pulled from the ground by hand or with mini-rakes or hoes. Cape ivy tissue should not be put through a chipper, as it is likely to result in the spread of this invasive species. Biological control of cape ivy is possible but still in development. Moth and beetle larvae, and root-, stem-, and seed-feeding insects show promise as biocontrol agents of cape ivy but are not fully accepted as effective resources for control. Chemical control involves the use of herbicides, primarily a foliar-sprayed mixture of 0.5 percent glyphosate (as Roundup) + 0.5 percent triclopyr (as Garlon 4). Chemical control of cape ivy should be consistent with the standards outline in the CalVTP Program EIR (CalVTP Final Program EIR Volume II Table 3.10-1).

Pampas Grass

Pampas Grass (*Cortaderia jubata*) is a large perennial grass prevalent along the coast and coast ranges of California. Cortaderia jubata favors recently disturbed sites with bare soil including roadsides, dunes, and coastal bluffs. The species is quick to establish with bare soil but poorly competes with established grasses and herbs (California Invasive Plant Council 2022). Non-chemical methods of removal include hand pulling of seedlings as well as removal of mature plants utilizing hand tools such as pulaskis, pick-mattocks, and shovels. Care needs to be taken to remove the entirety of the root crown to prevent resprouting, as well as disposal of mature plants in locations where they are not capable of resprouting. Before removal of each plant cluster, the seed heads should be cut off and bagged separately to reduce the spread of seed when treating. Chemical methods of removal include spot treatments of glyphosate and/or imazapyr in low concentrations during the late summer or fall.

2.5 TREATMENT MAINTENANCE

Maintenance treatments or retreatment intervals would be based on monitoring of the site conditions, but are estimated to occur following initial treatments (i.e., manual treatment, mechanical treatment, prescribed burning, targeted herbicide application, or prescribed herbivory), or approximately every two to 10 years, or if the qualified professional determines that the initial treatment did not obtain the appropriate results (e.g., the prescribed burning treatment did not result in the appropriate treatment outcome representative of the results expected from the average fire return interval).

Maintenance treatment methods may include any of the vegetation treatment activities outlined in the PSA/Addendum (i.e., manual treatment, mechanical treatment, prescribed burning, targeted herbicide application, or prescribed herbivory). Retreatment in ecological restoration areas would give consideration to the natural fire return interval (i.e., time since last burn is greater than or equal to the average fire return interval for the habitat type) of a given vegetation type and existing conditions, prior to implementing a maintenance treatment. Fire return intervals vary by vegetation type. Treatment activities that do not use fire (e.g., manual treatments and mechanical treatments) are considered "fire surrogates." In the absence of additional data regarding mechanical and manual treatment activities, fire return interval is used as a proxy for disturbance (e.g., manual treatment may be analogous to low severity fire and mechanical treatment may be analogous to a mixed severity fire). Follow-up maintenance treatment to target invasive species may occur at any time. Maintenance treatments would generally be of a lower intensity and

scale than initial treatments. Prior to implementing maintenance treatments, the project proponent would determine the natural fire return interval of the habitat(s) to be retreated.

In chaparral and coastal sage scrub ecosystem types within the project area, pursuant to SPR BIO-5, all treatments and the maintenance treatment intervals would be designed to maintain habitat function of the specific vegetation alliance being treated and to avoid type conversion of chaparral or coastal sage scrub. Retreatment in common vegetation types that are not sensitive natural communities or sensitive habitats (e.g., wetland, riparian, chaparral, coastal sage scrub) is generally anticipated to occur between two and 10 years following initial treatments. Maintenance treatments would generally be conducted at a lower intensity and scale than initial treatments. Prior to implementing maintenance treatments, the project proponent would determine the natural fire return interval of the habitat(s) to be retreated.

Maintenance intervals would depend on the revegetation rate of understory species and would be highly variable based upon the dominant pre-existing vegetation type. Maintenance treatments would be triggered by dense, continuous understory and ladder fuels. Maintenance treatments would be implemented through the use of manual treatments, mechanical treatments, prescribed burning, prescribed herbivory, and targeted herbicide treatments to treat dead and dying trees, dense understory and mid-range diameter vegetation and ladder fuels, and to reduce the reestablishment of less desirable species, including invasives and fire intolerant species. Maintenance treatments are expected to occur more frequently in non-shaded fuel break areas than ecological restoration/forest health areas. This maintenance work would still be completed per the requirements of the MMRP (Attachment A) and Coastal VTS (Attachment B).

Prior to implementing a maintenance treatment, it would be verified that the expected site conditions as described in the PSA/Addendum are present in the treatment area. As time passes, the continued relevance of the PSA/Addendum would be considered in light of potentially changed conditions or circumstances. If environmental conditions evolve or project approaches change to the degree that the project proponent finds new or substantially more severe impacts may occur, a new PSA/Addendum, PSA update, or other environmental analysis may be warranted if determined by USLTRCD or other responsible agency.

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

2.5.1 Guidance Following PSA/Addendum Approval

The purpose of the below list of general actions to implement treatment activities is to provide guidance to the implementing entity to ensure that all steps necessary to commence treatments described in the PSA/Addendum are complete prior to operations; this list serves as a timeline and checklist that may be applied to each phase of treatment implementation. Some actions listed below would be completed during the development of the PSA/Addendum, while others must be completed in respect to individual implementation periods (i.e., phases of treatments, initial treatments, maintenance treatments). This checklist is intended to be used in conjunction with the MMRP (Attachment A).

1. Protocol-level botanical surveys are complete and sensitive species are flagged (SPR BIO-1, SPR BIO-3, and SPR BIO-7).
2. Protocol-level wildlife and nursery site surveys are complete and sensitive species are flagged (SPR BIO-1 and SPR BIO-10).
3. The Archaeological Survey Report process is complete and archaeological sites are flagged for avoidance and protection (SPR CUL-4, SPR CUL-5, and SPR CUL-7).
4. Burn plan complete – if necessary (SPR AQ-3).
5. Smoke Management plan obtained – if necessary (SPR AQ-2).

6. Prepare draft treatment operations maps that include, but are not limited to existing roads, existing stream crossings, staging areas, access points, watercourses and other sensitive resources, specify treatment activity areas, and potential unstable areas (SPR AD-2).
7. CalVTP PSA noticing requirements to neighbors and other appropriate entities are complete (SPR AD-4, SPR AD-6, SPR CUL-2, SPR HAZ-9, SPR NOI-6, and SPR REC-1).
8. Final field verification of treatment units that include flagging all sensitive resources including, but not limited to sample treatment areas flagged for retention, access points, staging areas, property lines where necessary, watercourse and lake protection zones, unstable areas, and existing stream crossings.
9. Begin contract bid process and conduct bid walk with contractors explaining the treatment prescription and associated activities. Show sample treatment areas.
10. Pretreatment activity surveys are complete and sensitive resources have been flagged and avoided to maximum extent feasible (SPR BIO-7 and SPR BIO-10).
11. Nesting bird surveyors are under contract and ready to conduct surveys (SPR BIO-12).
12. Environmental awareness training and cultural resource training are complete with contractors and treatment operations begin (SPR BIO-2 and SPR CUL-8).
13. Supervision of contractors occurs consistently throughout project implementation.
14. Implementation meetings occur 2-4 times a month to keep track of operations and ensure appropriate sensitive resource protection.
15. Roads and other appropriate infrastructure are closed out with necessary erosion control measures as winter approaches (SPR GEO-5).
16. Roads and other appropriate infrastructure are checked during the winter period to ensure that no erosion issues are occurring as a result of treatment operations (SPR GEO-4).

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3 ENVIRONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

1. **Project Title:** North Coastal San Luis Obispo County Regional Ecological Strategy for Improving Landscapes (SLO-RESIL)

2. **CalVTP I.D. Number:** 2025-09

3. **Project Proponent Name and Address:** Upper Salinas-Las Tablas Resource Conservation District (USLTRCD)
5905 Capistrano Avenue, Suite F
Atascadero, CA 93422

4. **Contact Person Information and Phone Number:** Spencer Gordon
Project Manager
(805) 460-7272, Ext. 2
sloresilvtp@gmail.com

5. **Project Location:** The extent of the North Coastal San Luis Obispo County Regional Ecological Strategy for Improving Landscapes (SLO-RESIL) project encompasses approximately 88,151 acres of US-LT RCD's jurisdictional boundary within the California Coastal Zone, from the northern San Luis Obispo County line to Toro Creek near Morro Bay. The project area comprises both private and public lands, excluding federally managed lands and existing, previously approved California Vegetation Treatment Program (CalVTP) projects within its bounds (i.e., Hearst Ranch Forest Health Fuels Reduction Project, Covell Ranch Forest Health Fuels Reduction Project, and Cambria Reserves Restoration and Vegetation Treatment Project; Figure 1-1, "Regional Location"). The project area corresponds to the extent of the *Upper Salinas-Las Tablas Resource Conservation District Forest Health and Fire Resilience Public Works Plan (PWP)* approved by the California Coastal Commission on October 15, 2021.
The project area consists of portions of the following US Geological Survey Quadrangles: Burnett Peak, Burro Mountain, Cambria, Cayucos, Cayucos OE W, Cypress Mountain, Morro Bay North, Pebblestone Shut-in, Pico Creek, Piedras Blancas, and San Simeon.

6. **Total Area to Be Treated (acres)** Up to 88,151 acres

7. **Description of Project**:

See Chapter 2, "Project Description," above, for a detailed description of the proposed project.

See Section 2.2, "Problem Statement," above, for the problem statement.

See Section 2.3, "Objectives Statement," for the objectives statement.

See Section 2.4.3, "Consistency with Coastal Vegetation Treatment Standards," above, for a description of Coastal Act compliance for the proposed project.

a. Initial Treatments

Initial treatments would involve ecological restoration and fuel break and the proposed treatment activities are manual treatments, mechanical treatments, prescribed burning, prescribed herbivory, and herbicide application. See Chapter 2, "Project Description," for additional details.

Treatment Types

☐ Wildland-Urban Interface Fuel Reduction

☒ Fuel Break

☒ Ecological Restoration

Treatment Activities

☒ Prescribed Burning (Broadcast), Up to 88,151 acres

☒ Prescribed Burning (Pile Burning), Up to 61,867 acres

☒ Mechanical Treatment, Up to 61,867 acres

☒ Manual Treatment, Up to 88,151 acres

☒ Prescribed Herbivory, Up to 61,867 acres

☒ Herbicide Application, Limited to 3,394 acres

Fuel Type

☒ Grass Fuel Type

☒ Shrub Fuel Type

☒ Tree Fuel Type

b. Treatment Maintenance

Maintenance treatments or retreatment intervals would be based on monitoring of the site conditions, but are estimated to occur following initial treatments (i.e., manual treatment, mechanical treatment, prescribed burning, targeted herbicide application, or prescribed herbivory), or approximately every two to 10 years, or if the qualified professional/lead agency determines that the initial treatment did not obtain the appropriate results (e.g., the prescribed burning treatment did not result in the appropriate treatment outcome representative of the results expected from the average fire return interval).

Use of the PSA for Treatment Maintenance

See "Treatment Maintenance" above

8. Regional Setting and Surrounding Land Uses:

The project area is bordered to the north by US Forest Service lands and the border between Monterey and San Luis Obispo counties. To the west, the project area is bound by the coastline of the Pacific Ocean, and to the east by the Coastal Zone boundary. The eastern project boundary predominantly borders private landowners, except in a section near the town of Cayucos where the California Department of Water Resources manages land surrounding Whale Rock Reservoir. Within the project area, major landowners include California State Parks and Hearst Holdings, which owns lands surrounding the Heart-San Simeon State Historical Monument and historic castle grounds. Agriculture and grazing constitute major land uses supported by the large expanses of grasslands within and surrounding the project. Annual and perennial grasses occupy over half of the total project area. In the upper elevation mountainous areas along the eastern and northern boundaries of the project area, chaparral, hardwood, and conifer vegetation communities are widespread. Due to its proximity to the coast, the project area contains a large component of coastal scrub throughout. Surrounding the towns of San Simeon and Cambria are native stands of Monterey pine (*Pinus radiata*), which are found naturally in only four other locations worldwide.

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

- Smoke management plans will be prepared for the appropriate Air Quality Management District as required.
- Burn permits will be obtained from CAL FIRE and the appropriate Air Quality Management District as required.
- Public Works Plan consistency determination from Coastal Commission.

Coastal Act Compliance

☐ The proposed project is NOT within the Coastal Zone.

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

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

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

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

Pursuant to CalVTP SPR BIO-2, Native American contacts in San Luis Obispo County were contacted on April 10, 2025, and included Julio Quair, Chairperson, Chumash Council of Bakersfield; Gabe Frausto, Chairman, Coastal Band of the Chumash Nation; Violet Walker, Chairperson, Northern Chumash Tribal Council; Patti Dunton, Tribal Administrator, Salinan Tribe of Monterey, San Luis Obispo Counties; Robert Piatti, Cultural Protection Lead, Salinan Tribe of Monterey, San Luis Obispo Counties; Nakia Zavalla, Tribal Historic Preservation Officer, Santa Ynez Band of Chumash Indians; Crystal Mendoza, Elders' Council Administrative Assistant, Santa Ynez Band of Chumash Indians; Sam Cohen, Government & Legal Affairs Director, Santa Ynez Band of Chumash Indians; Wendy Teeter, Cultural Resources Archaeologist, Santa Ynez Band of Chumash Indians; Neil Peyron, Chairperson, Tule River Indian Tribe; Kerri Vera, Environmental Department, Tule River Indian Tribe; Karen White, Chairperson, Xolon-Salinan Tribe; Penny Hurt, Cultural Preservation Administrator, Xolon-Salinan Tribe; and Mona Tucker, Chairperson, yak tityu tityu yak tiłhini – Northern Chumash Tribe. A response from a representative of the Xolon-Salinan Tribe was received on May 5, 2025, and a response from a representative of the Salinan Tribe was received on May 21, 2025. USLTRCD responded to both tribes on May 12, 2025 and May 25, 2025, respectively. No other responses were received from other tribes. Refer to Section 4.4, "Archaeological, Historical, and Tribal Cultural Resources," for more information.

DETERMINATION

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

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

☒ I find that the presence of proposed project areas outside the CalVTP treatable landscape and proposed revisions to SPRs and a mitigation measure 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 CalVTP SPRs and mitigation measures 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 and a mitigation measure.

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

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

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

Amy Smart
Signature

6/25/25
Date

Amy Smart
Printed Name

Deputy Director / Board Secretary
Title

US-LT RCD
Agency

4 PROJECT-SPECIFIC ANALYSIS/ADDENDUM

4.1 AESTHETICS AND VISUAL RESOURCES

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

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

New Aesthetic and Visual Resource Impacts: Would the treatment result in other impacts to aesthetics and visual resources that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT AES-1

Initial and maintenance treatments would be implemented using prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and targeted application of herbicides. The potential for these treatment activities to result in short-term degradation of the visual character of the project area was examined in the Program EIR.

The nearest officially designated state scenic highway to the project area is State Route (SR) 1 (also referred to as Cabrillo Highway), which runs through the entire project area, from Cayucos though Ragged Point, at times traveling directly along portions of the coastline (Caltrans 2025) (refer to Figure 1-1 and Figure 1-2). The nearest eligible state scenic highway to the project area is SR 46, which runs east-west through the project area between Harmony and Cambria (Caltrans 2025) (refer to Figure 1-1 and Figure 1-2). Publicly accessible viewpoints within and near the project area from which treatments would be visible are located along public roadways, trails, and recreation areas, including Cayucos State Beach, Estero Bluffs State Park, Whale Rock Reservoir, Harmony Headlands State Park, Piedras Blancas Light Station, Elephant Seal Vista Point, Arroyo Laguna Beach, La Tortuga Beach, Morro Bay State Park, Montana de Oro State Park, San Simeon State Park, William Randolph Hearst Memorial State Beach, Heart-San Simeon State Historical Monument and historic castle grounds, Ragged Point, SR 1, SR 46, and other public roadways.

Although portions of the project area are visible from public viewpoints, and from an eligible and officially designated state scenic highways, the project area is densely vegetated with mature trees and varied topography, which would substantially reduce the visibility of treatments from public viewpoints. Treatments would generally remove shrubs and trees smaller than 8 inches dbh and would include pruning lower branches of trees 6 to 15 feet from the ground, but would not prune more than 33 percent of the tree's crown where feasible, leaving overstory vegetation. Equipment staging would occur in developed areas such as roadways and trailheads to the extent possible to reduce degradation of the visual character of the project area. Although in the short-term after treatment, the absence of treated vegetation could be noticeable, mature vegetation would remain to provide partial screening of treatment areas and existing views from trails and recreation areas within the project area (e.g., Cayucos State Beach, Estero Bluffs State Park, Whale Rock Reservoir) of the coast would be retained, or potentially opened more by vegetation removal for improved scenic access to coastal views. Equipment, crews and smoke from prescribed burning could be temporarily visible from public viewpoints and from an eligible state scenic highway (SR 46) and from an officially designated state scenic highway (SR 1). The potential for the project to result in short-term substantial degradation of the visual character of the project area is within the scope of the Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area 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 scenic resources are essentially the same within and outside the treatable landscape; therefore, the short-term aesthetic impact is also the same, as described above. SPRs applicable to this impact are AD-3, AD-4, AES-2, AQ-2, AQ-3, and REC-1. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AES-2

Proposed initial and maintenance treatments are ecological restoration and fuel break (shaded and non-shaded) treatment types. Non-shaded fuel breaks are addressed in Impact AES-3, below. The potential for these treatment types to result in long-term degradation of the visual character of an area was examined in the Program EIR.

Public viewpoints primarily include the publicly accessible recreation areas within the project area (e.g., Cayucos State Beach, Estero Bluffs State Park, Whale Rock Reservoir, Harmony Headlands State Park, Piedras Blancas Light Station, Elephant Seal Vista Point, Arroyo Laguna Beach, La Tortuga Beach, Morro Bay State Park, Montana de Oro State Park, San Simeon State Park, William Randolph Hearst Memorial State Beach, Heart-San Simeon State Historical Monument and historic castle grounds, Ragged Point) and public roadways adjacent to the proposed treatments. Some

treatments would also be visible from SR 46, which is an eligible state scenic highway, as well as from SR 1, which is an officially designated state scenic highway. The long-term visual character and quality of public views after implementation of the proposed ecological restoration and shaded fuel break treatments would remain consistent with the current natural, vegetated landscape and, therefore, would not constitute a substantial adverse change or degrade the current visual character of the landscape. The potential for the project to result in long-term substantial degradation of the visual character of the project area is within the scope of the Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area 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 long-term aesthetic impact is also the same, as described above. SPRs applicable to the proposed treatments are AD-3, AES-1, and AES-3. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AES-3

Initial and maintenance treatments would include non-shaded fuel break treatments in non-forested areas without an existing overstory (i.e., chaparral, coastal scrub, and grassland). However, some non-shaded fuel break buffers would extend slightly into forested areas because of their strategic locations. The potential for this treatment type to result in long-term degradation of the visual character of an area was examined in the Program EIR and found to be significant and unavoidable after the application of all feasible mitigation measures because it may be infeasible to relocate a non-shaded fuel break to avoid public visibility. Public viewpoints of the non-shaded fuel breaks include the public roadways (main highways and primary access routes) adjacent to the proposed treatments. Some non-shaded fuel breaks would also be visible from SR 46, which is an eligible state scenic highway, as well as from SR 1, which is an officially designated state scenic highway. The potential for the project to result in long-term substantial degradation of the visual character of the project area is within the scope of the Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area 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 visual character is essentially the same within and outside of the treatable landscape; therefore, the long-term aesthetic impact is also the same, as described above. SPR AD-3 is applicable to this impact. In addition, Mitigation Measure AES-3 would apply to this treatment to minimize visual impacts, if feasible, from any recreation areas, public roads, and state scenic highways with lengthy views (i.e., longer than a few seconds) of non-shaded fuel breaks. While implementation of Mitigation Measure AES-3 would substantially reduce the potential for substantial long-term degradation of visual character, as noted in the Program EIR, non-shaded fuel breaks may be visible from public viewpoints and it is not feasible to relocate them because they would be located in strategic locations to reduce wildfire risk and support fire suppression by providing responders with a staging area. Therefore, the potential remains for substantial long-term degradation of visual character and this impact is considered significant and unavoidable. This determination is consistent with the Program EIR and would not constitute a new or substantially more severe significant impact than what was covered in the Program EIR.

NEW AESTHETIC AND VISUAL RESOURCE IMPACTS

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

environmental conditions pertinent to aesthetics and visual resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to aesthetics and visual resources would occur.

4.2 AGRICULTURE AND FORESTRY RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact AG-1: Directly Result in the Loss of Forest Land or Conversion of Forest Land to a Non-Forest Use or Involve Other Changes in the Existing Environment Which, Due to Their Location or Nature, Could Result in Conversion of Forest Land to Non-Forest Use	LTS	Impact AG-1, pp. 3.3-7 – 3.3-8	Yes	AD-3	NA	LTS	No	Yes

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

New Agriculture and Forestry Resource Impacts: Would the treatment result in other impacts to agriculture and forestry resources that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT AG-1

Vegetation treatment activities implemented within the project area would consist of prescribed burning, mechanical and manual treatments, prescribed herbivory, and targeted herbicide application to conduct ecological restoration and fuel breaks. Ecological restoration treatment would focus on restoring ecosystem processes, native forestland, meadowland, and shrubland communities, as well as improving ecosystem resiliency through the removal of dead, dying, diseased, and overstocked trees, nonnative and/or invasive species, and dense understory fuels. The project also proposes the creation of shaded fuel breaks within forested areas; however, larger healthy trees would be promoted and remain as shade in forested areas of fuel breaks allowing for the removal of dead, dying and diseased trees.

The potential for these treatment types and treatment activities to result in the loss of forestland or conversion of forestland to non-forest use was examined in the Program EIR. The treatment activities described above would occur in forested lands. Consistent with the Program EIR, the vegetation remaining after treatments would meet the definition of forestland as defined in Public Resources Code Section 12220(g), which defines "forest land" as land that can support 10 percent native tree cover of any species under natural conditions.

The inclusion of land in the 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 composition of forested land as defined in PRC Section 12220(g) is essentially the same within and outside the treatable landscape; therefore, the impact to forest land is also the same, as described above. SPR AD-3 is applicable to this impact. Therefore, the potential for the project to result in the loss or conversion of forest land is within the scope of the

Program EIR. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW AGRICULTURE AND FORESTRY RESOURCE IMPACTS

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

4.3 AIR QUALITY

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

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

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

Discussion

The project area is in the jurisdiction of the San Luis Obispo County Air Pollution Control District (SLOAPCD). Pursuant to SPR AQ-1, USLTRCD would comply with the applicable air quality requirements of the SLOAPCD. Pursuant to SPR AQ-2, USLTRCD would prepare a smoke management plan and submit it to SLOAPCD prior to implementing any prescribed burning treatment. In addition, USLTRCD would prepare a burn plan as required by SPR AQ-3, which would include fire behavior modeling. In addition, SPR AQ-6 requires the implementation of an Incident Action Plan, which identifies burn dates, burn hours, weather limitations, specific burn prescription, communication plan, medical plan, traffic plan, and other special instructions required by SLOAPCD. The Incident Action Plan would also identify the contact personnel for the SLOAPCD to use in coordinating on-site briefings, posting notifications, and weather monitoring during burning.

IMPACT AQ-1

Use of vehicles, mechanical equipment, and prescribed (broadcast and pile) burning during initial and maintenance treatments would result in emissions of criteria pollutants that could exceed California ambient air quality standard (CAAQS) or national ambient air quality standard (NAAQS) thresholds. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was examined in the Program EIR and found to be potentially significant and unavoidable after the application of all feasible mitigation measures because of uncertainties in the degree of emissions reduction that could occur during implementation of later treatment projects.

Emissions of criteria air pollutants related to the proposed treatments are within the scope of the Program EIR because the associated equipment and duration of use are consistent with those analyzed in the Program EIR. Mitigation Measure AQ-1 is also applicable to this impact. The emission reduction techniques proposed in Mitigation Measure AQ-1 would be implemented to the extent feasible. However, it may be cost prohibitive to use equipment meeting the latest efficiency standards, including meeting the EPA's Tier 4 emission standards, using renewable diesel fuel, using electric- and gasoline-powered equipment, and using equipment with Best Available Control Technology. Carpooling would be encouraged by the implementing entity, but because crews may not all be employed with the same company and due to the project's location in a rural area it may not be feasible for most workers. For these reasons, this impact would remain significant and unavoidable.

When feasible, USLTRCD is proposing use of specialized biomass processing technologies in place of pile burning, pursuant to Mitigation Measure GHG-2 (i.e., air curtain, pyrolysis/carbonization, gasifier). Evaluation of criteria air pollutant emissions from these biomass processing technologies conducted by Ascent (2022) indicates that smoke and criteria air pollutant emissions can be substantially reduced, compared to open pile burning. Use of an air curtain burner (e.g., BurnBoss T24) would substantially reduce reactive organic gas (ROG) and particulate matter (PM) emissions by approximately 96 percent when compared to pile burning. Carbonization (i.e., use of a portable carbonator such as the Tigercat 6050 Carbonator) would substantially reduce ROG emissions by approximately 98 percent and PM emissions by 71-100 percent when compared to pile burning. For nitrous oxide (NO_X), air curtains are estimated to reduce NO_X emissions by at least 73 percent and carbonization is estimated to reduce NO_X emissions by approximately 39-94 percent. Gasification would also substantially reduce ROG and PM emissions by 98 percent and 91 percent, respectively (Ascent 2022). Based on available information about emissions from specialized biomass processing technologies, these technologies offer the opportunity to substantially reduce local exposure to PM from smoke, a potentially beneficial difference compared to pile burning.

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 air quality conditions present and air basin in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. The SPRs applicable to the proposed project are AD-4 and SPR AQ-1 through SPR AQ-6. Despite the substantial reduction in criteria air pollutant emissions afforded by use of these biomass processing technologies, Impact AQ-1 must still be recognized as significant and unavoidable because of uncertainties in the extent of their use. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-2

Use of vehicles and mechanical equipment during initial and maintenance treatments could expose people, such as hikers and recreationists, to diesel particulate matter emissions. However, treatment activities would not take place near the same people for an extended period such that prolonged exposure would occur. The potential to expose people to diesel particulate matter emissions was examined in the Program EIR. Diesel particulate matter emissions from the proposed treatments are within the scope of the Program EIR because the exposure potential is the same as analyzed in the Program EIR, and the types and amount of equipment that would be used, as well as the duration of use during proposed treatments are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area 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 air quality conditions and sensitive receptors (i.e., exposure potential) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. SPRs applicable to this treatment are AQ-1, HAZ-1, NOI-4, and NOI-5.

In addition, USLTRCD proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on-site. All other elements of SPR HAZ-1 would remain the same as presented in the Program EIR. This revision is consistent with the purpose of SPR HAZ-1 and does not involve any changes to requirements regarding equipment maintenance that could affect diesel particulate emissions. For the reasons described, proposed revisions to SPR HAZ-1 would not result in a substantially more severe significant effect related to emissions of diesel particulate matter than what was covered in the Program EIR.

This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-3

Use of vehicles, mechanical equipment, and prescribed burning during treatments would involve ground disturbing activities. The potential to expose people to naturally occurring asbestos (NOA)-containing fugitive dust emissions was examined in the Program EIR. Most of the project area is not located on soil types where NOA would be present; however, portions of the project area are underlain by serpentine soils (DOC 2000; USGS 2011). These soil types could potentially contain thin veins of asbestos fibers that can become airborne when disturbed. In accordance with SPR AQ-5, no ground-disturbing activities would occur in these areas without an Asbestos Dust Control Plan if required by 17 CCR Section 93105. Potential NOA exposure from the proposed treatments is within the scope of the activities and impacts addressed in the Program EIR because the types of ground-disturbing activities and the exposure potential are consistent with the impacts 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 air quality impact is also the same, as described above. SPRs applicable to this treatment are AQ-1, AQ-4, and AQ-5. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-4

SPRs applicable to prescribed burning and ongoing maintenance treatments are designed to minimize the risk of exposing people to smoke, which includes toxic air contaminants (TAC); however, prescribed burning during initial and maintenance treatments could still expose people to TAC. This potential exposure risk was examined as an impact in the Program EIR and found to be potentially significant and unavoidable after the application of the SPRs and all feasible mitigation measures because unpredictable changes in weather can occur during prescribed burns resulting in short-term exposure of people to concentrations of TAC and associated levels of acute health risk with a

Hazard Index greater than 1.0. When feasible, the use of specialized biomass processing technologies is proposed to reduce smoke emissions and associated TACs in comparison to pile burning. TACs resulting from the combustion of biomass are generally organic in nature and are, therefore, a subset of ROG emissions. Based on evaluation conducted by Ascent (2022), the proposed use of air curtain burners would reduce ROG emissions by at least 96 percent and the use of carbonizers and gasifiers would reduce ROG emissions by approximately 98 percent when compared to pile burning of equivalent areas. Therefore, the exposure of persons to TACs and related health risks would likely be substantially lower with the use of air curtain burners as compared with pile burning. The duration and parameters of the prescribed burns are within the scope of the activities addressed in the Program EIR. Therefore, the potential for exposure to TACs is also within the scope 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 air quality impact is also the same, as described above. SPRs applicable to these treatment activities are AD-4, AQ-1, AQ-2, and AQ-6. All feasible measures to prevent and minimize smoke emissions as well as exposure to smoke are included in SPRs. No additional mitigation measures are feasible, and this impact would remain significant and unavoidable, as explained in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-5

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

The inclusion of land in the proposed project area 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 air quality conditions and sensitive receptors present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. SPRs applicable to this impact are AQ-1, HAZ-1, NOI-4, and NOI-5.

In addition, USLTRCD proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on-site. All other elements of SPR HAZ-1 would remain the same as presented in the Program EIR. This revision is consistent with the purpose of SPR HAZ-1 and does not involve any changes to requirements regarding equipment maintenance that could affect diesel exhaust emissions and related odors. For the reasons described, proposed revisions to SPR HAZ-1 would not result in a substantially more severe significant effect related to odors from diesel exhaust than what was covered in the Program EIR.

This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-6

SPRs applicable to prescribed burning are designed to minimize the risk of exposing people to smoke, which includes objectionable odors; however, prescribed burning during initial and maintenance treatments could still expose people to objectionable odors. The potential to expose people to objectionable odors was examined in the Program EIR and was found to be potentially significant and unavoidable after the application of all feasible mitigation measures because short-term exposure to odorous smoke emissions from unpredictable weather changes could occur. Pursuant to Mitigation Measure GHG-2, the use of biomass processing technologies is proposed to reduce

smoke emissions and associated odors in comparison to pile burning. When compared to pile burning, the proposed biomass technologies would substantially reduce smoke through filtering (i.e., air curtains) or eliminate smoke and associated odors altogether (i.e., carbonizers, gasifiers).

The duration and parameters of prescribed burning and the exposure potential are consistent with the activities addressed in the Program EIR, and impacts would be reduced with the use of proposed biomass processing technologies. Therefore, the resultant potential for exposure to objectionable odors from smoke is within the scope of impacts covered 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 air quality conditions present and sensitive receptors in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. SPRs that are applicable to this treatment project are AD-4, AQ-1, AQ-2, and AQ-6. All feasible measures to prevent and minimize smoke odors, as well as exposure to smoke odors, are included in SPRs; additionally, biomass processing technologies to reduce smoke would be used pursuant to Mitigation Measure GHG-2. No additional mitigation measures are feasible, and this impact would remain significant and unavoidable, as explained in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW AIR QUALITY IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP Program EIR. USLTRCD has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP Program EIR (refer to Section 3.4.1, "Regulatory Setting," and Section 3.4.2, "Environmental 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 air quality 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 consistent with those covered in the Program EIR.

Revisions to SPR HAZ-1 would constitute a change to the project analyzed in the Program EIR. However, as described under Impact AQ-2 and AQ-5 above, the revisions do not involve any changes to requirements regarding equipment maintenance that could affect diesel particulate emissions or diesel exhaust emissions and related odors and would therefore continue to reduce the potential for air quality impacts consistent with the overall intent of SPR HAZ-1. Therefore, revisions to SPR HAZ-1 would not result in a new impact that was not covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and revisions to SPR HAZ-1 would not give rise to any new significant impact. Therefore, no new impact related to air quality would occur.

4.4 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

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

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

New Archaeological, Historical, and Tribal Cultural Resource Impacts: Would the treatment result in other impacts to archaeological, historical, and tribal cultural resources that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

Consistent with SPR CUL-1, a records search of the 88,151-acre project area, including areas within and outside of the CalVTP treatable landscape, was performed by the Central Coast Information Center (CCIC) on April 23, 2025 (CCIC Records Search # 25-061). The search revealed 395 previously recorded archaeological sites and historic features within the project area and an additional 28 in the 1/8-mile search radius. Four of these records have been voided and combined with other resource records; 15 records are of isolated features, meaning they have no historic context and are not considered resources for the purpose of CEQA. Fifty are built-environment historic features, consisting of

commercial and residential properties, bridges, religious buildings, and ranch properties. Twenty-eight are multicomponent sites, meaning they have both precontact (Native America) and historic materials. Of the remaining 329 archaeological sites, 310 are Native American in nature (rockshelters, human remains, midden soils, village sites, shell fragments, faunal bones, groundstones and tools, bedrock milling features, and lithic scatters), and 16 are historic-era archaeological sites (abandoned water conveyance systems, trash scatters, major ditches, roadbeds, structure pads, and fences).

Consistent with SPR CUL-2, an updated Native American contact list was obtained from the Native American Heritage Commission (NAHC). On April 10, 2025, letters inviting the tribes to consult were emailed to the tribal representatives indicated by NAHC. A response from a representative of the Xolon-Salinan Tribe was received on May 5, 2025, and a response from a representative of the Salinan Tribe was received on May 21, 2025. USLTRCD responded to both tribes on May 12, 2025 and May 25, 2025, respectively. No other responses were received from other tribes. Due to the number of precontact archaeological sites revealed by the CCIC, a search of NAHC's sacred lands database was not conducted, but is assumed to be positive. A positive result would simply indicate that a tribe has provided NAHC documentation stating that there is a site they consider sacred in this 88,151-acre project area.

IMPACT CUL-1

Proposed treatment activities include mechanical treatments and prescribed burning, which could damage historical resources. The CCIC records search revealed 50 historic features, 27 of which have been evaluated for local, state, or national eligibility. As shown in Table 4.4-1, 21 are considered resources under CEQA because they are eligible or listed in a local register, in the California Register of Historical Resources (CRHR), the National Register of Historic Places (NRHP), as a California Historical Landmark, or California Point of Historical Interest. These historical resources will be identified and avoided pursuant to SPR CUL-7.

Table 4.4-1 Historical Resources

Primary number/Name	Status	Additional details
P-40-000221 – Rancho San Simeon	NRHP/CRHR listed	Multicomponent but only the built portion appears eligible.
P-40-000327	NRHP/CRHR eligible	Multicomponent but only the built portion appears eligible.
P-40-001435 - Chinese Temple	California Point of Historical Interest and CRHR listed	
P-40-001442 - The Bianchini House	NRHP/CRHR listed	
P-40-001445 - Heart's Ease	local register	
P-40-041180 – Cambria School House	local register	
P-40-001527 – Squibb House	local register	
P-40-040861 – Guthrie House	NRHP/CRHR listed	
P-40-003016 - Cayucos Vets Hall	NRHP and CRHR eligible	Multicomponent site, but only the built portion appears eligible. Formerly the Cass Warehouse.
P-40-002760 – Old Hearst Bridge	CRHR eligible	
P-40-040760 - Captain James Cass House	California Point of Historical Interest	
P-40-041455 - Cass Tank House	Local consideration	
P-40-040759 – Nit Wit Ridge	California Historical Landmark #939	
P-40-040842 - Old Santa Rosa Catholic Church and Cemetery	NRHP/CRHR listed	

Primary number/Name	Status	Additional details
P-40-040850 - La Cuesta Encantada, Hearst Castle	California Historical Landmark #640, NRHP/CRHR listed, National Historic Landmark	
P-40-041137 – Greenhouse A of Hearst Castle	NRHP/CRHR listed	
P-40-041133 - Harmony District	NRHP/CRHR eligible	District
P-40-041136, Cheese Factory	NRHP/CRHR eligible	Contributor to the Harmony District
P-40-041134, Creamery Building	NRHP/CRHR eligible	Contributor to the Harmony District
P-40-041135, Cold Storage Warehouse	NRHP/CRHR eligible	Contributor to the Harmony District
P-40-041138, Harmony Creek Bridge	NRHP/CRHR eligible	Contributor to the Harmony District

Source: Compiled by Ascent in April 2025.

Six historic features previously evaluated were recommended not eligible for listing in the CRHR and are therefore, are not considered resources under CEQA; these features are: P-40-041132, Perry Ranch; P-40-041342, highway marker; P-40-041334, residence; P-40-041187, Evans Farmstead; P-40-041188, motel; and P-40-041244, commercial garage. No further considerations are needed for these features.

The remaining 23 historic features, however, have not been evaluated for eligibility for listing in the CRHR. Therefore, it is not known whether they are considered resources under CEQA, but they are assumed to be for the purposes of this analysis. Accordingly, historic features (i.e., buildings, bridges, roadways) over 50 years old that have not been recorded or evaluated for historical significance may be present in the project area; these structures will be identified and avoided pursuant to SPR CUL-7. The potential for treatment activities to result in disturbance, damage, or destruction of built-environment structures that have not yet been evaluated for historical significance was examined in the Program EIR. This impact is within the scope of the Program EIR, because treatment activities and the intensity of ground disturbance of the treatment project are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area 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 potential to encounter built-environment structures that have not yet been evaluated for historical significance in areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to historical resources is also the same, as described above. SPRs applicable to this impact are AD-3, CUL-1, CUL-7, and CUL-8. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT CUL-2

Vegetation treatment would include mechanical treatments using heavy equipment that could churn up the surface of the ground during treatment as vegetation is removed; this may result in damage to known or previously unknown archaeological resources. The CCIC records search revealed 329 archaeological sites; as shown in Table 4.4-2, only nine have been previously evaluated. The four archaeological sites that have been evaluated as not eligible are not considered resources under CEQA and need no further consideration for project implementation. The five archaeological resources that are eligible will be avoided according to the provisions of SPR CUL-5.

Table 4.4-2 Previously Evaluated Archaeological Sites

Primary number/Name	Status	Additional details
P-40-000273	NRHP/CRHR eligible	Multicomponent. Shell midden, lithic scatter, historic habitation debris (school, Chinese seaweed farmer's compound). Eligible for precontact only.
P-40-000274	NRHP/CRHR eligible	shell midden, lithic scatter, FAR, groundstone
P-40-000129	CRHR eligible	flaked stone and tools, shellfish, human remains, faunal bones

Primary number/Name	Status	Additional details
P-40-000258	not eligible	lithic scatter
P-40-000879	NRHP/CRHR eligible	Multicomponent. Village site with flaked and ground stone tools, bone tools, beads, bedrock milling features, midden deposits, and human remains. Historic component is the Chevron Estero Marino Terminal, which lacks integrity. Eligible for precontact only.
P-40-001478	not eligible	multicomponent
P-40-002089	CRHR eligible	Assemblage of lithic debitage, formed stone tools, ground stone including manos, metates, pestles, and pitted stone.
P-40-002156	not eligible	lithic scatter
P-40-002157	not eligible	lithic scatter

Source: Compiled by Ascent in April 2025.

The remaining 320 archaeological sites have not been evaluated; therefore, it is not known whether these sites are considered resources under CEQA, but they are assumed to be for the purposes of this analysis. A survey will be conducted before treatment pursuant to SPR CUL-4 to identify any previously unrecorded archeological resources and identified resources will be avoided according to the provisions of SPR CUL-5.

As described under Section 1.1.4, "Purpose of This PSA/Addendum," the project proposes to revise requirements under SPR CUL-4 to exempt manual treatments, when woody material is chipped and scattered, chipped and removed, or lopped and scattered, from needing an archaeological and historical resource survey. This constitutes a revision to the program description analyzed in the Program EIR. Requirements under SPR CUL-4 are intended to prevent damage to archaeological and historical resources. The proposed revisions to SPR CUL-4 would not result in any adverse effects to cultural resources, because the revision would only allow treatment activities that could not result in damage to cultural resources to occur without a survey. Those activities that may result in damage to cultural resources (e.g., mechanical treatments and prescribed burning) would require pretreatment surveys. Therefore, proposed revisions to SPR CUL-4 would not result in a substantially more severe significant effect related to disturbance of cultural resources than what was covered in the Program EIR. The proposed revisions to SPR CUL-4 are shown in the MMRP (Attachment A).

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

This impact is within the scope of the Program EIR, because treatment activities and intensity of ground disturbance of the treatment project are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area 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 potential for discovery of archaeological resources is essentially the same within and outside the treatable landscape; therefore, the potential impact to unique archaeological resources or subsurface historical resources is also the same, as described above. SPRs applicable to this impact are AD-3, CUL-1 through CUL-5 and CUL-8. Mitigation Measure CUL-2 would also apply to this treatment to protect any inadvertent discovery. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT CUL-3

Native American contacts in San Luis Obispo County were contacted on April 10, 2025, and included Julio Quair, Chairperson, Chumash Council of Bakersfield; Gabe Frausto, Chairman, Coastal Band of the Chumash Nation; Violet Walker, Chairperson, Northern Chumash Tribal Council; Patti Dunton, Tribal Administrator, Salinan Tribe of Monterey, San Luis Obispo Counties; Robert Piatti, Cultural Protection Lead, Salinan Tribe of Monterey, San Luis Obispo Counties; Nakia Zavalla, Tribal Historic Preservation Officer, Santa Ynez Band of Chumash Indians; Crystal Mendoza, Elders' Council Administrative Assistant, Santa Ynez Band of Chumash Indians; Sam Cohen, Government & Legal Affairs Director, Santa Ynez Band of Chumash Indians; Wendy Teeter, Cultural Resources Archaeologist, Santa Ynez Band of Chumash Indians; Neil Peyron, Chairperson, Tule River Indian Tribe; Kerri Vera, Environmental Department, Tule River Indian Tribe; Karen White, Chairperson, Xolon-Salinan Tribe; Penny Hurt, Cultural Preservation Administrator, Xolon-Salinan Tribe; and Mona Tucker, Chairperson, yak tityu tityu yak tiłhini – Northern Chumash Tribe. As stated above, the Xolon-Salinan Tribe and the Salinan Tribe responded to the outreach letters; both tribes have stated that the project area is sensitive for indigenous resources. Coordination between USLTRCD and tribal representatives is ongoing and will continue throughout project implementation.

As described under Section 1.1.4, "Purpose of This PSA/Addendum," the project proposes to revise requirements under SPR CUL-4 to exempt manual treatments when woody material is chipped and scattered, chipped and removed, or lopped and scattered, from needing an archaeological and historical resource survey. This constitutes a revision to the program description analyzed in the Program EIR. Requirements under SPR CUL-4 are intended to prevent damage to archaeological and historical resources. The proposed revisions to SPR CUL-4 would not result in any adverse effects to cultural resources, because the revision would only allow treatment activities that could not result in damage to cultural resources to occur without a survey. Those activities that may result in damage to cultural resources (e.g., mechanical treatments, prescribed burning) would require pretreatment surveys. Therefore, proposed revisions to SPR CUL-4 would not result in a substantially more severe significant effect related to disturbance of cultural resources than what was covered in the Program EIR. The proposed revisions to SPR CUL-4 are shown in the MMRP (Attachment A).

The potential for the proposed treatment activities to cause a substantial adverse change in the significance of a tribal cultural resource during implementation of vegetation treatment was examined in the Program EIR. This impact is within the scope of the Program EIR, because the intensity of ground disturbance of the treatment project is consistent with that analyzed in the Program EIR. As explained in the Program EIR, while tribal cultural resources may be identified within the treatable landscape during development of later treatment projects, implementation of SPRs would avoid any substantial adverse change to any tribal cultural resource. The inclusion of land in the proposed project area 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 tribal cultural affiliations present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to tribal cultural resources is also the same, as described above. SPRs applicable to this impact are AD-3, CUL-1 through CUL-6, and CUL-8. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT CUL-4

Vegetation treatment activities would include mechanical treatments using heavy equipment, including skid steers, excavators, dozers, and masticators, which could uncover human remains. The CCIC records search revealed burials sites containing human remains; because these sites are classified as archaeological sites, they will be avoided according to the provisions of SPR CUL-5. The potential for treatment activities to uncover human remains was examined in the Program EIR. This impact is within the scope of the Program EIR, because the treatment activities and intensity of ground disturbance are consistent with those analyzed in the Program EIR. Additionally, consistent with the Program EIR, the project would comply with California Health and Safety Code Section 7050.5 and PRC Section 5097 in the event of a discovery. 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 potential for uncovering human remains during implementation of the treatment project is essentially the same within and outside the treatable landscape and treatment activities; therefore, the impact related to disturbance of human remains is also the same, as described above. The SPR applicable to this impact is AD-3. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCE IMPACTS

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to archaeological, historical, or tribal cultural resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Revisions to SPR CUL-4 as described in Section 1.1.4, "Purpose of This PSA/Addendum," and shown in the MMRP (Attachment A), would constitute a change to the project analyzed in the Program EIR. Revisions to SPR CUL-4 exempt certain treatment activities (e.g., manual treatments, when woody material is chipped and scattered, chipped and removed, or lopped and scattered) from needing an archaeological and historical resource survey. Requirements under SPR CUL-4 are intended to prevent damage to archaeological and historical resources. Those activities that may result in damage to cultural resources (e.g., mechanical treatments and prescribed burning) would still require pretreatment surveys; therefore, revisions to SPR CUL-4 would not result in a new impact that was not analyzed in the Program EIR. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape, and revisions to SPR CUL-4, would not give rise to any new significant impacts. Therefore, no new impact related to archaeological, historical, or tribal cultural resources would occur.

4.5 BIOLOGICAL RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTSM	Impact BIO-1, pp 3.6-131 – 3.6-138	Yes	AD-1 AQ-3 AQ-4 BIO-1 BIO-2 BIO-7 BIO-9 GEO-1 GEO-3 GEO-4 GEO-5 GEO-7 HYD-5	BIO-1a BIO-1b	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTSM (all wildlife species except bumble bees) PSU (bumble bees)	Impact BIO-2, pp 3.6-138 – 3.6-184	Yes	AD-1 BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-8 BIO-10 BIO-11 HAZ-5 HAZ-6 HYD-1 HYD-3 HYD-4 HYD-5	BIO-2a BIO-2b BIO-2e BIO-2g BIO-3a BIO-4	LTSM	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation That Leads to Loss of Habitat Function	LTSM	Impact BIO-3, pp 3.6-186 – 3.6-191	Yes	AD-1 BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-6 BIO-8 BIO-9 HYD-4 HYD-5	BIO-3a	LTSM	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTSM	Impact BIO-4, pp 3.6-191 – 3.6-192	Yes	AD-1 BIO-1 HYD-1 HYD-3	BIO-4	LTSM	No	Yes

Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
				HYD-4				
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTSM	Impact BIO-5, pp 3.6-192 – 3.6-196	Yes	AD-1 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, Including Nesting Birds	LTS	Impact BIO-6, pp 3.6-197 – 3.6-198	Yes	AD-1 BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-12	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	NI	Impact BIO-7, pp 3.6-198 – 3.6-199	Yes	AD-1 AD-3	NA	NI	No	Yes
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	NI	Impact BIO-8, pp 3.6-199 – 3.6-200	No	None	NA	—	—	—

Notes: LTS = less than significant; LTSM = less than significant with mitigation; NI = no impact; PSU = potentially significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR for this impact; None = there are SPRs and/or MMs identified in the Program EIR 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 Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

Pursuant to SPR BIO-1, Ascent biologists conducted a review of project-specific biological resources data, including habitat and vegetation types, and special-status plants, special-status wildlife, and sensitive habitats (e.g., sensitive natural communities, wetlands) with potential to occur in the project area. CAL FIRE's Fire and Resource Assessment Program (FRAP) vegetation layer was used to identify the general vegetation and land cover types in the project area.

The project area is within the Central California Coast ecoregion and ranges in elevation from approximately sea level to 2,397 feet, encompassing multiple different vegetation types as a result. Land cover and vegetation types,

classified according to the California Wildlife Habitat Relationships (CWHR) classification system, within the project area and total acreage for each treatment type are presented in Table 4.5-1.

Table 4.5-1 Vegetation and Land Cover Types in the Project Area

Vegetation/Land Cover Type	Ecological Restoration (Acres)	Fuel Break (Acres)	Total (Acres)
Forest/Woodland			
Blue Oak Woodland	89.6	2.2	91.8
Blue Oak–Foothill Pine	121.3	2.9	124.2
Coast Oak Woodland	18,111.0	329.8	18,440.8
Closed-Cone Pine Cypress	2,055.8	192.5	2,248.3
Eucalyptus	16.9	0	16.9
Montane Hardwood	244.9	0	244.9
Montane Hardwood–Conifer	1,438.0	41.9	1,479.9
Sierran Mixed Conifer	4.2	0	4.2
Valley Oak Woodland	63.3	4.7	68.0
Forest/Woodland Total	**22,145**	**574**	**22,719**
Shrub/Scrub			
Chamise-Redshank Chaparral	195.4	1.3	196.7
Coastal Scrub	11,651.3	338.7	11,990
Mixed Chaparral	3,385.1	58.9	3,444.0
Shrub/Scrub Total	**15,231.8**	**398.9**	**15,630.7**
Herbaceous			
Annual Grassland	42,177.6	2,078.5	44,256.1
Perennial Grassland	517.4	47.1	564.5
Herbaceous Total	**42,695**	**2,125.6**	**44,820.6**
Wetland/Riparian[1]			
Estuarine	53.4	1.0	54.4
Lacustrine	14.9	0.2	15.1
Marine	31.4	0.3	31.7
Montane Riparian	2.8	0	2.8
Riverine	22.1	0.4	22.5
Saline Emergent Wetland	3.4	0	3.4
Valley Foothill Riparian	1,135.6	61.6	1,197.2
Wet Meadow	5.0	0	5
Wetland/Riparian Total	**1,268.6**	**63.5**	**1,332.1**
Agricultural			
Cropland	21.3	0	21.3
Deciduous Orchard	249.1	10.8	259.9
Dryland Grain Crops	21.9	0.5	22.4
Evergreen Orchard	119.3	0.3	119.6
Irrigated Hayfield	760.9	12.6	773.5

Vegetation/Land Cover Type	Ecological Restoration (Acres)	Fuel Break (Acres)	Total (Acres)
Irrigated Row and Field Crops	19.1	0	19.1
Pasture	303.2	22.3	325.5
Vineyard	191.6	13.0	204.6
Agricultural Total	**1686.4**	**59.5**	**1,745.9**
Developed/Disturbed/Barren			
Urban	1,290.6	129.6	1,420.2
Barren	322.5	41.5	364
Developed/Disturbed/Barren Total	**1,613.1**	**171.1**	**1,784.2**
All Vegetation Types Total[2]	***84,757***	***3,394***	***88,151***

[1] Wetland and riparian habitats are generally underrepresented in CAL FIRE FRAP vegetation data.

[2] Best available vegetation data does not completely cover the project area. Therefore, the treatment type acres do not sum up to the vegetation type by treatment type acre totals. Project and treatment type totals include 118.5 acres within the project area for which there is no vegetation data available.

Source: CAL FIRE FRAP vegetation data, downloaded and compiled by ARC and Ascent in 2025.

A list of special-status plant and wildlife species with potential to occur in the project area was compiled through review of the California Natural Diversity Database (CNDDB) and CNPS Inventory of Rare and Endangered Plants of California database records for the following US Geological Survey (USGS) quadrangles containing and surrounding the project area (CNDDB 2024; CNPS 2024), Appendix BIO-3 (Table 1a, Table 1b, and Table 19) in the CalVTP Final Program EIR (Volume II), and the Plants of Coastal San Luis Obispo County (Walgren 2019). A list of sensitive natural communities with potential to occur in the project area was compiled by assessing community composition during the reconnaissance surveys, completing a search of the Manual of California Vegetation online (CNPS 2025), and reviewing Table 3.6-3 (pages 3.6-25 through 3.6-27) in the CalVTP Final Program EIR (Volume II) for sensitive natural communities that could occur in the Central California Coast ecoregion in the habitat types mapped in the project area.

All habitat within the project area was evaluated for its potential to qualify as an environmentally sensitive habitat area (ESHA) pursuant to the California Coastal Act. Criteria considered to determine if an area would be designated as ESHA are presence of rare species or habitats, presence of species or habitats that are valuable, and sensitivity of species or habitats to human disturbance or degradation.

Ascent conducted a reconnaissance-level survey of the project area pursuant to SPR BIO-1 on November 19, 20, and 21, 2024. Based on implementation of SPR BIO-1, including review of occurrence data, species ranges, habitat requirements for each species, results of reconnaissance-level surveys, and habitat present within the project area as assessed during reconnaissance surveys, Ascent assembled a complete list of all special-status plant and wildlife species with potential to occur in the vicinity of the proposed project. This complete species list along with genus and species names, federal and state listing status, and potential to occur within the project area is contained in Attachment C. Special-status species with potential to occur in the project area are discussed in detail under Impact BIO-1 (special-status plants) and Impact BIO-2 (special-status wildlife).

IMPACT BIO-1

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on special-status plant species in the project area. Potential impacts resulting from maintenance activities would be similar to those resulting from initial treatments because the same treatment activities would occur. Maintenance treatments would be timed to mimic the natural fire return interval, but selective invasive species removal could be implemented as needed. Additionally, prescribed herbivory would predominantly be implemented during maintenance treatments, and any potential adverse effects on special-status plants resulting from this treatment activity are described in this section as well. However, treatment frequency and intensity can determine whether effects on certain plant species

are beneficial or adverse. Initial higher intensity treatment, such as prescribed fire or mastication that reduces overgrowth, opens the tree canopy to allow more light penetration, or removes invasive competitors can be beneficial for some special-status plant populations; however, repeated higher intensity treatments at too frequent intervals can have adverse effects on those same special-status plants. In particular, if higher intensity maintenance treatment occurs in Monterey pine communities at frequencies outside the natural fire return interval, Monterey pine and other special-status plants associated with this community type could be adversely affected through habitat alteration that makes the habitat unsuitable for their growth and reproduction. Therefore, maintenance treatments outside of the natural fire return interval (i.e., treatments occurring less than 11 years after initial treatment for Monterey pine forest) would occur only in areas where a qualified RPF or qualified botanist determines that the goal of the initial treatment to restore the Monterey pine community to Condition Class 1 (i.e., natural vegetation composition, structure, and fuels) was not achieved with initial treatments implemented within the natural fire return interval. In those instances, lower intensity, targeted maintenance activities may be implemented outside of the natural fire return interval to achieve these goals and return the Monterey pine stand to Condition Class 1. These lower intensity maintenance activities would consist of targeted removal of dead, dying, and diseased trees, and invasive species; pile burning or chipping to dispose of resulting biomass; or select thinning of regenerating trees to achieve desired tree spacing consistent with healthy Monterey pine stands. Burn piles will be limited to areas outside the driplines of mature Monterey pine trees to avoid damaging retained trees. The potential for treatment activities to result in adverse effects on special-status plants was examined in the Program EIR.

SPR BIO-7 would apply to all treatment activities, including maintenance treatments, and protocol-level surveys for special-status plants would be conducted pursuant to *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018a, or current version) prior to implementing prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and herbicide treatments in any habitat potentially suitable for special-status plants as indicated in Attachment C. Pursuant to SPR BIO-7, surveys would not be required for those special-status plants not listed under the federal Endangered Species Act (ESA) or California Endangered Species Act (CESA), if the target special-status plant species is an herbaceous annual species, stump-sprouting species, or geophyte species, and the specific treatments may be carried out during the dormant season for that species or when the species has completed its annual life cycle, provided the treatment would not alter habitat in a way that would make it unsuitable for the special-status plants to reestablish following treatment, or destroy seedbanks, stumps, or roots, rhizomes, bulbs and other underground parts of special-status plants. However, this would require that treatments in habitats potentially suitable for these special-status plants be restricted to the dormant season for these species and to treatments that do not disturb below the soil surface (i.e., manual treatments, herbicide application, prescribed herbivory, and prescribed burning) without prior knowledge of their presence, which may unnecessarily or infeasibly constrain treatment implementation. In this case, surveys could be conducted to determine presence or absence and, depending on the results, may provide greater flexibility in terms of the timing and types of treatments that may be implemented.

Multiple special-status plant species that are known to occur or may occur within the project area are herbaceous annual species or geophytes, as indicated in Attachment C. Impacts on these species would be avoided by implementing only treatment activities that can be selectively implemented so as to not kill the species or disturb the soil below the surface (i.e., manual treatment, prescribed herbivory, herbicide application, and prescribed burning) and carrying out these treatments only during the dormant season (i.e., when the plant has no aboveground living parts), which would typically occur after seed set and before germination. Typically, germination will occur after the first significant rainfall (approximately 0.5 inch), and cold snap, which generally occurs between October–December (Levine et al. 2008). Control lines for prescribed burning would have to be created outside of potential habitat for special-status plants or the proposed control line areas would need to be surveyed for special-status plants, including annual species, stump-sprouting species, or geophyte species, prior to installing any control lines. Treatment activities that could potentially kill or remove seeds, stumps, and underground root structures (i.e., mechanical treatments) and pile burning may result in impacts on these plant species even when dormant and would not be conducted in potential habitat for these species without prior implementation of SPR BIO-7 to determine if they are present. If treatment activities would not be limited to those that do not kill or remove vegetation or disturb the soil below the surface or treatments cannot be completed in the dormant season and would be implemented during the growing

period of annual and geophyte species, protocol surveys (per SPR BIO-7) and avoidance of any identified special-status plants (per Mitigation Measures BIO-1a and BIO-1b) must be implemented, as described below. The remaining special-status plant species that have potential to occur within the project area are perennial species, which could not be avoided seasonally in the same manner as herbaceous annual species, stump sprouters, or geophytes; therefore, protocol-level surveys under SPR BIO-7 would be necessary to identify them prior to implementing treatment activities regardless of the timing of treatments.

Where protocol-level surveys are required (per SPR BIO-7) and special-status plants are identified during these surveys, Mitigation Measures BIO-1a or BIO-1b, depending on species status, will be implemented to avoid loss of identified special-status plants. Pursuant to project-specific guidance to implement Mitigation Measure BIO-1a and BIO-1b, the 50-foot buffer required to protect special-status plants may be reduced to allow for the treatment of invasive plants to protect plants from encroachment and habitat degradation. Only localized, targeted removal methods, including manual or selective herbicide treatments (i.e., cut-stump method), will be implemented to minimize disturbance to rare plant species while preventing long-term habitat degradation. Mechanical treatment, prescribed burning, and prescribed herbivory would not occur within the 50-foot buffer. The use of targeted manual and herbicide treatments to remove invasive plants would result in a benefit to special-status plants and their habitat by reducing competition between those plants and invasive species for space, light, water, and nutrients and reduce the risk of these species being consumed by wildland fire or by a fire cycle altered by the prevalence of invasive grasses that burn more frequently than the native vegetation type these species are associated with. A no-disturbance buffer is not required for Monterey pine because this species would benefit from treatments.

Control lines and burn piles for prescribed burning would not be sited in areas known to support special-status plants under any circumstances. In the case of plants listed pursuant to ESA or CESA, the determination of beneficial effects will need to be made in consultation with CDFW and/or US Fish and Wildlife Service (USFWS), depending on species status. If treatments are determined to be beneficial and would be implemented in areas occupied by special-status plants, under the specific conditions described under Mitigation Measures BIO-1a and BIO-1b, additional impact minimization and avoidance measures or design alternatives to reduce impacts will be identified. A qualified RPF or botanist will evaluate the initial and maintenance treatment design and frequency appropriate to maintain habitat function for special-status plants and the identified design and frequency will be implemented.

In addition, pursuant to SPR HYD-5, nontarget vegetation and special-status species would be protected from herbicides. Only ground-level targeted application would occur (no aerial spraying). Only herbicides labeled for use in aquatic environments would be used when working in areas where there is a possibility the herbicide could come into direct contact with water. Herbicides would be applied by hand and only during low-flow periods or when seasonal streams are dry. As discussed in Section 2.2.4, "Treatment Activities," herbicides, aquatic and terrestrial, would not be used within WLPZs, wet meadows, or equipment limitation zones.

Several special-status species known to occur or with potential to occur in the project area are associated with wetland habitats. Consistent with the Coastal VTS and pursuant to Mitigation Measure BIO-4, existing information reviews and implementation surveys will be conducted to delineate the extent of all wetlands within treatment areas. Where wetland habitats are delineated, a protection buffer will be established around the wetland boundary (see Impact BIO-4 below). Only treatment activities that would restore ecological benefits to the wetland or would maintain wetland habitat quality while improving surrounding ecosystems, including ESHAs, will be allowed within the wetland protection buffer. Treatment activities other than broadcast burning will not occur within wetlands, and broadcast burning will only be implemented within the expected fire return interval for the vegetation communities present. Broadcast burning would only be implemented in wetlands if no special-status species (other than vernal pool fairy shrimp, see "Impact BIO-2," below) are present and habitat function will be maintained or enhanced/restored. Ecological restoration treatments would be implemented within the wetland buffer (e.g., manual treatments, prescribed burning, and/or targeted herbicide application) to remove coyote brush shrubs, and invasive plants such as blue gum and French broom, and reduce thatch buildup in native perennial grasslands that are surrounding and intermixed with wetlands. Fire ignition and accelerants will not be used in the wetland buffers. Therefore, there would be no impacts to special-status plants associated with wetland habitats.

Special-Status Plants Known to Occur in the Project Area

Several special-status plant species are known to occur within the project area (see Attachment C). Therefore, implementation of Mitigation Measures BIO-1a and BIO-1b will be required to avoid loss of individual plants. Any special-status plants found during the surveys conducted under SPR BIO-7, would be protected by establishing a no-disturbance buffer around the area occupied by special-status plants (see Attachment A).

Under Mitigation Measure BIO-1b, treatments may be conducted within the no-disturbance buffer outside of the growing season of annual and geophytic species (e.g., after species has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the underground parts of special-status plants or destroy the seedbank. Additional information is provided below on Monterey pine, a special-status plant species known to occur throughout the project area, because treatment activities would occur within the no-disturbance buffers of this species, but the species would benefit from the treatments and habitat function would improve with implementation of the treatments. Pursuant to Mitigation Measure BIO-1a and Mitigation Measure BIO-1b, impacts on special-status plants must be avoided unless it is determined that the plants would benefit from treatment and that habitat function would improve with implementation of the treatment.

Monterey Pine

Monterey pine is a special-status plant species with a California Rare Plant Rank of 1B.1 (see Attachment C) and qualifies as ESHA. It is known to occur throughout the project area. It is the dominant species in closed-cone pine cypress (i.e., Monterey pine) habitat in the area. Manual, mechanical, and prescribed burning treatments in closed-cone pine cypress habitat are proposed and would specifically target Monterey pine. Much of the Monterey pine habitat within the project area has not experienced fire for at least 70 years and is outside the natural fire return interval of 11 to 20 years. Many trees are infected by disease, including western gall rust, dwarf mistletoe, and pine pitch canker, and some Monterey pine stands are extremely dense (see Section 2.4 for additional details on Monterey pine within the project area and Section 2.4.4, "Pests and Disease," for additional information on these diseases).

Monterey pine has an intermediate shade tolerance and becomes less shade tolerant as the tree matures. It obtains optimal growth in full sunlight (Cope 1993). Generally, natural stands of Monterey pine are mixed age classes, but size distribution is skewed based on the last fire (Piirto and Volkonen 2005). Monterey pine can survive low intensity fire if it is not a crown fire. Crown fires in dense stands kill young Monterey pine trees. Reproduction rates are greatest after a fire if the parent trees survive. The optimal seedbed for Monterey pine is bare mineral soil, such as that created by fire (Hayes et al. 2007) but regeneration can also occur after disturbance such as clearing or logging (Cope 1993). Maximum seed production is achieved once Monterey pine individuals are 1 or 2 decades old (Hayes et al. 2007). Monterey pine also regenerates through regular release of seeds that occurs most years and is based on temperature and humidity. More seeds are released during warm, dry weather (Cope 1993; Piirto and Volkonen 2005).

Treatments are proposed in Monterey pine habitat to promote and maintain healthy, resilient stands. Treatments would focus on reducing density in stands through removal of dead, dying, and diseased Monterey pine trees, including concentrations of smaller and deformed Monterey pines, encouraging natural regeneration, enhancing mixed age stands, increasing biodiversity, and reducing other downed, dead fuels. Manual and mechanical treatments are proposed to remove live Monterey pines up to 8 inches dbh and trees that are dead, in irreversibly poor condition, or a safety hazard in all age classes. Decreasing the density of Monterey pine through removal of smaller trees would encourage recruitment. Maximum seed production of Monterey pine occurs when stands have an open tree canopy (Cope 1993). In addition, decreasing the density of the stand would create canopy openings that would enhance biodiversity and forest complexity and would promote a more resilient forest, thereby decreasing the risk of high severity and crown fire and increasing the chance of individual trees surviving a low to moderate severity fire. Reducing understory Monterey pine density (along with removal of entire plants and limbs of other shrub and tree species) would also allow prescribed low intensity ground fire to be conducted to help promote regeneration. An initial prescribed burn would be within the normal fire return interval of 11 to 20 years. No maintenance prescribed burning treatments in Monterey pine stands would occur in these areas, except pile burning to dispose of biomass as described above for lower intensity maintenance activities, sooner than 11 years since the last burn (pursuant to Mitigation Measure BIO-1b). Burn piles will be limited to areas outside the driplines of mature Monterey pine trees to avoid damaging retained trees.

In addition, reducing the density of Monterey pine would reduce competition in the lower and mid canopy where oak competition is more prevalent. Reducing the competition with oak trees would help prevent the conversion of Monterey pine dominated habitat to oak dominated habitat, which is a succession that occurs in absence of fire. A study on the Monterey pine stand at Año Nuevo found that treatments that reduce stand density and favor mid to small diameter Monterey pine trees over other species and large Monterey pine trees seem most appropriate when aiming to promote the sustainability of Monterey pine (Piirto and Volkonen 2005). Therefore, direct removal of Monterey pine as part of treatments would benefit Monterey pine by encouraging regeneration, enhancing a mixed age stand, and promoting the health and vigor of larger, older pines for seed production. Habitat function in Monterey pine stands would improve with implementation of treatments through increased health and resiliency. This is consistent with Mitigation Measure BIO-1b, which states that impacts on special-status plants must be avoided unless it is determined that the plants would benefit from treatment and that habitat function would improve with implementation of the treatment. Proposed treatments are also consistent with Coastal VTS 5, which requires that ESHAs be protected against any significant disruption of habitat values.

Conclusion

The potential for treatment activities to result in adverse effects on special-status plants was examined in the Program EIR. This impact on special-status plants is within the scope of the Program EIR, because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on special-status plants is also the same, as described above.

As described under Section 1.1.4, "Purpose of This PSA/Addendum, " USLTRCD proposes to revise requirements under SPR GEO-1 to suspend mechanical and herbivory treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical treatment or prescribed herbivory activities, and proposes to suspend targeted herbicide application if the National Weather Service forecast is a "chance" (30 percent or more averaged over each hour) of rain within the next operational day's 12-hour period between 6:00 a.m. and 6:00 p.m. USLTRCD proposes to implement this SPR only for prescribed herbivory activities associated with goats, and sheep, and llama, no prescribed herbivory activities associated with cattle are proposed. In the coastal region of the project area, forecasts often include a chance of rain; however, precipitation sometimes does not materialize. Therefore, suspension of treatment activities in these cases could result in unnecessary loss of work time. Without this revision to SPR GEO-1, the objectives of the project could not be achieved. This constitutes a revision to the program description analyzed in the Program EIR. Requirements under SPR GEO-1 are intended to prevent soil destabilization during precipitation events that could result in soil compaction and disturbance that could have adverse effects on special-status plants if present. Suspension of mechanical treatments that cause soil disturbance, prescribed herbivory, and targeted herbicide treatments in the above-mentioned conditions (e.g., rain, saturated soils, or soils wet enough for compaction to occur) would provide the same level of protection for indirect effects on special-status plants resulting from soil destabilization as the original SPR GEO-1, because these activities would not continue during conditions where soil destabilization could occur. Suspension of these activities would not be based on weather forecasts alone, but rather if weather predictions materialize and lead to precipitation events. Therefore, proposed revisions to SPR GEO-1 would not result in a substantially more severe significant effect on special-status plants than what was covered in the Program EIR.

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

IMPACT BIO-2

Initial treatments and follow-up maintenance treatments could result in direct or indirect adverse effects on special-status wildlife species and habitat suitable for these species within a treatment area, as described in the following sections. Potential impacts resulting from maintenance activities would be similar to those resulting from initial treatments because the same treatment activities would occur.

California Red-Legged Frog

California red-legged frog is endemic to California and Baja California, Mexico. Adult and juvenile California red-legged frogs are known to travel through upland habitat (e.g., riparian, woodland, grassland) to move between breeding and nonbreeding sites (e.g., other ponds, deep pools in streams, moist and cool riparian understory, burrows) for access to refugia and foraging habitat, or to disperse to new breeding locations. Movements through upland habitat are known to occur up to approximately 1 mile over the course of a wet season (Bulger et al. 2003). During migration, California red-legged frog may travel longer distances from aquatic habitat and typically travel in straight lines irrespective of vegetation types; individuals have been documented to move more than 1.7 miles between aquatic habitat sites (Bulger et al. 2003). However, studies have demonstrated that California red-legged frogs generally remain very close to breeding ponds during the nonbreeding season and typically do not move more than a few hundred feet into upland habitats (Bulger et al. 2003; Fellers and Kleeman 2007). California red-legged frogs generally make overland movements (i.e., dispersal, migration, foraging) during the wet season (i.e., October to May) and these movements are typically made at night (Bulger et al. 2003). California red-legged frog is known to occur in the project area (see Attachment C) and breeding and nonbreeding aquatic habitat for California red-legged frog may be found in the perennial streams and farm ponds throughout the project area.

Pursuant to SPR BIO-1, if it is determined that adverse effects can be clearly avoided by physically avoiding the habitat suitable for the species or the season of sensitivity, then no surveys or mitigation would be required. The implementation of SPR HAZ-5, SPR HYD-1, SPR HYD-3, and SPR HYD-4 (see Attachment A) would reduce the impacts of treatment activities by setting buffers around aquatic habitats and limiting activities within those buffers. In addition, with the implementation of these SPRs, prescribed herbivory would not result in injury or mortality to California red-legged frog because, outside of the buffers, the species would be expected to move to avoid grazing animals, and grazing is not likely to remove or collapse cover for California red-legged frog in upland habitat. These SPRs would also reduce impacts on California red-legged frog from prescribed burning, mechanical treatment, manual treatment, and targeted herbicide application; however, injury or mortality would not be completely avoided because the species is known to occur year-round farther from suitable aquatic habitat than the required maximum buffer distance. In addition, manual activities implemented within the buffers may result in adverse effects on California red-legged frogs. Therefore, per SPR BIO-1, all adverse effects cannot be clearly avoided, and SPR BIO-10 would apply. The potential for treatment activities and maintenance treatments to result in adverse effects on California red-legged frog was examined in the Program EIR.

Pursuant to SPR BIO-10, protocol surveys (see Attachment A) would be conducted, or presence of California red-legged frog would be assumed within the project area. If California red-legged frogs are detected during SPR BIO-10 surveys, or presence is assumed within the project area, Mitigation Measure BIO-2a will be required.

Within the project area and because of the proximity to nonbreeding and potential breeding habitat, Mitigation Measure BIO-2a would require seasonal pretreatment visual surveys, monitoring during treatments near aquatic habitat, and work stoppages and would prohibit mechanical treatments following precipitation events (see Attachment A). Furthermore, targeted herbicide use during project implementation will comply with the herbicide use restrictions in the stipulated injunction issued by the Federal District Court for the Northern District of California (Mitigation Measure BIO-2a).

Habitat function for California red-legged frog would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat, and treatments within WLPZs would be limited pursuant to SPR HYD-4 (see Attachment A). While non-shaded fuel break treatments may result in removal of more vegetative cover and increase spacing between remaining vegetation within upland habitat when compared to ecological restoration

treatments (see Section 2.4.2, "Treatment Type – Fuel Breaks"), not all vegetation would be removed; root systems would predominantly be left intact, which will promote natural regeneration mimicking post fire conditions; fuel break treatments would also be subject to applicable SPRs, mitigation measures, and Coastal VTS; and these treatments are not a substantial portion of the potential upland habitat for the species.

Furthermore, ecological restoration treatments, which make up the majority of the proposed treatment acres within the project area would be designed to retain down woody debris in strategic locations and retain a mosaic pattern of vegetation (see Section 2.4, "Proposed Treatments"). In addition, impacts on California red-legged frog habitat from targeted herbicide treatments would be avoided and minimized by implementation of SPR HAZ-5, HAZ-6, and HYD-5 (see Attachment A). Habitat for California red-legged frog would also be maintained through implementation of Mitigation Measure BIO-3a (see Impact BIO-3). Mitigation Measure BIO-4 will further reduce potential impacts by requiring protection of state and federally protected wetlands, which include aquatic habitat suitable for California red-legged frog (see Impact BIO-4). Pursuant to SPR BIO-4, at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within riparian corridors would be maintained. Lastly, the understory vegetation and downed wood retention standards for the project (see Section 2.4, "Proposed Treatments") would maintain habitat for California red-legged frog.

Pursuant to Mitigation Measure BIO-2a, and because this species is listed under ESA, USLTRCD must notify USFWS about its proposed measures to avoid mortality, injury, or disturbance of the species and its determination that habitat function would be maintained after treatments. For the reasons summarized above, USLTRCD determined that implementation of treatments would maintain habitat function for California red-legged frog and contacted USFWS to seek technical input on this determination, as required. On April 25, 2025, USLTRCD contacted Emily Levin at USFWS describing the measures that would be taken to avoid mortality, injury, and disturbance to California red-legged frogs and to maintain habitat function in compliance with Mitigation Measure BIO-2a. A refinement to the project description regarding prioritizing chipped biomass on roads and trails resulted from this notification. 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.

Foothill Yellow-Legged Frog

Foothill yellow-legged frog is typically found in perennial streams and directly adjacent moist upland habitat, depending on the time of year. During the fall and winter, the species may be found in the uplands near streams, and in the spring individuals move to wider sunlit channels to breed. The species is highly aquatic and is rarely found farther than 36 to 150 feet from perennial water (CDFW 2018b). However, a longer dispersal distance has been noted (over 4.3 miles), although primarily wetted channels were used in this observation (CDFW 2018b). The species has been documented within the project area (see Attachment C).

The potential for treatment activities including maintenance treatments to result in adverse effects on foothill yellow-legged frog was examined in the Program EIR. Pursuant to SPR BIO-1, if it is determined that adverse effects on foothill yellow-legged frog can be clearly avoided by physically avoiding habitat for the species, or by conducting treatments outside of the season when foothill yellow-legged frogs are present, then no further action is required. The implementation of SPR HAZ-5, SPR HYD-1, SPR HYD-3, and SPR HYD-4 (see Attachment A) would reduce the impacts of treatment activities by setting buffers around aquatic habitats and limiting activities within those buffers; however, effects would not be completely avoided, because foothill yellow-legged frogs may be found outside of these buffers and are present year-round. With the implementation of SPRs to reduce impacts to aquatic habitat, prescribed herbivory would not result in injury or mortality to foothill yellow-legged frog because the species would be expected to move to avoid grazing animals, and grazing is not likely to remove or collapse cover for foothill yellow-legged frog in upland habitat. However, treatment activities, including prescribed burning, mechanical treatments, manual tree and snag removal, and targeted herbicide application conducted within upland foothill yellow-legged frog habitat could result in injury or mortality of individuals.

Because effects on the species may not be avoided, pursuant to SPR BIO-10, focused surveys for foothill yellow-legged frog would be conducted within habitat for this species prior to implementation of treatment activities (i.e., prescribed burning, mechanical treatments, manual tree and snag removal, and targeted herbicide application), or

presence would be assumed. If no foothill yellow-legged frogs are observed during focused surveys, then additional mitigation would not be required. If foothill yellow-legged frogs are observed during focused surveys, or presence of the species is assumed, then Mitigation Measure BIO-2a will be implemented. Under Mitigation Measure BIO-2a, biological monitoring and work stoppages would be implemented to avoid injury to or mortality of individual foothill yellow-legged frogs.

Habitat function for foothill yellow-legged frog would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat, and treatments within WLPZs would be limited pursuant to SPR HYD-4 (see Attachment A). While non-shaded fuel break treatments may result in removal of more vegetative cover and increase spacing between remaining vegetation within upland habitat when compared to ecological restoration treatments (see Section 2.4.2, "Treatment Type – Fuel Breaks"), not all vegetation would be removed; root systems would predominantly be left intact, which will promote natural regeneration mimicking post fire conditions; fuel break treatments would also be subject to applicable SPRs, mitigation measures, and Coastal VTS; and these treatments are not a substantial portion of the potential upland habitat for the species.

Furthermore, ecological restoration treatments, which make up the majority of the proposed treatment acres within the project area would be designed to retain down woody debris in strategic locations and retain a mosaic pattern of vegetation (see Section 2.4, "Proposed Treatments"). In addition, impacts on foothill yellow-legged frog habitat from targeted herbicide application would be avoided and minimized by implementation of SPR HAZ-5, HAZ-6, and HYD-5 (see Attachment A). Habitat for foothill yellow-legged frog would also be maintained through implementation of Mitigation Measure BIO-3a (see Impact BIO-3). Mitigation Measure BIO-4 will further reduce potential impacts by requiring protection of state and federally protected wetlands, which include aquatic habitat for foothill yellow-legged frog (see Impact BIO-4). Pursuant to SPR BIO-4, at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within riparian corridors would be maintained. Last, the understory vegetation and downed wood retention standards for the project (see Chapter 2, "Project Description") would maintain habitat for foothill yellow-legged frog.

Pursuant to Mitigation Measure BIO-2a, and because this species is listed under CESA and ESA, USLTRCD must notify CDFW and USFWS about its proposed measures to avoid mortality, injury, or disturbance of the species and its determination that habitat function would be maintained after treatments. For the reasons summarized above, USLTRCD determined that implementation of treatments would maintain habitat function for foothill yellow-legged frog and contacted CDFW and USFWS to seek technical input on this determination, as required. On April 25, 2025, USLTRCD contacted Austin Fisher and Margarita Gordus at CDFW and Emily Levin at USFWS describing the measures that would be taken to avoid mortality, injury, and disturbance to foothill yellow-legged frogs and to maintain habitat function in compliance with Mitigation Measure BIO-2a. A refinement to the project description regarding prioritizing chipped biomass on roads and trails resulted from this notification. 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.

Southwestern Pond Turtle

Southwestern pond turtle is known to occur in ponds, reservoirs, streams, and rivers throughout the project area, and this species may use upland habitat in the vicinity of these features including riparian areas, grasslands, and open oak woodlands on east-facing or south-facing areas (see Attachment C).

Pruning of trees and shrubs, targeted herbicide application, and prescribed herbivory are not likely to result in injury, death, or substantial disturbance of individuals due the limited vegetation and ground disturbance that would result from these activities. Prescribed burning, mechanical treatments, and manual tree/snag removal within suitable habitat for southwestern pond turtle may result in the destruction of nests and injury or death of individuals if present. The potential for initial treatment activities and maintenance treatments to result in adverse effects on southwestern pond turtle was examined in the Program EIR.

Pursuant to SPR BIO-1, if it is determined that adverse effects on southwestern pond turtles would be clearly avoided by physically avoiding the habitat suitable for these species, then no mitigation would be required. The implementation of SPR HAZ-5, SPR HYD-1, SPR HYD-3, and SPR HYD-4 (see Attachment A) would reduce the impacts

of treatment activities by setting buffers around aquatic habitats and limiting activities within those buffers. However, these measures may not avoid impacts on southwestern pond turtle when they are present outside of established buffers, or if non-mechanical treatment activities implemented within buffers resulted in injury or mortality of southwestern pond turtle. Southwestern pond turtle may be present in upland habitats year-round; therefore if prescribed burning, mechanical treatments, or manual tree/snag removal is implemented within habitat for southwestern pond turtles, SPR BIO-10 would apply, and focused surveys for southwestern pond turtle would be required prior to prescribed burning, mechanical treatments, and manual tree/snag removal.

Southwestern pond turtle is proposed for listing under ESA, and as such, currently does not have protection under ESA; however, it is possible that the species will be listed during the life of the project. USFWS also proposed the 4(d) rule, which would provide certain exceptions to take prohibitions in the ESA for projects that have beneficial or negligible impacts to the southwestern pond turtle, including wildfire suppression and management projects, such as the proposed project. "Take" is defined under ESA as to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." If southwestern pond turtles are detected during surveys pursuant to SPR BIO-10, and work occurs before the southwestern pond turtle is listed under ESA or if this species is listed with the proposed 4(d) ruling, protective buffers would be implemented pursuant to Mitigation Measure BIO-2b to avoid injury or mortality.

Habitat function for southwestern pond turtle would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat, and SPR HYD-4 and HYD-5 would be implemented to protect aquatic habitat. While non-shaded fuel break treatments may result in removal of more vegetative cover and increase spacing between remaining vegetation within upland habitat when compared to ecological restoration treatments (see Section 2.4.2, "Treatment Type – Fuel Breaks"), not all vegetation would be removed; root systems would predominantly be left intact, which will promote natural regeneration mimicking post fire conditions; fuel break treatments would also be subject to applicable SPRs, mitigation measures, and Coastal VTS; and these treatments are not a substantial portion of the potential upland habitat for the species. Also, SPR BIO-5 would retain cover in coastal scrub and chaparral habitats, and SPR BIO-8 would avoid habitat conversion of environmentally sensitive habitats. Additionally, pursuant to Mitigation Measure BIO-3a, treatments would be designed to avoid the loss of oak woodlands and sensitive natural communities. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Other Special Status Amphibians and Reptiles

Coast range newt and two-striped gartersnake are both known to occur within the project area (CNDDB 2024). Coast range newts may be found in upland habitats up to 1 kilometer from aquatic habitat, while two-striped gartersnake is a highly aquatic species that remains within riparian habitat along permanent streams (see Attachment C). Northern California legless lizard and coast horned lizard have not been documented to occur within the project area, but habitat for these species is present in multiple portions of the project area where there is sandy loose soil (see Attachment C).

Prescribed herbivory would not result in injury or mortality to special-status amphibians and reptiles, because the species would be expected to move to avoid grazing animals, and grazing is not likely to remove or collapse cover for special-status amphibians and reptiles in upland habitat. However, prescribed burning, mechanical treatments, manual tree and snag removal, and targeted herbicide application conducted within habitat suitable for special-status amphibians and reptiles could result in injury or mortality. The potential for treatment activities to result in adverse effects on special-status reptiles and amphibians was examined in the Program EIR.

Pursuant to SPR BIO-1, if it is determined that adverse effects on special-status amphibians and reptiles can be avoided by physically avoiding the habitat for these species or by avoiding the sensitive season then no further measures would be needed (see Attachment A). However, because these species are present in the project area year-round, if treatments are conducted in habitat for special-status amphibians and reptiles, then SPR BIO-10 would be implemented and focused surveys would be conducted prior to treatment activities. If individual special-status amphibians and reptiles are detected during pretreatment surveys, then Mitigation Measure BIO-2b would apply and biological monitoring during treatments, work stoppage, and other measures would be implemented.

Habitat function for special-status amphibians and reptiles would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat, and SPR HYD-4 and HYD-5 would be implemented to protect aquatic habitat. While non-shaded fuel break treatments may result in removal of more vegetative cover and increase spacing between remaining vegetation within upland habitat when compared to ecological restoration treatments (see Section 2.4.2, "Treatment Type – Fuel Breaks"), not all vegetation would be removed; root systems would predominantly be left intact, which will promote natural regeneration mimicking post fire conditions; fuel break treatments would also be subject to applicable SPRs, mitigation measures, and Coastal VTS; and these treatments are not a substantial portion of the potential upland habitat for the species. Furthermore, ecological restoration treatments, which make up the majority of the proposed treatment acres within the project area would be designed to retain down woody debris in strategic locations and retain a mosaic pattern of vegetation (see Section 2.4," Proposed Treatments). Also, SPR BIO-5 would retain cover in coastal scrub and chaparral habitats, and SPR BIO-8 would avoid habitat conversion of environmentally sensitive habitats. Additionally, pursuant to Mitigation Measure BIO-3a, treatments would be designed to avoid the loss of oak woodlands and sensitive natural communities. 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.

Burrowing Owl

The project area is within the wintering range of burrowing owl and this species has been documented in several locations throughout the project area (see Attachment C). Grasslands and open coastal scrub habitat in the project area may provide habitat suitable for overwintering owls.

Targeted herbicide application is not likely to result in injury, death, or substantial disturbance of individuals due the limited ground disturbance that would result from this activity. Prescribed burning, other than the disturbance involved in the construction and use of control lines and staging areas, is not likely to result in injury, death, or substantial disturbance of individuals, because overwintering owls would be able to shelter within a burrow or temporary flee for the short period that the burn is around the burrow. Prescribed herbivory, other than the placement of fencing, pens, and other infrastructure would not likely result in injury, death, or substantial disturbance of individuals, because the species frequently occurs in areas grazed by native and nonnative ungulates (e.g., deer, elk, cattle, goats), and the herding dogs that may be used for prescribed herbivory are working dogs that are not likely to pursue or injure owls.

Per SPR BIO-1, if it is determined that adverse effects on burrowing owls will be clearly avoided by physically avoiding nesting habitat for the species or conducting treatments outside of the season of sensitivity (i.e., overwintering season) (see Attachment C), then no additional survey would be required. However, mechanical or manual treatments, or ground or human disturbance associated with prescribed burning (e.g., control lines, staging areas) and prescribed herbivory (e.g., fence lines, pens, watering infrastructure, staging areas) could result in disturbance or loss of individual overwintering burrowing owls due to burrow collapse, or predation. Therefore, if these activities are conducted within burrowing owl habitat during the overwintering season, then SPR BIO-10 would apply and protocol surveys would be conducted (see Attachment A). If burrowing owl burrows are detected during surveys (pursuant to SPR BIO-10), Mitigation Measure BIO-2a would apply and seasonal avoidance and non-disturbance buffers would be implemented to avoid injury or mortality (see Attachment A).

Habitat function for burrowing owls would be maintained because treatment activities within habitat for burrowing owls would result in the thinning of dense vegetation and grasses that would approximate conditions under the natural fire regime, which would benefit overwintering burrowing owls. Additionally, SPR BIO-5 would maintain coastal scrub communities, and Mitigation Measure BIO-3a would avoid the loss of sensitive natural communities. 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.

Pursuant to Mitigation Measure BIO-2a, and because this species is listed under CESA, USLTRCD must notify CDFW about its proposed measures to avoid mortality, injury, or disturbance of the species and its determination that habitat function would be maintained after treatments. For the reasons summarized above, USLTRCD determined that implementation of treatments would maintain habitat function for burrowing owl and contacted CDFW to seek

technical input on this determination, as required. On April 25, 2025, USLTRCD contacted Austin Fisher and Margarita Gordus at CDFW describing the measures that would be taken to avoid mortality, injury, and disturbance to burrowing owl and to maintain habitat function in compliance with Mitigation Measure BIO-2a. No refinements to the project description or measures resulted from this notification. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

California Condor

Habitat suitable for California condor nesting (e.g., cliffs and large rock outcrops) and foraging (grassland, open coastal scrub, and open chaparral) is present in the project area, and this species is known to occur in the project area (see Attachment C).

Prescribed herbivory, targeted herbicide application, and manual treatments that do not use power tools are not likely to result in nest disturbance, abandonment of the nest, or loss of young, because these activities would not occur within nesting habitat (e.g., cliffs and rock outcrops), and the level of disturbance (e.g., noise) is not likely to be sufficient to result in substantial disturbance. However, manual treatments using power tools, mechanical, and prescribed burning treatments conducted near nesting habitat suitable for this species during the nesting season could disturb active nests, potentially resulting in abandonment of the nest and loss of young.

Per SPR BIO-1, if it is determined that adverse effects on California condors will be clearly avoided by physically avoiding nesting habitat for the species or conducting treatments outside of the season of sensitivity (i.e., nesting season), then no additional survey would be required. While impacts to nesting California condors would be clearly avoided for treatments that would occur outside of the nesting season, if California condors are present within treatment areas outside of the nesting season, injury to California condors may still occur. If conducting some treatments outside of the nesting season is determined to be infeasible for certain treatment areas, then SPR BIO-10 would be applied prior to implementation of manual treatments using power tools, mechanical treatments, and prescribed burning (see Attachment A). If the implementation of SPR BIO-10 determines that active California condor nests are present, Mitigation Measure BIO-2a would apply and a buffer around the nest would be implemented (see Attachment A).

SPR BIO-2 would minimize impacts year-round from all treatment activities on foraging condors (see Attachment A); however, impacts may still occur if condors are actively foraging within the project area during implementation of treatment activities. Therefore, measures to avoid impacts to foraging California condors in Mitigation Measure BIO-2a would apply for all project activities (see Attachment A).

Habitat function for California condor would be maintained because treatments would not remove foraging or nesting habitat for California condor, and treatment activities within fuel breaks would reduce vegetation density in this species' foraging habitat, providing additional foraging opportunities that could benefit this species. Treatments would not result in complete removal of foraging habitat for California condor because condors use a variety of habitat and would be expected to continue to use foraging habitat post-treatment. Additionally, treatments in chaparral habitat would result in a reduction in overall chaparral density within the project area, which may provide additional foraging opportunities that could benefit this species.

Pursuant to Mitigation Measure BIO-2a, and because this species is listed under CESA and ESA, USLTRCD must notify CDFW and USFWS about its proposed measures to avoid mortality, injury, or disturbance of the species and its determination that habitat function would be maintained after treatments. For the reasons summarized above, USLTRCD determined that implementation of treatments would maintain habitat function for California condor and contacted CDFW and USFWS to seek technical input on this determination, as required. On April 25, 2025, USLTRCD contacted Austin Fisher and Margarita Gordus at CDFW and Emily Levin at USFWS describing the measures that would be taken to avoid mortality, injury, and disturbance to California condor and to maintain habitat function in compliance with Mitigation Measure BIO-2a. No refinements to the project description or measures resulted from this notification. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR

California Spotted Owl

The California spotted owl coastal-southern California Distinct Population Segment (DPS) is proposed for listing under ESA, and as such, currently does not have protection under ESA. However, it is possible that the species will be listed during the life of the project. USFWS also proposed the 4(d) rule, which would provide certain exceptions to take prohibitions under ESA for projects that have beneficial or negligible impacts to California spotted owl, including forest or fuels management to reduce the risk or severity of wildfire.

Much of the project area does not contain habitat suitable for California spotted owl; however, the species has been documented to occur just north of the project area and habitat for the species is present within the dense forest stands in higher elevation portions of the project area (see Attachment C).

Direct removal of nest trees is not likely to occur because live trees greater than 8 inches dbh would not be removed during treatment activities; however, snags of any size may be removed, which may contain California spotted-owl nests. Although direct removal of nests is unlikely, mechanical treatment activities (e.g., heavy equipment) or manual treatments using loud hand tools (e.g., chainsaws), or prescribed burning could result in disturbance of nesting California spotted owls within or adjacent to the project area, if these activities occur during the sensitive nesting season (March 1–August 15). Other manual treatments (e.g., loppers, weed wrench), prescribed herbivory, and targeted herbicide application are not likely to result in the disturbance of nesting California spotted owls, because targeted herbicide application would primarily occur within fuel breaks, along roads, and in grassland habitat (see Section 2.4.3, "Treatment Activities"), which are not likely nesting habitat for California spotted owls. While prescribed herbivory may be used in forested habitats, the high canopy requirements for California spotted owl nesting habitat makes use of prescribed herbivory in these locations unlikely. In addition, because these activities would not involve the use of loud and continuous noise from equipment or tools, significant habitat modification or substantial visual stimuli from human presence close enough to a California spotted owl nest to result in disturbance of the nest. The potential for treatment activities to result in adverse effects on special-status birds was examined in the Program EIR.

Pursuant to SPR BIO-1, if it is determined that adverse effects can be clearly avoided by physically avoiding the habitat suitable for the species or the season of sensitivity, then no surveys or mitigation would be required. To avoid the season of sensitivity for California spotted owls, a review of occurrences and nesting habitat would occur prior to implementation of mechanical treatments, manual treatments using loud hand tools, and prescribed burning. Nesting season avoidance would be implemented if California spotted owl nesting is documented to occur or suitable nesting habitat is present (see Attachment A). If nesting season for California spotted owl cannot be avoided by mechanical treatments, manual treatments using loud hand tools, and prescribed burning, protocol surveys would be completed prior to beginning treatments. If nesting California spotted owls are identified during protocol-level surveys, Mitigation Measure BIO-2b will be implemented and a no disturbance buffer would be established around active California spotted owl nests.

Habitat function for California spotted owl would be maintained because treatment activities would not result in removal of live trees (i.e., conifers, hardwoods) greater than 8 inches dbh, and select snags would be retained (see Section 2.4, "Proposed Treatments"). In addition, treatments would be designed to maintain vegetation cover and comply with the standards (membership rules) set forth in the second edition of the Manual of California Vegetation to avoid unintended habitat conversion. In addition, pursuant to Mitigation Measure BIO-2b, canopy cover within forest habitats occupied or assumed occupied by California spotted owl would be maintained at 60 percent or greater, and treatments would be designed by a qualified RPF to maintain tree age class diversity and long-term maintenance of habitat function.

If treatment activities occur before California spotted owl is listed under ESA or if this species is listed with the proposed 4(d) ruling, avoidance of nests would be implemented pursuant to Mitigation Measure BIO-2b to avoid injury or mortality. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Other Special-Status Birds

Several special-status bird species may or are known to occur within the project area: bald eagle, black swift, California black rail, golden eagle, grasshopper sparrow, least Bell's vireo, loggerhead shrike, northern harrier, olive-

sided flycatcher, purple martin, tricolored black bird, western snowy plover, and white-tailed kite. Nesting habitat for these species are found in various portions of the project area (see Attachment C). Nesting habitat for tufted puffin, is not found within the project area; however, the species may nest near the project area on sea cliff faces at the western edge of the project area. Because the nesting habitat of tufted puffin will not be treated and is topographically screened from project activities within the project area, impacts to this species are not likely to occur.

Per SPR BIO-1, if it is determined that adverse effects on nesting habitat for nesting special-status birds will be clearly avoided by physically avoiding nesting habitat for the species or conducting treatments outside of the season of sensitivity (i.e., nesting bird season), then no additional survey would be required. Adverse effects on nesting special-status birds would be clearly avoided for treatments that would occur outside of nesting habitat (see Attachment C) or the nesting season for each species (see Attachment A). If conducting some treatments outside of the nesting bird season is determined to be infeasible for individual treatment areas, then SPR BIO-10 would apply, and focused nesting bird surveys would be conducted prior to implementation of all treatment activities.

If no active bird nests are observed during focused surveys, then additional avoidance measures for these species would not be required. If active special-status bird nests are observed during focused surveys, then Mitigation Measures BIO-2a (for bald eagle, California black rail, golden eagle, least Bell's vireo, tricolored blackbird, western snowy plover, and white-tailed kite) and BIO-2b (for black swift, grasshopper sparrow, loggerhead shrike, northern harrier, olive-sided flycatcher, and purple martin) would be implemented. Under Mitigation Measures BIO-2a and BIO-2b, no-disturbance buffers would be applied around special-status bird nests (see Attachment A). No treatment activities would occur within these buffers until chicks have fledged, or the nest is otherwise no longer active, as determined by a qualified RPF or biologist. Additionally, trees containing bald eagle or golden eagle nests would not be removed pursuant to the Bald and Golden Eagle Protection Act.

Habitat function for special-status birds would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat, and SPR HYD-4 and HYD-5 would be implemented to protect aquatic habitat. While non-shaded fuel break treatments may result in removal of more vegetative cover and increase spacing between remaining vegetation within upland habitat when compared to ecological restoration treatments (see Section 2.4.2, "Treatment Type – Fuel Breaks"), not all vegetation would be removed; root systems would predominantly be left intact, which will promote natural regeneration mimicking post fire conditions; fuel break treatments would also be subject to applicable SPRs, mitigation measures, and Coastal VTS; and these treatments are not a substantial portion of the potential habitat for the species. Furthermore, ecological restoration treatments, which make up the majority of the proposed treatment acres within the project area would be designed to retain live trees greater than 8 inches dbh, retain wildlife trees, and retain a mosaic pattern of vegetation (see Section 2.4," Proposed Treatments). Also, SPR BIO-5 would retain cover in coastal scrub and chaparral habitats, and SPR BIO-8 would avoid habitat conversion of environmentally sensitive habitats. Additionally, pursuant to Mitigation Measure BIO-3a, treatments would be designed to avoid the loss of oak woodlands and sensitive natural communities. 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.

Pursuant to Mitigation Measure BIO-2a, and because bald eagle, California black rail, golden eagle, least Bell's vireo, tricolored blackbird, western snowy plover, and white-tailed kite are listed under CESA, ESA, or fully protected under the California Fish and Game Code, USLTRCD must notify CDFW and USFWS about its proposed measures to avoid mortality, injury, or disturbance of these species and its determination that habitat function would be maintained after treatments. For the reasons summarized above, USLTRCD determined that implementation of treatments would maintain habitat function for bald eagle, California black rail, golden eagle, least Bell's vireo, tricolored blackbird, western snowy plover, and white-tailed kite and contacted CDFW and USFWS to seek technical input on this determination, as required. On April 25, 2025, USLTRCD contacted Austin Fisher and Margarita Gordus at CDFW and Emily Levin at USFWS describing the measures that would be taken to avoid mortality, injury, and disturbance to bald eagle, California black rail, golden eagle, least Bell's vireo, tricolored blackbird, western snowy plover, and white-tailed kite and to maintain habitat function in compliance with Mitigation Measure BIO-2a. No refinements to the project description or measures resulted from this notification. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Special-Status Fish

Steelhead – South Central California coast Distinct Population Segment are known to occur in creeks and streams within the project area, and tidewater goby is known to occur in the lower reaches and lagoons of streams (see Attachment C). The potential for treatment activities and maintenance treatments to result in adverse effects on special-status fish was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on special-status fish can be clearly avoided by physically avoiding habitat for these species, then mitigation would not be required. Treatments would not occur within aquatic habitat for these species. SPR HYD-4 would be implemented, which prohibits operating heavy equipment, crossing watercourses unless dry, equipment fueling, placement of burn piles, and fire ignition within the WLPZ. In addition, prescribed herbivory treatments would be excluded within 50 feet of environmentally sensitive, pursuant to SPR HYD-3. Furthermore, SPRs HAZ-5, HAZ-6, and HYD-5, would apply to targeted herbicide application treatments and would require measures which would reduce the likelihood of contaminated runoff from treatment activities reaching the streams that are habitat for special-status fish (see Attachment A). Therefore, adverse effects on special-status fish would be clearly avoided through implementation of these SPRs and further measures would not be required.

Habitat function for special-status fish would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat. Furthermore, treatments within WLPZs adjacent to aquatic habitat would be limited pursuant to SPR HYD-4, which requires retention of at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation. This riparian vegetation standard would maintain stream shading and avoid increases in water temperature. In addition, SPR HYD-3 would require that prescribed herbivory treatments are excluded from habitat for these species, and HYD-1 requires compliance with water quality regulations. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Crotch's Bumble Bee

Crotch's bumble bee, along with three other bumble bee species, was designated as a candidate for listing as endangered under CESA by the California Fish and Game Commission on May 31, 2022. In June of 2023, CDFW released *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species*, which included survey and mitigation guidance for the four candidate species, as well as updated current range maps for each species (CDFW 2023). The current range of the species includes all of San Luis Obispo county (CDFW 2023). Documented occurrences of Crotch's bumble bee include multiple sightings detected near Piedras Blancas Light Station in June 2023 within the treatment area, and grasslands and scrub in the project area provide foraging and nesting habitat, while woodlands provide overwintering habitat (see Attachment C).

Bumble bees have three basic habitat requirements: suitable nesting sites for the colonies, availability of nectar and pollen from floral resources throughout the duration of the colony period (spring, summer, and fall), and overwintering sites suitable for the queens. Crotch's bumble bees nest underground and likely use, at least in part, old rodent burrows (Williams et al. 2014; Xerces Society 2018). Overwintering queens may prefer shaded areas near trees in areas without dense vegetation and north-facing slopes (Liczner and Colla 2019; Williams et al. 2019). Bumble bees in California have been documented overwintering under 1–2 inches of duff, between leaf/needle litter and mineral soil (Williams et al. 2014).

Treatment activities (i.e., prescribed burning, mechanical treatments, manual treatments, targeted herbicide application, and prescribed herbivory) could result in temporary removal of floral resources, as well as inadvertent destruction of bumble bee nests or overwintering sites, if present in the project area, through trampling, crushing, or removal of nesting or overwintering substrate (e.g., downed woody debris, leaf litter). The potential for treatment activities to result in adverse effects on special-status bumble bees was examined in the Program EIR.

In the Program EIR, Mitigation Measure BIO-2g was proposed as a feasible set of actions to reduce potentially significant impacts on special-status bumble bees by requiring avoidance of prescribed burning and targeted ground application of herbicide treatment during the flight/nesting season and retention of habitat in the range of these species, or compensation for unavoidable loss of special-status bumble bees or habitat function. Recognizing the difficulty in detecting overwintering and nesting bumble bees and determining the occurrence and severity of

impacts, limited information about nesting and overwintering behaviors, and the statewide scope of potential effects analyzed, for purposes of good faith and full disclosure under CEQA, this impact was designated in the Program EIR as potentially significant and unavoidable. However, addressing this potential effect at a project-specific level may result in a different significance conclusion if evidence supports it.

Per SPR BIO-1, if it is determined that adverse effects on Crotch's bumble bee will be clearly avoided by conducting treatments outside of the season of sensitivity or physically avoiding habitat for these species, then additional survey and avoidance measures would not be required. However, because Crotch's bumble bees may use habitat in the project area year-round, implementation of SPR BIO-10 would be required prior to treatment activities. Under SPR BIO-10, a habitat evaluation for special-status bumble bees would be conducted based on the recommendations within *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023). If the habitat evaluation determines that habitat for this species is present within a treatment area, focused surveys for Crotch's bumble bee will be conducted following the recommendations in CDFW 2023 (or any additional, more recent guidance if developed by CDFW). In lieu of conducting focused surveys (e.g., if conducting a valid survey is not feasible), the potential presence of Crotch's bumble bee in the project area may be assumed. This survey guidance does not provide survey methods for determining the presence of overwintering bumble bees because overwintering habitat is not well understood (CDFW 2023).

If Crotch's bumble bee nests are detected, then Mitigation Measure BIO-2g will be implemented and a no-disturbance buffer will be established around active nests for pile burning and mechanical treatments. If presence of special-status bumble bees is assumed within habitat suitable for this species as determined pursuant to SPR BIO-10, then Mitigation Measure BIO-2g would apply and prescribed (broadcast and pile) burning, mechanical treatments, and targeted herbicide application will be avoided or limited during the colony active season (April through August). Furthermore, Mitigation Measure BIO-2g includes additional measures to avoid mortality, injury, or disturbance to Crotch's bumble bees. These measures include conducting treatments in a patchy pattern to retain floral resources for active colonies and to provide refuge for overwintering bumble bees. Additional project-specific implementation has been added to Mitigation Measure BIO-2g based on feedback from CDFW, including restrictions on herbicide application techniques, specific guidance for chipped debris and burn pile placement, guidance for broadcast burning, and division of the project area such that the entirety of overwintering or colony habitat is not treated in a single year to further provide refuge.

With implementation of Mitigation Measure BIO-2g and applicable SPRs, habitat function for Crotch's bumble bee would be maintained during and after treatment implementation. Treatments would be designed and implemented in a patchy pattern to retain floral resources and provide refuge for bumble bees. Treatment activities in ecological restoration treatment areas would retain select logs and snags that provide wildlife habitat but do not pose safety hazards, and some of these features may provide nesting or overwintering sites suitable for Crotch's bumble bee. The proposed vegetation treatments would not cause any conversion or loss of natural land cover or permanent soil disturbance that could remove availability of potential underground nesting or overwintering sites over the long term. Ecological restoration treatments in grassland areas would focus on broadcast burning and targeted herbicide application to promote native flora within the natural fire regime, retaining floral resources and other elements of habitat function for grassland species. With implementation of Mitigation Measure BIO-2g and applicable SPRs, the impact of the project on habitat function for Crotch's bumble bee would be less than significant with mitigation.

Pursuant to Mitigation Measures BIO-2a and BIO-2g, the determination that habitat function would be maintained for Crotch's bumble bee must be made in consultation with CDFW. For the reasons summarized above, USLTRCD determined that implementation of treatments would maintain habitat function for Crotch's bumble bee and consulted with CDFW to seek technical input on this determination, as required. On April 25, 2025, USLTRCD sent a memo to Austin Fisher and Margarita Gordus at CDFW describing the measures that would be taken to avoid mortality, injury, and disturbance to Crotch's bumble bee and to maintain habitat function in compliance with Mitigation Measures BIO-2a an BIO-2g. No refinements to the project description or measures resulted from this consultation. These potential effects would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Monarch Butterfly

Monarch butterfly is a candidate for listing under ESA, and as such, currently does not have protection under ESA and is considered an "other special-status species" in the CalVTP Program EIR. However, it is possible that the species will be listed during the life of the project. USFWS also proposed the 4(d) rule, which would provide certain exceptions to take prohibitions under ESA for projects that have beneficial or negligible impacts to monarch, including forest or fuels management in breeding habitat. Monarchs overwinter in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby, and multiple monarch overwintering sites are present in the project area (see Attachment C). Treatment activities, (i.e., prescribed burning, mechanical treatment, manual treatment, targeted herbicide application, and prescribed herbivory) could result in damage to overwintering site vegetation structure and removal of floral resources used during overwintering, or direct mortality of monarch butterflies. Treatments would also occur in grasslands, riparian areas, wetlands, open woodlands, and openings in forests that may provide foraging and breeding habitat (i.e., milkweed) for monarchs. While removal of milkweed would not be targeted during prescribed herbivory treatments and livestock may avoid eating milkweed because the plants are unpalatable and contain glycosides that are toxic to goats and sheep; prescribed burning, mechanical treatment, manual treatment, and targeted herbicide application could result in removal of milkweed and potential direct mortality of monarchs. The potential for treatment activities to result in adverse effects on monarch butterflies was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on monarchs will be clearly avoided by conducting treatments outside of the season of sensitivity or physically avoiding habitat for these species, then additional survey and avoidance measures would not be required. Although treatments within riparian areas and wetlands would be limited pursuant to SPRs HYD-3, HYD-4, BIO-4, and Mitigation Measure BIO-4 and milkweed would not be targeted for treatments in these habitats, impacts to monarch could still occur in these and other areas suitable for the species. Because tree and other vegetation removal within monarch overwintering stands could result in direct mortality of monarchs if implemented during the overwintering period (October 31 to March 15) and could result in indirect mortality due to loss of habitat if implemented outside of the overwintering period, implementation of SPR BIO-10 would apply for all treatments within potential overwintering habitat. If it is not feasible to avoid prescribed burning, mechanical treatment, manual treatment, and targeted herbicide application within breeding habitat when monarch eggs, larvae, and pupae are likely to be present on milkweed (March 15-October 31), SPR BIO-10 would apply (see Attachment A).

Pursuant to SPR BIO-10, a habitat assessment and survey would be conducted in potential overwintering stands. Within breeding habitat, surveys for milkweed hostplants would be conducted, and if hostplants are found, further surveys for monarch eggs, larvae, and pupae would be conducted or the presence of monarch assumed (see Attachment A).

If focused surveys are conducted and overwintering stands or monarchs are not detected, then further mitigation for the species would not be required. If overwintering stands are detected during focused surveys, then Mitigation Measure BIO-2b would apply. If breeding monarchs are detected or are assumed to be present on milkweed, then Mitigation Measure BIO-2e would be implemented. Under Mitigation Measure BIO-2b and Mitigation Measure BIO-2e, several measures will be implemented to reduce the likelihood of mortality, injury, or disturbance to monarchs and to maintain habitat function (see Attachment A).

Habitat function for monarch would be maintained because treatment activities within overwintering stands would be designed to maintain habitat function pursuant to Mitigation Measure BIO-2b, and because all habitat suitable for monarch breeding in the project area would not be treated at once (i.e., treatments in the project area would occur over the course of several years). Prescribed fire and prescribed herbivory would also reduce encroachment of woody species and maintain grassland areas where this encroachment is occurring, potentially maintaining grassland foraging and breeding habitat for monarchs. 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.

Smith's Blue Butterfly

The project area overlaps the southernmost portion of the historic and current range of Smith's blue butterfly, and the species is known to occur at the northern edge of the project area (see Attachment C). Additionally, the two obligate host plants for this species, seaside buckwheat (*Eriogonum latifolium*) and seacliff buckwheat (*Eriogonum parvifolium*), have ranges which extend through the project area (Calflora 2025). Therefore, the species may occur in portions of the project area in habitat types such as coastal sage scrub, coastal dune, and serpentine grassland, which are suitable for their host plants. Prescribed burning, mechanical treatments, manual treatments, targeted herbicide application, and prescribed herbivory within coastal sage scrub, coastal dune, and serpentine grassland habitat could result in the crushing or burning of host plants and adverse effects on Smith's blue butterflies. The potential for all treatment activities to result in adverse effects on Smith's blue butterflies was examined in the Program EIR Per SPR BIO-1, if it is determined that adverse effects on Smith's blue butterflies can be clearly avoided by conducting treatments outside of the season of sensitivity or physically avoiding habitat for these species, then mitigation would not be required. Because Smith's blue butterfly may be present at all different life history stages within coastal sage scrub, coastal dune, or serpentine grassland habitat in the project year-round, the sensitive season for this species cannot be avoided. It is also not possible to physically avoid the habitat for this species as host plants may occur in a variety of habitat types. Therefore, SPR BIO-10 would apply, and focused surveys for Smith's blue butterfly would be conducted, or presence may be assumed (see Attachment A). Because portions of the project area are within the range of the ESA-listed Smith's blue butterfly and near previously documented occurrences, Mitigation Measure BIO-2e for Smith's blue butterfly would be implemented, regardless of the results of SPR BIO-10 surveys, although the implementation of specific requirements of Mitigation Measure BIO-2e would be informed by the results of the SPR BIO-10 focused surveys if conducted (see Attachment A).

In addition, Mitigation Measure BIO-2e requires avoidance of host plants in habitat occupied by or assumed to be occupied by Smith's blue butterfly and requires that unoccupied areas within the range be treated in a patchy pattern such that all habitat is not treated or not treated in the same year, which would maintain habitat for the species.

Pursuant to Mitigation Measure BIO-2e, and because Smith's blue butterfly is listed under ESA, USLTRCD has notified USFWS regarding its determination that mortality, injury, or disturbance would not occur, and habitat function would be maintained. For the reasons summarized above, USLTRCD determined that implementation of treatments would maintain habitat function for Smith's blue butterfly. On April 25, 2025, USLTRCD contacted Emily Levin at USFWS describing the measures that would be taken to avoid mortality, injury, and disturbance to Smith's blue butterfly and to maintain habitat function in compliance with Mitigation Measure BIO-2e. A refinement to the project description regarding prioritizing chipped biomass on roads and trails resulted from this consultation. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Vernal Pool Fairy Shrimp

Vernal pools within the project area may be suitable habitat for vernal pool fairy shrimp. Fairy shrimp use vernal pools for every stage of their life cycle and are present in pools when they are wetted. In addition, the cysts of vernal pool fairy shrimp remain in the soil of vernal pools during the portion of the year when pools are dry. Broadcast burning is not likely to result in impacts to vernal pool fairy shrimp, because the cysts of vernal pool invertebrates have been found to survive fire in the soil and found in burned pools following the next rainy season (Wells et al. 1997). Pile burning, ground disturbing activities, including mechanical treatments and ground disturbing manual treatments (e.g., construction of hand containment lines) and targeted herbicide application may result in injury or death of vernal pool fairy shrimp and the cysts of the species, through direct injury, death of individuals or cysts, or a loss of habitat caused by impacts to water quality. Prescribed herbivory, other than the placement of fencing, pens, and other infrastructure would not likely result in injury, death of individuals or cysts, due to the relatively small ground disturbance caused by grazing animals.

Per SPR BIO-1, if it is determined that adverse effects on vernal pool fairy shrimp can be clearly avoided by conducting treatments outside of the season of sensitivity or physically avoiding habitat for these species, then mitigation would not be required. However, vernal pool fairy shrimp may be present in vernal pools year-round either as individuals or cysts, and implementation of SPR BIO-10 would be required before implementation of

targeted herbicide application within vernal pool habitat, and mechanical treatments within 100 feet of vernal pool habitat. If surveys are not conducted, the species may be assumed to be present (see Attachment A). If protocol surveys detect the presence of vernal pool fairy shrimp, or the species are assumed to be present, Mitigation Measure BIO-2a will apply and 100 foot buffers would be placed around vernal pools that are occupied or assumed to be occupied and no mechanical treatments will be conducted that buffer, but other treatment types (e.g., prescribed burning, manual treatments, prescribed herbivory, and targeted herbicide application, that do not result in ground disturbance would be permitted within the buffer; however, only broadcast burning would be allowed within the vernal pool itself subject to limitations under Mitigation Measure BIO-4 (see below). If protocol surveys pursuant to SPR BIO-10 do not detect the presence of vernal pool fairy shrimp, Mitigation Measure BIO-2a and this buffer will not apply. Furthermore, pursuant to Mitigation Measure BIO-4 (refer to Impact BIO-4 below regarding adverse effects on state or federally protected wetlands), additional buffers would apply to non-mechanical treatments (i.e., manual treatments, targeted herbicide application), around vernal pools.

Habitat function for vernal pool fairy shrimp would be maintained through the implementation of SPRs HAZ-5 and HAZ-6, which require that herbicides and other hazardous materials are handled safely and are not allowed to enter waterways including vernal pools. In addition, treatment activities and maintenance treatments would not occur within aquatic habitat, and pursuant to Mitigation Measure BIO-4 (refer to Impact BIO-4 below), impacts on vernal pools would be avoided through establishment of no-disturbance buffers.

As described above under Section 1.1.4, "Purpose of the PSA/Addendum," USLTRCD proposes to revise requirements under Mitigation Measure BIO-4 to allow for broadcast burning within vernal pools where vernal pool fairy shrimp occur or are assumed to occur pursuant to SPR BIO-10, which would require a revision from the restrictions in Mitigation Measure BIO-4 that prohibit broadcast burning within wetlands when special-status species are present. See Section 2.4, "Proposed Treatments" for more information regarding the goals of conducting broadcast burning.

Proposed revisions to Mitigation Measure BIO-4 would not result in adverse impacts to conservancy fairy shrimp, vernal pool fairy shrimp, and vernal pool tadpole shrimp. The cysts of vernal pool invertebrates have been found to survive fire in the soil and found in burned pools following the next rainy season (Wells et al. 1997). Broadcast burning within vernal pools has been found to result in short-term decreases of nonnative grasses and increases in native species richness (Marty 2007), which contributes to general ecosystem health within vernal pools. In addition, removal of natural fire frequency supporting invasive species distribution has been identified as a threat to vernal pool species (USFWS 2005). Broadcast burning within vernal pool habitat occupied or assumed to be occupied by special-status vernal pool invertebrates would be subject to the remaining conditions in Mitigation Measure BIO-4 that require wetland function to be maintained, that the burn be within the normal fire interval, and that no containment lines or pile burning are permitted within the vernal pool. Therefore, the proposed revision to Mitigation Measure BIO-4, specifically to allow broadcast burning within vernal pools that are occupied by vernal pool fairy shrimp, would not result in a substantially more severe significant effect on vernal pool fairy shrimp not addressed in the Program EIR. The text revision to Mitigation Measure BIO-4 is shown in the MMRP (Attachment A).

Pursuant to Mitigation Measure BIO-2a, and because vernal pool fairy shrimp are listed under the ESA, USLTRCD must consult with USFWS about its determination that mortality, injury, or disturbance would not occur, and habitat function would be maintained. For the reasons summarized above, USLTRCD determined that implementation of treatments would maintain habitat function for vernal pool fairy shrimp and contacted USFWS to seek technical input on this determination, as required. On April 25, 2025, USLTRCD contacted Emily Levin at USFWS describing the measures that would be taken to avoid mortality, injury, and disturbance to vernal pool fairy shrimp and to maintain habitat function in compliance with Mitigation Measure BIO-2a. Including the proposed revision to Mitigation Measure BIO-4 to allow for broadcast burning in vernal pools occupied by special-status vernal pool invertebrates. No refinements to the proposed measures and revision to Mitigation Measure BIO-4 resulted from this consultation. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

American Badger

Grassland, open scrub, and open woodland habitat in the project area not subject to high levels of human disturbance may provide habitat for this species, and the species has been observed just outside the project area (see Attachment C). Other portions of the project area directly adjacent to development or areas regularly used for recreation may not be suitable habitat for the species, due to ongoing human disturbance. Pile burning, the placing of control lines for broadcast burning, mechanical treatments, and the placement of fencing, pens, and other infrastructure for prescribed herbivory within habitats that are suitable for the species could result in destruction of active dens, and potential loss of adults or young through direct mortality or den collapse. Broadcast burning (other than the placing of control lines and staging areas), manual treatments, targeted herbicide application, and prescribed herbivory (other than the placement of fencing, pens, and other infrastructure) would not result in destruction of American badger dens, because personnel implementing these treatments would conduct the majority of these activities on foot, and the likelihood of a den being inadvertently crushed or otherwise destroyed would be very low. In addition, broadcast burning, prescribed herbivory, and targeted herbicide application are not likely to cause a substantial disruption in feeding, as these activities are not likely to be conducted in the vicinity of a den for a substantial length of time. However, installation of control lines and staging areas for prescribed burning, pile burning, mechanical treatments, manual treatments, and setup of infrastructure associated with prescribed herbivory in the vicinity of a maternity den could result in a substantial interruption of feeding and potential loss of young during the American badger pupping season. The potential for treatment activities to result in adverse effects on American badger was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on American badger can be clearly avoided by conducting treatments outside of the season of sensitivity or physically avoiding habitat for this species, then mitigation would not be required; however, American badgers may use a den year-round there is no season when all impacts can be avoided. Therefore, implementation of SPR BIO-10 would be required before implementation of any pile burning, installation of control lines and staging areas for prescribed burning, mechanical treatments, or the setup of infrastructure for prescribed herbivory activities year-round, and for all treatments other than broadcast burning (other than installation of control lines and staging areas), prescribed herbivory (other than setup of infrastructure), and targeted herbicide application during the pupping season (see Attachment A). Under SPR BIO-10, focused surveys would be conducted for American badger dens within habitat suitable for the species (i.e., grasslands, open woodland) by a qualified RPF or biologist. If American badger dens are not detected during focused surveys, then further mitigation for the species would not be required. If American badger dens are detected during focused surveys, Mitigation Measure BIO-2b will be implemented, and a no-disturbance buffer will be established around the den, the size of which will be determined by the season and the treatment activity (see Attachment A).

Habitat function for American badger would be maintained, because a portion of downed woody debris (e.g., down logs) would be retained (see Section 2.4," Proposed Treatments), which would act as habitat for prey species. In addition, habitat suitable for the species (i.e., grasslands, open shrublands, open woodland) would be maintained and SPR BIO-8 would avoid habitat conversion of environmentally sensitive habitats. Impacts to oak woodlands will also be avoided or minimized through implementation of Mitigation Measure BIO-3a (see Impact BIO-3). 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.

Marine Mammals

The Marine Mammal Protection Act (MMPA) (16 US Code Chapter 31), first enacted in 1972, provides for protection of all marine mammals (whales, dolphins, seals, and sea lions) in the United States. The MMPA provides that it shall be unlawful, with certain permitted exceptions, to take a marine mammal in waters of the United States. Under the MMPA, "take" is defined as "harass, hunt, capture, collect, or kill, or attempt to harass, hunt, capture, collect, or kill any marine mammal." The coastal beaches and rocky shoreline along the project area provides haul out habitat for Steller sea lion; however, this species is not expected to breed in or adjacent to the project area. Additionally, northern elephant seals are known to breed on beaches adjacent the project area (see Attachment C). Although these species may occur adjacent to the project area, treatments would not occur within habitat for Steller sea lion and northern elephant seals and project activities would be screened by topography from Steller sea lion haul outs. In

addition, no prescribed burning, manual, or mechanical treatments would occur within 300 feet of breeding habitat for northern elephant seal during the pupping season unless screened by vegetation or topography in which case these treatments may occur as close as 50 feet from breeding habitat. Based on the avoidance of habitat for these species and guidelines to avoid marine mammal disturbance (NOAA Fisheries 2025; NMFS 2024) and the noise levels from treatment activities (see CalVTP Final Program EIR Volume II Section 3.13.3), impacts to these species would not result from project activities.

Monterey Dusky-Footed Woodrat

The forest, chaparral, and coastal scrub within the project area provides habitat for Monterey dusky-footed woodrat (see Attachment C). This species builds middens (nests) of dried grass, leaves, sticks, and similar materials on the ground, within shrubs, and occasionally in hollows and low branches of large trees. These nests provide shelter year-round for Monterey dusky-footed woodrat in addition to providing a location for breeding and rearing of young. Prescribed burning, mechanical treatments, and manual treatments, conducted within habitat suitable for Monterey dusky-footed woodrats could result in the disturbance or destruction of woodrat nests and potential injury or mortality of individuals if present. Targeted herbicide application and prescribed herbivory are not anticipated to result in destruction of nests, injury, or mortality of individuals, because nests are constructed of dead materials and would not be affected by herbicides or grazing animals. The potential for treatment activities, including maintenance treatments, to result in adverse effects on Monterey dusky-footed woodrat was examined in the Program EIR.

Pursuant to SPR BIO-1, if it is determined that adverse effects on special-status species can be clearly avoided by physically avoiding the suitable habitat or by conducting treatments outside of the season when a sensitive resource is present, then no additional action would be required. However, because Monterey dusky-footed woodrats may be present within nests in the project area year-round, and nests are present in a variety of habitat types, clear avoidance of impacts is not feasible without further measures. Prescribed burning, mechanical treatments, and manual treatments could result in the destruction of nests; however, specialized training pursuant to SPR BIO-2 (see Attachment A) would be required for crews conducting treatments to allow these crews to recognize and avoid (for manual treatments and pile burning) or minimize (for broadcast burning and mechanical) destruction of nests. Although crew training under SPR BIO-2 would minimize destruction of nests, SPR BIO-10 would apply, and focused surveys for Monterey dusk-footed woodrat nests would be conducted within habitat for the species prior to implementation of mechanical treatments, or nest presence may be assumed for other treatment types (see Attachment A).

If no woodrat nests are found during pretreatment surveys, no further measures are required. If woodrat nests are found, or presence is assumed, Mitigation Measure BIO-2b will apply, and a no-disturbance buffer of between 5 feet and 10 feet around nests will be implemented if feasible for pile burning, mechanical treatments, and manual treatments. In addition, where nests are found or assumed to be present, broadcast burning would be avoided during the season when the majority of young are present in the nest (see Attachment A).

The proposed treatments are not expected to result in long-term adverse effects on habitat for Monterey dusky-footed woodrat across the project area. While non-shaded fuel break treatments may result in removal of more vegetative cover and increase spacing between remaining vegetation within upland habitat when compared to ecological restoration treatments (see Section 2.4.2, "Treatment Type – Fuel Breaks"), not all vegetation would be removed; root systems would predominantly be left intact, which will promote natural regeneration mimicking post fire conditions; fuel break treatments would also be subject to applicable SPRs, mitigation measures, and Coastal VTS; and these treatments are not a substantial portion of the potential habitat for the species. Furthermore, ecological restoration treatments, which make up the majority of the proposed treatment acres within the project area would be designed to retain live trees greater than 8 inches dbh, retain wildlife trees, and retain a mosaic pattern of vegetation (see Section 2.4," Proposed Treatments). Also, SPR BIO-5 would retain cover in coastal scrub and chaparral habitats, and SPR BIO-8 would avoid habitat conversion of environmentally sensitive habitats. Additionally, pursuant to Mitigation Measure BIO-3a, treatments would be designed to avoid the loss of oak woodlands and sensitive natural communities (see Impact BIO-3). 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.

Mountain Lion

Mountain lion has been documented in the project area (see Attachment C) and may use the majority of the project area for movement and foraging. More remote portions of the project area containing structures such as rock outcrops, downed trees, large tree hollows, or shrub thickets in woodlands may provide denning or nursery habitat for the species; however, portions of the project area adjacent to highways, towns, neighborhoods, and other areas frequented by humans are not likely to support denning or nursery habitat due to ongoing human disturbance. Targeted herbicide application, manual treatment (except tree and snag removal), and prescribed herbivory are not likely to take place in the more remote portions of the project area that may support denning and nursery habitat due to lack of access, and are therefore unlikely to have an impact on the species. Prescribed burning, mechanical treatments, and manual tree and snag removal treatments conducted within mountain lion nursery habitat could result in injury or mortality of kittens if an active nursery is present and the kittens are too young to move on their own (less than 3 months old). The potential for treatment activities, including maintenance treatments, to result in adverse effects on mountain lion was examined in the Program EIR.

Pursuant to SPR BIO-1, if it is determined that adverse effects on special-status species can be clearly avoided by physically avoiding the suitable habitat or by conducting treatments outside of the season when a sensitive resource is present, then no additional action would be required. However, because mountain lions may breed within the project area year-round, and dens and nurseries may be present in a variety of habitat types, clear avoidance of impacts is not feasible without further measures. Prior to implementation of prescribed burning, mechanical treatments, and manual tree and snag removal treatments within potential nursery habitat, a desktop analysis of the treatment area would be conducted pursuant to SPR BIO-10 (see Attachment A). If nursery habitat exists within a treatment area, a nursery would be assumed to be present and Mitigation Measure BIO-2a would be implemented. Mitigation Measure BIO-2a includes surveys for nurseries, and if a nursery is found a no-disturbance buffer would be established around the nursery (see Attachment A).

Habitat function for mountain lions would be maintained across the project area. While non-shaded fuel break treatments may result in removal of more vegetative cover and increase spacing between remaining vegetation within upland habitat when compared to ecological restoration treatments (see Section 2.4.2, "Treatment Type – Fuel Breaks"), not all vegetation would be removed; root systems would predominantly be left intact, which will promote natural regeneration mimicking post fire conditions; fuel break treatments would also be subject to applicable SPRs, mitigation measures, and Coastal VTS; and these treatments are not a substantial portion of the potential habitat for the species. Furthermore, ecological restoration treatments, which make up the majority of the proposed treatment acres within the project area would be designed to retain live trees greater than 8 inches dbh, retain wildlife trees, and retain a mosaic pattern of vegetation (see Section 2.4," Proposed Treatments). Also, SPR BIO-5 would retain cover in coastal scrub and chaparral habitats, and SPR BIO-8 would avoid habitat conversion of environmentally sensitive habitats. Additionally, pursuant to Mitigation Measure BIO-3a, treatments would be designed to avoid the loss of oak woodlands and sensitive natural communities. 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.

Pursuant to Mitigation Measure BIO-2a, and because mountain lion is listed as candidate under CESA, USLTRCD must consult with CDFW about its determination that mortality, injury, or disturbance would not occur, and habitat function would be maintained. For the reasons summarized above, USLTRCD determined that implementation of treatments would maintain habitat function for mountain lion and contacted CDFW to seek technical input on this determination, as required. On April 25, 2025, USLTRCD contacted Austin Fisher and Margarita Gordus at CDFW describing the measures that would be taken to avoid mortality, injury, and disturbance to mountain lion and to maintain habitat function in compliance with Mitigation Measure BIO-2a. No refinements to the project description or measures resulted from this consultation. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Ringtail

The oak woodland, chaparral (with scattered trees and other denning structures), rock outcrops, and riparian habitats within the project area provide suitable habitat for this species (Attachment C). Targeted herbicide application and prescribed herbivory are not expected to result in injury or mortality of ringtail because these treatments would not

result in destruction of denning sites. Rock outcrops would not be targeted for treatment and healthy live trees greater than 8 inches dbh would be retained. However, prescribed burning, as well as mechanical or manual treatments that result in removal of snags or trees greater than 12 inches dbh may result in injury or mortality of ringtail if conducted during the maternity season (i.e., the period during which young would be present in a den, approximately April 15–June 30). The potential for treatment activities, including maintenance treatments, to result in adverse effects on ringtail was examined in the Program EIR.

Pursuant to SPR BIO-1, if it is determined that adverse effects on special-status species can be clearly avoided by physically avoiding the suitable habitat or by conducting treatments outside of the season when a sensitive resource is present, then no additional action would be required. Therefore, if prescribed burning and mechanical or manual removal of snags greater than 12 inches dbh occurs outside of the maternity season, then no further measures are required. Prior to implementation of prescribed burning or snag removal during the ringtail maternity season, focused surveys for ringtail would be conducted (see Attachment A). If ringtails are detected during focused surveys, then additional surveys by a qualified RPF or biologist would be required to determine whether an active ringtail den is present within a treatment area. If an active den is identified in a treatment area, then Mitigation Measure BIO-2a would be implemented, and a no-disturbance buffer would be applied (Attachment A). If the presence of ringtail within the treatment area is assumed, then implementation of avoidance and minimization measures would be required pursuant to Mitigation Measure BIO-2a before and during implementation of prescribed burning and snag removal during the maternity season (see Attachment A).

Habitat function for ringtail would be maintained across the project area. While non-shaded fuel break treatments may result in removal of more vegetative cover and increase spacing between remaining vegetation within upland habitat when compared to ecological restoration treatments (see Section 2.4.2, "Treatment Type – Fuel Breaks"), not all vegetation would be removed; root systems would predominantly be left intact, which will promote natural regeneration mimicking post fire conditions; fuel break treatments would also be subject to applicable SPRs, mitigation measures, and Coastal VTS; and these treatments are not a substantial portion of the potential habitat for the species. Furthermore, ecological restoration treatments, which make up the majority of the proposed treatment acres within the project area would be designed to retain live trees greater than 8 inches dbh, retain wildlife trees, and retain a mosaic pattern of vegetation (see Section 2.4," Proposed Treatments). Also, SPR BIO-5 would retain cover in coastal scrub and chaparral habitats, and SPR BIO-8 would avoid habitat conversion of environmentally sensitive habitats. Additionally, pursuant to Mitigation Measure BIO-3a, treatments would be designed to avoid the loss of oak woodlands and sensitive natural communities. 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.

Pursuant to Mitigation Measure BIO-2a, and because ringtail is a fully protected species, USLTRCD must consult with CDFW about its determination that mortality, injury, or disturbance would not occur, and habitat function would be maintained. For the reasons summarized above, USLTRCD determined that implementation of treatments would maintain habitat function for ringtail and contacted CDFW to seek technical input on this determination, as required. On April 25, 2025, USLTRCD contacted Austin Fisher and Margarita Gordus at CDFW describing the measures that would be taken to avoid mortality, injury, and disturbance to ringtail and to maintain habitat function in compliance with Mitigation Measure BIO-2a. No refinements to the project description or measures resulted from this consultation. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Special-Status Bats

Big free-tailed bat, pallid bat, Townsend's big-eared bat, western mastiff bat, and western red bat are either known to occur or may occur within the project area (see Attachment C). The larger trees, abandoned buildings, and rock outcrops within the project area may provide suitable roosts for these species. Some roost habitat suitable for special-status bats (e.g., rocky areas) would not be targeted for treatment, and prescribed herbivory is not anticipated to result in roost removal or substantial disturbance. However, removal of large snags or diseased trees by mechanical or manual treatments could result in destruction of roosts. In addition, depending on the proximity of treatment activities to suitable roost habitat, implementation of prescribed burning, mechanical treatments, and manual treatments and targeted herbicide application using power equipment during the bat maternity season (April 1–August 31; Caltrans

2004) could disturb active bat roosts due to auditory and visual stimuli (e.g., heavy equipment, chainsaws, vehicles, personnel) or smoke (e.g., prescribed burning), potentially resulting in abandonment of the roost and loss of young. The potential for treatment activities, including maintenance treatments, to result in adverse effects on special-status bats was examined in the Program EIR.

Pursuant to SPR BIO-1, if it is determined that adverse effects on special-status species can be clearly avoided by physically avoiding the suitable habitat or by conducting treatments outside of the season when a sensitive resource is present, then no additional action would be required. Therefore, if prescribed burning, mechanical treatments, and manual treatments and targeted herbicide application using power equipment can be implemented outside the bat maternity season, then no further action is required. If it is infeasible to implement treatments outside of the bat maternity season, pursuant to SPR BIO-10, focused surveys for special-status bat maternity roosts would be implemented by a qualified RPF or biologist within habitat suitable for these species (see Attachment A). If special-status bat roosts are identified, Mitigation Measure BIO-2b would be implemented, and a no-disturbance buffer would be established around active special-status bat roosts (see Attachment A).

Habitat function for special-status bats would be maintained across the project area. Fuel break treatments would not result in foraging habitat removal (see Section 2.4," Proposed Treatments) for these aerial foraging species. Furthermore, ecological restoration treatments, which make up the majority of the proposed treatment acres within the project area would be designed to retain live trees greater than 8 inches dbh, retain wildlife trees, and retain a mosaic pattern of vegetation (see Section 2.4," Proposed Treatments). Also, SPR BIO-5 would retain cover in coastal scrub and chaparral habitats, and SPR BIO-8 would avoid habitat conversion of environmentally sensitive habitats. Additionally, pursuant to Mitigation Measure BIO-3a, treatments would be designed to avoid the loss of oak woodlands and sensitive natural communities. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Conclusion

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

As described in Section 1.1.4, "Purpose of This PSA/Addendum," USLTRCD proposes to revise requirements under SPR HYD-4 to require establishment of WLPZ buffers for only the watercourses within 300 feet of treatment activities, including manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments. This revision would ensure that all WLPZs in proximity to a treatment area are flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area. This revision is consistent with the overall intent of SPR HYD-4, which is to prevent degradation of watercourses during implementation of treatment activities, including manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments, and all other conditions on treatment activities within WPLZs would apply. This establishment of WLPZs within 300 feet of treatment activities would therefore provide the same reduction in impacts to wildlife as provided by SPR HYD-4 in the Program EIR. For the reasons described above, the proposed revisions to SPR HYD-4 would not result in a substantially more severe significant effect related special-status wildlife than what was covered in the Program EIR.

The revision to Mitigation Measure BIO-4 described in Section 1.1.4, "Purpose of This PSA/Addendum," would allow for the use of broadcast burning in vernal pools that provide suitable habitat for vernal pool fairy shrimp. This would allow for restoration of vernal pools where this species is present and would avoid the need for additional control lines to prevent broadcast burning from entering these vernal pools, thereby reducing ground disturbance. Proposed

revisions to Mitigation Measure BIO-4 would not result in adverse impacts to vernal pool fairy shrimp. The cysts of vernal pool invertebrates have been found to survive fire in the soil and be present in burned pools following the next rainy season (Wells et al. 1997). Broadcast burning within vernal pools has been found to result in short-term decreases of non-native grasses and increases in native species richness (Marty 2007), which contributes to general ecosystem health within vernal pools. In addition, removal of natural fire frequency supporting invasive species distribution has been identified as a threat to vernal pool species (USFWS 2005). All other conditions on treatment activities within Mitigation Measure BIO-4 to protect water quality would remain the same as contained in the Program EIR. For the reasons described above, the proposed revisions to Mitigation Measure BIO-4 would not result in a substantially more severe significant effect related special-status wildlife than what was covered in the Program EIR.

SPRs that apply to this impact are AD-1, BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-8, BIO-10, BIO-11, HAZ-5, HAZ-6, HYD-1, HYD-3, HYD-4 and HYD-5. Biological resource mitigation measures that apply to project impacts under Impact BIO-2 are Mitigation Measure BIO-2a, BIO-2b, BIO-2e, BIO-2g. BIO-3a, and BIO-4. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT BIO-3

Based on the vegetation types mapped in the project area (Table 4.5-1) and observations from the reconnaissance-level survey conducted pursuant to SPR BIO-1, sensitive natural communities (i.e., natural communities with a rarity rank of S1, S2, or S3) may be present in the project area. The sensitive natural communities, their associated rarity rank, and the vegetation type within which the communities may occur are presented in Table 4.5-2, below.

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

Sensitive Natural Community[1]	Rarity Rank[2]	CWHR Type
Forest/Woodland		
Bishop pine – Monterey pine forest and woodland*	S3.2	Closed-cone pine-cypress
California bay forest and woodland*	S3	Coastal Oak Woodland
California buckeye grove*	S3	Montane Hardwood
Redwood forest and woodland*	S3	Redwood
Santa Lucia fir groves*	S3.2	Montane hardwood-conifer
Tanoak forest	S3.2	Montane hardwood
Ultramafic cypress woodland	S3	Closed-Cone Pine-Cypress
Valley oak woodland*	S3	Valley Oak Woodland
Shrub/scrub		
Black sage - California sagebrush scrub*	S3S4	Coastal Scrub
Brittle leaf - woolly leaf manzanita chaparral	S3	Mixed Chaparral
Bush monkeyflower scrub*	S3?	Coastal Scrub
Canyon live oak - Interior live oak chaparral	S3S4	Mixed Chaparral
Dune mat	S3	Coastal Scrub
Eastwood manzanita chaparral	S3	Chamise-Redshank Chaparral
Glossy leaf manzanita - Golden chinquapin chaparral[3]	S2	Mixed Chaparral
Hairy leaf - woolly leaf ceanothus chaparral	S3	Mixed Chaparral
Hazelnut scrub	S2?	Coastal Scrub
Hoary, common, and Stanford manzanita chaparral	S3	Mixed Chaparral
Hooker's manzanita chaparral	S2	Mixed Chaparral
Hoover's manzanita chaparral	S2	Mixed Chaparral

Sensitive Natural Community[1]	Rarity Rank[2]	CWHR Type
Salmonberry - Wax myrtle scrub	S3	Coastal Scrub
Seaside woolly-sunflower - seaside daisy - buckwheat patches	S3	Coastal Scrub
Silver dune lupine - mock heather scrub	S3	Coastal Scrub
Wart leaf ceanothus chaparral	S3	Mixed Chaparral
Herbaceous/Barren		
Coastal tufted hair grass - Meadow barley - California oatgrass meadow	S3	Fresh Emergent Wetland, Perennial Grassland, Wet meadow
California brome-blue wildrye prairie	S3	Perennial Grassland, Wet Meadow
Idaho fescue - California oatgrass grassland	S3	Perennial Grassland
Needle grass - Melic grass grassland*	S3S4	Perennial Grassland
Onion - twistflower - dwarf-flax serpentinite rock outcrop	S2S3	Barren
Pacific reed grass meadows	S2	Perennial Grassland
Sea lyme grass patches	S2	Perennial Grassland
Smooth goldfields - pale spike rush vernal pool bottoms	S2	Annual Grassland
Riparian/Wetland		
Black cottonwood forest*	S3	Montane Riparian, Valley Foothill Riparian
California sycamore - coast live oak riparian woodlands*	S3	Valley Foothill Riparian
Coastal dune willow - Sitka willow - Douglas spiraea thickets	S3	Fresh Emergent Wetland
Common monkey flower - thistle - hedgenettle seeps	S3	Fresh Emergent Wetland, Wet Meadow
Fremont cottonwood forest*	S3.2	Montane Riparian, Valley Foothill Riparian
Goodding's willow - red willow riparian woodland and forest	S3	Fresh Emergent Wetland, Valley Foothill Riparian
Hardstem and California bulrush marshes	S3S4	Fresh Emergent Wetland
Iris-leaf rush seeps	S2?	Fresh Emergent Wetland, Wet Meadow
Pickleweed mats	S3	Saline Emergent Wetland
Pondweed mats*	S3?	Fresh Emergent Wetland
Quillwort beds	S3?	Fresh Emergent Wetland
Salt marsh bulrush marshes	S3	Saline Emergent Wetland
Saltgrass - Alkali heath Coastal	S3	Saline Emergent Wetland
Shining willow groves	S3.2	Valley Foothill Riparian
Slough sedge - Water-parsley - Small-fruited bulrush marsh	S3	Fresh Emergent Wetland, Saline Emergent Wetland
Soft and western rush - Sedge marshes	S3S4	Fresh Emergent Wetland, Saline Emergent Wetland, Wet Meadow
Valley oak riparian forest and woodland*	S3	Valley Oak Woodland
Yerba mansa - Nuttall's sunflower - Nevada goldenrod alkaline wet meadows	S2	Fresh Emergent Wetland, Saline Emergent Wetland, Wet Meadow

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

* Species associated with these sensitive natural communities were observed during SPR BIO-1 reconnaissance-level surveys.

[2] Older ranks, which need to be updated, may still contain a decimal "threat" rank of .2 or .3, where .2 indicates moderate threat and .3 indicates few or no current known threats. Ranks that contain two state ranks (e.g., S3S4) indicate a range of uncertainty about the status of the species or ecosystem, which may fall under either of the two state rank categories listed. Ranks that are followed with a question mark indicate that the numeric rank is considered inexact or tentative. This inexactness suggests there is uncertainty or insufficient information available to confirm the exact rarity rank of the species or habitat.

[3] Only the Chrysolepis chrysophylla-Arctostaphylos glandulosa and Chrysolepis chrysophylla/Vaccinium ovatum associations of this alliance have potential to occur in the project area. Versions of this alliance characterized by rare manzanita species do not occur in San Luis Obispo County; however, these are still sensitive natural communities with an S2 rank.

Source: CNPS 2025; compiled by Ascent in 2025.

During the reconnaissance-level survey, several species associated with the documented sensitive natural communities were observed, including Monterey pine, Santa Lucia fir (*Abies bracteata*), California bay, coast redwood (*Sequoia sempervirens*), valley oak (*Quercus lobata*), cottonwood (*Populus fremontii; P. trichocarpa*), California buckeye (*Aesculus californica*), black sage (*Salvia mellifera*), California sage (*Artemisia californica*), bush monkeyflower (*Diplacus aurantiacus*), needlegrass (*Stipa* sp.), and pondweed (*Potamogeton* sp.). While not all dominant species associated with sensitive natural communities included in Table 4.5-2 were observed during reconnaissance-level surveys, these communities may be present. As a result, prior to implementation of treatment activities, SPR BIO-3 would be implemented and a qualified RPF or biologist would identify sensitive natural communities in the project area to the alliance level pursuant to *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018a). If fine-scale mapping to the alliance level using the state's Vegetation Classification and Mapping Program (VegCAMP) methodology has been completed for the treatment area, the qualified RPF or biologist can rely on that existing fine-scale mapping, with filed verification, to identify sensitive natural communities.

Although not a CDFW designated sensitive natural community, riparian habitats are a sensitive habitat type protected under California Game Code Section 1602 and consistently recognized as ESHA by the Coastal Commission. Riparian habitats are also present in the project area. Some of these riparian habitats are also designated as sensitive natural communities by CDFW. CAL FIRE's FRAP vegetation data for the project area includes 1,198 acres of valley foothill riparian, 2.8 acres of montane riparian, and 5 acres of wet meadow habitats. Riparian habitats observed during SPR BIO-1 surveys were dominated by willow (*Salix* spp.), cottonwood (*Populus* spp.), California sycamore (*Platanus racemosa*), and coast live oak (*Quercus agrifolia*) (all would likely qualify as S3 sensitive natural communities).

Coast live oak woodland, blue oak woodland, blue-oak foothill pine, and valley oak woodland totaling approximately 18,737 acres are present within the project area, and both riparian and oak woodland communities are considered to qualify as especially valuable habitats by the Coastal Commission and therefore are ESHA. Additionally, chaparral, coastal sage scrub, and native grasslands (i.e., grasslands with at least 10 percent cover of native grasses and forbs) may be present in areas mapped generally as California annual and perennial grassland, and these would also qualify as ESHA. Other natural communities, agricultural lands, and nonnative communities such as eucalyptus, are present in the treatment areas, and due to the presence of suitable habitat for multiple special-status wildlife species within the treatment area (e.g., see Impact BIO-2 above), the project area would be generally recognized as ESHA under the definition in California Coastal Act Section 30107.5.

Treatment activities are proposed within sensitive natural communities as defined by CDFW and shown in Table 4.5-2, riparian habitats, and oak woodlands, all considered ESHA pursuant to the Coastal Act. Initial treatments and maintenance treatments could result in direct or indirect adverse effects on sensitive habitats, including riparian habitat, sensitive natural communities as defined by CDFW, and other especially valuable habitats that make up ESHA as defined by the Coastal Act Section 30107.5. Potential impacts resulting from maintenance activities would be similar to those resulting from initial treatments because the same treatment activities are proposed. Maintenance treatments would generally be of a lower intensity and scale than initial treatments. Additionally, prescribed herbivory would predominantly be implemented during maintenance treatments.

Maintenance treatment at too great a frequency could result in additional adverse effects. Therefore, maintenance treatments outside of the natural fire return interval of the native vegetation alliance being treated would occur only in areas where a qualified RPF or botanist determines that the goal of the initial treatment to restore the sensitive natural community to Condition Class 1 (i.e., natural vegetation composition, structure, and fuels) was not achieved with initial treatments implemented within the natural fire return interval. In those instances, lower intensity, targeted maintenance activities may be implemented outside of the natural fire return interval to achieve these goals. These lower intensity maintenance activities would consist of targeted removal of dead, dying, and diseased trees, and invasive species; or select thinning of regenerating trees and shrubs to achieve desired densities consistent with healthy examples of the vegetation alliance being treated.

The potential for treatment activities, including maintenance treatments, to adversely affect sensitive habitats was examined in the Program EIR. Maintenance in ecological restoration areas would be implemented with consideration for the location's vegetation type (as determined by a RPF or biologist) and its natural fire return interval (i.e., time since last

burn or treatment is greater than the average fire return interval for the vegetation type). These intervals vary by vegetation type. For example, Monterey pine forest requires a minimum of 11 years to recover post fire. Most of the project area has not burned since before 1960 (Table 4.5-3), therefore, the Monterey pine forests in the project area are well outside their typical fire return interval of 40 to 70 years (Harvey and Agne 2021).

Table 4.5-3 Historic Fires within the Project Area*

Name	Date	Total Acres Burned in Project Area
Weferling	1960	4,151.9
Buckeye	1970	533.8
Phelan	1982	714.1
Chimney	2016	324.5
Villa	2017	10.2
Green1	2023	4.5
Green2	2023	247.3
Valley	2023	9.5
Total Acres		**6,000.3**

*Does not include prescribed burning by CSP and others

SPR BIO-4 requires that treatments be designed to avoid loss or degradation of riparian habitat functions and limits herbicide use (see Attachment A). Under SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented for mechanical treatment, manual treatment, prescribed burning, prescribed herbivory, and targeted herbicide application which would limit the extent of treatment activities within riparian habitat. Only manual treatments, targeted herbicide application, and prescribed burning are proposed within riparian habitats, and consistent with Coastal VTS 6 and pursuant to SPR HYD-4, driving heavy equipment, equipment fueling, placement of burn piles, and fire ignition would be prohibited within the WLPZ. In addition, pursuant to SPR BIO-4 and HYD-5, only herbicides labeled for use in aquatic environments would be used when working in riparian habitats and in areas where there is a possibility the herbicide could come into direct contact with water. Hand application of herbicides within riparian habitat would occur only during low-flow periods or when seasonal streams are dry. As stated in the project description, and pursuant to SPR HYD-5, the use of herbicides, aquatic and terrestrial, would be avoided within wet meadows and WLPZs. While these SPRs would reduce potential impacts on riparian habitat, the extent of riparian habitat within the treatment area has not been mapped and riparian habitat may be present outside of the areas encompassed within WLPZs. As a result, before implementation of treatment activities, SPR BIO-3 would be implemented to identify and map the extent of riparian habitat within a treatment area. For treatments occurring within riparian habitat, the project proponent would implement SPR BIO-3 and notify CDFW pursuant to California Fish and Game Code Section 1602 as required.

The project area contains habitats considered ESHA by the Coastal Commission; therefore, SPR BIO-8 would be implemented, and treatments would be designed in compliance with the Coastal VTS developed in consultation with the Coastal Commission for consistency with the Coastal Act (see Attachment B for documentation that the project is consistent with the Coastal VTS). Pursuant to SPR BIO-8, treatments would be designed to protect the habitat function of the affected ESHA, improve protected habitat values, and prevent loss or type conversion of habitat and vegetation types that define the ESHA, or loss of special-status species that inhabit the ESHA. Furthermore, pursuant to Coastal VTS 6, all forest health treatments implemented for this project would be designed to protect ecosystems by proactively restoring and enhancing ecosystem function, restoring and maintaining vegetation cover to reflect appropriate fire frequencies and comply with standards set forth in the Manual of California Vegetation, and provide for an appropriate mosaic of native plants by age, size, and class. In addition, pursuant to Coastal VTS 6, vegetation removal would follow a hierarchy to obtain a vegetation cover threshold that avoids unintended habitat conversion. With the application of SPR BIO-8 and the Coastal VTS, adverse impacts to ESHA would be avoided or minimized.

Avoiding treatment activities in all sensitive natural communities and oak woodlands would preclude achieving the treatment objectives of restoring forest health and improving wildfire resilience; therefore, Mitigation Measure BIO-3a would apply to treatment activities in sensitive natural communities and oak woodlands. Treatments have been designed specifically within Bishop pine – Monterey pine forest and woodland (see Section 4.5, Impact BIO-1 for a detailed discussion on Monterey pine) to restore ecological function to the existing sensitive natural community to improve forest health and ecosystem resilience consistent with Coastal VTS 5 and Mitigation Measure BIO-3a.

A qualified RPF will design treatments in all sensitive natural communities and oak woodlands to ensure that the characteristics that qualify the communities as sensitive (e.g., dominant canopy species, relative percentage of dominant species, species composition, per membership rules of the Manual of California Vegetation [online version]) are retained post-treatment to the extent feasible. Treatments in all sensitive natural communities will be designed to maintain or improve the habitat value and functional capacity of the vegetation type compared to its existing condition and will maintain the natural species diversity, abundance, and composition of the sensitive natural community being treated. Under Mitigation Measure BIO-3a, a qualified RPF or biologist will determine the natural fire regime, condition class, and departure from fire return interval for each sensitive natural community and oak woodland prior to treatment. Initial and maintenance treatment activities in sensitive natural communities and oak woodlands would be designed to restore the fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function. In addition, pursuant to Mitigation Measure BIO-3a, treatments within sensitive natural communities in fuel breaks will not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in an S3 sensitive natural community, and no fuel breaks will be created in S1 or S2 sensitive natural communities. The only exception to this prohibition of fuel breaks in S1 or S2 sensitive natural communities will be in cases where it is infeasible to meet these requirements within fuel break treatment areas because it would preclude meeting the project objectives. The feasibility of avoiding fuel breaks in sensitive natural communities with a rarity rank of S1 and S2 for public safety reasons will be determined by qualified fire resource professionals (e.g., CAL FIRE) in consideration of community and life safety. Proposed treatments would also be consistent with Coastal VTS 5 and 6, which require that ESHAs be protected against any significant disruption of habitat values.

In accordance with Mitigation Measure BIO-3a, ecological restoration treatments within sensitive natural communities that are fire dependent, such as chaparral alliances characterized by fire-stimulated, obligate seeders, will employee prescribed burning as the primary treatment activity to mimic the natural disturbance regime where feasible and appropriate. If it is not feasible to apply prescribed burning in the fire dependent sensitive natural community because of hazardous fuel loads, either the fire dependent sensitive natural community will be avoided or, if avoidance is not an option because avoidance would not meet CalVTP program objectives (e.g., ecological restoration, community protection), manual and mechanical pretreatment activities may be employed to reduce fuel loads (e.g., dead standing vegetation) prior to implementing prescribed burning. If the project proponent determines that using prescribed fire as the primary treatment is infeasible and avoidance of the fire dependent sensitive natural community is also infeasible, the reasons manual or mechanical pretreatment is needed before implementing prescribed burns will be submitted to the Coastal Commission for Executive Director review and approval and will also be documented in the post-project implementation report.

Chaparral and Coastal Scrub

As described in Table 4.5-1, approximately 3,645 acres of chaparral habitat (i.e., mixed chaparral and chamise-red shank chaparral), and 12,006 acres of coastal scrub habitat are present in the project area. Several representative examples of habitats mapped as chaparral and coastal scrub in CAL FIRE's FRAP vegetation layer were visited during SPR BIO-1 surveys. Various chaparral and coastal scrub alliances were observed, including blue blossom chaparral, chamise chaparral, holly leaf cherry - toyon - greenbark ceanothus chaparral, salal – berry brambles, black sage – California sagebrush scrub, coyote brush scrub, yellow bush lupine scrub, poison oak scrub, and California buckwheat scrub. Coyote brush scrub was the most commonly observed coastal scrub alliance. Species composition and cover in this alliance is variable and several associations are likely present. Generally, dominant and associated species observed in the coyote brush alliance include coyote brush (*Baccharis pilularis*), bush monkeyflower, coffeeberry (*Frangula californica*), California blackberry (*Rubus ursinus*), poison oak (*Toxicodendron diversilobum)*, and California sage. Dominant and associated species observed in the California buckwheat scrub alliance include California

buckwheat (*Eriogonum fasciculatum),* California sage, chaparral yucca *(Hesperoyucca whipplei*), and coastal goldenbush *(Isocoma menziesii).* Some scrub alliances observed during the SPR BIO-1 surveys are consistent with coastal sage scrub vegetation types and for purposes of this analysis, coastal scrub and coastal sage scrub will be considered synonymous.

Treatment activities are proposed within chaparral and coastal scrub communities, and initial treatments and maintenance treatments could result in direct or indirect adverse effects on chaparral and coastal scrub. SPR BIO-5 requires avoidance of the environmental effects of type conversion within chaparral and coastal sage scrub and that the habitat function of chaparral and coastal sage scrub communities be maintained. The spatial scale within which the effects of type conversion are evaluated for this project comprises the approximately 93,000-acre Upper Salinas-Las Tablas Resource Conservation District Public Works Plan program area. This spatial scale is appropriate because even though most of this land is not publicly owned, the northern half of the program area is part of the Hearst Ranch, an 80,000-acre working cattle ranch held in a conservation agreement and owned by the Hearst Corporation. The southern half of the plan area is also largely privately owned ranch land. Approximately 56,409 acres of the program area are publicly owned lands under various protected status as parks and open space or are held in trust by non-profit conservancies or land trusts. This is a substantial landscape scale at which ecologically functional habitat capable of meeting the resource needs of species that rely on these habitats can be maintained. Type conversion of chaparral and coastal sage scrub would not occur at this scale, as required by SPR BIO-5. Because this project is in the Coastal Zone, additional protections are required including that ecological restoration treatments would not result in unintended habitat type conversion at the alliance level (i.e., would not result in conversion to another vegetation alliance), pursuant to Coastal VTS 6 (Attachment B).

Fuel break treatments would be implemented in up to a maximum of approximately 60 acres of chaparral habitat and 339 acres of coastal sage scrub habitat in the project area. This constitutes approximately less than 2.5 percent of the approximately 16,866 acres of chaparral and coastal sage scrub within the PWP program area. The limited scope of fuel break treatments across the landscape would not constitute landscape-scale conversion of chaparral and coastal sage scrub habitat to other habitat types because the majority of chaparral and coastal sage scrub habitats would be maintained and there would not be a substantial loss of habitat function at the identified spatial scale as required by SPR BIO-5.

Within the remaining acres of chaparral and coastal sage scrub habitat in the project area, which would be subject to ecological restoration treatments, treatment types would be designed to maintain habitat function within treatment areas pursuant to SPR BIO-5 and SPR BIO-8. This includes identifying the chaparral and coastal sage scrub vegetation types to the alliance level, determining appropriate treatment prescriptions based on current fire return interval departure and condition class of the chaparral and coastal sage scrub vegetation alliances on-site, maintaining at least 35 percent relative cover of chaparral and coastal sage scrub vegetation, retaining a mix of middle to older aged shrubs to maintain heterogeneity and provide nurse plants for seeding, and implementing maintenance treatments at a frequency that allows regeneration of the characteristic species of each chaparral and coastal sage scrub community within ecological restoration treatment areas. Most of the chaparral and coastal scrub habitats in the project area have not experienced fire in over 80 years (Table 4.5-4) and this is greater than the typical mean fire return interval of 50 years for mixed chaparral communities. Because chaparral and coastal sage scrub communities within the treatment area are adapted to disturbance (e.g., fire) at greater frequencies than have occurred in the past 100 years, type conversion would not occur from ecological restoration treatments designed specifically to restore historic disturbance regimes.

Table 4.5-4 Historic Fire in Chaparral Communities within the Project Area*

Name	Date	Total Acres Burned in Project Area	Mixed Chaparral (Acres)	Coastal Scrub (Acres)	Chamise-Redshank Chaparral (Acres)
Weferling	1960	4,151.9	1,128.0	241.9	110.5
Buckeye	1970	533.8	85.7	1.0	0
Phelan	1982	714.1	0	187.2	0
Chimney	2016	324.5	161.7	0	33.6

Name	Date	Total Acres Burned in Project Area	Mixed Chaparral (Acres)	Coastal Scrub (Acres)	Chamise-Redshank Chaparral (Acres)
Villa	2017	10.2	0	0	0
Green1	2023	4.5	0	0.1	0
Green2	2023	247.3	0	29.4	0
Valley	2023	9.5	0	0.5	0
	Total Acres	6,000.3	1,375.4	460.1	144.1

*Does not include prescribed burning by CSP and others.

Additional protections would be required under Mitigation Measure BIO-3a if the chaparral and coastal sage scrub vegetation type is also a sensitive natural community, as described above. Some S2 sensitive natural communities that are known or may occur in the project area (see Table 4.5-2) are maritime chaparral vegetation types that are characterized by rare and endemic manzanita species. In compliance with Mitigation Measure BIO-3a, to the extent feasible, no fuel breaks will be created in sensitive natural communities with a rarity rank of S1 or S2. There are no sensitive natural communities with a rarity rank of S1 with potential to occur in the project area. Additional measures for special-status manzanita species pursuant to Mitigation Measures BIO-1a and BIO-1b (Avoid Loss of Special-Status Plants) would provide further protection to chaparral sensitive natural communities ranked S2 that are dominated or characterized by special-status manzanita species (see Attachment A). All ecological restoration treatments in chaparral sensitive natural communities will be treated according to a prescription that is consistent with their natural fire characteristics and subject to Coastal Commission Executive Director review and approval (per Mitigation Measure BIO-3a); fire characteristics of sensitive natural communities ranked S1 or S2 with potential to occur in the project area are discussed in Table 4.5-5.

Table 4.5-5 Chaparral Sensitive Natural Communities Ranked S1 and S2 and Characterized by Rare Endemic Manzanita Species and Their Known Fire Characteristics

Sensitive Natural Community	Rarity Rank[2]	Plant Status	Fire Characteristics Notes	Fire Characteristics
Hooker's manzanita chaparral	S2	In SLO County, this alliance is characterized by Hearst's manzanita (*A. hookeri* ssp. *hearstiorum*), which is listed as endangered under CESA.	Hearst's manzanita is a prostrate to mounded shrub that has no lignotuber and reestablishes from a seedbank. Seeds germinate following heat scarification. The species can also reproduce by layering. Infrequent fire results in tree encroachment and decline in shrub vigor and seedbank quality while too frequent fire converts stands to coastal scrub or grassland.	FRI: Moderately long (50-100 years)
Hoover's manzanita	S2	This alliance is dominated by Hoover's manzanita (*A. hooveri*), a CRPR 4.3 species.	Hoover's manzanita is an obligate seeder adapted to high-intensity, long interval fires.	FRI: Moderately long (50-100 years) Season: Late Summer/ Fall Size: Med to large, stand and beyond Complexity: Low to moderate Intensity: High. Severity: Very High Type: Active-independent crown

Sources: Calflora 2025; Manual of California Vegetation, Online Edition 2025; Compiled by Ascent 2025.

Chaparral and coast sage scrub alliances known to occur and that may occur in the project area have different reproductive strategies. Some alliances are dominated by obligate seeder species, meaning the species is entirely dependent on seed germination after fire. For example, coyote brush, California buckwheat, and most manzanitas are obligate seeders. Other species, such as chamise and California sage, are facultative seeders. These species sprout new shoots after fire and have persistent soil seed banks that are fire stimulated. For example, chamise rejuvenates its

crown by continually producing new sprouts from an established lignotuber. To protect facultative species, mechanical and manual treatments will maintain root systems intact, where feasible, to allow for resprouting. Mechanical treatments would target above-ground vegetation with the intent of keeping masticating heads out of duff layers and minimizing direct disturbance to subsurface soil layers, allowing intact root systems to resprout. This will allow plants to sprout new shoots following treatment. Prescribed fire treatments will promote seedling recruitment as well as allow resprouting from established lignotubers. In addition, most fuel break and ecological restoration treatments would be implemented over a long-term period, and only a portion of the chaparral and coastal sage scrub habitat in the total project area would be treated in any given year, resulting in a mosaic of different age groups of shrubs (i.e., older, middle-aged, younger) at any given time in the project area.

As described in the project description (see Section 2.4, "Proposed Treatments"), many shrub habitats within the project area are in late successional stages or are degraded shrubland vegetation stands characterized by dense cover, low biodiversity, and a greater composition of invasive and nonnative species than are typical for these alliances when they are in Condition Class 1, with no or minimal departure from their natural fire regime. In the project area, native grasslands have converted to shrublands and shrublands have converted to forestland due to longer than natural fire-free intervals.

In addition to implementation of SPR BIO-5, implementation of SPR BIO-9 would further avoid type conversion of chaparral and coastal sage scrub to annual grasslands in the project area by substantially reducing the risk of spreading or introducing invasive plants including annual grasses rated as invasive by Cal-IPC or designated as noxious weeds by the California Department of Food and Agriculture. SPR BIO-9 would require the removal of seeds, soil, vegetative matter, or other seed-bearing material from clothing, footwear, and equipment before entering a treatment area or when leaving an area with infestations of invasive plants. It also would require targeting invasive species during treatments and treating invasive plant biomass on-site or disposing of invasive plant biomass off-site at an appropriate waste collection facility to eliminate seeds and propagules and prevent reestablishment. Furthermore, fire and fuel management BMPs outlined in *Preventing the Spread of Invasive Plants: Best Management Practices for Land Managers* (Cal-IPC 2012, or current version) would be implemented pursuant to SPR BIO-9, which includes post-treatment monitoring and follow-up removal of invasive species.

Further, treatments in chaparral and coastal sage scrub vegetation types will be designed to benefit these vegetation types by targeting the removal of invasive species and dead, dying, or diseased plants, selectively removing live plants that are at densities greater than is characteristic of that vegetation type, selectively removing species that are becoming dominant and changing the composition of the vegetation type (for example, coyote brush), and retaining species that will leave a stronger assemblage of species representative of the historic shrub vegetation type. The treatments will also consider the health of the vegetation community, the natural fire return interval, and the reproductive strategy of the dominant shrub species.

Conclusion

The potential for treatment activities to result in adverse effects on sensitive habitats, including designated sensitive natural communities, riparian habitats, oak woodlands, chaparral and coastal sage scrub, and ESHA, as described above, was examined in the Program EIR. This impact on sensitive habitats is within the scope of the Program EIR, because the treatment activities and intensity of disturbance from implementing treatment activities would be consistent with those analyzed in the Program EIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on riparian habitat and sensitive natural communities is also the same, as described above.

As described in Section 1.1.4, "Purpose of This PSA/Addendum," USLTRCD proposes to revise requirements under SPR HYD-4 to require establishment of WLPZ buffers for only the watercourses within 300 feet of treatment activities, including manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments. This revision would ensure that all WLPZs in proximity to a treatment area are flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area. This

revision is consistent with the overall intent of SPR HYD-4, which is to prevent degradation of watercourses during implementation of treatment activities, including manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments, and all other conditions on treatment activities within WLPZs would apply. This establishment of WLPZs within 300 feet of treatment activities would therefore provide the same reduction in impacts to sensitive habitats including riparian habitats as provided by SPR HYD-4 in the Program EIR. For the reasons described above, the proposed revisions to SPR HYD-4 would not result in a substantially more severe significant effect related to sensitive habitats, including designated sensitive natural communities, riparian habitats, oak woodlands, chaparral and coastal sage scrub, and ESHA than what was covered in the Program EIR.

Biological resource SPRs that apply to project impacts under Impact BIO-3 are SPRs AD-1, BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-8, BIO-9, HYD-4, and HYD-5. Coastal VTS 6 applies to project impacts under BIO-3 in addition to the CalVTP SPRs and mitigation measures to support California Coastal Act compliance and consistency with the PWP. The biological resource mitigation measure that applies to project impacts under Impact BIO-3 is Mitigation Measure BIO-3a. Because habitat function of sensitive natural communities or oak woodlands would be improved or maintained through implementation of Coastal VTS 6, and Mitigation Measure BIO-3a, Mitigation Measure BIO-3b would not apply, and no compensatory mitigation would be required because there would be no unavoidable losses of these resources. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant Impact than what was covered in the Program EIR.

IMPACT BIO-4

Initial treatments and maintenance treatments could result in direct or indirect adverse effects on state or federally protected wetlands, or coastal wetlands as defined under the Coastal Act. Potential impacts resulting from maintenance activities would be similar to those resulting from initial treatments because the same treatment activities are proposed. Additionally, prescribed herbivory would predominantly be implemented during maintenance treatments; however, prescribed herbivory would be excluded within 50 feet of waterbodies and wetlands using temporary fencing or active herding, pursuant to SPR HYD-3. The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the Program EIR.

During the reconnaissance-level survey conducted pursuant to SPR BIO-1, multiple different types of aquatic habitats were observed including Class I, Class II, and Class III watercourses, freshwater emergent wetlands, freshwater forested-shrub wetlands, and freshwater ponds. Intermittent and perennial waterways and associated tributaries within the project area include San Carpoforo Creek, Estrada Creek, Chris Flood Creek, Arroyo Hondo, Arroyo de los Chinos, Arroyo de la Cruz, Arroyo del Oso, Arroyo del Corral, Arroyo Laguna, Oak Knoll Creek, Arroyo del Puerto, Broken Bridge Creek, Little Pico Creek, North and South Forks Pico Creek, Marmolejo Creek, Arroyo del Padre Juan, Van Gordon Creek, San Simeon Creek, Steiner Creek, Santa Rosa Creek, Green Valley Creek, Perry Creek, Ellysly Creek, Villa Creek, Cayucos and Little Cayucos Creeks, Old Creek, Willow Creek, and Toro Creek. Many of these waterways contain or abut wetlands. Estuarine and marine wetlands are also present within the project area in the immediate vicinity of the coast. The National Wetland Inventory (NWI) for the project area includes approximately 827 acres of riverine habitat (i.e., rivers, streams), 510 acres of estuarine and marine wetlands, 340 acres of freshwater emergent wetlands, 1,311 acres of freshwater forested-shrub wetlands, and 57 acres of freshwater pond habitat. In addition, the FRAP vegetation data identifies 5 acres of wet meadow habitat within the project area (see Table 4.5-1 for additional aquatic habitats). FRAP vegetation data and NWI data are sourced using different methods, which accounts for differences in acreages and types. Acreage totals and types from both sources are provided here to provide a full picture of aquatic habitat potentially present in the project area; however, resources mapped in these databases are identified primarily through aerial imagery and are not ground verified.

Additional wetlands may be present throughout the project area that have not been identified or mapped as well as ponds smaller than 1 acre (i.e., not considered a lake under Forest Practice Rules). Therefore, consistent with the requirements of the Coastal VTS 5 (which requires protection of ESHA), and pursuant to Mitigation Measure BIO-4, a qualified RPF or biologist would identify the boundaries of all wetlands in the treatment area; establish an appropriate buffer (with a minimum of 50 feet) around these features; and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). Only treatment activities that would

restore ecological benefits to the wetland or would maintain wetland habitat quality while improving surrounding ecosystems, including ESHAs, will be allowed within the wetland buffer. No fire ignition (including the associated use of accelerants) will occur within wetland buffers. A larger buffer may be required if wetlands or other aquatic habitats contain habitat potentially suitable for special-status plants or special-status wildlife (e.g., California red-legged frog and western pond turtle; see Impact BIO-2). Larger buffers (i.e., 150-foot WLPZ) are required for Class 1 waters on slopes greater than 50 percent. Treatments within wetland boundaries would be limited to broadcast burning and only where no special-status species other than the cysts of vernal pool fairy shrimp are present and where habitat function in the wetland would be maintained or enhanced/restored. Ecological restoration treatments would be implemented within the wetland buffer, including prescribed burning, manual treatment, and targeted herbicide application, to remove encroaching coyote brush shrubs, and invasive plants such as blue gum and French broom, and reduce thatch buildup in native perennial grasslands that are surrounding and intermixed with wetlands. Only hand containment lines for prescribed burns will be installed within the minimum 50-foot wetland buffers.

A WLPZ of 50 to 150 feet adjacent to all Class I (i.e., perennial/relatively permanent) and Class II (i.e., intermittent/relatively permanent) streams would be implemented, and equipment limitation zones (ELZs) of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III (i.e., ephemeral) and Class IV (i.e., human-created) watercourses within the project area per SPR HYD-4. Establishment of WLPZs and 50-foot wetland protection buffers (consistent with the Coastal VTS and pursuant to Mitigation Measure BIO-4) would result in impact avoidance for wetland, stream, and other aquatic habitats during all treatment activities.

Conclusion

The potential for treatment activities to adversely affect state or federally protected wetlands was examined in the Program EIR. This impact on wetlands is within the scope of the Program EIR, because the treatment activities and intensity of disturbance from implementing treatment activities would be consistent with those analyzed in the Program EIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on wetlands is also the same, as described above. As described in Section 1.1.4, "Purpose of This PSA/Addendum," USLTRCD proposes to revise requirements under SPR HYD-4 to require establishment of WLPZ buffers for only the watercourses within 300 feet of treatment activities, including manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments. This revision would ensure that all WLPZs in proximity to a treatment area are flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area. This revision is consistent with the overall intent of SPR HYD-4, which is to prevent degradation of watercourses during implementation of treatment activities, including manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments, and all other conditions on treatment activities within WPLZs would apply. This establishment of WLPZs within 300 feet of treatment activities would therefore provide the same reduction in impacts to state or federally protected wetlands as provided by SPR HYD-4 in the Program EIR. For the reasons described above, the proposed revisions to SPR HYD-4 would not result in a substantially more severe significant effect related state or federally protected wetlands than what was covered in the Program EIR.

The revision to Mitigation Measure BIO-4 described in Section 1.1.4, "Purpose of This PSA/Addendum," would allow for the use of broadcast burning in vernal pools that provide suitable habitat for vernal pool fairy shrimp. This would allow for restoration of vernal pools where this species is present and would avoid the need for additional control lines to prevent broadcast burning from entering these vernal pools, thereby reducing ground disturbance around vernal pools. All other conditions on treatment activities within Mitigation Measure BIO-4 to protect state or federally protected wetlands would remain the same as contained in the Program EIR. For the reasons described above, the proposed revisions to Mitigation Measure BIO-4 would not result in a substantially more severe significant effect related to state or federally protected wetlands than what was covered in the Program EIR.

Biological resource SPRs that apply to project impacts under Impact BIO-4 are SPRs AD-1, BIO-1, HYD-1, HYD-3, and HYD-4. Coastal VTS 5 in addition to the CalVTP SPRs and mitigation measures, support California Coastal Act compliance and consistency with the PWP. The biological resource mitigation measure that applies to project impacts

under Impact BIO-4 is Mitigation Measure BIO-4. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT BIO-5

Initial vegetation treatments and maintenance treatments within the project area could result in direct or indirect adverse effects on wildlife movement corridors and nurseries because habitat suitable for wildlife is present throughout the project area. Based on review and survey of project-specific biological resources (SPR BIO-1), large portions of the project area experience little human disturbance and provide a corridor for movement north and south along the coast from Big Sur to Morro Bay (CNDDB 2025a). Therefore, in addition to local wildlife movement within the treatment areas, the treatment areas also function to facilitate movement of wildlife through the region. Portions of the project area also likely function as nursery sites (e.g., deer fawning areas, common bat roosts, shorebird rookeries), which may be disturbed by treatment activities. The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the Program EIR.

Prescribed herbivory treatments would be subject to SPR BIO-11 which would require use of wildlife friendly fencing during treatments (see Attachment A). Although SPR BIO-11 would reduce the adverse effects on wildlife movement, temporary disruption of wildlife movement through treatment areas may occur. However, because only a small portion of the project would be treated in any one year, this temporary disruption would not be a substantial impact on wildlife movement through the project area as a whole. Furthermore, while non-shaded fuel break treatments may result in removal of more vegetation and wildlife habitat features than would be removed during ecological restoration treatments (see Section 2.4.2, 'Treatment Type – Fuel Breaks"), not all vegetation would be removed, root systems would predominantly be left intact, which will promote natural regeneration mimicking post fire conditions; fuel break treatments would also be subject to applicable SPRs, mitigation measures, and Coastal VTS; and these treatments are not a substantial portion of the potential habitat for wildlife species. Furthermore, ecological restoration treatments, which make up the majority of the proposed treatments within the project area would be designed to retain live trees greater than 8 inches dbh, retain wildlife trees, and retain a mosaic pattern of vegetation (see Section 2.4," Proposed Treatments). Also, SPR BIO-5 would retain cover in coastal scrub and chaparral habitats. If during surveys conducted pursuant to SPR BIO-10 wildlife nursery sites (e.g., deer fawning areas, common bat roosts, shorebird rookeries) are detected, Mitigation Measure BIO-5 will apply to all treatment activities and a no-disturbance buffer would be established around these features, the size of which would be determined by a qualified biologist or RPF.

The potential for treatment activities to interfere substantially with wildlife movement corridors or impede use of wildlife nurseries was examined in the Program EIR, and the potential for adverse effects on wildlife movement and nurseries is within the scope of the Program EIR, because the proposed treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on wildlife movement corridors and wildlife nurseries is also the same, as described above. As described in Section 1.1.4, "Purpose of This PSA/Addendum," USLTRCD proposes to revise requirements under SPR HYD-4 to require establishment of WLPZ buffers for only the watercourses within 300 feet of treatment activities, including manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments. This revision would ensure that all WLPZs in proximity to a treatment area are flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area. This revision would also provide the same reduction in impacts to the use of WLPZs for wildlife movement and wildlife nurseries as provided by SPR HYD-4 in the Program EIR. For the reasons described above, the proposed revisions to SPR HYD-4 would not result in a substantially more severe significant effect related wildlife movement and wildlife nurseries than what was covered in the Program EIR.

Biological resource SPRs that apply to project impacts under Impact BIO-5 are SPR AD-1, BIO-1, BIO-4, BIO-10, BIO-11, HYD-1, and HYD-4. The biological resource mitigation measure that applies to project impacts under Impact BIO-5 is

Mitigation Measure BIO-5. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT BIO-6

Initial and maintenance treatments could result in direct or indirect adverse effects resulting in a reduction in the abundance of common wildlife, including nesting birds, because habitat suitable for these species is present throughout the treatment areas. The potential for treatment activities, including maintenance treatments, to result in adverse effects on these resources was examined in the Program EIR.

Prescribed burning, mechanical treatments, manual treatments, targeted herbicide application, and prescribed herbivory conducted during the nesting bird season (February 1 through August 31) could result in direct loss of active nests or disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chain saws, vehicles, personnel), potentially resulting in abandonment and loss of eggs or chicks. However, SPR BIO-12 would be applied, and for treatments implemented during the nesting bird season, a survey for common nesting birds would be conducted within the treatment area by a qualified RPF or biologist prior to treatment activities. If no active bird nests are observed during focused surveys, then additional avoidance measures would not be required. If active nests of common birds or raptors are observed during focused surveys, disturbance to the nests would be avoided by establishing an appropriate buffer around the nests, modifying treatments to avoid disturbance to the nests, or deferring treatment until the nests are no longer active as determined by a qualified RPF, biologist, or biological technician. Buffers may be modified by a qualified biologist based on rationale such as species sensitivity, vegetative cover, nest height, and topography that would attenuate noise and visual disturbance.

Habitat function for special-status birds would be maintained because, while non-shaded fuel break treatments may result in removal of more vegetative cover and increase spacing between remaining vegetation within upland habitat when compared to ecological restoration treatments (see Section 2.4.2, "Treatment Type – Fuel Breaks"), not all vegetation would be removed; root systems would predominantly be left intact, which will promote natural regeneration mimicking post fire conditions; fuel break treatments would also be subject to applicable SPRs, mitigation measures, and Coastal VTS; and these treatments are not a substantial portion of the potential habitat for the species. Furthermore, ecological restoration treatments, which make up the majority of the proposed treatment acres within the project area would be designed to retain live trees greater than 8 inches dbh, retain wildlife trees, and retain a mosaic pattern of vegetation (see Section 2.4," Proposed Treatments). Also, SPR BIO-5 would retain cover in coastal scrub and chaparral habitats.

The potential for adverse effects on wildlife habitat or the abundance of common wildlife, including nesting birds, is within the scope of the Program EIR because the proposed treatment activities and intensity of disturbance as a result of implementing treatment activities 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, because the existing environmental conditions outside the treatable landscape in the project area are essentially the same as those within the treatable landscape, as described above, the potential impact on common wildlife, including nesting birds is also the same. Biological resource SPRs that apply to project impacts under Impact BIO-6 are SPRs AD-1, BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, and BIO-12. Therefore, 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 BIO-7

The proposed project would occur within the Coastal Zone of San Luis Obispo County; as such, the project must comply with the provisions of the Coastal Act and relevant LCP. In collaboration with multiple agencies, USLTRCD developed, and the Coastal Commission approved, a PWP as a companion to the CalVTP to provide design standards for projects in the Coastal Zone and in compliance with the LCP. The project would be implemented in compliance with the PWP and would therefore not result in a conflict with the LCP. The potential for the proposed treatments to conflict with local policies was examined in the Program EIR and is within the scope of the Program EIR because vegetation treatment

locations, types, and activities are consistent with those analyzed in the Program EIR. In addition, all projects implemented under the CalVTP would be required to comply with applicable local policies, plans, and ordinances, per SPR AD-3 to the extent the implementing entities are subject to them. Furthermore, projects implemented under the USLTRCD's PWP are not expected to require additional approvals from San Luis Obispo County.

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. 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 project area boundary, the existing regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential for conflicts with local policies or ordinances is also the same, as described above. The biological resource SPRs that apply to project impacts under Impact BIO-7 are SPRs AD-1 and AD-3. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT BIO-8

The potential for the proposed treatments to conflict with the provision of an adopted habitat conservation plan (HCP) or natural community conservation plan (NCCP) was examined in the Program EIR. Implementation of the proposed vegetation treatment and maintenance treatments would not result in a conflict with an adopted HCP or NCCP because the project area is not within the plan area of, or adjacent to, any adopted HCP or NCCP (CNDDB 2025b). Therefore, this impact does not apply to the proposed project. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW BIOLOGICAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to new significant impacts not addressed in the Program EIR.

The proposed revision to SPR GEO-1 would constitute a change to the Program EIR. Revisions to SPR GEO-1 would replace the work stoppage of mechanical operations that cause soil disturbance, targeted herbicide application, and prescribed herbivory based on forecasted rain with a stoppage based on rain and soil saturation and compaction. The proposed revisions to SPR GEO-1 would be equally protective and would therefore not result in a new impact that was not covered in the Program EIR.

The revision of SPR HYD-4 would constitute a change to the Program EIR. Revisions to SPR HYD-4 would allow the establishment of WLPZ buffers for only the watercourses within 300 feet of treatment activities, including manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments. This revision would ensure that all WLPZs in proximity to a treatment area are flagged and prevent degradation of watercourses during implementation of treatment activities, because all conditions for treatments within WLPZs would apply. With the remaining requirements in SPR HYD-4, the proposed revision to SPR HYD-4 would be equally protective and would therefore not result in a new impact that was not covered in the Program EIR.

The revision to Mitigation Measure BIO-4 to allow for the use of broadcast burning in vernal pools that provide suitable habitat for vernal pool fairy shrimp, would be a change to the project analyzed in the Program EIR. These

revisions would allow for restoration of vernal pools where the species is present, avoid the need for additional control lines to prevent broadcast burning from entering these vernal pools, and would not result in impacts to vernal pool fairy shrimp, because the cysts of vernal pool invertebrates have been found to survive fire in the soil and be present in burned pools following the next rainy season. All other requirements of Mitigation Measure BIO-4 would continue to apply and would ensure that the project does not have a substantial adverse effect on special-status plants and wildlife, or state or federally protected wetlands. The proposed revisions to Mitigation Measure BIO-4 would not result in a new or more severe impact that was not covered in the Program EIR, because impacts to special-status plants and wildlife, or state or federally protected wetlands were analyzed in the Program EIR.

Therefore, the impacts of the proposed treatment project are also consistent with those considered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape, and revisions to SPR GEO-1, SPR HYD-4, and Mitigation Measure BIO-4, would not give rise to any new significant impacts not addressed in the Program EIR as described above. Therefore, no new impact related to biological resources would occur that is not covered in the Program EIR.

4.6 GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	LTS	Impact GEO-1, pp. 3.7-26 – 3.7-29	Yes	AD-3 AQ-3 AQ-4 GEO-1 GEO-2 GEO-3 GEO-4 GEO-5 GEO-6 GEO-7 GEO-8 HYD-3 HYD-4	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	AD-3 AQ-3 GEO-3 GEO-4 GEO-7 GEO-8	NA	LTS	No	Yes

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

New Geology, Soils, Paleontology, and Mineral Resource Impacts: Would the treatment result in other impacts to geology, soils, paleontology, and mineral resources that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

The project area is within the Coast Ranges geomorphic province, which consists of northwest-trending mountain ranges and valleys that are subparallel to the San Andreas Fault. The Coast Ranges contain thick Mesozoic (70 to 200 million years old) and Cenozoic (less than 70 million years old) sedimentary strata (CGS 2002). The northern coastal area of San Luis Obispo County is primarily underlain by Jurassic- to Cretaceous-age (approximately 120 to 180 million years old) rocks of the Franciscan complex, which is a mixture of igneous, metamorphic, and sedimentary rocks. Along the coastal plain, and within stream valleys, the older bedrock formations are overlain by recent to Quaternary-age alluvium and terrace deposits (Cambria CSD 2008). The predominant soil types within the project area include: Lompico-McMullin loams, 30 to 75 percent slopes (13.1 percent of project area), Los Osos-Lodo complex, 30 to 75 percent slopes (8.6 percent of project area), and Diablo-Lodo complex, 15 to 50 percent slopes (7.9 percent of project area), San Simeon sandy loam, 15 to 30 percent slopes (4.7 percent of project area) (NRCS 2025). The project area contains areas with varying susceptibility to landslides; approximately 78 percent of the project area has high or very high landslide risk (USGS 2024).

IMPACT GEO-1

Vegetation treatment activities implemented within the project area would consist of prescribed burning, mechanical and manual treatments, prescribed herbivory, and targeted herbicide application to conduct ecological restoration and fuel breaks. These activities could result in varying levels of soil disturbance and have the potential to increase the rates of erosion and loss of topsoil. The potential for these treatment activities to cause substantial erosion or loss of topsoil was examined in the Program EIR. Mechanical treatments using heavy machinery are the most likely to cause soil disturbance that could lead to substantial erosion or loss of topsoil, especially in areas that contain steep slopes, or in areas that previously experienced fire. This impact is within the scope of the Program EIR because the use and type of equipment, extent of vegetation removal, and intensity of prescribed burning are consistent with those analyzed in the Program EIR. The inclusion of land in the 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 soil characteristics are essentially the same within and outside the CalVTP treatable landscape and therefore, the potential impact related to soil erosion is also the same, as described above.

SPRs applicable to this impact are AD-3, AQ-3, AQ-4, GEO-1 through GEO-8, HYD-3, and HYD-4. The USLTRCD proposes to revise requirements under SPR GEO-1 and SPR HYD-4. SPR GEO-1 would be revised to allow for suspension of mechanical and herbivory treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities or prescribed herbivory activities. This revision would replace the current requirement of suspending activities based on a forecasted 30 percent chance of rain. Suspension of these activities would not be based on weather forecasts alone (under which precipitation may never materialize), but rather if weather predictions materialize and lead to precipitation events. This revision is consistent with the overall intent of SPR GEO-1 because USLTRCD would be required to suspend mechanical disturbance during heavy precipitation to minimize the risk of soil compaction and soil disturbance.

SPR HYD-4 would be revised to require establishment of WLPZ buffers for only the watercourses within 300 feet of the manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments. This revision would ensure that all WLPZs in proximity to a treatment area are flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area. This revision is consistent with the overall intent of SPR HYD-4, which is to prevent degradation of watercourses during implementation of manual, mechanical, prescribed pile burning, and targeted herbicide application treatments; degradation would be prevented pursuant to the revised SPR. For the reasons described above, the proposed revisions to SPR GEO-1 and SPR HYD-4 would not result in a substantially more severe significant effect related to erosion or loss of topsoil than what was covered in the Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT GEO-2

Treatment activities would include prescribed burning, mechanical and manual treatments, prescribed herbivory, and targeted herbicide application. As stated above, approximately 78 percent of the project area has high or very high landslide risk (USGS 2024). The potential for treatment activities to increase landslide risk was examined in the Program EIR. This impact is within the scope of the Program EIR because the extent of vegetation removal, intensity of prescribed burning, and characteristics of the geographical terrain are consistent with those analyzed in the Program EIR. The inclusion of land in the 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 range of slopes and landslide conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the potential impact related to landslide risk is also the same, as described above.

SPRs applicable to this impact are AD-3, AQ-3, GEO-3, GEO-4, GEO-7, and GEO-8, which require the stabilization of mechanically disturbed soil, erosion monitoring, and that a registered professional forester or licensed geologist evaluate treatment areas with slopes greater than 50 percent for unstable areas. 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 GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. USLTRCD has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.7.1, "Environmental Setting," and Section 3.7.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the 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 geology and soils that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR.

Revisions to SPR GEO-1 and SPR HYD-4 would constitute a change to the project analyzed in the Program EIR. However, as described under Impact GEO-1 above, the revisions would reduce the potential for runoff and soil erosion and would be consistent with the overall intent of SPR GEO-1 and SPR HYD-4. Therefore, revisions to SPR GEO-1 and SPR HYD-4 would not result in a new impact that was not covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape, and revisions to SPR GEO-1 and SPR HYD-4, would not give rise to any new significant impacts. Therefore, no new impact related to geology, soils, paleontology, or mineral resources would occur that is not covered in the Program EIR.

4.7 GREENHOUSE GAS EMISSIONS

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

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

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

Discussion

IMPACT GHG-1

Use of vehicles and mechanical equipment and prescribed burning during initial and maintenance treatments would result in greenhouse gas (GHG) emissions. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the Program EIR. Consistent with the Program EIR, although GHG emissions would occur from equipment and vehicles used to implement treatments, the purpose of the proposed project is to reduce wildfire risk, which could reduce GHG emissions and increase carbon sequestration over the long term. This impact is within the scope of the Program EIR because the proposed activities, as well as the associated equipment, duration of use, and resulting GHG emissions, are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the same plans, policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape, as well as areas within the treatable landscape; therefore, the GHG impact is also the same, as described above. SPR AD-3, which requires consistency with local plans, policies, and ordinances, is applicable to this impact. SPR GHG-1 is not applicable to the proposed project because this project is not a registered offset project under the Board of Forestry and Fire Protection's Assembly Bill 1504 Carbon Inventory Process. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT GHG-2

Use of vehicles and mechanical equipment and prescribed burning during initial and maintenance treatments and biomass processing would result in GHG emissions. The potential for treatments under the CalVTP to generate GHG emissions was examined in the Program EIR. This impact was found to be potentially significant and unavoidable after the application of all feasible mitigation measures because of the infeasibility of implementing specific emission reduction techniques and the uncertainties associated with all the parameters and objectives of prescribed burning. Mitigation Measure GHG-2 in the CalVTP Program EIR requires project proponents to implement feasible methods to reduce the GHG emissions from prescribed burning, including pile burning. Accordingly, USLTRCD is proposing the use of air curtain burners and carbonizers (e.g., BurnBoss T24 and Tigercat 6050 Carbonator), and although not currently available, USLTRCD is proposing the use of a gasifier in the future if feasible. The essential function of these specialized biomass processing technologies is to reduce smoke, and resultant GHG emissions, compared to pile burning by consuming biomass quickly and efficiently. According to a 2020 study of biomass, air curtain burners and Oregon kilns emit 54 percent less CO_2 emissions compared to pile burning (Puettmann et al. 2020, as cited in Ascent 2022). The specific GHG emissions of pyrolysis depend on multiple factors, but are lower than pile burning in all cases (Ascent 2022). In addition, the production of biochar by these technologies and subsequent application as a soil amendment provides long-term carbon sequestration benefits that are not available from pile burning.

This impact is within the scope of the Program EIR because the proposed activities, as well as the associated equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions related to wildfire are consistent with those analyzed in the Program EIR. Mitigation Measure GHG-2 will be implemented by using air curtain burners and carbonizers and a gasifier when feasible to reduce GHG emissions associated with prescribed burning. Although use of these specialized biomass processing technologies would substantially reduce GHG emissions, emissions generated by the proposed treatments would still contribute to the annual emissions generated by the CalVTP, and this impact would remain significant and unavoidable, consistent with, and for the same reasons described in, the Program EIR.

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

NEW IMPACTS RELATED TO GHG EMISSIONS

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

4.8 ENERGY RESOURCES

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

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

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

Discussion

IMPACT ENG-1

Use of vehicles, mechanical equipment, and some manual equipment (e.g., chainsaws, hand saws, pole saws, weed whips, drip torches) during initial treatment and treatment maintenance activities would result in the consumption of energy through the use of fossil fuels. The use of fossil fuels for equipment and vehicles was examined in the Program EIR. The consumption of energy during implementation of the treatment project is within the scope of the Program EIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the existing energy consumption is essentially the same within and outside the treatable landscape; therefore, the energy 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.

NEW ENERGY RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP Program EIR. USLTRCD has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.9.1, "Environmental Setting," and Section 3.9.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to energy resources outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the Program EIR. The inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to energy resources would occur.

4.9 HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

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

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

New Hazardous Materials, Public Health and Safety Impacts: Would the treatment result in other impacts related to hazardous materials, public health and safety that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT HAZ-1

Initial treatments would consist of manual treatments, mechanical treatments, prescribed burning, targeted herbicide application, and prescribed herbivory. These treatment activities would require the use of fuels and related accelerants, which are hazardous materials. The potential for treatment activities to cause a significant health hazard from the use of hazardous materials was examined in the Program EIR. This impact is within the scope of the Program EIR because the types of treatments and associated equipment and types of hazardous materials that would be used are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed treatment area

that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, the exposure potential and regulatory conditions are essentially the same within and outside the treatable landscape; therefore, the hazardous material impact is also the same, as described above. SPR AD-3, HAZ-1 through HAZ-4, and HYD-4 are applicable to this treatment.

In addition, USLTRCD proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on-site outside of WLPZ or promptly removed and repaired off-site. All other elements of SPR HAZ-1 would remain the same as presented in the Program EIR. This revision is consistent with the original purpose and intent of SPR HAZ-1 to minimize hazardous material releases in treatment areas from equipment use and would allow USLTRCD to stabilize and fix leaking equipment promptly on-site, if feasible, otherwise the equipment would be promptly removed. For the reason described, the proposed revision to SPR HAZ-1 would not result in a substantially more severe significant effect related to creation of a significant health hazard from the use of hazardous materials compared to what was covered in the Program EIR.

USLTRCD also proposes to revise SPR HYD-4 by establishing the WLPZ buffers for only the watercourses within 300 feet of the manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments. This revision would help ensure that all WLPZs in proximity to a treatment area are recently flagged without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area. This revision is consistent with the original purpose and intent of SPR HYD-4 to prevent degradation of watercourses during implementation of manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments; degradation would be prevented pursuant to the revised SPR. For the reason described, the proposed revision to SPR HYD-4 would not result in a substantially more severe significant effect related to creation of a significant health hazard from the use of hazardous materials compared to what was covered in the Program EIR.

This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HAZ-2

Initial and maintenance treatments would include targeted ground-based herbicide application methods including using a backpack sprayer or manual brush applicator. No aerial spraying of herbicides would occur. The potential for treatment activities to cause a significant health hazard from use of herbicides was examined in the Program EIR. This impact is within the scope of the Program EIR because the herbicides (i.e., Clopyralid, Glyphosate, Imazapyr, and Triclopyr) and application methods that would be used are consistent with those analyzed in the Program EIR. In addition, herbicides would be applied by licensed applicators in compliance with all laws, regulations, and herbicide label instructions, consistent with herbicide use described in the Program EIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the hazardous materials impact is also the same, as described above. SPRs AD-3 and HAZ-2 through HAZ-9 are applicable to this treatment. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HAZ-3

Initial and maintenance treatments would include soil disturbance and prescribed burning, which could expose workers, the public, or the environment to hazardous materials if a contaminated site is present within the project area. The potential for workers participating in treatment activities to encounter contamination that could expose them, the public, or the environment to hazardous materials was examined in the Program EIR. This impact was identified as potentially significant in the Program EIR because hazardous materials sites could be present within treatment sites throughout the large geographic extent of the treatable landscape, and the feasibility of implementing mitigation for exposure of people or the environment to hazards resulting from soil disturbance or burning in a hazardous materials site was uncertain.

As directed by Mitigation Measure HAZ-3, database searches for hazardous materials sites within the project area have been conducted. No active hazardous materials sites were identified within the project area (SWRCB 2025; DTSC 2025a; CalEPA 2025). Twelve sites were identified within the project area that have been remediated and closed (SWRCB 2025). In addition, three school investigation sites and two military evaluation sites were identified within the project area that required either no action or no further action (DTSC 2025a). Four military evaluation sites within the project area were identified as inactive, three of which need evaluation: (CAFS) FAMILY HOUSING (80000047), CAMBRIA AFSTA (80000209), and CAMBRIA COMM FAC ANNEX (80000073), and one that requires action: (CAFS) COMMUNITY FAC (80000029) (DTSC 2025b; DTSC 2025c; DTSC 2025d; DTSC 2025e).

Because three sites needing evaluation and one site requiring action have been identified within the project area, these sites could have potential contaminants not specified yet, and therefore, these areas will be marked, and no prescribed burning or soil disturbing treatment activities will occur within 100 feet of the site boundaries in accordance with Mitigation Measure HAZ-3. Therefore, with the implementation of Mitigation Measure HAZ-3, no hazardous materials sites would be disturbed by treatments and this impact would be less than significant.

This impact is within the scope of the Program EIR because the types of treatments and associated equipment that could potentially expose workers or the environment to hazardous materials are consistent with those analyzed in the Program EIR. The inclusion of land in the project area 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 potential to encounter hazardous materials and the regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the hazardous materials impact is also the same, as described above. SPRs AD-3, HAZ-2, HAZ-3, and HAZ-4 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.

NEW HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. USLTRCD has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.10.1, "Environmental Setting," and Section 3.10.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project areas constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to hazardous materials 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. Revisions to SPRs HAZ-1 and HYD-4 would constitute a change to the project analyzed in the Program EIR. However, as described under Impact HAZ-1 above, the revisions would reduce the potential for hazardous material releases in treatment areas from equipment use and would prevent degradation of watercourses, consistent with the overall intent of SPRs HAZ-1 and HYD-4. Therefore, revisions to SPRs HAZ-1 and HYD-4 would not result in a new impact that was not covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape, and revisions to SPRs HAZ-1 and HYD-4, would not give rise to any new significant impacts. Therefore, no new impact related to hazardous materials, public health, or safety would occur.

4.10 HYDROLOGY AND WATER QUALITY

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning	LTS	Impact HYD-1, pp. 3.11-25 – 3.11-27	Yes	AD-3 AQ-3 BIO-4 BIO-5 GEO-4 GEO-6 HYD-2 HYD-4	NA	LTS	No	Yes
Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities	LTS	Impact HYD-2, pp. 3.11-27 – 3.11-29	Yes	AD-3 BIO-1 GEO-1 GEO-2 GEO-3 GEO-4 GEO-5 GEO-7 GEO-8 HYD-1 HYD-2 HYD-4 HYD-5 HAZ-1 HAZ-5	NA	LTS	No	Yes
Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory	LTS	Impact HYD-3, p. 3.11-29	Yes	AD-3 HYD-2 HYD-3	NA	LTS	No	Yes
Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through	LTS	Impact HYD-4, pp. 3.11-30 – 3.11-31	Yes	AD-3 BIO-4 HAZ-5 HAZ-7 HYD-2 HYD-5	NA	LTS	No	Yes

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

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

New Hydrology and Water Quality Impacts: Would the treatment result in other impacts to hydrology and water quality that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

The project area is primarily within the following watersheds: Big Creek-San Carpoforo, San Simeon-Arroyo de la Cruz, Santa Rosa, and Cayucos Creek-Whale Rock Area. Major hydrologic features in the project area include Arroyo de la Cruz, San Carpoforo Creek, Arroyo Hondo, Arroyo De Los Chinos, Arroyo de la Laguna, Arroyo del Oso, Arroyo Del Corral, Adobe Creek, Oak Knoll Creek, Arroyo del Puerto, Broken Bridge Creek, Little Pico Creek, Pico Creek, Arroyo Del Padre Juan, San Simeon Creek, Santa Rosa Creek, and Steiner Creek (CDFW 2021).

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

IMPACT HYD-1

Initial and maintenance treatments would include prescribed burning. Ash and debris from treatment areas could be washed by runoff into adjacent drainages and streams. USLTRCD would only implement prescribed burning during appropriate burn windows (typically fall, winter, spring, and early summer) when environmental conditions (windspeed, weather forecast, fuel moisture) are conducive to burning targeted fuels, while reducing the risk of high severity burns. WLPZs ranging from 50 to 150 feet will be implemented for Class I and Class II streams that are within treatment areas pursuant to SPR HYD-4. USLTRCD proposes to revise requirements under SPR HYD-4 to require establishment of WLPZ buffers for only the watercourses within 300 feet of treatment activities, including prescribed burning. This revision would ensure that all WLPZs in proximity to a treatment area are flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area. This revision is consistent with the overall intent of SPR HYD-4, which is to prevent degradation of watercourses during

implementation of treatment activities, including prescribed burning. For the reasons described above, the proposed revisions to SPR HYD-4 would not result in a substantially more severe significant effect related to water quality than what was covered in the Program EIR.

The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of low intensity prescribed burns and associated impacts to water quality are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed project area 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 surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from prescribed burning is also the same, as described above. SPRs applicable to this impact are AD-3, AQ-3, BIO-4, BIO-5, GEO-4, GEO-6, HYD-2, and HYD-4. As explained above, impacts on water quality resulting from the proposed project would not constitute a new or substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HYD-2

Initial and maintenance treatments would include mechanical and manual treatment activities. WLPZs ranging from 50 to 150 feet will be implemented for any watercourses that are within treatment areas pursuant to SPR HYD-4. The potential for mechanical and manual treatment activities to violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of heavy equipment and hand-held tools to remove vegetation and associated impacts to water quality are consistent with those analyzed in the Program EIR.

SPRs applicable to this impact are AD-3, HYD-1, HYD-2, HYD-4, HYD-5, GEO-1 through GEO-5, GEO-7, GEO-8, BIO-1, HAZ-1, and HAZ-5. USLTRCD proposes to revise requirements under SPRs HYD-4, GEO-1, and HAZ-1. SPR HYD-4 would be revised to require establishment of WLPZ buffers for only the watercourses within 300 feet of treatment activities, including mechanical and manual treatments. This revision would help ensure that all WLPZs in proximity to a treatment area are recently flagged without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area. This revision is consistent with the original purpose and intent of SPR HYD-4 to prevent degradation of watercourses during implementation of treatment activities, including mechanical and manual treatments.

SPR GEO-1 would be revised to allow for suspension of mechanical and herbivory treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical treatment or prescribed herbivory activities. This revision would replace the current requirement of suspending activities based on a forecasted 30 percent chance of rain. Suspension of these activities would not be based on weather forecasts alone, but rather if weather predictions materialize and lead to precipitation events. This revision is consistent with the overall intent of SPR GEO-1 because USLTRCD would be required to suspend mechanical disturbance during heavy precipitation to minimize the risk of soil compaction and soil disturbance.

USLTRCD also proposes to revise SPR HAZ-1 such that any leaking equipment may be stabilized and fixed on-site. All other elements of SPR HAZ-1 would remain the same as presented in the Program EIR. This revision is consistent with the original purpose and intent of SPR HAZ-1 to minimize hazardous material releases in treatment areas from equipment use and would allow USLTRCD to stabilize and fix leaking equipment promptly on-site, if feasible, otherwise the equipment would be promptly removed. For the reasons described above, the proposed revisions to SPRs HYD-4, GEO-1, and HAZ-1 would not result in a substantially more severe significant effect related to water quality than what was covered in the Program EIR.

The inclusion of land in the 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 surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from manual and mechanical treatments is also the same, as described above.

As explained 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 HYD-3

Initial and maintenance treatments would include prescribed herbivory. The potential for prescribed herbivory to violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of grazing animals (e.g., goats, sheep) and the grazing intensity to manage and remove vegetation are consistent with those analyzed in the Program EIR. Environmentally sensitive areas such as watercourses, riparian woodlands, and sensitive habitat areas or areas potentially containing special-status plant species or cultural resources if prescribed herbivory would have an adverse effect on the resource. A herder, fencing, mineral block, and/or a watering site may be required to keep the grazing animals within the desired area; typically, professional herders or portable electric fencing would be used during prescribed herbivory treatments. A buffer of approximately 50 feet would be maintained between sensitive and actively grazed areas as required by SPR HYD-3. The inclusion of land in the 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 surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from prescribed herbivory treatments is also the same, as described above. SPRs applicable to this treatment are AD-3, HYD-2, and HYD-3. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HYD-4

Initial and maintenance treatments would include targeted application of herbicides to promote regeneration of native species, reduce the spread of invasive vegetation, and maintain fuel breaks for wildland fire control or prescribed burning. Targeted herbicide treatment is predominantly expected to occur near roads, fuel breaks, trails, and in annual grasslands to promote growth of native grasslands or restore degraded coastal prairie communities where increased sunlight is present. Herbicides would not be used within wet meadows or WLPZs. Targeted herbicide application could occur on up to 3,394 acres of the project area; however, herbicide application would be avoided to the maximum extent feasible and would be used only if such treatment activity is the least environmentally damaging feasible alternative and would not result in significant adverse impacts to sensitive ecological resources. Consistent with the Program EIR, herbicide application would only be implemented at ground-level from equipment on vehicles or by manual application devices and would comply with EPA and California Department of Pesticide Regulation label standards. The potential for the use of herbicides to violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of herbicides to remove vegetation and associated impacts to water quality are consistent with those analyzed in the Program EIR.

The inclusion of land in the 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, surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from use of herbicides is also the same, as described above. SPRs applicable to this impact are AD-3, HYD-2, HYD-5, BIO-4, HAZ-5, and HAZ-7. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HYD-5

Initial and maintenance treatments could cause ground disturbance and erosion, which could directly or indirectly modify existing drainage patterns. The potential for treatment activities to substantially alter the existing drainage pattern of a project site was examined in the Program EIR. This impact on site drainage is within the scope of the Program EIR because the types of treatments and treatment intensity are consistent with those analyzed in the Program EIR. The inclusion of land in the 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, surface water conditions are essentially the same within and outside the treatable landscape; therefore, the impact related to alteration of site drainage patterns is also the same, as described above.

SPRs applicable to this impact are AD-3, GEO-5, HYD-2, HYD-4, and HYD-6. USLTRCD proposes to revise requirements under SPR HYD-4 to require establishment of WLPZ buffers for only the watercourses within 300 feet of manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments. This revision would ensure that all WLPZs in proximity to a treatment area are flagged, without unnecessarily slowing down project implementation to establish all WLPZs throughout the entire project area. This revision is consistent with the overall intent of SPR HYD-4, which is to prevent degradation of watercourses during implementation of manual, mechanical, prescribed burning, prescribed herbivory, and targeted herbicide application treatments. For the reasons described above, the proposed revisions to SPR HYD-4 would not result in a substantially more severe significant effect related to drainage patterns than what was covered in the Program EIR.

This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW HYDROLOGY AND WATER QUALITY IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. USLTRCD has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.11.1, "Environmental Setting," and Section 3.11.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the 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 hydrology and water quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed project are also consistent with those covered in the Program EIR. Revisions to SPRs HYD-4, GEO-1, and HAZ-1 would constitute a change to the project analyzed in the Program EIR. However, as described under Impact HYD-1, HYD-2, and HYD-5 above, the revisions would reduce the potential for hydrology and water quality impacts consistent with the overall intent of SPRs HYD-4, GEO-1, and HAZ-1. Therefore, revisions to SPRs HYD-4, GEO-1, and HAZ-1 would not result in a new impact that was not covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape, and revisions to SPRs HYD-4, GEO-1, and HAZ-1, would not give rise to any new significant impacts. Therefore, no new impact related to hydrology and water quality would occur.

4.11 LAND USE AND PLANNING, POPULATION AND HOUSING

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

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

New Land Use and Planning, Population and Housing Impacts: Would the treatment result in other impacts to land use and planning, population and housing that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT LU-1

Initial and maintenance vegetation treatments and biomass processing would occur within USLTRCD's jurisdictional boundary within the Coastal Zone, from the northern San Luis Obispo County line south to Toro Creek near Morro Bay. The potential for vegetation treatments to cause a significant environmental impact due to the conflict with a land use plan, policy, or regulation was evaluated in the Program EIR.

Land use plans, policies, and regulations applicable to this impact include noise standards established in the San Luis Obispo General Plan and San Luis Obispo County Code (refer to Section 4.12, "Noise," for additional information). There is the potential for prescribed burning to occur during nighttime and weekend hours. However, all treatment activities using equipment would be limited to daytime hours on Monday through Friday, which would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours consistent with the San Luis Obispo General Plan and San Luis Obispo County Code.

Other land use plans, policies, and regulations applicable to this impact include the Coastal Act and the relevant Local Coastal Plan, which govern development within the Coastal Zone. USLTRCD would comply with the Coastal Act through the existing USLTRCD Forest Health and Fire Resilience PWP; the treatment design and this PSA/Addendum are consistent with the requirements of the PWP (USLTRCD 2021). This impact is within the scope of the Program EIR because the treatment types and activities are consistent with those analyzed in the Program EIR. No conflict would occur because USLTRCD would adhere to SPR AD-3.

The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent considered in the Program EIR. However, land uses in the project area are essentially the same within and outside the treatable landscape; therefore, the land use impact is also the same, as described above. SPRs applicable to this impact are AD-3 and AD-9. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

IMPACT LU-2

The potential increases in demand for employees to implement initial treatments and maintenance treatments and resultant potential for substantial population growth was examined in the Program EIR. Prescribed burning would require between 10 and 60 crew members, depending on size and site characteristics of the burn unit. Mechanical treatments would typically require between one and 50 crew members, and multiple crews could be active simultaneously depending on production objectives and treatment area sizes. Manual treatments would typically require between one and 50 crew members; however, crews would typically include between two and 10 personnel. Prescribed herbivory may require a herder to keep the grazing animals within the desired area. Targeted herbicide treatments would typically use a two- to four-person crew. Impacts associated with short-term increases in the demand for workers during implementation of the treatment project are within the scope of the Program EIR because the number of workers required for implementation of the treatments is consistent with the crew sizes analyzed in the Program EIR for the types of treatments proposed. In addition, the proposed project would not require the hiring of new employees or the creation of new staff positions at USLTRCD.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the 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 population and housing 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 covered in the Program EIR.

NEW LAND USE AND PLANNING, POPULATION AND HOUSING IMPACTS

The proposed treatments are within the CalVTP treatable landscape and are consistent with the treatment types and activities covered in the CalVTP Program EIR. USLTRCD considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.12.1, "Environmental Setting," and Section 3.12.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed treatment areas constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to new significant impacts not addressed in the Program EIR. Therefore, no new impact related to land use and planning or population and housing would occur that is not covered in the Program EIR.

4.12 NOISE

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

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

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

Discussion

IMPACT NOI-1

The proposed project entails the use of noise-generating equipment during treatment activities and biomass processing. Mechanical treatments would require the use of heavy, noise-generating equipment, and prescribed burning may require the use of helicopters equipped with a helitorch. The Noise Element of the San Luis Obispo County General Plan includes maximum allowable noise limits for stationary noise sources (e.g., industrial and commercial facilities; vehicle movements on private property; and impulsive noise, such as hammering) and transportation noise sources (e.g., traffic on public roadways, railroad line operations, and aircraft in flight). Maximum allowable noise levels are more stringent during the nighttime and early morning hours between 10:00 p.m. and 7:00 a.m. (County of San Luis Obispo 1992). In addition, Section 23.06.040, "Noise Standards," of the San Luis Obispo County Code establishes standards for acceptable exterior and interior noise levels. Noise sources associated with construction are exempt from the County's noise standards, provided that these activities do not take place before 7:00 a.m. or after 9:00 p.m. any day except Saturday or Sunday, or before 8:00 a.m. or after 5:00 p.m. on Saturday or Sunday. It is anticipated that helicopter operations would occur within the same construction working hours as well and would not occur during nighttime hours. Treatment activities would mostly occur during the daytime; however, some activities associated with prescribed burning and prescribed herbivory may occasionally occur outside these

hours. These occasional activities would involve staying out at night to manage burns and grazing livestock for prescribed herbivory. In addition, treatments would be dispersed throughout the 88,151-acre project area, distributed across distinct treatment areas, so that short-term noise increases at any one sensitive receptor would be limited.

The potential for a substantial short-term increase in ambient noise levels from use of heavy equipment was examined in the Program EIR. This impact is within the scope of the Program EIR because the number and types of equipment proposed, and the duration of equipment use, are consistent with those analyzed in the Program EIR. SPRs AD-3 and NOI-1 through NOI-5 are applicable to this treatment. With implementation of SPR AD-3, noise levels associated with treatment activities under the CalVTP would not exceed local land use/noise compatibility standards, and noise exposure attributed to treatment activities under the CalVTP would not generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of local standards. For any sensitive receptors (e.g., residential land uses, schools, places of worship) that are within 1,500 feet of a treatment area, SPR NOI-6 would also apply. There are residences scattered throughout the project area that could be within 1,500 feet of proposed treatments. However, to help ensure a more effective and feasible method of notification for residents in the communities in Cambria Community Services District Area; Cayucos; and San Simeon Village Reserve, USLTRCD proposes modified requirements under SPR NOI-6 to refine the approach for notification of residents during mechanical treatment activities utilizing heavy equipment in these communities.

Instead of requiring mailing notification to each residents within 1,500 feet of mechanical treatment activity in the Cambria Community Services District Area; Cayucos; and San Simeon Village Reserve, SPR NOI-6 would be modified to require public notices be placed at key public facing locations (e.g., post office, library, fire station, as further described in Attachment A) to inform residents about treatment activities. Additional project notification and outreach would occur through websites, social media, and monthly public meetings. This revision would help ensure a more effective and feasible method of notification, particularly in small communities where residents rely on PO boxes rather than direct mail delivery. Based on the RCD's experience with previous projects, residents in parts of the project area do not have direct mail delivery. Additionally, alternative notification strategies—such as public postings, digital outreach, and community engagement—remain available to ensure sensitive receptors receive timely and accurate information. This revision remains consistent with the overall intent of SPR NOI-6, which is to minimize noise disturbances during mechanical treatment activities utilizing heavy equipment through proactive communication by notifying nearby noise-sensitive receptors. For the reasons described above, the proposed revisions to SPR NOI-6 would not result in a substantially more severe significant effect related to noise impacts than what was covered 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 exposure potential to any sensitive receptors present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the noise impact is also the same, as described above. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT NOI-2

Initial and maintenance treatments would involve large trucks hauling heavy equipment to the project area. These haul truck trips would be dispersed on area roadways providing access to the project area including, but not limited to SR 1 (Cabrillo Highway), SR 46 (Green Valley Road), Main Street, Santa Rosa Creek Road, San Simeon-Monterey Creek Road, Van Gordon Creek Road, and Hearst Castle Road. Haul truck trips on the local roadways would pass by residential receptors and the event of each truck passing by could increase the Single-Event Noise Level (SENL). The potential for a substantial short-term increase in SENL was examined in the Program EIR. This impact is within the scope of the Program EIR because the number and types of equipment proposed are consistent with those analyzed in the Program EIR. The haul trips associated with the treatment would occur during daytime hours (per SPR NOI-1), which would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours.

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 exposure potential is essentially the same within and outside the treatable landscape; therefore, the noise impact is also the same, as described above. SPR NOI-1 is applicable to this treatment. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW NOISE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. USLTRCD has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.13.1, "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. Revisions to SPR NOI-6 would constitute a change to the project analyzed in the Program EIR. However, as described under Impact NOI-1 above, the revisions would continue to minimize noise disturbances during mechanical treatment activities utilizing heavy equipment through more effective and proactive notification of residents in the Cambria Community Services District Area; Cayucos; and San Simeon Village Reserve, consistent with the overall intent of SPR NOI-6. Therefore, revisions to SPR NOI-6 would not result in a new impact that was not covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape, and revisions to SPR NOI-6, would not give rise to any new significant impacts. Therefore, no new impact related to noise would occur.

4.13 RECREATION

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

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

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

Discussion

The project area is located within the jurisdictional boundary of USLTRCD, within the California Coastal Zone, extending from the northern San Luis Obispo County line to Toro Creek near Morro Bay. This region encompasses a diverse array of recreational opportunities, such as hiking, wildlife viewing, and beach activities, available at several key recreational areas. These areas include Cayucos State Beach, Estero Bluffs State Park, Whale Rock Reservoir, Harmony Headlands State Park, Piedras Blancas Light Station, Elephant Seal Vista Point, Arroyo Laguna Beach, La Tortuga Beach, Morro Bay State Park, Montaña de Oro State Park, San Simeon State Park, William Randolph Hearst Memorial State Beach, Hearst-San Simeon State Historical Monument and its historic castle grounds, and Ragged Point.

IMPACT REC-1

Initial and maintenance vegetation treatments would occur within USLTRCD's jurisdictional boundary within the Coastal Zone, from the northern San Luis Obispo County line south to Toro Creek near Morro Bay. USLTRCD's jurisdictional boundary contains a variety of recreational areas, including those listed above. Vegetation treatment activities have the potential to disrupt recreational activities by degrading the experience of recreationists in nearby areas through the creation of noise, dust, degradation of scenic views, or increased traffic when treatments are implemented near recreation areas. The potential for vegetation treatment activities to disrupt recreation activities was examined in the Program EIR. 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 in this PSA/Addendum.

The potential for the proposed treatment project to impact recreation is within the scope of the Program EIR because the treatment activities, and their duration and intensity 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, the availability of recreational resources within the project vicinity is essentially the same within and outside the CalVTP treatable landscape and the treatment activities and intensity are consistent with those analyzed in the Program EIR. The SPR applicable to this treatment is REC-1.

This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

NEW RECREATION IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. USLTRCD has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.14.1, "Environmental Setting," and Section 3.14.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the 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 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 Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to recreation would occur.

4.14 TRANSPORTATION

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

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

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

Discussion

IMPACT TRAN-1

Initial and maintenance treatments would temporarily increase vehicular traffic along roadways throughout the project area, including SR 1 (Cabrillo Highway), SR 46 (Green Valley Road), Main Street, Santa Rosa Creek Road, San Simeon-Monterey Creek Road, Van Gordon Creek Road, Hearst Castle Road, and various 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 impact are AD-3 and TRAN-1. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT TRAN-2

Initial and maintenance treatments would not require the construction or alteration of any roadways. However, the proposed treatments would include prescribed burning, which would produce smoke and could potentially affect visibility along nearby roadways and hauling heavy machinery and operating large trucks along 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 and intensity are consistent with that analyzed in the Program EIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the 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

Treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the proposed project would require vehicle trips to transport crew members and equipment to the treatment areas. This impact was identified as potentially significant and unavoidable in the Program EIR because implementation of the CalVTP would result in a net increase in VMT. As noted under Impact TRAN-3 in the Program EIR, individual vegetation treatment projects under the CalVTP are likely to generate fewer than 110 trips per day, which would be considered a less-than-significant transportation impact for specific later activities, as described in the Technical Advisory on Evaluating Transportation Impacts, published by the Governor's Office of Planning and Research (OPR 2018).

Prescribed burning would require between 10 and 60 crew members, depending on size and site characteristics of the burn unit. Mechanical treatments would typically require between one and 50 crew members, and multiple crews could be active simultaneously depending on production objectives and treatment area sizes. Manual treatments would typically require between one and 50 crew members; however, crews would typically include between two and 10 personnel. Prescribed herbivory may require a herder to keep the grazing animals within the desired area. Targeted herbicide treatments would typically use a two- to four-person crew.

The potential for an increase in VMT on affected roadways during implementation of treatment projects 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 are consistent with those 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. Carpooling would be encouraged under Mitigation Measure AQ-1 and local crews would be used to the extent feasible to reduce VMT. The proposed project would contribute to the cumulative increase in VMT attributable to implementation of the CalVTP. For these reasons, and as explained in the Program EIR, this impact would remain significant and unavoidable.

The inclusion of land in the proposed project area 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 IMPACTS ON TRANSPORTATION

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. USLTRCD has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.15.1, "Environmental Setting," and Section 3.15.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from 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 not addressed in the Program EIR. Therefore, no new impact related to transportation would occur that is not covered in the Program EIR.

4.15 PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

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

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

New Public Services, Utilities and Service System Impacts: Would the treatment result in other impacts to public services, utilities and service systems that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT UTIL-1

Initial and maintenance treatments would consist of prescribed burning, mechanical and manual treatments, prescribed herbivory, and targeted herbicide application. Water would be required during implementation of the proposed project as a safety measure for fire suppression, water for domestic livestock, and to minimize dust if excessive while traveling on unpaved roads or to remove visible dirt or mud that gets tracked out onto public paved roadways (per SPR AQ-4). If needed, 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 activities and impacts addressed in the Program EIR because the size of the areas proposed for prescribed burn treatments, amount of water required for prescribed burning, dust control, and domestic livestock, as well as water source type are consistent with those analyzed in the Program EIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the 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. SPR AD-3 is applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT UTIL-2

Initial and maintenance treatments would generate biomass from vegetation removal within the treatment areas. Biomass generated by mechanical and manual treatments would be disposed of by several means: masticated, chipped, crushed, or lopped and scattered on-site. Pile burning and specialized biomass processing technologies (e.g., air curtain burning, carbonization, gasification) may be used in some areas. In addition, some biomass may be hauled off-site to biomass facilities within 120 miles of the project area. Invasive plant and noxious weed biomass would be treated on-site or disposed of off-site at an appropriate waste collection facility to prevent reestablishment or spread of invasive plants and noxious weeds.

The potential for solid waste generation to exceed state standards or local infrastructure capacity 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. 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 project, approximately 2.5 percent of plant biomass would be hauled off-site to an appropriate waste collection facility. The volume of biomass generated from treatments is not expected to exceed the capacity of existing disposal facilities in San Luis Obispo County. However, because the project would generate biomass needing off-site disposal, it would contribute to the environmental significance conclusion in the Program EIR. Therefore, for the purposes of CEQA compliance, this PSA/Addendum notes the impact as significant and unavoidable.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the 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.

SPR AD-3 is applicable to this impact. SPR UTIL-1 would be applicable to the proposed treatments if biomass is hauled off-site. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT UTIL-3

As discussed above, initial and maintenance treatments would generate biomass from vegetation removal within the treatment areas. If off-site disposal is required, USLTRCD 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 treatment 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 AD-3 is applicable to this impact. SPR UTIL-1 would be applicable to the proposed treatments if biomass is hauled off-site. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW IMPACTS ON PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. USLTRCD has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.16.1, "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.

4.16 WILDFIRE

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

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

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

Discussion

IMPACT WIL-1

Proposed vegetation treatment activities include mechanical treatment, manual treatment, prescribed burning, prescribed herbivory, and targeted herbicide application. Machine-powered hand tools would have federal- or state-approved spark arrestors, which prevent the emissions of flammable debris. Vegetation treatment involving mechanical equipment poses a risk of accidental ignition. Vegetation treatment crews would carry one fire extinguisher per chainsaw and one long-handle shovel and one axe or pulaski, to quickly respond to an ignition should one occur. 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 broadcast burn, fire containment lines would be established by clearing vegetation surrounding the designated burn area to help prevent the accidental escape of fire. Water containers 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 with prescribed burns is

within the scope of the Program EIR because the types of equipment and treatment duration and the types of prescribed burning 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. Consistent with the Program EIR, SPRs applicable to this impact are AD-3, HAZ-2, HAZ-3, and HAZ-4.

SPR BIO-9 will also be implemented as part of proposed treatment design. This SPR avoids the spread or introduction of annual grasses rated as invasive by Cal-IPC or designated as noxious weeds by the California Department of Food and Agriculture. Invasive annual grasses can provide flashy fuels for wildfire ignition; however, these would be managed pursuant to SPR BIO-9 such that their establishment in treated areas will be avoided.

This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT WIL-2

Vegetation treatment activities include mechanical treatment, manual treatment, prescribed burning, prescribed herbivory, and targeted ground application of herbicides, 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 burning implementation are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the wildfire risk of the project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. SPRs applicable to this impact are AD-3, AQ-3, GEO-3 through GEO-5, and GEO-8. Although most mechanical treatment would occur from existing roads or on flat to moderate slopes (on slopes generally less than 35 percent), SPR GEO-8 would apply if a treatment area contains steep slopes. Furthermore, because the treatments reduce wildfire risk, they would also decrease post wildfire landslide and flooding risk in areas that could otherwise burn in a high-severity wildfire without treatment. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW IMPACTS ON WILDFIRE

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. USLTRCD has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP Program EIR (refer to Section 3.17.1, "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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6 REFERENCES

Ascent. 2022 (December). *Evaluation of Air Quality and Climate Change Impacts from Specialized Biomass Processing Technologies under the California Vegetation Treatment Program*. Prepared for Board of Forestry and Fire Protection, Sacramento, CA.

Ayars, J., Kramer, H. A., and Jones, G. M. 2023. "The 2020 to 2021 California megafires and their impacts on wildlife habitat." Proceedings of the National Academy of Sciences (PNAS). Available: https://www.pnas.org/doi/10.1073/pnas.2312909120.

Bonello, P., Gordon, T. R., and Storer, A. J. 2001. "Systemic induced resistance in Monterey pine." *Forest Path*. 31:1–8.

Bulger, J. B., N. J. Scott Jr., and R. B. Seymour. 2003. "Terrestrial Activity and Conservation of Adult California Red-legged Frogs *Rana aurora draytonii* in Coastal Forests and Grasslands." *Biological Conservation* 110: 85–95.

CalEPA. *See* California Environmental Protection Agency.

CAL FIRE: Fire and Resource Assessment Program. 2022. California Vegetation by Wildlife Habitat Relationship Type. Retrieved 2025 from https://www.fire.ca.gov/what-we-do/fire-resource-assessment-program/gis-mapping-and-data-analytics.

CAL FIRE FRAP. *See* CAL FIRE: Fire and Resource Assessment Program.

California Department of Conservation. 2000. *A General Location Guide for Ultramafic Rocks In California - Areas More Likely To Contain Naturally Occurring Asbestos.* Available: https://www.conservation.ca.gov/cgs/minerals/mineral-hazards/asbestos. Accessed February 19, 2025.

California Department of Fish and Wildlife. 2018a. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline. Accessed February 9, 2023.

———. 2018b. Considerations for Conserving the Foothill Yellow-legged Frog. May 14, 2018.

———. 2021 (July 28). California Department of Fish and Wildlife River and Stream hydrography. Retrieved from: https://hub.arcgis.com/datasets/CalEMA::california-river-and-stream-hydrography/about. Accessed February 28, 2025.

———. 2023. *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species*. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline. Accessed November 12, 2024.

California Department of Toxic Substances Control. 2025a. EnviroStor. Available: www.envirostor.dtsc.ca.gov. Retrieved February 18, 2025.

———. 2025b. EnviroStor database. Profile Report. (CAFS) FAMILY HOUSING (80000047). Available: https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=80000047. Accessed February 18, 2025.

———. 2025c. EnviroStor database. Profile Report. CAMBRIA AFSTA (80000209). Available: https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=80000209. Accessed February 18, 2025.

———. 2025d. EnviroStor database. Profile Report. CAMBRIA COMM FAC ANNEX (80000073). Available: https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=80000073. Accessed February 18, 2025.

———. 2025e. EnviroStor database. Profile Report. (CAFS) COMMUNITY FAC (80000029). Available: https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=80000029. Accessed February 18, 2025.

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

———. 2025. California State Scenic Highway System Map. Available: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed February 18, 2025.

California Environmental Protection Agency. 2025. Cortese List Database. Available: https://calepa.ca.gov/wp-content/uploads/2016/10/SiteCleanup-CorteseList-CurrentList.pdf. Accessed February 18, 2025.

California Forest Pest Council. 2025. Stem Disease. Available: Stem Diseases | California Forest Pest Council. Accessed June 3, 2025.

California Geological Survey. 2002. California Geomorphic Provinces. Available: https://www.conservation.ca.gov/cgs/documents/publications/cgs-notes/CGS-Note-36.pdf. Accessed February 28, 2025.

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

———. 2020. *Genista monspessulana* (n.d.). Cal IPC. Retrieved January 2025, from https://www.cal-ipc.org/plants/profile/genista-monspessulana-profile/.

———. 2022. *Cortaderia jubata (*n.d.). Cal IPC. Retrieved January 2025, from https://www.cal-ipc.org/plants/profile/cortaderia-jubata-profile/.

———. 2025. Genista monspessulana. Available: https://www.cal-ipc.org/plants/profile/genista-monspessulana-profile/. Accessed June 3, 2025.

California Native Plant Society. 2024. Inventory of Rare and Endangered Plants of California (online edition, v9-01 1.5). Available: http://www.rareplants.cnps.org. Retrieved November 6, 2024.

———. 2025. A Manual of California Vegetation, Online Edition. California Native Plant Society, Sacramento, CA. Available: http://www.cnps.org/cnps/vegetation/. Retrieved January 16, 2025.

California Natural Diversity Database. 2024. Results of electronic records search. Sacramento: California Department of Fish and Wildlife, Biogeographic Data Branch. Retrieved November 6, 2024.

———. 2025a. Essential Connectivity Areas – California Essential Habitat Connectivity (CEHC) [ds620]. Retrieved March 14, 2025.

———. 2025b. Conservation Plan Boundaries – HCP and NCCP [ds760]. Retrieved January 27, 2025.

California Oak Mortality Task Force. 2025. Sanitation and Reducing Spread. Available: https://www.suddenoakdeath.org/diagnosis-and-management/sanitation-and-reducing-spread/. Accessed June 3, 2025.

Calflora 2025. CalFlora Observation Search Database. Available: https://www.calflora.org/entry/observ.html. Accessed April 3, 2025.

Caltrans. *See* California Department of Transportation.

Cambria Community Services District. 2008 (July). Cambria Community Services District Water Master Plan Program Environmental Impact Report. Available: https://www.cambriacsd.org/files/7affe537f/05.08-geology.pdf. Accessed February 28, 2025.

Cambria CSD. *See* Cambria Community Services District.

Cambria Forest Committee. 2002. Cambria Forest Management Plan. Prepared by Jones & Stokes Associates Inc. Accessed 2021 from http://cambriaforestcommittee.org/documents-2/.

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

CGS. *See* California Geological Survey.

CNDDB. See California Natural Diversity Database.

CNPS. *See* California Native Plant Society.

Cocking, M.I.; Varner, J.M.; Sherriff, R.L. 2012. California black oak responses to fire severity and native conifer encroachment in the Klamath Mountains. Forest Ecology and Management 270: 25–34.

Cope, Amy B. 1993. *Pinus radiata*. In: Fire Effects Information System, [Online]. US Department of Agriculture, Forest Service, Rocky Mountain Research Station, Fire Sciences Laboratory (Producer). Available: https://www.fs.usda.gov/database/feis/plants/tree/pinrad/all.html. Accessed March 17, 2025.

County of San Luis Obispo. 1992 (May). *County of San Luis Obispo General Plan, Noise Element, Part I Policy Document.* Available: https://www.slocounty.ca.gov/Departments/Planning-Building/Forms-Documents/Plans-and-Elements/Elements/Noise-Element.pdf. Accessed February 28, 2025.

Dale, V. H., Joyce, L. A., McNulty, S., and Neilson, R. 2000. The interplay between climate change, forests, and disturbances. The Science of the Total Environment 262.

DiTomaso, J.M., G.B. Kyser et. Al. 2013. Weed Control In Natural Areas in the Western United States. Weed Research and Information Center, University of California. 544pp.

DOC. *See* California Department of Conservation.

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

Fellers, G. M. and P. M. Kleeman. 2007. "California Red-Legged Frog (*Rana draytonii*) Movement and Habitat Use: Implications for Conservation." *Journal of Herpetology* 41: 276–286.

Gordon, T.R., A.J. Storer, & D.L. Wood. 2001. The pitch canker epidemic in California. Plant Disease. 85:1128–1139.

Governor's Office of Planning and Research. 2018 (December). Technical Advisory on Evaluating Transportation Impacts in CEQA. Available: http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf. Accessed February 28 2025.

Harvey, B. J. and M. C. Agne. 2021. "Bishop pine (*Pinus muricata*) forest health." White paper prepared for the Golden Gate Parks Conservancy. University of Washington School of Environmental and Forest Sciences. Seattle, Washington.

Hawksworth, F.G. 1977. The 6-class dwarf mistletoe rating system. General Technical Report RM-48. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Forest and Range Experiment Station 7 p.

Hayes, G. F., D.W. Taylor, and D.M. Neubauer. 2007. Coastal Training Program. Endangered Species Fact Sheets: *Pinus radiata.* Available: http://www.elkhornsloughctp.org/factsheet/factsheet.php?SPECIES_ID=35. Accessed March 17, 2025.

Keeley, J. E. 2002. Native American impacts on fire regimes of the California coastal ranges. Journal of Biogeography. Available: https://onlinelibrary.wiley.com/doi/full/10.1046/j.1365-2699.2002.00676.x. Accessed June 28, 2023.

Levine, L. M., A. K. McEachern, and C. Cowan. 2008. "Rainfall Effects on Rare Annual Plants." *Journal of Ecology* 96 (4): 794–806.

Liczner A. R. and S. R. Colla. 2019. "A Systematic Review of the Nesting and Overwintering Habitat of Bumble Bees Globally." *Journal of Insect Conservation* 23: 787–801.

Marty. J. 2007. Managing For Biodiversity in Vernal Pool Grasslands Using Fire and Grazing. Pages 175-185 in R. A. Schlising and D. G. Alexander (Editors), Vernal Pool Landscapes. Studies from the Herbarium, Number 14. California State University, Chico, CA.

McDonald, P. M. and Laacke, R. J. n.d. Monterey Pine. US Forest Service. Retrieved 2025 from https://www.srs.fs.usda.gov/pubs/misc/ag_654/volume_1/pinus/radiata.htm

National Marine Fisheries Service. 2024. Summary of Marine Mammal Protection Act Acoustic Thresholds. NMFS, Office of Protected Resources. Silver Spring, Maryland.

National Oceanic and Atmospheric Administration, Fisheries. 2025. Share the Shore: Watch Marine Mammals Responsibly. Available: https://www.fisheries.noaa.gov/west-coast/marine-life-viewing-guidelines/share-shore-watch-marine-mammals-responsibly. Accessed May 27, 2025.

Natural Resources Conservation Service. 2025. Web Soil Survey. Retrieved from: https://websoilsurvey.nrcs.usda.gov/app/. Available February 27, 2025.

NMFS. *See* National Marine Fisheries Service.

NOAA Fisheries. *See* National Oceanic and Atmospheric Administration, Fisheries.

NRCS. *See* Natural Resources Conservation Service.

OPR. See Governor's Office of Planning and Research.

Piirto, Douglas D., and Sauli Valkonen. 2005. "Structure and Development of Pitch Canker Infected Monterey Pine Stands at Año Nuevo, California." *Forest Ecology and Management* 213.1-3: 160-174.

Puettmann, M., K. Sahoo, K. Wilson, and E. Oneil. 2020 (March). Life Cycle Assessment of Biochar Produced from Forest Residues Using Portable Systems. Available: https://www.sciencedirect.com/science/article/abs/pii/S0959652619344348. Accessed October 2022. Cited in Ascent 2022.

Rajotte, E. 2017. Gall Rusts. Penn State Extension. Accessed 2021 from https://extension.psu.edu/gall-rusts

Sawyer, J.O., T. Keeler-Wolf, and J. M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society, Sacramento, CA. 1300 pp.

State Water Resources Control Board. 2025. *GeoTracker database*. Available: https://geotracker.waterboards.ca.gov/map. Retrieved February 18, 2025.

Staub, S., B. Ruskin, & D. Windt. 2011. Forest Management Plan for Covell Ranch Prepared for The Nature Conservancy. Staub Forestry and Environmental Consulting.

Stephens, S. L., Bernal, A. A., Collins, B. M., Finney, M. A., Lautenberger, C., and Saah, D. 2022 (August). "Mass fire behavior created by extensive tree mortality and high tree density not predicted by operational fire behavior models in the southern Sierra Nevada." Forest Ecology and Management 518. Available: https://www.sciencedirect.com/science/article/pii/S0378112722002523?via%3Dihub.

Stephens, S. L., J. D. McIver, R. E. J. Boerner, C. J. Fettig, J. B. Fontaine, B. R. Hartsough, P. L. Kennedy, and D. W. Schwilk. 2012. The Effects of Forest Fuel Reduction Treatments in the United States. BioScience 62(6): 549-560. Available: https://nature.berkeley.edu/stephenslab/wp-content/uploads/2015/04/Stephens-et-al.-Surrogates-BioSci-5-12.pdf. Accessed May 29, 2025.

Strong, N. and Bevis, K. 2016. *Wildlife-Friendly Fuels Reduction in Dry Forest of the Pacific Northwest*. Woodland Fish and Wildlife. https://www.woodlandfishandwildlife.com/wp content/uploads/2019/12/Wildlife-Friendly-Fuels-Reduction-in-Dry-Forests-of-the-Pacific Northwest_reduced.pdf

SWRCB. *See* State Water Resources Control Board.

Taylor, Suzanne Pierce. n.d. The Salinan People. Accessed 2023 from https://www.missionsanmiguel.com/history/salinans.html

UC Berkeley. 2025. SOD Blitz 2024 Results. Available: https://nature.berkeley.edu/matteolab/?page_id=7878. Accessed June 2, 2025.

Upper Salinas-Las Tablas Resource Conservation District. 2021. *Forest Health and Fire Resilience Public Works Plan*. Approved by the Upper Salinas-Las Tablas Resource Conservation District Board on September 16, 2021; approved by the California Coastal Commission Board on October 15, 2021.

US Department of Agriculture. 1960. Western Gall Rust on Hard Pines. Available: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.fs.usda.gov/foresthealth/docs/fidls/FIDL-50-WesternGallRust.pdf. Accessed June 3, 2015.

US Fish and Wildlife Service. 2005. *Recovery Plan for Vernal Pool Ecosystems of California and Southern Oregon*. Region 1, U.S. Fish and Wildlife Service, Portland Oregon.

US Forest Service. 2014. Western Gall Rust. Accessed 2025 from: https://www.fs.usda.gov/detailfull/r10/forest-grasslandhealth/?cid=FSEPRD536898

US Forest Service. 2025. Dwarf Mistletoes. Available: https://www.fs.usda.gov/eng/active_dev/views/dwarf_mistletoe.html. Accessed June 3, 2025.

USFS. *See* US Forest Service.

USFWS. *See* US Fish and Wildlife Service.

USGS. *See* US Geological Survey.

US Geological Survey. 2011. *Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California*. Available: https://pubs.usgs.gov/of/2011/1188/. Accessed February 19, 2025.

———. 2024. U.S. Landslide Inventory and Susceptibility Map. Available: https://www.usgs.gov/tools/us-landslide-inventory-and-susceptibility-map. Accessed February 26, 2025.

USLTRCD. *See* Upper Salinas-Las Tablas Resource Conservation District.

Vaillant, N. M., Fites-Kaufman, J., Reiner, A. L., Noonan-Wright, E. K., and Dailey, S. N. 2009. "Effect of Fuel Treatments on Fuels and Potential Fire Behavior in California, USA, National Forests." Fire Ecology 5: 14–29. Available at: https://doi.org/10.4996/fireecology.0502014. Accessed December 4, 2023.

Walgren, M. 2019. *Plants of Coastal San Luis Obispo County*. Coastal Resources Foundation. Columbia, SC. Wells, M. L., S. A. Hathaway, and M. A. Simovich. 1997. Resilience of Anostracan Cysts to Fire. Hydrobiologia. 359 199-202.

Wells, M. L., S. A. Hathaway, and M. A. Simovich. 1997. Resilience of Anostracan Cysts to Fire. Hydrobiologia. 359 199-202.

Williams, P. H., R. W. Thorp, L. L. Richardson, and S. R. Colla. 2014. *Bumble Bees of North America*. Princeton University Press. Princeton, NJ.

Williams, N. L., J. M. Mola, C. Stuligross, T. Harrison, M. L. Page, R. M. Brennan, N. M. Rosenberger, and M. Rundlof. 2019. "Fantastic Bees and Where to Find Them: Locating the Cryptic Overwintering Queens of a Western Bumble Bee." *Ecosphere* 10: e02949.

The Xerces Society for Invertebrate Conservation. 2018. *A Petition to the State of California Fish and Game Commission to List the Crotch bumble bee (Bombus crotchii), Franklin's bumble bee (Bombus franklini), Suckley cuckoo bumble bee (Bombus suckleyi), and western bumble bee (Bombus occidentalis occidentalis) as Endangered under the California Endangered Species Act*. October 2018.

Xerces Society. See The Xerces Society for Invertebrate Conservation.

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Attachment A

Mitigation Monitoring and
Reporting Program for the
North Coastal San Luis Obispo County
Regional Ecological Strategy for
Improving Landscapes (SLO-RESIL)

TABLE OF CONTENTS

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MITIGATION MONITORING AND REPORTING PROGRAM

INTRODUCTION

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

PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

This MMRP has been prepared to facilitate the implementation of SPRs and mitigation measures. The attached table presents the text of each SPR and mitigation measure from the CalVTP Program EIR 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 Program EIR. SPRs and mitigation measures that are referenced more than once in the PSA are not duplicated in the MMRP. Instructions for project-specific guidance to implement certain SPRs and Mitigation Measures 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 Program EIR are shown in underline and strikethrough. In all cases, the additional project-specific implementation instruction and clarifying edits to mitigation measures maintain the SPRs and mitigation measures as equivalent or more effective than those presented in the Program EIR.

ROLES AND RESPONSIBILITIES

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

The Upper Salinas-Las Tablas Resource Conservation District (USLTRCD) is the CEQA lead agency and an implementing entity. As the CEQA lead agency, USLTRCD will approve the North Coastal San Luis Obispo County Regional Ecological Strategy for Improving Landscapes (SLO-RESIL), approve and adopt the PSA/Addendum, file a CEQA Notice of Determination, approve and adopt the MMRP, and approve and adopt a statement of overriding considerations, if needed. USLTRCD will be responsible for ensuring that implementation of SPRs and mitigation measures related to its discretionary approval occurs in accordance with the MMRP pursuant to Section 15097(a) of the State CEQA Guidelines. USLTRCD may partner with private landowners, non-governmental organizations (e.g., Fire Safe Council San Luis Obispo [FSCSLO]), and contractors to implement the mitigation measures and SPRs. As pertinent to its discretionary approval, USLTRCD is responsible for taking actions necessary to implement the SPRs and mitigation measures according to the specifications provided for each measure and for demonstrating that the action has been successfully completed.

Similarly, this responsibility pertains to other agencies that are seeking to use this PSA/Addendum for CEQA compliance related to their discretionary approval. For future treatments requiring a discretionary approval by another agency (e.g., those that would be funded through future public funding sources that have not yet been requested/obtained or implemented by another agency), that agency would be responsible for adopting the MMRP for their portion of the project.

If desired by the lead or a responsible agency and pursuant to State CEQA Guidelines Section 15097(a), the agency can delegate monitoring and reporting responsibilities to another public agency (e.g., CAL FIRE) or to a private entity (e.g., FSCSLO) that accepts the delegation; however, until the mitigation measures and SPRs have been completed, the agency remains responsible for ensuring that implementation of the measures occurs in accordance with this MMRP. For example, a public agency, FSCSLO, or other entities may partner with USLTRCD to conduct treatments using this PSA/Addendum. FSCSLO could implement the mitigation measures and SPRs, but the public agency remains responsible for ensuring that implementation of the measures occurs in accordance with this MMRP. The agency may also delegate implementing responsibility to FSCSLO.

The "project proponent" as identified in the SPRs and mitigation measures would refer to the agency or entity responsible for implementing treatments.

REPORTING

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

Pursuant to the USLTRCD certified Public Works Plan (PWP), USLTRCD shall provide monitoring reports in accordance with the requirements of the SPRs and mitigation measures in the MMRP (below) following implementation of the project. USLTRCD shall maintain a record of monitoring reports in their office, which shall be made available for public review. USLTRCD shall submit a copy of each monitoring report for the review and written approval of the Executive Director of the Coastal Commission within ten days of its completion. The monitoring reports shall be substantially consistent with the requirements of SPR AD-7 (and any other reporting required under the CalVTP) and shall be submitted after each completed phase of development (as such phases are described in the Notice of Impending Development). The monitoring reports shall describe compliance with PWP protection measures, progress of treatment activities (including initial and maintenance treatments), lessons learned, post-treatment evaluations for adaptive management purposes (including through photos documenting treatment areas before and after treatment), and an assessment of any changes in conditions that may affect project consistency with the PWP. The monitoring reports required by the Coastal Commission pursuant to the PWP also provide an opportunity to consider the need for adaptive management and an assessment of any changes in conditions that may affect project consistency with the PWP.

MITIGATION MONITORING AND REPORTING PROGRAM TABLE

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

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

QUALIFICATION REQUIREMENTS FOR BIOLOGICAL AND CULTURAL RESOURCE MEASURES

The biological and cultural resource SPRs and mitigation measures in the attached MMRP table require that qualified individuals implement components of the measures. The CalVTP Program EIR requirements listed below will be met to be considered qualified and may be performed by individuals of various titles (including biologist, botanist, ecologist, Registered Professional Forester (RPF), biological technician, or supervised designees working 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. Work performed by an archaeologically-trained resource professional must be reviewed and approved by a qualified archaeologist.

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

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

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

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

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Administrative Standard Project Requirements			
SPR AD-1: Project Proponent Coordination For treatments coordinated with CAL FIRE, CAL FIRE will meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable mitigation measures; identify any sensitive resources onsite; and discuss resource protection measures. For any prescribed burn treatments, CAL FIRE will also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR AD-2: Delineate Protected Resources: The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR AD-3: Consistency with Local Plans, Policies, and Ordinances: The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR AD-4: Public Notifications for Prescribed Burning: At least three days prior to the commencement of prescribed burning operations, the project proponent will: 1) post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or smoke concerns; 2) publish a public interest notification in a local newspapers or other widely distributed media source describing the activity, timing, and contact information; 3) send the local county supervisor and county administrative officer (or equivalent official responsible for distribution of public information) a notification letter describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.	At least three days prior to the commencement of prescribed burning operations.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR AD-5: Maintain Site Cleanliness: If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	During treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	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.	One to three days prior to the commencement of a treatment activity.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR AD-7: Provide Information on Proposed, Approved, and Completed Treatment Projects For any vegetation treatment project using the CalVTP Program EIR for CEQA compliance, the project proponent will provide the information listed below to the Board of Forestry and Fire Protection (Board) or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. Information on proposed projects (PSA in progress): ▶ GIS data that include project location (as a point), or project latitude/longitude; ▶ project size (typically acres); ▶ treatment types and activities; and ▶ contact information for a representative of the project proponent. The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public at least two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent's own website). Information on approved projects (PSA complete): ▶ A completed PSA Environmental Checklist; ▶ A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); ▶ GIS data that include a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction) Information on completed projects (following initial treatment): ▶ GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction) ▶ A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes ▪ Size of treated area (typically acres); ▪ Treatment types and activities; ▪ Dates of work;	During the proposed, approved, and completed stages of the project. **Information on the proposed project (PSA in progress) was submitted to the Board on March 19, 2025.**	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ A list of the SPRs and mitigation measures that were implemented ▪ Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). This SPR applies to all treatment activities and all treatment types, including treatment maintenance.			
SPR AD-8: Request Access for Post-Treatment Assessment For CAL FIRE projects, during contract development, CAL FIRE will include access to the treated area over a prescribed period (usually up to three years) to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance, as a contract term for consideration by the landowner. For public landowners, access to the treated area over a prescribed period will be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Following treatment	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR AD-9: Obtain a Coastal Development Permit for Proposed Treatment Within the Coastal Zone Where Required When planning a treatment project within the Coastal Zone, the project proponent will contact the local Coastal Commission district office, or applicable local government to determine if the project area is within the jurisdiction of the Coastal Commission, a local government with a certified Local Coastal Program (LCP), or both. All treatment projects in the Coastal Zone will be reviewed by the local Coastal Commission district office or local government with a certified LCP (in consultation with the local Coastal Commission district office regarding whether a Coastal Development Permit (CDP) is required). If a CDP is required, the treatment project will be designed to meet the following conditions: i. The treatment project will be designed in compliance with applicable provisions of the Coastal Act that provide substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the original jurisdiction of the Commission or an area of a local coastal government without a certified LCP; and ii. The treatment project will be designed in compliance with the applicable provisions of the certified LCP, specifically the substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the jurisdiction of a local coastal government with a certified LCP. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Prior to all treatment activities. **Coastal Act Compliance for this project is achieved through Coastal Commission review of the PSA and Coastal VTS and determination that the project is consistent with the Public Works Plan.**	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
Aesthetic and Visual Resource Standard Project Requirements			
SPR AES-1: Vegetation Thinning and Edge Feathering The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	During mechanical and manual treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR AES-2: Avoid Staging within Viewsheds The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	During all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR AES-3: Provide Vegetation Screening The project proponent will preserve sufficient vegetation within, at the edge of, or adjacent to treatment areas to screen views from public trails, parks, recreation areas, and roadways as reasonable or appropriate for vegetation conditions. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	During all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
Air Quality Standard Project Requirements			
SPR AQ-1: Comply with Air Quality Regulations The project proponent will comply with the applicable air quality requirements of air districts within whose jurisdiction the project is located. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	During all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR AQ-2: Submit Smoke Management Plan The project proponent will submit a smoke management plan for all prescribed burns to the applicable air district, in accordance with 17 CCR Section 80160. Pursuant to this regulation a smoke management plan will not be required for burns less than 10 acres that also will not be conducted near smoke sensitive areas, unless otherwise directed by the air district. Burning will only be conducted in compliance with the burn authorization program of the applicable air district(s) having jurisdiction over the treatment area. Example of a smoke management plan is in Appendix PD-2. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Prior to prescribed burn treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR AQ-3: Create Burn Plan The project proponent will create a burn plan using the CAL FIRE burn plan template for all prescribed burns. The burn plan will include a fire behavior model output of First Order Fire Effects Model and BEHAVE or other fire behavior modeling simulation and that is performed by a qualified fire behavior technical specialist that predicts fire behavior, calculates consumption of fuels, tree mortality, predicted emissions, greenhouse gas emissions, and soil heating. The project proponent will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. The burn plan will be created with input from a qualified technician or certified State burn boss. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Prior to prescribed burn treatment activities; does not apply to pile burning.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR AQ-4: Minimize Dust To minimize dust during treatment activities, the project proponent will implement the following measures: ▶ Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol. ▶ If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by ARB, EPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the water results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations. ▶ Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113. ▶ Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property," per Health and Safety Code Section 41700. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	During all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR AQ-5: Avoid Naturally Occurring Asbestos The project proponent will avoid ground-disturbing treatment activities in areas identified as likely to contain naturally occurring asbestos (NOA) per maps and guidance published by the California Geological Survey, unless an Asbestos Dust Control Plan (17 CCR Section 93105) is prepared and approved by the air district(s) with jurisdiction over the treatment area. Any NOA-related guidance provided by the applicable air district will be followed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	During all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR AQ-6: Prescribed Burn Safety Procedures Prescribed burns planned and managed by non-CAL FIRE crews will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP). The IAP will include the burn dates; burn hours; weather limitations; the specific burn prescription; a communications plan; a medical plan; a traffic plan; and special instructions such as minimizing smoke impacts to specific local roadways. The IAP will also assign responsibilities for coordination with the appropriate air district, such as conducting onsite briefings, posting notifications, weather monitoring during burning, and other burn related preparations. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	During prescribed burn treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements			
SPR CUL-1: Conduct Record Search An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to all initial treatment activities. Not required prior to maintenance treatments if records search remains valid. **A complete record search of the 88,151-acre project area has been conducted; see PSA for a summary of results. Compliance with this SPR is complete.**	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR CUL-2: Contact Geographically Affiliated Native American Tribes The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the project proponent will notify the California Native American Tribes in the counties where the treatment activity is located. The notification will contain the following: ▶ A written description of the treatment location and boundaries. ▶ Brief narrative of the treatment objectives. ▶ A description of the activities used (e.g., prescribed burning, mastication) and associated acreages. ▶ A map of the treatment area at a sufficient scale to indicate the spatial extent of activities. ▶ A request for information regarding potential impacts to cultural resources from the proposed treatment. ▶ A detailed description of the depth of excavation, if ground disturbance is expected. In addition, the project proponent will contact the NAHC for a review of their Sacred Lands File. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to all initial treatment activities. Not required prior to maintenance treatments if records search remains valid. **Outreach to the NAHC has occurred, Tribes have been contacted and a SLF query has been completed; see PSA for a summary of consultation and Sacred Lands File query results.**	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR-CUL-3: Pre-field Research The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. The purpose of this research is to properly inform survey design, based on the types of resources likely to be encountered within the treatment area, and to be prepared to interpret, record, and evaluate these findings within the context of local history and prehistory. The qualified archaeologist and/or archaeologically-trained resource professional will review records, study maps, read pertinent ethnographic, archaeological, and historical literature specific to the area being studied, and conduct other tasks to maximize the effectiveness of the survey. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to all initial treatment activities. Not required prior to maintenance treatments if research remains valid.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
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. **Revisions to the SPR:** Text of the original SPR will be removed and replaced with new language. The original language states, "This SPR applies to all treatment activities and treatment types, including treatment maintenance." The revised language states, "This SPR applies to all treatment activities and treatment types that involve ground disturbance (i.e., treatments that include the use of heavy equipment) and prescribed burning, including treatment maintenance."	Prior to all initial treatment activities that involve ground disturbance and prescribed burning. Not required prior to maintenance treatments if initial surveys remain valid.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR CUL-5: Treatment of Archaeological Resources If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. The project proponent, in consultation with culturally affiliated tribe(s), will develop effective protection measures for important cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. These protection measures will be written in clear, enforceable language, and will be included in the survey report in accordance with applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR CUL-6: Treatment of Tribal Cultural Resources The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity to submit comments and participate in consultation to resolve issues of concern. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR CUL-7: Avoid Built Historical Resources If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. Within a buffer of 100 feet of the built historical resource, there will be no prescribed burning or mechanical treatment activities. Buffers less than 100 feet for built historical resources will only be used after consultation with and receipt of written approval from a qualified archaeologist. If the records search does not identify known historical resources in the treatment area, but structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historic significance are present in the treatment area, they will similarly be avoided. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR CUL-8: Cultural Resource Training The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
Biological Resources Standard Project Requirements			
SPR BIO-1: Review and Survey Project-Specific Biological Resources The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this Program EIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified RPF or biologist, will determine which one of the following best characterizes the treatment:	Prior to treatment activities. **Initial data review and reconnaissance-level survey have been conducted; see PSA for summary of results.**	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
1. **Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided**. If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment: a. by physically avoiding the suitable habitat, or b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites). Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist. **Project-Specific Guidance to Implement SPR BIO-1** <u>Special-Status Plants</u> For special-status plants not listed under CESA or ESA, to avoid impacts on the annual and geophyte species identified in Attachment C of the PSA/Addendum, only non-ground-disturbing treatment activities (i.e., manual treatments, herbicide application, prescribed herbivory, and prescribed burning) will be implemented and only during the dormant season for these species (i.e., when the plant has no aboveground parts), if feasible, provided the treatment will not alter habitat in a way that would make it unsuitable for the special-status plants to reestablish following treatment, or destroy seedbanks, stumps, or roots, rhizomes, bulbs and other underground parts of these species. If the limited operating period for annual and geophyte species (i.e., only non-ground-disturbing treatment activities conducted during the dormant season) is determined to be infeasible, then protocol-level surveys will be required per SPR BIO-7. Note that ground-disturbing treatment activities (i.e., mechanical treatments) and pile burning may result in impacts on these plant species even when dormant and will not be conducted without prior implementation of SPR BIO-7. <u>Special-Status Wildlife</u> ▶ To avoid impacts on overwintering burrowing owl, a limited operating period for the construction of control lines and staging areas for prescribed burning; mechanical treatments; manual treatments; and the placement of fencing, pens, and other infrastructure for prescribed herbivory during the burrowing owl overwintering season (September 1–January 31) will be implemented within habitats determined to be suitable for overwintering burrowing owls by a qualified RPF or biologist, if feasible. If conducting treatments outside of the burrowing owl overwintering season is determined to be infeasible, then SPR BIO-10 will be implemented. ▶ To avoid impacts on California spotted owls, the following measures will be implemented:	Prior to and during treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ To determine whether a documented California spotted owl nesting occurrence is present within 0.25 miles of the project area, a qualified RPF or biologist will review California spotted owl occurrence data in the CNDDB and will contact California Department of Parks and Recreation and US Forest Service Biologists from the Los Padres National Forest to obtain any recent survey and occurrence data for California spotted owl lands adjacent to the treatment area that have not been made publicly available (e.g., in the CNDDB). ▪ If a nesting occurrence is determined to be present, or if habitat suitable for California spotted owl nesting as determined by a qualified RPF or biologist is present in or within 0.25 miles of a treatment area, potential impacts on the nesting occurrence or nesting habitat will be avoided by implementing a limited operating period within 0.25 miles of the occurrence or nesting habitat during the spotted owl nesting season (March 1–August 15) for mechanical treatments, manual treatments using loud hand tools, and prescribed burning, if feasible. If the limited operating period is determined to be infeasible, then SPR BIO-10 will be implemented. ▶ To avoid impacts on special-status nesting birds (i.e., bald eagle, black swift, California black rail, golden eagle, grasshopper sparrow, least Bell's vireo, loggerhead shrike, northern harrier, olive-sided flycatcher, purple martin, tricolored black bird, western snowy plover, and white-tailed kite), a limited operating period for all treatment activities from December 1–July 31 for golden eagle and bald eagle, January 1–August 31 for white-tailed kite, and February 1–August 31 for other special-status nesting birds will be implemented within habitats determined to be suitable for these species by a qualified RPF or biologist, if feasible. If conducting treatments outside of the nesting bird season is determined to be infeasible, then SPR BIO-10 will be implemented. ▶ To avoid impacts on monarch butterfly, the following measures will be implemented: ▪ To avoid impacts on overwintering monarch butterflies, prescribed burning, mechanical, manual, herbicide, and prescribed herbivory treatments would be avoided within forested habitats potentially suitable for overwintering monarchs as determined by a qualified RPF or biologist. If it is not feasible to avoid treatments within potential overwintering habitat, SPR BIO-10 will be implemented. ▪ To avoid impacts on breeding monarch butterflies, prescribed burning, mechanical, manual, and herbicide treatments will be conducted in grassland, shrub, and oak woodland habitat outside of the season when monarch eggs, larvae, and pupae are likely to be present on milkweed host plants (i.e., treatment will be conducted outside of March 15-October 31) (Xerces 2019). This period may be adjusted by a qualified biologist or RPF to reflect local timing of monarch breeding. If it is not feasible to avoid treatments during this sensitive season, then SPR BIO-10 will be implemented. ▶ To avoid impacts on vernal pool fairy shrimp mechanical treatments; herbicide application; and the placing of fencing, pens, and other infrastructure related to prescribed herbivory will not occur within vernal pools that are habitat for this species. If conducting these treatments outside of vernal pool habitat is infeasible, then SPR BIO-10 will be implemented.			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ To avoid impacts on ringtail, a limited operating period for prescribed burning and mechanical or manual tree or snag (i.e., greater than 12 inches DBH) removal activities from April 15 to July 31 will be implemented, if feasible. If conducting mechanical and manual tree or snag removal or prescribed burning treatments outside of the ringtail maternity season is determined to be infeasible for certain treatments, then SPR BIO-10 will be implemented. ▶ To avoid impacts on special-status bat maternity colonies, a limited operating period for prescribed burning, mechanical treatments, and manual treatments and herbicide application using power equipment from April 1 to August 31 will be implemented, if feasible. If the limited operating period is infeasible, focused surveys will be required per SPR BIO-10. 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. **Project-Specific Guidance to Implement SPR BIO-1** <u>Special-Status Wildlife</u> ▶ Because there is no reliable season during which all impacts on California red-legged frog, foothill yellow-legged frog, coast horned lizard, coast range newt, Northern California legless-lizard, southwestern pond turtle, two-striped gartersnake, California condor, Crotch's bumble bee, Smith's blue butterfly, American badger, mountain lion, and Monterey dusky footed woodrat could be avoided and avoidance of habitat is not feasible due to these species' variable habitat preferences, or need to implement treatments within habitat implementation of SPR BIO-10 for these species would be required before all treatment activities.			
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	Prior to treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance. **Project-Specific Guidance to Implement SPR BIO-2** California Condor ▶ The qualified RPF or biologist will provide all workers at the project site with "condor hazing" training pursuant to the September 3, 2014, California Condor Recovery Program memo (USFWS 2014). If any California condors enter the project area while work activities are being conducted, the hazing measures would be implemented to avoid the possibility that California condors would become habituated to human activities or be harmed by project activities. Work crews will inform the project biologist should any California condor hazing take place. ▶ In circumstances where California condors are already present in the project area, and engaged in natural behaviors (e.g., roosting, foraging), prior to treatment the hazing protocol would not be implemented and California condors would be allowed to depart on their own. Condors that come into the project area while work activities are taking place will be hazed. Monterey Dusky-Footed Woodrat ▶ The qualified RPF or biologist will provide all workers conducting prescribed burning, mechanical, and manual treatments with specific training on finding the various typical and atypical woodrat nests, and how to estimate a 5 to 10-foot buffer around the nest. Training will include in field practical training using existing woodrat nests within planned treatment areas or similar habitat types.			
Sensitive Natural Communities and Other Sensitive Habitats			
SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, the project proponent will: ▶ require a qualified RPF or biologist to perform a protocol-level survey following the CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of *A Manual of California Vegetation* (including updated natural communities data at http://vegetation.cnps.org/), or referring to relevant reports (e.g., reports found on the VegCAMP website). ▶ map and digitally record, using a Global Positioning System (GPS), the limits of any potential sensitive habitat and sensitive natural community identified in the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

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

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Only hand application of herbicides approved for use in aquatic environments will be allowed and only during low-flow periods or when seasonal streams are dry. ▶ The project proponent will notify CDFW when required by pursuant to California Fish and Game Code Section 1602 prior to implementing any treatment activities in riparian habitats. Notification will identify the treatment activities, map the vegetation to be removed, identify the impact avoidance identification methods to be used (e.g., flagging), and appropriate protections for the retention of shaded riverine habitat, including buffers and other applicable measures to prevent erosion into the waterway. ▶ In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, different protection measures and design standards will only be approved when the treatment plan incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
SPR BIO-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 Program EIR 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 Program EIR, 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	Prior to and during all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
proponent will demonstrate with substantial evidence that the habitat function of chaparral and coastal sage scrub would be at least maintained within the identified spatial scale at which type conversion is evaluated for the specific treatment project. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, spatial 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 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			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
definition and habitat functions presented in the Program EIR, such as geographic context. It is beyond the legal scope of the Program EIR 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 Program EIR.			
SPR BIO-6: Prevent Spread of Plant Pathogens When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., Ione chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (*Fusarium*), goldspotted oak borer, shot hole borer, bark beetle): ▶ clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk; ▶ include training on *Phytopthora* diseases and other plant pathogens in the worker awareness training; ▶ minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment; ▶ minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination; ▶ clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low risk areas or between widely separated portions of a treatment area; and ▶ follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (Working Group for *Phytoptheras* in Native Habitats 2016). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to and during all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
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.	Prior to all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS. For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this Program EIR, surveys will not be required under the following circumstances: ▶ If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. ▶ If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment. This SPR applies to all treatment activities and treatment types, including treatment maintenance. **Project-Specific Guidance to Implement SPR BIO-7** ▶ If the limited operating period for non-ESA and -CESA annual and perennial geophyte species (i.e., non-ground-disturbing treatment activities conducted during the dormant season) is determined to be infeasible, then protocol-level surveys for these species will be conducted prior to implementation of treatments. ▶ Protocol-level surveys will be conducted for all special-status plants listed under ESA or CESA and perennial species not listed under ESA or CESA prior to implementation of treatments. ▶ The results of protocol-level surveys for special-status plant species will be submitted to Coastal Commission staff before activities occur in a treatment area.			
Environmentally Sensitive Habitat Areas			
SPR BIO-8: Identify and Avoid or Minimize Impacts in Coastal Zone ESHAs When planning a treatment project within the Coastal Zone, the project proponent will, in consultation with the Coastal Commission or a local government with a certified Local Coastal Program (LCP) (as applicable), identify the habitat types and species present to determine if the area qualifies as an Environmentally Sensitive Habitat Area (ESHA). If the area is an ESHA, the treatment project may be allowed pursuant to this Program EIR, if it meets the following conditions. If a project requires a CDP by the Coastal Commission or a local government with a certified LCP (as applicable), the CDP approval may require modification to these conditions to further avoid and minimize impacts:	Prior to and during all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ The treatment will be designed, in compliance with the Coastal Act or LCP if a site is within a certified LCP area, to protect the habitat function of the affected ESHA, protect habitat values, and prevent loss or type conversion of habitat and vegetation types that define the ESHA, or loss of special-status species that inhabit the ESHA. ▶ Treatment actions will be limited to eradication or control of invasive plants, removal of uncharacteristic fuel loads (e.g., removing dead, diseased, or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the vegetation types present in the ESHA. ▶ A qualified biologist or RPF familiar with the ecology of the treatment area will monitor all treatment activities in ESHAs. ▶ Appropriate no-disturbance buffers will be developed in compliance with the Coastal Act or relevant LCP policies for treatment activities in the vicinity of ESHAs to avoid adverse direct and indirect effects to ESHAs. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. **Project-Specific Guidance to Implement SPR BIO-8** All treatments will be implemented consistent with the approved Coastal VTS from the Upper Salinas-Las Tablas Resource Conservation District certified Forest Health and Fire Resilience Public Works Plan.			
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	Prior to and during all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
invasive species present and may include herbicide application, manual or mechanical treatments, prescribed burning, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles; ▶ treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and ▶ implement Fire and Fuel Management BMPs outlined in the "Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers" (Cal-IPC 2012, or current version). This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
Wildlife			
SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries, monarch overwintering sites) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. The qualified RPF or biologist will determine if following an established protocol is required, and the project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed. This SPR applies to all treatment activities and treatment types, including treatment maintenance. **Project-Specific Guidance to Implement SPR BIO-10** ▶ Prior to implementation of prescribed burning, mechanical, manual, and herbicide application activities, a qualified RPF or qualified biologist will conduct protocol-level surveys for California red-legged frog pursuant to the *Revised Guidance on Site Assessments and Field Surveys for the California Red-Legged Frog* (USFWS 2005) within habitat potentially suitable for the species, or presence of the species will be assumed and Mitigation Measure BIO-2a will be implemented. If protocol-level surveys are conducted and California red-legged frogs are not detected within the treatment areas, then no additional mitigation for the species will be required and Mitigation Measure BIO-2a will not be required. If California red-legged frog is detected or assumed present, Mitigation Measure BIO-2a will be implemented.	No more than 14 days prior to all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ To avoid impacts on foothill yellow-legged frogs, focused surveys (i.e., visual encounter, or walk and turn surveys) would be conducted within habitat suitable for the species prior to implementation of treatment activities (i.e., prescribed burning, mechanical treatments, manual tree and snag removal, and herbicide application) that occur within 200 feet of Class I and Class II watercourses that provide habitat suitable for foothill yellow legged frog as determined by a qualified RPF or biologist, focused visual encounter surveys for foothill yellow-legged frog will be conducted prior to treatment activities within the 200-foot buffer. If foothill yellow-legged frogs are not detected within the treatment area during focused surveys, then no mitigation for the species would be required. If foothill yellow-legged frogs are identified during focused surveys, Mitigation Measure BIO-2a would be implemented. ▶ To avoid impacts on southwestern pond turtles focused surveys for individuals and nests will be conducted by a qualified biologist or RPF prior to prescribed burning, mechanical treatments, and manual tree removal treatment activities that occur in upland habitat suitable for southwestern pond turtle as determined by a qualified biologist or RPF. Upland habitat may include riparian areas, grasslands, and open oak woodlands on east-facing (Reese and Welsh 1997) or south-facing areas that are less than 25 percent slope (Buskirk 2002) within 1,300 feet of aquatic habitat (USFWS 2023). If southwestern pond turtles or nests are detected during focused surveys, Mitigation Measure BIO-2b will be implemented. ▶ To avoid impacts on other special-status reptiles and amphibians (i.e., coast horned lizard, coast range newt, Northern California legless-lizard, two-stripped garter snake), focused surveys (i.e., visual encounter, or walk and turn surveys) would be conducted within habitat suitable for the species prior to implementation of treatment activities (i.e., prescribed burning, mechanical treatments, manual tree and snag removal, and herbicide application). If coast horned lizard, coast range newt, Northern California legless-lizard, two-stripped garter snake are identified during focused surveys, or if presence of these species is assumed, Mitigation Measure BIO-2b will be implemented. ▶ If it is not feasible to avoid prescribed burning, mechanical treatments, manual treatments, and prescribed herbivory during the burrowing owl overwintering season (September 1–January 31) in habitats suitable for the species, pursuant to SPR BIO-1, then a survey shall be conducted to determine whether burrowing owls occupy the portions of the treatment area subject to mechanical or manual treatments, or ground or human disturbance associated with prescribed burning (e.g., control lines, staging areas) or prescribed herbivory (e.g., fence lines, pens, watering infrastructure, staging areas). ▪ Surveys shall be conducted according to Appendix D of the 2012 Staff Report on Burrowing Owl Mitigation prepared by California Department of Fish and Game (now California Department of Fish and Wildlife; CDFW 2012) or any subsequent updated guidance. Surveys shall be conducted within 250 feet of mechanical or manual treatments, or ground or human disturbance associated with prescribed burning (e.g., control lines, staging areas) and prescribed herbivory (e.g., fence lines, watering infrastructure, staging areas). Because burrowing owls may recolonize a site after only a few days the single survey, or an additional survey, shall be conducted no less than 14 days before initiating treatment activities to verify that take of burrowing owl would not occur. Alternatively, following the first survey, any burrows that are potentially suitable for burrowing owl would be assumed to be occupied. If active overwintering			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
burrowing owl burrows are detected during protocol surveys, or burrows are assumed to be occupied, Mitigation Measure BIO-2a will be implemented. ▶ To avoid impacts to California condor, the following will be implemented for manual treatments using power tools, mechanical, and prescribed burning treatments that occur during the nesting bird season (February 1 – August 31): ▪ A qualified RPF or biologist will contact CDFW and USFWS before implementation of treatment activities to obtain general information about documented California condor activity within or in the vicinity of a treatment area that has not been made publicly available. ▪ If California condor activity (e.g., detections or documented nesting activity) has been documented in a treatment area, pursuant to information provided by CDFW and USFWS then treatment activities will not be initiated in the treatment area during the nesting season (February 1 – August 31) until these agencies have provided further guidance. Mitigation Measure BIO-2a will be implemented. ▪ If California condor activity has not been documented in a treatment area and the treatment area does not overlap the home range of a documented California condor pursuant to information provided by CDFW or USFWS and USLTRCD concurs that the species is unlikely to occur in the treatment area, then treatment activities during the nesting season (February 1 – August 31) may proceed without California condor surveys. ▪ If California condor occurrences have not been documented in a treatment area and the treatment area does not overlap a home range for a documented California condor, but presence of nesting California condors cannot be ruled out by Hopper Mountain Wildlife Refuge and USLTRCD (e.g., a documented home range is close to the treatment area, there is otherwise not enough information available to rule out potential presence), then focused surveys for California condor nests will be conducted within the treatment area and a buffer of 1 mile surrounding the treatment area. Focused surveys will be conducted by a qualified RPF or biologist. If an active California condor nest is detected during focused surveys, then Mitigation Measure BIO-2a will be implemented and treatment activities will not be initiated in the treatment area until CDFW and USFWS have provided further guidance. ▶ If avoidance of prescribed burning, mechanical treatments, and manual treatments using loud hand tools during the nesting season for California spotted owl is determined to be infeasible, protocol-level surveys for California spotted owl will be conducted by a qualified RPF or biologist where a documented nest or nesting habitat is present within 0.25 mile of treatment activities. The protocol-level surveys will be completed prior to implementation of treatment activities and, to the extent feasible, during the year of treatment implementation; otherwise, the surveys may be completed no more than one year prior to implementation. Surveys for California spotted owl will be conducted pursuant to the Protocol for Surveying for Spotted Owls in Proposed Management Activity Areas and Habitat Conservation Areas (USFS 1993) or any protocol subsequently developed or otherwise required by USFWS. If nesting California spotted owls are identified during protocol-level surveys, Mitigation Measure BIO-2b will be implemented.			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ If it is not feasible to avoid all treatments during the nesting bird season (i.e., December 1–July 31 for golden eagle and bald eagle, January 1–August 31 for white-tailed kite, and February 1–August 31 for other special-status nesting birds (as adjusted by a qualified RPF or biologist), pursuant to SPR BIO-1, focused surveys (i.e., nest searches) for nests of special-status species (i.e., bald eagle, black swift, California black rail, golden eagle, grasshopper sparrow, least Bell's vireo, loggerhead shrike, northern harrier, olive-sided flycatcher, purple martin, tricolored black bird, western snowy plover, and white-tailed kite) will be conducted in habitat suitable for the species prior to implementing treatment activities during the nesting bird season. If nesting special-status birds are detected during focused surveys, Mitigation Measure BIO-2a or BIO-2b will be implemented depending on the species detected. ▶ Because avoidance of habitat pursuant to SPR BIO-1 is not feasible to avoid impacts on Crotch's bumble bee, a habitat assessment will be conducted by a qualified biologist or RPF. If habitat suitable for the species is present, focused surveys will be conducted by a biologist or qualified RPF within habitat potentially suitable for Crotch's bumble bee based on the Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW 2023) or more recent guidance, prior to implementation of all treatment activities, or presence of this species in potentially suitable habitat will be assumed, and Mitigation Measure BIO-2g will be implemented. ▶ If it is not feasible to avoid prescribed burning, mechanical, manual, herbicide, and prescribed herbivory treatments within potential monarch overwintering habitat pursuant to SPR BIO-1, to avoid impacts to special-status overwintering monarch butterflies, the following will be implemented: ▪ A qualified RPF or biologist will assess the treatment area for stands suitable for overwintering monarch butterflies and overwintering activity. ▪ If overwintering stands suitable for monarch are present within the treatment area, these stands will be recorded and surveyed for overwintering monarchs and, Mitigation Measure BIO-2b will be implemented. ▶ If it is not feasible to avoid mechanical, manual, herbicide, or prescribed burning treatments in grasslands, shrub, and oak woodland habitat during the period when monarch may be breeding (March 15-October 31) pursuant to SPR BIO-1, focused surveys for milkweed host plants (*Asclepias* spp.) will be conducted prior to implementing treatment activities. If milkweed is detected during focused surveys, further survey for monarch butterfly eggs, larvae, and pupae may be conducted or presence of monarch may be assumed. If milkweed host plants are detected during focused surveys and monarch butterfly is detected or assumed present, Mitigation Measure BIO-2e will be implemented. ▶ To avoid impacts on Smith's blue butterfly, focused surveys for the species will be conducted before implementation of all treatment activities in habitat suitable for the species. If focused surveys for Smith's blue butterfly are not conducted, presence of the butterfly may be assumed. Because the project area is within the range of the federally listed Smith's blue butterfly, Mitigation Measure BIO-2e (Smith's blue butterfly) would be implemented, regardless of the results of SPR BIO-10 surveys, although the implementation of Mitigation Measure BIO-2e would be informed by the results of the focused surveys if they occur.			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ If avoidance of vernal pool habitat pursuant to SPR BIO-1 is not feasible, to avoid impacts on vernal pool fairy shrimp, surveys will be conducted within aquatic habitat for these species prior to implementing all treatment activities following *Survey Guidelines for the Listed Large Branchiopods* (USFWS 2017). If protocol surveys detect conservancy fairy shrimp, vernal pool fairy shrimp and vernal pool tadpole shrimp, or if presence of these species is assumed, Mitigation Measure BIO-2a will apply. ▶ To avoid impacts on American badger, focused den surveys in habitat determined to be suitable for denning by a qualified biologist or RPF will be conducted prior to implementing pile burning, installation of control lines and staging areas for prescribed burning, mechanical treatments, or the setup of infrastructure for prescribed herbivory activities year-round. Within the pupping season (February 15–July 1) surveys will be conducted prior to, manual treatments, as well as the other activities which require year-round survey. If American badger dens are detected during focused surveys, Mitigation Measure BIO-2b will be implemented. ▶ To avoid impacts on Monterey dusky-footed woodrat, focused surveys for the species will be conducted by a qualified RPF, biologist, or biological technician within habitat suitable for the species year-round prior to implementation of mechanical treatments; nest presence may be assumed for other treatment types. ▶ To avoid impacts on mountain lion, prior to implementing prescribed burning, manual tree and snag removal treatments, and mechanical treatments, nursery habitat suitable for the species will be identified by a qualified RPF or biologist through desktop analyses (e.g., review of land cover, slope, distance from development, coordination with local experts studying or tracking the species [if available], and field assessments). Potential mountain lion nursery habitat may include large natural cavities within rocky areas, downed trees, shrub thickets, or other areas with structures deemed appropriate for use by mountain lions based on size and other characteristics (e.g., proximity to human development, surrounding habitat). If nursery habitat is confirmed within the treatment area, use of the habitat will be assumed and Mitigation Measure BIO-2a will be applied. If nursery habitat is not identified within the treatment area, no additional measures will be required. ▶ If it is not feasible to avoid prescribed burning or mechanical and manual large tree and snag (i.e., greater than 12 inches DBH) removal within habitat suitable for ringtail during the ringtail maternity season (pursuant to SPR BIO-1), focused surveys for ringtail will be conducted using trail cameras, track plates, or other non-invasive survey methods to determine whether ringtails are present within the treatment area. Surveys will be conducted by a qualified RPF or biologist with the appropriate permits as needed, or presence may be assumed. If ringtails are detected during focused surveys, or presence is assumed, Mitigation Measure BIO-2a will be implemented. ▶ If it is not feasible to avoid prescribed burning, mechanical treatments, manual treatments, and herbicide application using power equipment within habitat suitable for special-status bat roosting during the bat maternity season (April 1 through August 31) pursuant to SPR BIO-1, focused surveys for maternity roosts will be conducted by a qualified RPF or biologist prior to implementing these treatment activities during the bat maternity season. If special-status maternity roosts are detected during focused surveys, Mitigation Measure BIO-2b will be implemented.			

Standard Project Requirements	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.	Prior to and during all prescribed herbivory treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR BIO-12: Protect Common Nesting Birds, Including Raptors The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP Program EIR. The active nesting season will be defined by the qualified RPF or biologist. If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identity the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food).	Conduct a survey for common nesting birds (if needed) at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies (typically, up to 3 weeks before treatment). If an active nest is observed, implement avoidance strategies prior to and during all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following: ▶ **Establish Buffer.** The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. Treatment activities will be implemented outside of the buffer. The buffer location will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. ▶ **Modify Treatment.** The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment methods). Treatment modifications will be determined by the project proponent in coordination with the qualified RPF or biologist. ▶ **Defer Treatment.** The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of 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			

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
(establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases. ▶ **Retention of Raptor Nest Trees**. Trees with visible raptor nests, whether occupied or not, will be retained. This SPR applies to all treatment activities and treatment types, including treatment maintenance.			
Geology, Soils, Paleontology, and Mineral Resource Standard Project Requirements			
SPR GEO-1: Suspend Disturbance during Heavy Precipitation The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types, including treatment maintenance. **Revisions to the SPR:** Text of the original SPR will be removed and replaced with new language. The original language states, "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." The revised language states, "The project proponent will suspend mechanical and prescribed herbivory treatment if (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical treatment or prescribed herbivory activities. The project proponent will suspend herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next operational day's 12-hour period between 6:00 a.m. and 6:00 p.m."	During mechanical and herbicide treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR GEO-2: Limit High Ground Pressure Vehicles The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	During mechanical treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR GEO-3: Stabilize Disturbed Soil Areas The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments, and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, prescribed herbivory, or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery, animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical, prescribed herbivory, and prescribed burns that result in exposure of bare soil over 50 percent of the project area treatment activities and all treatment types, including treatment maintenance.	During mechanical and prescribed burn activities that result in exposure of bare soil over 50 percent or more of the treatment area.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR GEO-4: Erosion Monitoring The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Prior to and during treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR GEO-5: Drain Stormwater via Water Breaks The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (February 2019 version). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types, including treatment maintenance.	During mechanical, manual, and prescribed burn treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR GEO-6: Minimize Burn Pile Size The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15 percent of the total treatment area (Busse et al. 2014). The project proponent will not locate burn piles in a Watercourse and Lake Protection Zone as defined in SPR HYD-4. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	During mechanical, manual, and prescribed burn treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
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:	During all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**:	USLTRCD/FSCSLO **Future treatments involving other entities**:

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
(i) Slopes steeper than 65 percent. (ii) Slopes steeper than 50 percent where the erosion hazard rating is high or extreme. (iii) Slopes steeper than 50 percent that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake. (2) On slopes between 50 percent and 65 percent where the erosion hazard rating is moderate, and all slope percentages are for average slope steepness based on sample areas that are 20 acres, or less, heavy equipment will be limited to: (i) Existing tractor roads that do not require reconstruction, or (ii) New tractor roads flagged by the project proponent prior to the treatment activity. (3) Prescribed herbivory treatments will not be used in areas with over 50 percent slope. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.		To be determined	To be determined
SPR GEO-8: Steep Slopes The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). If unstable areas or soils are identified within the treatment area, are unavoidable, and will be potentially directly or indirectly affected by the treatment, a licensed geologist (P.G. or C.E.G.) will determine the potential for landslide, erosion, of other issue related to unstable soils and identity measures (e.g., those in SPR GEO-7) that will be implemented by the project proponent such that substantial erosion or loss of topsoil would not occur. This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types, including treatment maintenance.	Prior to and during mechanical treatment activities on slopes greater than 50 percent.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
Hazardous Material and Public Health and Safety Standard Project Requirements			
SPR HAZ-1: Maintain All Equipment The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance. **Revisions to the SPR:** Text of the original SPR will be removed and replaced with new language. The original language states, "Any equipment found leaking will be promptly removed." The revised language states, "Any equipment found leaking will be promptly stabilized and fixed on-site outside of Watercourse and Lake Protection Zones (WLPZ), or promptly removed and repaired off-site."	Prior to and during treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

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

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

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or vegetation management activities. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types, including treatment maintenance. **Project-Specific Guidance to Implement SPR HYD-1** Vegetation treatment activities may result in discharges to waters of the state; therefore; compliance with Water Code sections 13260(a)(1) and 13264 are required. The project proponent will use the State Water Board's Vegetation Treatment General Order, which provides a mechanism for Water Code compliance for projects that prepare a CalVTP PSA or PSA/Addendum. The project will be automatically enrolled (through implementation of SPR AD-7) in the State Water Board's Vegetation Treatment General Order. The project's automatic enrollment satisfies the requirements of SPR HYD-1.		**Future treatments involving other entities**: To be determined	**Future treatments involving other entities**: To be determined
SPR HYD-2: Avoid Construction of New Roads The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Prior to treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
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.	Prior to treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR HYD-4: Identify and Protect Watercourse and Lake Protection Zones The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916.5 of the California Forest Practice Rules (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.	Establish WLPZs during design of treatment project; implement WLPZ protections during treatment	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

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

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

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

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

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
Revisions to the SPR: Text of the original SPR will be removed and replaced with new language. The original language states, "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)." The revised language states, "The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses within 300 feet of proposed manual, mechanical, prescribed burning, prescribed herbivory, and herbicide treatments, as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (February 2019 version)."			
SPR HYD-5: Protect Non-Target Vegetation and Special-status Species from Herbicides The project proponent will implement the following measures when applying herbicides: ▶ Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway. ▶ Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry. ▶ No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ provided that the project proponent notifies the applicable regional water quality control board no fewer than 15 days prior to herbicide application. The feasibility of avoiding herbicide application within WLPZ of Class I and II watercourses will be determined by the project proponent and may be based on whether doing so will preclude achieving CalVTP program objectives, including, but not limited to, protection of vulnerable communities. The reasons for infeasibility will be documented in the PSA. ▶ No herbicides will be applied within a 50-foot buffer of ESA or CESA listed plant species or within 50 feet of dry vernal pools. ▶ For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray. ▶ Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative). ▶ No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities. This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.	During herbicide treatment.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

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

Standard Project Requirements	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR NOI-5: Restrict Equipment Idle Time The project proponent will require that all motorized equipment be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	During all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
SPR NOI-6: Notify Nearby Off-Site Noise-Sensitive Receptors For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. Notification will include anticipated dates and hours during which treatment activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance. **Revisions to the SPR:** The revised SPR adds the following language to modify the notification requirements. For residents within the Cambria Community Services District Area; Cayucos; and San Simeon Village Reserve, instead of mailing notification to each resident within 1,500 feet of mechanical treatment activities utilizing heavy equipment, the following notification process will be implemented: ▪ **Cambria Community Services District Area**. A minimum of 10 public notices will be placed in public facing places including, but not limited to, the Cambria Post Office, The Veterans Hall, Cambria Public Library, Cambria Community Service District Office and Fire Station, CAL FIRE's Cambria station, Friends of Fiscalini Ranch office, and other public facing locations along Main Street. ▪ **Cayucos**. A minimum of 10 public notices will be placed in public facing places including, but not limited to, two CAL FIRE stations, the Cayucos Post Office, and along South Ocean Avenue and Ocean Boulevard. ▪ **San Simeon Village Reserve.** A minimum of 5 public notices will be placed in public facing places at the San Simeon Post Office and other public facing locations along Castillo and Hearst Drive. In addition, the following notification actions will be implemented: ▪ The project proponent, the Community Fire Safe Council of San Luis Obispo County, SLO County CAL FIRE, Friends of Fiscalini, and Greenspace Land Trust will maintain a copy of the notice on their websites. ▪ The project proponent and the Community Fire Safe Council of San Luis Obispo County – Cambria Fire Safe Focus will continue to maintain an agenda item providing updates on the status of the SLO-RESIL project at their monthly public meetings. ▪ The project proponent will post notification on social media (e.g., Instagram and Facebook).	Prior to mechanical treatment activities occurring within 1,500 feet of noise-sensitive receptors.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

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

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

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

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria: ▪ meet California's Low Carbon Fuel Standards and be certified by CARB Executive Officer; ▪ be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables; ▪ contain no fatty acids or functionalized fatty acid esters; and ▪ have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines. ▶ Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment. ▶ Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes. Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NO_X and PM.			
Archaeological, Historical, and Tribal Cultural Resources			
Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist will assess the significance of the find. The qualified archaeologist will work with the project proponent to develop a primary records report that will comply with applicable state or local agency procedures. If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan will be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or tribal cultural resource), the archaeologist will work with the project proponent to develop appropriate procedures to protect the integrity of the resource. Procedures could include preservation in place (which is the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or recovery of scientifically consequential information from and about the resource. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center.	During ground-disturbing activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
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.	Prior to and during all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**:

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report) with a science-based justification for the deviation. No fire ignition (and associated use of accelerants) will occur within 50 feet of listed plants. 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. **Project-Specific Guidance to Implement Mitigation Measure BIO-1a** The 50-foot buffer may be reduced to allow for the treatment of invasive plants to protect rare plant species from encroachment. Only localized, targeted removal methods, including manual or selective herbicide treatments (i.e., cut-stump method), will be implemented to minimize disturbance to rare plant species while preventing long-term habitat degradation. Mechanical treatment, prescribed burning, and prescribed herbivory would not occur within the 50-foot buffer.			To be determined
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	Prior to and during all treatment activities.	USLTRCD/FSCSLO	USLTRCD/FSCSLO **Future treatments**

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
SPR BIO-1 and SPR BIO-7, the project proponent will implement the following measures to avoid loss of individuals and maintain habitat function of occupied habitat: ▶ Physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape. ▶ Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank. ▶ Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the special-status plant itself, habitat function would be diminished and the treatment would need to be modified or precluded from implementation. ▶ No fire ignition (and associated use of accelerants) will occur within the special-status plant buffer. A qualified RPF or botanist with knowledge of the special-status plant species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment would not maintain habitat function of the special-status plant habitat (i.e., the habitat would be rendered unsuitable) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If the project proponent determines the impact on special-status plants would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1c will be implemented.		**Future treatments involving other entities**: To be determined	**involving other entities**: To be determined

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required. **Project-Specific Guidance to Implement Mitigation Measure Bio-1b:** ▶ If special-status plant species, other than Monterey pine, are detected during protocol-level surveys, a no-disturbance buffer of at least 50 feet will be established around the area occupied by the species within which treatments will not occur. A no-disturbance buffer is not required for Monterey pine because this species will benefit from treatments. ▶ If special-status plant species are detected during protocol-level surveys, an evaluation of the appropriate treatment design and frequency to maintain habitat function within habitat suitable for special-status plants will be carried out by a qualified RPF, biologist, or botanist. Therefore, habitat function for special-status plants would be maintained because treatment activities and maintenance treatments would be designed to ensure that treatments, including follow-up maintenance, maintain habitat function for the special-status plant species present. ▶ The 50-foot buffer may be reduced to allow for the treatment of invasive plants to protect rare plant species from encroachment. Only localized, targeted removal methods, including manual or selective herbicide treatments (i.e., cut-stump method), will be implemented to minimize disturbance to rare plant species while preventing long-term habitat degradation. Mechanical treatment, prescribed burning, and prescribed herbivory would not occur within the 50-foot buffer. <u>Monterey Pine</u> The project proponent will avoid adverse effects to Monterey pine by implementing the following strategies which are applicable to prescribed burning: ▶ Monterey pine habitat will be broadcast burned within the natural fire return interval of 11 to 20 years. Maintenance treatments outside of the natural fire return interval (i.e., treatments occurring less than 11 years after initial treatment for Monterey pine forest) will occur only in areas where a qualified RPF or qualified botanist determines that the goal of the initial treatment to restore the Monterey pine community to Condition Class 1 (i.e., natural vegetation composition, structure, and fuels) was not achieved with initial treatments implemented within the natural fire return interval. In those instances, lower intensity, targeted maintenance activities may be implemented outside of the natural fire return interval to achieve these goals and return the Monterey pine stand to Condition Class 1. These lower intensity maintenance activities may consist of targeted removal of dead, dying, and diseased trees, and invasive species; pile burning or			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
chipping to dispose of resulting biomass; or select thinning of regenerating trees to achieve desired tree spacing consistent with healthy Monterey pine stands. Burn piles will be limited to areas outside the driplines of mature Monterey pine trees to avoid damaging retained trees.			
Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities) If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species by implementing the following. <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> The project proponent will implement one of the following two measures to avoid mortality, injury, or disturbance of individuals: 1. Treatment will not be implemented within the occupied habitat. Any treatment activities outside occupied habitat will be a sufficient distance from the occupied habitat such that mortality, injury, or disturbance of the species will not occur, as determined by a qualified RPF or biologist using the most current and commonly-accepted science and considering published agency guidance; OR 2. Treatment will be implemented outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, CDFW and/or USFWS/NOAA Fisheries will be consulted to determine if there is a period of time within which treatment could occur that would avoid mortality, injury, or disturbance of the species. ▶ For species listed under ESA or CESA, if the project proponent cannot avoid mortality, injury or disturbance by implementing one of the two options listed above, the project proponent will implement Mitigation Measure BIO-2c. Injury or mortality of California Fully Protected Species is prohibited pursuant to Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code and will be avoided. <u>Maintain Habitat Function</u> ▶ The project proponent will design treatment activities to maintain the habitat function, by implementing the following: ▪ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; dens; tree snags; large raptor nests [including inactive nests]; downed woody debris; food sources). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed	Prior to and during all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
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 the lead agency determines after consultation that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c. **Project-Specific Guidance to Implement Mitigation Measure BIO-2a** <u>California Red-Legged Frog</u> If California red-legged frog is assumed present or detected during protocol-level surveys (pursuant to SPR BIO-10), the following measures will be implemented: ▶ Pre-treatment surveys and biological monitoring. Pre-treatment visual surveys will be performed daily by a qualified RPF, biologist, or biological technician, prior to implementation of treatment activities (i.e., mechanical, manual, prescribed burning, and herbicide) within 300 feet of Class I or Class II streams and within or adjacent to other sensitive habitat areas (e.g., wet intermittent streams, wet seeps), during the dispersal season (October 1 through April 1) or within 24 hours following a rain event greater than one quarter inch. Visual surveys and visual monitoring of the treatment area during operations will be performed year-around prior to any activities within 30 feet of Class I or Class II streams and within or adjacent to other sensitive habitat areas (e.g., wet Class III streams, wet seeps). If a California red-legged frog is found during pre-activity surveys or enters the project site during treatment activities, all work will stop within a non-disturbance buffer of 100 feet around the individual unless the qualified RPF or biological technician determines that a different sized buffer is appropriate to avoid disturbance, injury, or mortality. Treatment activities will cease within the buffer until the animal leaves on its own and the occurrence will be reported to the qualified RPF or biological technician and USFWS. ▶ If California red-legged frog is found during pre-activity surveys, which will be conducted by a qualified RPF, biologist, or biological technician, or enters the project site during treatment activities, the specific habitat features (i.e., log, tree, debris pile) used by the frog when detected will be evaluated by a qualified RPF,			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
biologist, or biological technician for habitat retention, if habitat retention is achievable while meeting the project goals. ▶ Mechanical treatments will be prohibited within 30 feet of Class III watercourses; Mechanized treatments may occur from an existing road in WLPZ or ELZs if pretreatment surveys have been conducted within 24 hours that resulted in no California red-legged frog detection; and all mechanized equipment, including track chippers, and herbicide treatments will shut down for 24 hours following any precipitation event of 0.20 inch to less than 1 inch, 48 hours following any precipitation event 1 inch to less than 2 inches, and 72 hours following any precipitation event greater or equal to 2 inches. ▶ Burn piles located within 300 feet of Class I or Class II watercourses will be inspected prior to ignition to avoid impacts to California red-legged frog that may be using the pile as refuge. ▶ All herbicide use during project implementation will comply with the herbicide use restrictions in the stipulated injunction issued by the Federal District Court for the Northern District of California to resolve the 2006 case brought against the Environmental Protection Agency by the Center for Biological Diversity. For example, to comply with the injunction, only cut stump and basal bark applications will be allowed in California red-legged frog habitat under the following conditions. ▪ Cut stump and basal bark applications may be used but will not be applied within 60 feet of breeding or non-breeding aquatic habitat. ▶ If operators need to move or treat large woody debris greater than 12 inches in diameter, that piece of woody debris will be evaluated for the presence of California red-legged frog by a qualified biological technician, qualified professional, qualified RPF, RPF supervised designee, or a contractor who has been through the environmental awareness training. ▶ All personnel involved in the implementation of the project will check for the presence of California red-legged frog under or next to stationary vehicles prior to operating their vehicles. If a California red-legged frog is found, the qualified RPF, biologist, or biological technician will contact the USFWS to determine necessary next steps to avoid impact. <u>Foothill Yellow-Legged Frog</u> If foothill yellow-legged frog is detected during focused visual encounter surveys or assumed to be present (pursuant to SPR BIO-10), the following will be implemented: ▶ Biological monitoring by a qualified RPF, biologist, or biological technician during treatment activities (i.e., prescribed burning, mechanical treatments, manual tree and snag removal, and herbicide application) within or adjacent to sensitive habitat areas (e.g., perennial streams, seeps, springs) will be implemented to avoid injury to or mortality of individual frogs. If the qualified RPF, qualified biologist, or qualified biological technician detects a foothill yellow-legged frog during treatments, treatment activities will cease until the individual has left the area or has been moved out of harm's way and to other nearby habitat suitable for the species by the qualified RPF, qualified biologist, or biological technician.			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ All personnel involved in the implementation of the project will check for the presence of foothill yellow-legged frog under or next to stationary vehicles prior to operating their vehicles. If a foothill yellow-legged frog is found, the qualified RPF or biological technician will contact CDFW and USFWS to determine the next steps to avoid impact. Burrowing Owl If burrowing owls are detected during protocol surveys (pursuant to SPR BIO-10), the following will be implemented: ▶ If an active burrowing owl burrow or a potentially active burrow that is assumed to be occupied is detected during the overwintering season (September 1–January 31), during SPR BIO-10 surveys, a no-disturbance nest buffer of 250 feet will be placed around the burrow. No mechanical or manual treatments, or ground or human disturbance associated with prescribed burning (e.g., control lines, staging areas) or prescribed herbivory (e.g., fence lines, watering infrastructure, staging areas) would occur within this buffer until all burrowing owls have left the burrow (i.e., surveys indicate that no owls have used the burrow for seven consecutive days) as determined by a qualified biologist or RPF. The buffer distance may be modified by a qualified RPF or biologist based on presence of natural buffers provided by vegetation or topography, baseline levels of noise and human activity, and expected treatment activities in coordination with CDFW. California Condor ▶ If active California condor nests are found during SPR BIO-10 surveys or reported to the project proponent by CDFW or USFWS, a no-disturbance nest buffer of 1 mile would be placed around active California condor nests, and no treatment activities would occur within this buffer until the chicks have fledged as determined by a qualified biologist or RPF. Nest buffers may be adjusted by a qualified RPF or biologist, based on vegetative and topographic screening and other factors in coordination with CDFW and USFWS. ▶ Project activities will be temporarily halted if any California condors are observed within the project area prior to the start of work. California condors will be allowed to depart on their own before project activities resume. California condors that arrive in the project area or approach work crews while work is on-going will be hazed (additional details regarding hazing are described under SPR BIO-2). Work crews will inform the project biologist should any California condor-related work stoppages take place. ▶ Garbage removal will be required in all contracts. Work crews involved in all project activities will remove all trash associated with this project and ensure that it is disposed of properly. ▶ All personnel involved in implementing the project will be briefed on the importance of not leaving hazardous materials exposed and daily removal of all garbage fragments to maintain condor health. ▶ Work crews will store all project materials, tools, hardware, equipment, and loose items in a manner that will prevent their removal or ingestion by California condors and other wildlife. ▶ Work Crews will place all materials that are liquid, granular, or powder in sealed leak-proof containers and store in a manner that prevents access by California condors and other wildlife. ▶ Work crews will keep all parked vehicles and equipment free of leaks.			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Other Special-Status Birds ▶ If active special-status bird nests are detected during focused surveys, a no-disturbance buffer for ground and aerial treatment activities of at least 1 mile will be established around active nests for golden eagle, 0.5 mile for bald eagle nests, 0.25 mile for white-tailed kite nests, 700 feet for California black rail nests, and at least 250 feet for least Bell's vireo nests, tricolored blackbird nests, and western snowy plover nests. For helicopter and drone operations, this buffer will be a vertical buffer as well as a horizontal buffer (e.g., for golden eagle, 1 mile of horizontal distance or 5,280 feet above ground level [AGL]). No treatment activities will occur within these buffers until the chicks have fledged, or the nest is otherwise no longer active, as determined by a qualified RPF or biologist. Nest buffers may be adjusted by a qualified RPF or biologist, based on vegetative and topographic screening and other factors. Vernal Pool Fairy Shrimp ▶ If protocol surveys detect the presence of vernal pool fairy shrimp, or if the species is assumed to be present within vernal pools, no mechanical treatments would be conducted within 100 feet of the vernal pool where the species is present or assumed to be present, but other treatment types that do not result in ground disturbance may occur within this buffer. Mountain lion ▶ Within 14 days prior to the start of prescribed burning, mechanical treatments, and manual tree and snag removal treatments, a qualified RPF or biologist will inspect suitable nursery habitat (as determined pursuant to SPR BIO-10) in the part of the treatment area scheduled to be treated during that 14-day period for mountain lion or signs of mountain lion nurseries. The qualified RPF or biologist will also use publicly available data on recent mountain lion sightings, or survey for signs of mountain lion (e.g., tracks, scat, prey items such as a fresh kill) in the vicinity of potential nursery habitat to help determine whether the area may contain an active mountain lion nursery. If no mountain lion or sign of a nursery is observed, treatment activities may begin. If signs of a mountain lion nursery are observed, further investigation will be required to determine if a mountain lion nursery is present (see below). ▶ If signs of a mountain lion nursery are found during review of publicly available data or during surveys, further investigation will be required to determine if a mountain lion nursery is present. No treatment will occur in the area while further investigation is occurring. Survey methods will include the use of trail cameras, listening for calling kittens and/or other noninvasive methods, as well as coordination with local experts tracking the species (if available). Surveys using these noninvasive methods will be conducted for five days and five nights to determine whether a nursery may be present. ▶ If a nursery is known to occur in the area or further signs of a nursery are detected based on the surveys described above (e.g., lactating adult females or cubs on camera, repeated detections of an adult female in the area, growls or calls from kittens), no-disturbance buffer of at least 2,000 feet (Wilmers et al. 2013) will be applied for 10 weeks. The duration of the buffer may be shortened by the qualified biologist or RPF based on evidence (e.g., trail camera images) that kittens are old enough to move out of harm's way			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
independently of the female. Treatment activities will not occur within this buffer during this time to avoid disturbance, injury, or mortality of mountain lion nurseries. Ringtail ▶ To avoid mortality or injury to ringtail the following will be implemented when broadcast burning or mechanical and manual large snag (i.e., greater than 12 inches DBH) removal are implemented during the maternity season (April 15–June 30). ▶ Within 14 days prior to the start of broadcast burning, mechanical and manual tree and snag removal during the ringtail maternity season, a qualified RPF or biologist will conduct a den search in the treatment area to be treated during that 14-day period. The qualified RPF or biologist will search for den structures, such as hollow logs, snags, rock piles, and large trees and snags (i.e., greater than 12 inches DBH) with appropriate cavities (i.e., holes larger than 3 inches in diameter, with cavities extending approximately 12 inches down from the cavity hole). If found, the qualified biologist or RPF will inspect the cavity using a cell phone with a flash or other tools (e.g., borescopes) to determine whether ringtails are present, unless cavities are not safely accessible. Structures (e.g., large trees) with appropriate den habitat, whether verified as occupied or not, will be marked (e.g., with flagging), for avoidance during the maternity season. ▶ Any potential den structures, where the biologist or qualified RPF is not able to determine if the structure is occupied or not, due to safety or access issues, will be retained until the end of the ringtail maternity season (June 30). ▶ If active ringtail dens are discovered during a den survey or during treatment activities, a no-disturbance buffer of 0.25 mile will be implemented around the den, and broadcast burning, mechanical and manual tree and snag removal that may result in the destruction or disturbance of the den and associated foraging habitat as determined by a qualified biologist or RPF will not proceed within the buffer until at least the end of the ringtail maternity season (June 30). The qualified RPF or biologist will confirm that the den is unoccupied before treatment activities resume. If an active den is discovered, CDFW will be notified of the den and buffer location. CDFW will be provided an opportunity to visit the site and provide technical information on the size and shape of the den buffer.			
Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities) If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following. Avoid Mortality, Injury, or Disturbance of Individuals ▶ The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals:	Prior to and during all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include, but not be limited to, the species' tolerance to disturbance; the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; baseline levels of noise and human activity; and treatment activity. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below 100 feet from an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). ▪ No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, or other occurrence is no longer active; or reducing the buffer would not likely result in disturbance, mortality, or injury. A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species. ▪ For prescribed burning, the project proponent will implement the treatment outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, the qualified RPF or biologist will determine the period of time within which prescribed burning could occur that will avoid or minimize mortality, injury, or disturbance of the species. The project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate limited operating periods. <u>Maintain Habitat Function</u> ▶ For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following:			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ 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. 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			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
will be required. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding the determination that a non-listed special-status species would benefit from the treatment. **Project-Specific Guidance to Implement Mitigation Measure BIO-2b** ▶ Southwestern Pond Turtle ▪ If southwestern pond turtles are detected during SPR BIO-10 focused surveys biological monitoring by a qualified RPF, biologist, biological technician, or trainee during prescribed burning, mechanical treatments, and manual tree and snag removal activities, within or adjacent to sensitive habitat areas will be implemented to avoid injury to or mortality of individuals. If the qualified RPF or biologist detects a southwest pond turtle during treatments, a non-disturbance buffer of 100 feet, or published agency distance, will be implemented around the individual unless it is determined by a qualified RPF, biologist, or RPF supervised designee that a different sized buffer is appropriate to avoid injury or mortality. Treatment activities will cease within the buffer until the animal has left the area or has been moved out of harm's way and to other nearby habitat suitable for the species by the qualified RPF or biologist. ▪ If southwestern pond turtle nests are detected during SPR BIO-10 surveys, nests will be flagged and prescribed burning, operation of mechanized equipment, and manual tree and snag removal, which may cause loss of nests, will not occur within 50 feet of western pond turtle nests. ▶ Other Special-Status Reptiles and Amphibians ▪ If special-status reptiles or amphibians (i.e., coast horned lizard, coast range newt, Northern California legless lizard, or two-striped gartersnake) are detected during SPR BIO-10 focused surveys, or if coast horned lizard, coast range newt, Northern California legless lizard, or two-striped gartersnake is assumed to be present, biological monitoring by a qualified RPF, biologist, biological technician, or trainee during prescribed burning, mechanical treatments, manual tree and snag removal activities, and herbicide application treatments within or adjacent to sensitive habitat areas will be implemented to avoid injury to or mortality of individual special-status reptiles or amphibians. If the qualified RPF or biologist detects a special-status reptile or amphibian during treatments, a non-disturbance buffer of 100 feet, or published agency distance, will be implemented around the individual unless it is determined by a qualified RPF, biologist, or RPF supervised designee that a different sized buffer is appropriate to avoid injury or mortality. Treatment activities will cease within the buffer until the animal has left the area or has been moved out of harm's way and to other nearby habitat suitable for the species by the qualified RPF or biologist. ▶ California Spotted Owls ▪ If nesting California spotted owls are identified during protocol-level surveys, a no disturbance buffer of 0.25 miles will be established around active California spotted owl nests and no mechanical treatments, manual treatments using loud hand tools, or prescribed burning treatments will occur within this buffer until the chicks have fledged as determined by a qualified RPF or biologist. This buffer may be adjusted by a qualified RPF or biologist, based on vegetative and topographic screening and other factors.			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▪ A protected activity center (PAC) will be designated by a qualified RPF or biologist around identified nest sites to include 300 acres of the highest quality nesting and roosting habitat, in as compact an area as possible, composed of (1) CWHR classes 6, 5D, 4D, and 4M (listed in descending order of priority); (2) at least two tree canopy layers; (3) dominant and codominant trees averaging more than 24 inches DBH; (4) more than 60 to 70 percent canopy cover; (5) large snags (at least 45 inches DBH); and (6) snag downed woody material levels that are higher than average. ▪ No mechanical treatments will be implemented within nest stands, even outside of breeding season. "Nest stand" is defined as the 10 acres surrounding an active nest tree. A nest tree will be considered active if it was used during the previous breeding season. ▪ As additional nest location and habitat data become available, PAC boundaries will be adjusted, as applicable by a qualified RPF or biologist. ▪ Forest habitats occupied or assumed occupied, based on habitat suitability, by California spotted owl would be maintained at 60 percent or greater canopy cover and treatments would be designed by a qualified RPF to maintain tree age class diversity and long-term maintenance of habitat function. <u>Special-Status Birds</u> ▶ If an active black swift, grasshopper sparrow, loggerhead shrike, olive-sided flycatcher, or purple martin nest is detected during SPR BIO-10 focused surveys, a no-disturbance buffer of at least 100 feet will be established around the nest. For northern harrier nests the no-disturbance buffer will be 500 feet around the nest. For helicopter and drone operations, this buffer will be a vertical buffer as well as a horizontal buffer (e.g., 100 feet horizontal distance or 100 feet AGL). No treatment activities will occur within this buffer until the chicks have fledged as determined by a qualified RPF or biologist. The buffer distance may be modified by a qualified RPF or biologist based on presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, and expected treatment activities. <u>Overwintering Monarch Butterfly</u> ▶ If stands are determined to be suitable for overwintering monarch butterflies, prescribed burning, mechanical, manual, targeted herbicide application, and prescribed herbivory treatments will not occur during the overwintering period. Furthermore, for stands with documented use by overwintering monarch butterfly, a treatment plan that maintains the suitability of these stands for overwintering monarchs will be implemented as described in *Protecting California's Butterfly Groves: Management Guidelines for Monarch Butterfly Overwintering Habitat* (Xerces 2017) and CDFW will be contacted prior to treatment to confirm best practices. <u>American Badger</u> ▶ If an active American badger den is detected within treatment areas during SPR BIO-10 focused surveys, a no-disturbance buffer of 100 feet would be established around active maternity dens, and installation of control lines and staging areas for prescribed burning, pile burning, mechanical treatment, manual treatment, and the setup of infrastructure for prescribed herbivory activities would not occur within this buffer during the pupping season (February 15–July 1). If an active American badger den is detected within			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
treatment areas outside of the pupping season, where pile burning, installation of control lines and staging areas for prescribed burning, mechanical treatments, or the setup of infrastructure for prescribed herbivory activities are to be conducted, a buffer of 50 feet will be placed around the den. Monterey Dusky-Footed Woodrat ▶ A no-disturbance buffer of 5 to 10 feet will be established around Monterey dusky-footed woodrat nests or clusters of nests, and no pile burning, mechanical treatments, or manual treatments will be conducted within that buffer if feasible. The buffer may be estimated by field crews for manual treatments and pile burning. For mechanical treatments, a reasonable effort shall be made to electronically mark or physically flag the buffer; marking and/or flagging of nests may be reduced where there is a safety issue in accessing the nest. An electronic map will be provided to field crews and used for reference during mechanical treatments. When visibility of a nest is limited, as determined by a qualified RPF or biologist during survey pursuant to SPR BIO-10, high-visibility flagging or other high visibility physical markers may be used to supplement electronic demarcation or visual estimation of the non-disturbance buffer. ▶ If Monterey dusky-footed woodrat nests within mechanical treatments or manual treatments cannot be avoided, a qualified biologist or RPF will implement nest relocation procedures, if feasible, outside of the season when most young are present in the nest (April through mid-July). The biologist or RPF would dismantle the woodrat nest by hand and rebuild the nest outside of the treatment footprint if feasible. ▪ Prior to any nest removal, safety measures will be employed to minimize potential human exposure to possible diseases carried by woodrats. Adequate protection, such as protective clothing, equipment and tools, gloves, and appropriate masks, will be used to ensure safety regarding viruses and diseases potentially carried by rodents. ▪ Nest removal efforts will not take place during inclement or extreme weather conditions and will take place at dusk or dawn when woodrats are least susceptible to predators. ▪ Rebuilt nests will be located in the vicinity (approximately 50 feet) of other existing nests (when other nests occur outside of the treatment area), and in the same habitat type as the original nest when feasible. ▶ If Monterey dusky-footed woodrat nests are located within prescribed burning treatment areas, or if presence of nests is assumed pursuant to SPR BIO-10, broadcast burning will not occur during the season when the majority of woodrat young are present in the nest (April through mid-July) to avoid loss of young woodrats, unless control lines can be established around the nest. ▶ In areas of existing woodrat habitat where pile burning would occur, pile burning will take place as soon as feasible to reduce the risk of woodrats occupying the debris piles. Prior to burning, debris piles should be disturbed to ensure any woodrats inside of the piles have the opportunity to escape. Special-Status Bats ▶ If a special-status bat roost is detected during SPR BIO-10 focused surveys, a no-disturbance buffer of 250 feet will be established around the roost during the bat maternity season (April 1–August 31), and prescribed			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
burning, mechanical treatments, and manual treatments and herbicide application using power equipment will not occur within this buffer until the roost is no longer being used as determined by a qualified RPF or biologist. The buffer distance may be modified by a qualified RPF or biologist based on presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, and expected treatment activities.			
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). ▶ 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.	Prior to and during treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

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

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

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA, because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status butterflies would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status butterflies or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. 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. **Project-Specific Guidance to Implement Mitigation Measure BIO-2e** The measures described above have been tailored to the proposed treatments for monarch butterfly and are as follows: ▶ If host plants for monarch butterfly are detected, and monarch eggs, larvae, and pupae are detected during focus surveys pursuant to SPR BIO-10 or assumed to be present, host plants will be marked with high-visibility flagging, fencing, or stakes, and no treatment activities (other than prescribed herbivory) will occur within 10 feet of these plants if feasible (unless, pursuant to SPR BIO-1, activities occur outside of the period March 15-October 31, when impacts to eggs, larvae, and pupae can be avoided). ▶ If monarch butterfly is detected during focused surveys pursuant to SPR BIO-10, or presence is assumed, treatments will be conducted in a patchy pattern to the extent feasible in grasslands, shrublands, and oak woodlands, such that the entirety of the habitat is not burned or removed and untreated portions of suitable habitat and floral resources are retained.		USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
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	During all treatment activities (if special-status bumble bees are identified during surveys or assumed to be present).	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
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 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			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
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. **Project-Specific Guidance to Implement Mitigation Measure BIO-2g** To avoid impacts on Crotch's bumble bee, the following measures will be implemented when implementation of surveys under SPR BIO-10 results in identification of habitat suitable for the species and the species is detected or presence of the species is assumed: ▶ If Crotch's bumble bees are detected during focused surveys, a no-disturbance buffer of at least 50 feet will be established around any identified nest colonies, and no pile burning or mechanical treatment activities will occur within this buffer until the nesting colony is no longer occupied as determined by a qualified RPF or biologist. Buffer size may be reduced or adjusted if recommended by a qualified biologist in consultation with CDFW. ▶ If surveys for nest colonies are not conducted and presence is assumed, pile burning and mechanical treatment will not occur during the colony flight season (April through August) (CDFW 2023). Herbicides will not be applied to flowering native plants within occupied or suitable habitat during the colony flight season (April through August), and herbicide application will not target native flowering plants while blooming. Herbicide application will be conducted with ground-level application only (i.e., paint-on stems, backpack hand-applicator, hypo-hatchet tree injection, or hand placement of pellets). No aerial spray of herbicides will occur. ▶ Prescribed burning and biomass disposal will be designed to avoid nesting bumble bees and bumble bee floral resources. ▶ Chips will not fully block existing rodent burrows, which may provide habitat for bumble bees. ▶ Broadcast burning in habitat suitable for sensitive bumble bees will be restricted to the winter season prior to emergence of bumble bee floral resources. Generally, prescribed burning will be limited to September 1–March 31 (outside of the colony flight season). If conditions in a given year vary and the timing of floral resource emergence is altered by unusual conditions (e.g., heavy rains, extended cold season), the prescribed burning window may be altered with coordination from a qualified bumble bee biologist. Variation from the September 1–March 31 broadcast burning window will be documented in the post-project implementation report. ▶ 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 scale will be determined by a qualified biologist or RPF. 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.			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3: ▶ Reference the *Manual of California Vegetation*, Appendix 2, Table A2, *Fire Characteristics* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class and fire return interval departure of the vegetation alliances present will also be determined. ▶ Design treatments in sensitive natural communities and oak woodlands to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function of the affected sensitive natural community. Treatments will be designed to replicate the fire regime attributes for the affected sensitive natural community or oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fireline intensity, severity, and fire type as described in *Fire in California's Ecosystems* (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval (i.e., time since last burn is less than the average time required for that vegetation type to recover from fire) or within Condition Class 1. ▶ To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled). ▶ To the extent feasible, fuel breaks will not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in sensitive natural communities with a rarity rank of S3 (vulnerable) or in oak woodlands. In forest and woodland sensitive natural communities with a rarity rank of S3, and in oak woodlands, only shaded fuel breaks will be installed, and they will not be installed in more than 20 percent of the stand of sensitive natural community or oak woodland vegetation (i.e., if the sensitive natural community covers 100 acres, no more than 20 acres will be converted to create the fuel break). ▶ Use prescribed burning as the primary treatment activity in sensitive natural communities that are fire dependent (e.g., closed-cone forest and woodland alliances, chaparral alliances characterized by fire-stimulated, obligate seeders), to the extent feasible and appropriate based on the fire regime attributes as described in *Fire in California's Ecosystems* (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). ▶ Time prescribed herbivory to occur when non-target vegetation is not susceptible to damage (e.g. non-target vegetation is dormant or has completed its reproductive cycle for the year). For example, use herbivores to control invasive plants growing in sensitive habitats or sensitive natural communities when	During treatment activities in areas that contain sensitive natural communities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
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 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. **Project-Specific Guidance to Implement Mitigation Measure BIO-3a** ▶ To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled). Feasibility will be determined by qualified fire resource professionals (e.g., CAL FIRE) in consideration of community and life safety. ▶ Maintenance treatments outside of the natural fire return interval of the native vegetation alliance being treated would occur only in areas where a qualified RPF or botanist determines that the goal of the initial treatment to restore the sensitive natural community to Condition Class 1 (i.e., natural vegetation composition, structure, and fuels) was not achieved with initial treatments implemented within the natural fire return interval. In those			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
instances, lower intensity, targeted maintenance activities may be implemented outside of the natural fire return interval to achieve these goals. These lower intensity maintenance activities would consist of targeted removal of dead, dying, and diseased trees, and invasive species; or select thinning of regenerating trees and shrubs to achieve desired density consistent with healthy examples of the vegetation alliance being treated. ▶ Prior to any ecologically restorative treatments in chaparral sensitive natural communities, a qualified RPF or botanist will prepare a treatment prescription including the following items. The prescription will be provided to Coastal Commission staff for Executive Director review and approval prior to treatment implementation. ▪ retention standards designed specifically to maintain the habitat value and natural species diversity, abundance, and composition of the sensitive natural community being treated; ▪ a list of SPRs and Mitigations Measures that would apply to treatment implementation; ▪ evidence that treatments will be conducted within the natural fire return interval (see above bullet for maintenance treatments); ▪ methods to maintain the alliance level membership rules from the most current edition of the California Manual of Vegetation; and ▪ treatments will be designed to maintain or improve the habitat value and functional capacity of the vegetation type compared to its existing condition and will maintain the natural species diversity, abundance, and composition of the sensitive natural community being treated. ▶ If it is not feasible to apply prescribed burning as the primary treatment activity in a fire dependent sensitive natural community because of hazardous fuel loads, either the fire dependent sensitive natural community will be avoided or, if avoidance is not an option because avoidance would not meet CalVTP program objectives (e.g., ecological restoration, community protection), manual and mechanical pretreatment activities may be employed to reduce fuel loads (e.g., dead standing vegetation) prior to implementing prescribed burning. If the project proponent determines that using prescribed fire as the primary treatment is infeasible and avoidance of the fire dependent sensitive natural community is also infeasible, the reasons manual or mechanical pretreatment is needed before implementing prescribed burns will be submitted to the Coastal Commission for Executive Director review and approval. This will also be documented in the post-project implementation report. ▶ No prescribed herbivory would occur in chaparral sensitive natural communities ranked S1, S2, or S3.			
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.	Prior to and during all treatment activities.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures). ▶ A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified RPF or biologist and will depend on the type of wetland present (e.g., seasonal wetland, wet meadow, freshwater marsh, vernal pool), the timing of treatment (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the species' vulnerability to the treatment activities, environmental conditions and terrain, and the treatment activity being implemented. ▶ A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. ▶ Within this buffer, herbicide application is prohibited. ▶ Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical treatments, prescribed herbivory, equipment and vehicle access or staging. ▶ Only prescribed (broadcast) burning may be implemented in wetland habitats if it is determined by a qualified RPF or biologist that: ▪ No special-status species are present in the wetland habitat. ▪ The wetland habitat function would be maintained. ▪ The prescribed burn is within the normal fire return interval for the wetland vegetation types present ▪ Fire containment lines and pile burning are prohibited within the buffer No fire ignition (and associated use of accelerants) will occur within the wetland buffer **Revisions to the Mitigation Measure:** Text of the original Mitigation Measure will be removed and replaced with new language. The original language states, "No special-status species are present in the wetland habitat." The revised language states, "No special-status species are present in the wetland habitat, other than the cysts of special-status vernal pool invertebrates." **Project-Specific Implementation** In addition to those wetlands defined as waters of the state or federally protected waters, wetlands will include Coastal Act wetlands where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes. Impacts to all wetlands (i.e., state protected wetlands, federally protected wetlands, wetlands meeting the definition of Coastal Act wetlands) will be avoided using the following measures: ▶ Wetlands and a 50-foot buffer around wetlands will be delineated;			

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
▶ Within wetland boundaries: ▪ Treatment activities will be limited within wetland boundaries to those that would restore ecological benefits to the wetlands or would maintain wetland habitat quality while improving surrounding ecosystems, including ESHAs. ▪ Treatment activities would be limited to the implementation of prescribed (broadcast) burning, and this would only be allowed where determined by a qualified RPF or qualified professional that: • no special-status species are present, other than the cysts of special-status vernal pool invertebrates; • habitat function would be maintained or enhanced/restored; • the burn occurs within the expected fire return interval for the vegetation communities present; • no soil disturbance (including hand containment lines), mechanical treatments, or equipment or vehicle access shall occur; • no pile burning shall occur; and, • no fire ignition (including the associated use of accelerants) shall occur within wetlands. ▶ Treatment activities will be limited within wetland buffers to those that would restore ecological benefits to the wetlands or would maintain wetland habitat quality while improving surrounding ecosystems, including ESHAs. No fire ignition (including the associated use of accelerants) shall occur within wetland buffers. No herbicide application shall occur within 25 feet of state or federally protected wetlands; and, hand containment lines intended to facilitate prescribed (broadcast) burns are the only type of containment lines that shall be allowed 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.	During treatment activities in areas that contain nursery sites (if nursery sites are identified during surveys).	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

Mitigation Measures	Timing	Implementing Entity	Verifying/Monitoring Entity
Greenhouse Gas Emissions			
Mitigation Measure GHG-2: Implement GHG Emission Reduction Techniques During Prescribed Burns When planning for and conducting a prescribed burn, project proponents implementing a prescribed burn will incorporate feasible methods for reducing GHG emissions, including the following, which are identified in the *National Wildfire Coordinating Group Smoke Management Guide for Prescribed Fire* (NWCG 2018): ▶ reduce the total area burned by isolating and leaving large fuels (e.g., large logs, snags) unburned; ▶ reduce the total area burned through mosaic burning; ▶ burn when fuels have a higher fuel moisture content; ▶ reduce fuel loading by removing fuels before ignition. Methods to remove fuels include mechanical treatments, manual treatments, prescribed herbivory, and biomass utilization; and ▶ schedule burns before new fuels appear. As the science evolves, other feasible methods or technologies to sequester carbon could be incorporated, such as conservation burning, a technique for burning woody material that reduces the production of smoke particulates and carbon released into the atmosphere and generates more biochar. Biochar is produced from the material left over after the burn and spread with compost to increase soil organic matter and soil carbon sequestration. Technologies to reduce greenhouse gas emissions may also include portable units that perform gasification to produce electricity or pyrolysis that produces biooil that can be used as liquid fuel and/or syngas that can be used to generate electricity. The project proponent will document in the Burn Plan required pursuant to SPR AQ-3 which methods for reducing GHG emissions can feasibly be integrated into the treatment design.	Prior to and during prescribed burning treatments.	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined
Hazardous Materials, Public Health and Safety			
Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments) or prescribed burning, CAL FIRE and other project proponents will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials. If it is determined that hazardous materials sites could be located within the boundary of a treatment site, the project proponent will conduct a DTSC EnviroStor web search (https://www.envirostor.dtsc.ca.gov/public/) and consult DTSC's Cortese List to identify any known contamination sites within the project site. If a proposed mechanical treatment or prescribed burn is located on a site included on the DTSC Cortese List as containing potential soil contamination that has not been cleaned up and deemed closed by DTSC, the area will be marked and no prescribed burning or soil disturbing treatment activities will occur within 100 feet of the site boundaries. If it is determined through coordination with landowners or after review of the Cortese List that no potential or known contamination is located on a project site, the project may proceed as planned.	During PSA preparation **Database searches are complete; see PSA/Addendum for results.**	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined	USLTRCD/FSCSLO **Future treatments involving other entities**: To be determined

REFERENCES

Buskirk, J. 2002. "The Western Pond Turtle, Emys marmorata." *Radiata. Journal of DGHT-AG Schildkroten*. 11-2: 3–30.

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

California Department of Fish and Wildlife. 2012. Staff Report on Burrowing Owl Mitigation. State of California Natural Resources Agency, Department of Fish and Game. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=83843&inline=true Accessed: June 8, 2023.

———. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline. Accessed February 9, 2023.

———. 2023. *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species*. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline. Accessed November 12, 2024.

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

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

Cal-IPC. *See* California Invasive Plant Council.

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

de Groot, RS, MA Wilson, and RM Boumans. 2002. A Typology for the Classification, Description and Valuation of Ecosystem Functions, Goods and Services. *Ecological Economics* 41:393-408.

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

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

NWCG. *See* National Wildfire Coordinating Group.

Reese, D. A., and H. H. Welsh. 1997. "Use of Terrestrial Habitat by Western Pond Turtles, *Clemmys marmorata*: Implications for Management." Proceedings: *Conservation, Restoration, and Management of Tortoises and Turtles. An International Conference*: 352–357.Sawyer, JO, T Keeler-Wolf, JM Evens. 2009. *A Manual of California Vegetation* (Second Edition). California Native Plant Society and California Department of Fish and Game.

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

US Fish and Wildlife Service. 2005. *Revised Guidance on Site Assessments and Field Surveys for the California Red-Legged Frog.* Available: https://ipac.ecosphere.fws.gov/guideline/survey/population/205/office/11420.pdf. Accessed August 8, 2024.

———. 2014. Recovery Program Guidance on Hazing California Condors. Memo from the California Condor Field Coordinator, Hopper Mountain NWRC to the Project Leader, Ventura Fish and Wildlife Office. September 3, 2014.

———. 2017. *Survey Guidelines for the Listed Large Branchiopods.* US Fish and Wildlife Service; Sacramento, CA.

———. 2023. "Endangered and Threatened Wildlife and Plants; Threatened Species Status With Section 4(d) Rule for the Northwestern Pond Turtle and Southwestern Pond Turtle." Proposed Rule. *Federal Register* 88: 68370 – 68399.

US Forest Service. 1993. Protocol for Surveying for Spotted Owls in Proposed Management Activity Areas and Habitat Conservation areas. March 12, 1991, revised February 1993.

USFS. *See* US Forest Service.

USFWS. *See* US Fish and Wildlife Service.

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

Wilmers, C. C., Y. Wang, B. Nickel, P. Houghtaling, Y. Shakeri, M. L. Allen, J. Kermish-Wells, V. Yovovich, and T. Williams. 2013. "Scale Dependent Behavioral Responses to Human Development by a Large Predatory, the Puma." *PLoS ONE* 8(4):e60590. Available: https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0060590. Accessed January 19, 2024.

Working Group for Phytophthoras in Native Habitats. 2016 (September). *Guidelines to Minimize Phytophthora Pathogens in Restoration Nurseries*. Available: https://www.suddenoakdeath.org/wp-content/uploads/2016/04/Restoration.Nsy_.Guidelines.final_.092216.pdf. Accessed January 17, 2024.

Xerces. *See* Xerces Society for Invertebrate Conservation.

Xerces Society for Invertebrate Conservation. 2017. *Protecting California's Butterfly Groves: Management Guidelines for Monarch Butterfly Overwintering Habitat*. Available: https://xerces.org/sites/default/files/2018-05/17-040_01_ProtectingCaliforniaButterflyGroves.pdf. Accessed January 3, 2023.

———. 2019. *Western Monarch Management Windows. Timing Management in Monarch Breeding Habitat*. Available: https://xerces.org/publications/guidelines/timing-management-in-monarch-breeding-habitat. Retrieved May 10, 2023.

Attachment B

Coastal Vegetation
Treatment Standards

Coastal Vegetation Treatment Standards North Coastal San Luis Obispo County Regional Ecological Strategy for Improving Landscapes

1. All projects shall comply with and carry out the requirements of the CalVTP Program EIR, including use of approved treatment methods, treatment activities, and all applicable standard project requirements (SPRs).

   Response: The North Coastal San Luis Obispo County Regional Ecological Strategy for Improving Landscapes (SLO-RESIL or proposed project) would comply with the applicable requirements of the California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (EIR). The Project-Specific Analysis (PSA) and Addendum to the Program EIR prepared for the proposed project provides details regarding the CalVTP treatment types and activities that would be implemented under the proposed project, and the applicable SPRs and mitigation measures that would be implemented. As evidenced therein, the project complies with and will carry out the applicable requirements of the CalVTP Program EIR.

2. Project-Specific Analyses (PSAs) shall be submitted to the California Coastal Commission (Coastal Commission) for review and approval pursuant to the Upper Salinas-Las Tablas Resource Conservation District's (USLTRCD) *Forest Health and Fire Resilience Public Works Plan* (PWP) prior to conducting projects. Coordination between the Project proponent and Coastal Commission shall occur as early as feasible in the design process in order to avoid delays.

   Response: A draft PSA/Addendum for the proposed project was submitted to the Coastal Commission staff for review on May 7, 2025. Prior to submitting the PSA/Addendum, USLTRCD and Auten Resource Consulting (ARC) conducted a site visit with Coastal Commission staff on January 7, 2025, to observe existing ecological conditions in the project area and discuss the identified treatment objectives and activities. Early drafts of the proposed project description were sent to Coastal Commission staff for review, input, and comment on January 3, 2025 and March 5, 2025. Additionally, multiple conference calls with Coastal Commission staff were held during development of the PSA/Addendum since November 2024. During these meetings, the treatment approach for the proposed project was discussed and USLTRCD received ongoing feedback from Coastal Commission staff on the proposed approach to the analysis and Coastal Vegetation Treatment Standards (Coastal VTS) throughout preparation of the PSA/Addendum.

3. PSAs shall include clear problem and goal statements (i.e., overall project goals, fire prevention goals, ecological goals) associated with each project proposed pursuant to this public works plan. These statements are intended to assist project proponents and Coastal Commission in developing mutual understanding of the potential impacts and benefits – both short and long term – for each project. It is expected that this information will be incorporated into item #6 (response to Coastal VTS 6) of each PSA.

   Response:

   Problem Statement: The effects of fire suppression and climate change have altered and continue to disrupt ecological processes across the landscape of California. This combination of stressors has resulted in sensitive habitats that have declined substantially in habitat quality and increased in vulnerability to severe wildfire (Ayars et al. 2023; Stephens et al. 2022). Of particular concern are the increasing loss of coastal grasslands and vulnerability of native Monterey pine (*Pinus radiata*) stands recovering from significant outbreaks of pitch canker and a drought-induced beetle epidemic circa 2015 that resulted in substantial tree mortality. These degraded conditions have been exacerbated by additional stressors, such as drought, increasing yearly average temperatures, and fewer fog days. Most of these dead trees have now fallen to the forest floor and become entangled with regenerating understory vegetation creating very hazardous fuels accumulation for local communities and increasing the likelihood of high severity wildfire. Vegetation communities in this region, including Monterey pine forests, hardwood forests, and coastal grasslands, face these significant ecological stressors and adverse outcomes that have caused changes in vegetation composition, structure, and density

resulting in increased fuel loads, which reduce the health and resilience of these habitats and increase the potential risk of catastrophic wildfires.

Like many other communities in California, the communities of Cambria and San Simeon are built in a fire adapted ecosystem, in this case Monterey pine forest. This forest is in critical need of ecologically restorative actions to support the conservation of one of only five remaining native Monterey pine stands in the world. Following the 2015 mortality event, there are still areas of unnaturally high forest densities and tree diseases such as dwarf mistletoe, western gall rust, and pitch canker are still prevalent. Like many areas of the state, forest, woodland, and coastal grassland landscapes across the San Luis Obispo County coast are undergoing significant change. The climate is becoming warmer and drier, endemic species are at risk, and invasive species are on the move. Altered fire regimes and increased fuel loads are driving larger and more catastrophic wildfires. The result has been damaging changes to ecosystems that require environmentally sensitive landscape-level treatments to correct the departure of these ecosystems from healthy conditions and redirect the trajectory of decline from changing climates and other ecological conditions affecting the area. In the absence of active treatments to restore ecological processes, native habitats, including Monterey pine forest, will continue to decline and could ultimately be lost.

Goal Statement: The overall objectives of this project are the same as those objectives set forth in the USLTRCD PWP approved by the Coastal Commission in October of 2021 and include:

- promote a mosaic of native vegetation types to support diverse native floral, faunal, and fungal assemblages that are resilient to climate change;
- improve habitat for rare, threatened, and endangered plant and animal species where they are present;
- increase the ability to safely manage wildfire and restore use of prescribed burning;
- reduce impacts to natural and cultural resources;
- maintain important cultural landscapes;
- significantly reduce loss of life and property from catastrophic wildfire; and
- educate the public about the role of fire in California's landscapes and their role in it.

These objectives acknowledge that complete reestablishment of fire regimes that existed during the evolutionary history of the plants and animals found within the San Luis Obispo coastal region cannot be replicated under current conditions. These natural communities have been so altered that, even if historic fire regimes were reestablished, it is expected that the effects of these fire patterns would not restore the native states of most of these communities.

Given these constraints, where possible, evolutionarily appropriate fire regimes or surrogates (i.e., mechanical, manual, prescribed burning, prescribed herbivory, and targeted herbicide application) should be enacted or maintained to restore vegetation community resilience. The primary goal of the ecological restoration and fuel break treatment types is to enhance natural habitats by restoring ecological conditions and natural and cultural processes that promote vegetation community regeneration, healthy habitat structure, tree and shrub density, species composition, promote community safety, and reduce impacts from wildfire.

4. In the coastal zone, vegetation treatment projects fall into two categories: (1) Forest Health projects and (2) Fire Prevention projects. The purpose of forest health projects is to restore and enhance ecosystems, including to prevent fire behavior to which the ecosystem is not adapted. The ecosystems that can be treated under this category include forested ecosystems as well as other ecosystems, such as woodland and scrub-dominated systems. The purpose of fire prevention projects is to protect existing structures and infrastructure, including access roads. Fire prevention projects shall be limited to the applicable defensible space requirement (which is typically 100 feet but can range to as much as 300 feet under specific circumstances), unless accompanied by a clear rationale, provided by a qualified professional, as to why additional defensible space is required to protect existing structures and infrastructure.

Response: The proposed ecological restoration treatment type, including the shaded fuel break treatment type, in the PSA/Addendum falls under the forest health category; additionally, ecological restoration treatments often have added benefits of fire prevention. The non-shaded fuel break treatment type in the PSA/Addendum falls under the fire prevention category of the PWP.

Ecological restoration, including shaded fuel break treatments would restore natural ecosystem processes and improve ecosystem resiliency through the removal of dead, dying, and diseased trees, and invasive species, and thinning unnaturally high-density forests and shrublands and dense understory fuels. In non-forested systems and ecologically sensitive communities, coastal grasslands, and coastal shrubland, the ecological restoration treatments would be site-specific and focused on protecting or enhancing these habitat types and could include activities designed to facilitate or maintain natural fire return intervals.

Fuel break treatments would create zones of vegetation removal to reduce wildfire risk and support fire suppression efforts by providing responders with a staging area or access to remote landscapes for fire control actions. Fuel breaks would also provide safe emergency access/egress during wildfires, would reduce high severity fire exposure to homes, and would reduce the likelihood of severe fire occurring within treated areas by minimizing ignition potential. Fuel breaks could serve to reduce the risk of environmentally sensitive habitat areas (ESHAs) experiencing significant ecological damage from high severity wildfire or wildfire outside the natural fire return interval by reducing contiguous vegetation across ridges and roads, which could assist in limiting the spread of wildfire between drainages where ESHAs are present.

5. In the coastal zone, environmentally sensitive habitat area (ESHA) is defined as any area in which plant or animal life, or their habitats, are either rare or especially valuable because of their special nature or role in an ecosystem, and that could be easily disturbed or degraded by human activities and developments (see Coastal Act Section 30107.5). Rarity determinations for habitats and species are made by CDFW, US Fish and Wildlife Service (USFWS), and California Native Plant Society (CNPS), and are used to support a Coastal Commission ESHA determination[1]. In addition, an ESHA determination may be made on the basis of an area constituting "especially valuable habitat" where it is of a special nature and/or serves a special role in the ecosystem, such as providing a pristine example of a habitat type or supporting important ecological linkages. The Coastal Act requires that ESHAs be protected against any significant disruption of habitat values and only allows uses dependent on the ESHA's resources within those areas (see Coastal Act Section 30240). It is anticipated that many of the Forest Health and Fire Prevention activities pursued within the coastal zones of this district will take place within natural communities that qualify as ESHAs (e.g., Monterey pine forest, Monterey cypress, coast live oak, etc.).

   Response: ESHA could occur throughout the entire project area. Therefore, treatments would occur within vegetation communities that meet the definition of ESHA, including Monterey pine forest (Bishop pine – Monterey pine forest and woodland alliance per the Manual of California Vegetation). In addition, many other sensitive natural communities and sensitive habitats, such as coast oak woodland, riparian woodland, and coastal prairie, are present throughout the project area. As described in response to Coastal VTS 3, the primary purpose of the proposed project is to conduct ecologically restorative treatments that promote vegetation community regeneration; healthy habitat structure, density, and composition; promote community safety; and reduce impacts from wildfire. Removing dead, dying, and irreversibly diseased trees and shrubs and reducing density of overstocked vegetation communities would promote the persistence and resiliency of these communities (which are identified as ESHA). The project was designed to provide for a mosaic of appropriate native plants by age, size, and class that would support the overall habitat as detailed in response to item #6 below. In addition, the CalVTP PSA/Addendum includes SPRs and mitigation measures that would avoid and minimize significant impacts to ESHAs and associated habitat values. Specifically, SPR BIO-8 would be implemented and includes the

[1] CDFW defines natural communities, animals, and plants with a global or state ranking of 1, 2, or 3 as rare and the Coastal Commission typically finds these to be ESHAs. Coastal Commission also typically considers plant and animal species listed by the federal and state endangered species acts (ESA and CESA, respectively) and/or identified under other special status categories (e.g., California Species of Special Concern) and/or identified by the California Native Plant Society (CNPS) as '1B' and '2' plant species as constituting ESHAs.

following requirements to protect ESHAs by protecting the habitat functions that define ESHAs within the treatment areas.

- Treatments must be designed in compliance with the PWP (which is consistent with the San Luis Obispo County Local Coastal Program) to protect the habitat function of the affected ESHA, protect habitat values, and prevent loss or type conversion of habitat and vegetation communities that define the ESHA, or loss of special-status species that inhabit the ESHA.
- Treatment actions are limited to eradication or control of invasive plants, removal of uncharacteristic fuel loads (e.g., removing dead, diseased, or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the vegetation types present in the ESHA.
- A qualified biologist or registered professional forester (RPF) familiar with the ecology of the treatment area would monitor all treatment activities in ESHA.

Refer to Impact BIO-3 in the PSA/Addendum as well as the response to item #6 below for more details on ESHA, habitat and vegetation types within the treatment area, and additional measures that will be implemented to protect the ecosystem. For example, in addition to SPR BIO-8 described above, surveys pursuant to SPR BIO-3 would be implemented to classify vegetation to the alliance level, and to determine the presence of sensitive natural communities and especially valuable habitat types (e.g., maritime chaparral) prior to treatment.

6. In addition to the requirements of the CalVTP Program EIR, the following standards shall also be met in the coastal zone:

   Protect Ecosystems. Forest Health projects shall:

   a) proactively restore and enhance ecosystems, protect watersheds, and promote long-term storage of carbon, including through the minimization of carbon loss from large and intense wildfires;

   b) restore and maintain vegetation cover to a threshold that reflects appropriate fire frequencies (i.e., fire-return intervals) on the landscape, considering estimated pre-European settlement conditions as well as future climate change, and the maintenance or improvement of ecosystem health;

   c) maintain vegetation cover and composition to comply with the standards (membership rules) set forth in the online edition of the Manual of California Vegetation (MCV) to avoid unintended habitat conversion[2]; and,

   d) provide for an appropriate mosaic of native plants by age, size, and class that support overall habitat function.

   Fire Prevention projects shall meet all of the above requirements to the maximum extent feasible, while achieving overall project goals and necessary fire prevention goals, and any deviations shall be clearly explained and identified in the PSA/Addendum.

   Response: Ecological restoration would be implemented to protect and improve forest regeneration and resiliency, create a dynamic mosaic of vegetation types and age classes, and reduce fuels thereby reducing the risk of catastrophic wildfire that threatens to impose extreme conditions on ecosystems and severely limit or even eliminate their capacity to recover thereafter. Treatments would focus on restoring ecosystem processes, conditions, and resiliency to reflect vegetative composition, structure, habitat values, and fuel conditions expected prior to modern fire exclusion. Shaded fuel break treatments would enhance habitat function by removing dead and dying vegetation, thinning overstocked trees and shrubs, increasing heterogeneity, and removing invasive vegetation as well as facilitating protection of surrounding vegetation from the catastrophic effects of wildfires, thereby minimizing loss of carbon from intense wildfires.

[2] Membership rules are quantitative definitions used to assign field samples to vegetation types based on data analysis and can include species constancy, cover values, and the presence of indicator species.

Within Monterey pine habitat, characterized by excessive tree densities, a lack of age class diversity, and high fuel loading, treatments would be focused on reducing tree density through removal of dead, dying, or diseased trees, selectively thinning live trees, and reducing fuel loads. Treatments within Monterey pine stands are anticipated to result in a healthy and diverse understory because thinning of smaller diameter trees and understory woody vegetation would let additional sunlight reach the forest floor. In addition, forest density would be targeted to achieve ideal residual spacing of 10 to 20 feet between trees. These desired retention standards would be the same for both ecological restoration and shaded fuel break areas. This would improve the existing conditions of mid-crown die-off and accumulation of excessive fuels on the forest floor. The resulting forest would be more vigorous and able to resist vegetation pattern transformations that can occur in a changing climate, with reduced continuity of hazardous vertical and horizontal fuels. The desired condition following treatment would be reestablishment of Monterey pine forests that mimic characteristics of more resilient mixed age stands.

Treatments within other conifer forest habitats and mixed hardwood habitat would similarly be focused on removing dead, dying, and diseased trees, and removing a continuous fuel bed. In addition, within these habitats, treatments would reduce the density of understory shrubs and small diameter (less than 8 inches diameter at breast height [dbh]) trees to reduce both ground and overstory fuels and reduce fuel continuity. Healthy, resilient conifer and hardwood forests following treatment would exhibit characteristics of variable forest structure, including target spacing of 10 to 20 feet apart, retention of micro-stands of oak trees, residual densities ranging from 50 to 100 trees per acre, a diverse mosaic of native understory species, and a diverse range of wildlife habitat features and refugia such as tree cavities, snags, mature trees, downed woody debris, and riparian corridors. Treatments within riparian woodlands would retain 75 percent of the native riparian tree canopy and 50 percent of the understory and selective thinning would help promote a healthier and more resilient riparian community. In addition, because hardwood forests and woodlands are encroaching into coastal grasslands, treatments would target removal of encroaching trees to promote habitat diversity and protect existing grasslands.

Within non-sensitive natural community shrubland habitats (i.e., chaparral and coastal scrub), treatments would reduce densities of overgrown and homogenous habitats and reduce fuel loads. Following ecological restoration treatments, shrubland habitats would be composed of a healthy and diverse mosaic of vegetation that mitigates the threat of wildfire through reduced shrub densities and fuel continuity, increased shrub spacing, and more heterogeneous habitat structure. In addition, these habitats would exhibit native herbaceous species growth, wildlife habitat improvement, reduction of fuel loading and resource competition, increased ecosystem diversity, and maintenance of fire-resilient vegetation. Installation of strategic fuel breaks in shrubland types is an added treatment approach necessary to maintain ingress and egress for fire suppression resources and to protect sensitive habitats associated with these landscapes. Strategic fuel breaks allow for abatement opportunities in the event of fast-moving, high intensity fire behavior common in these vegetation types. Post-treatment characteristics of a healthy shrubland habitat include variable, well-distributed shrub cover across the landscape in a mosaic pattern that promotes biodiversity, patchy wildlife habitat and refugia, and efficient ecosystem function (e.g., competition dynamics, nutrient cycling, water flow, and soil formation processes). Furthermore, treatments would target nonnative invasive plants and remove or thin nonnative trees of any size unless retention is required to protect wildlife or cultural resources.

The treatments within coastal grassland communities would prevent conversion of this habitat to another vegetation alliance (e.g., coyote brush scrub or woodland or forest) and enhance habitat function in these communities. Treatments would mimic the beneficial effects of a low to moderate intensity wildfire by protecting, expanding, and improving native grassland habitats and reducing fuels through the removal of thatch, encroaching coyote brush or trees, and invasive woody plants (e.g., French broom [*Genista monspessulana*], blue gum [*Eucalyptus globulus*]). Managed disturbance through prescribed burning and herbivory produce added benefits of nutrient cycling, phosphorous mobilization, and nitrogen fixation as a product of fire-following species regeneration. An additional component to ecologically restorative treatments is targeted invasive species removal and limited herbicide application to promote native species composition and regeneration.

Refer to Impact BIO-3 in the PSA/Addendum for more details on ESHA and other habitat types within the treatment area, as well as additional measures that would be implemented to protect ecosystems.

Use Vegetation Removal Hierarchy. Except for prescribed fire project components, a vegetation removal hierarchy shall be identified and implemented for each project to obtain the vegetation cover threshold identified by a qualified RPF or qualified professional, as necessary, while ensuring that unintended habitat conversion does not occur, and that vegetation cover is sufficient to support the project's ecological goals. In order of priority and application, the hierarchy shall be as follows:

1) thinning and removal of dead, dying, and diseased trees and shrubs (except that some snags will be retained to provide wildlife shelter, dens, etc.);
2) removal of invasive species; and,
3) removal of native species that are not listed as endangered, threatened, rare, or otherwise especially valuable, with the end goal of having appropriate species composition in the plant community with a mix of vegetation age, height, and density.

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

Response: The project would follow the vegetation removal hierarchy described in the PWP's Coastal VTS for projects in the Coastal Zone. Ecological restoration treatment and shaded fuel breaks would not result in unintended habitat type conversion at the alliance level (i.e., would not result in conversion to another vegetation alliance). Treatments within tree dominated habitat types would retain understory shrubs and trees within each treatment, maintaining the vegetation types consistent with the MCV membership rules. Treatments in shrubland habitat types would retain a diverse mosaic of vegetation, while also maintaining the vegetation types consistent with the MCV. Treatments in grassland habitats would be focused on enhancing habitat function by removing nonnative and invasive species and removing encroaching trees and shrubs, and thus maintaining and improving the vegetation types consistent with the standards set forth in the MCV.

The removal of endangered, threatened, rare or otherwise especially valuable species and habitats would be avoided as discussed in item #6, "Protect Ecosystem," above, except for the selective removal of Monterey pine trees where stand density is not reflective of healthy Monterey pine forest stands. Initial treatments would first remove dead, dying, and irreversibly diseased trees and shrubs and invasive plant species, and would then remove select live individual hardwood and conifer trees less than 16 inches dbh with appropriate canopy spacing to achieve ecological restoration goals, including reduced fuel connectivity and increased sunlight reaching the forest floor. Most live native trees greater than or equal to 8 inches dbh would be retained. This treatment would increase the growth and vigor of any remaining live trees of all species, including Monterey pine, by reducing resource competition with small-diameter trees and large woody shrubs, and irreversibly diseased trees. In addition, the treatment would reduce fuel loads thereby protecting the continued natural regeneration of Monterey pine and other native vegetation communities from additional high intensity fire. The PSA/Addendum provides additional discussion on the benefit to the Monterey pine vegetation alliance from the removal of individual Monterey pine plants (see Section 4.5, "Biological Resources," in the PSA/Addendum). Therefore, while initial treatments may result in alteration of species composition within sensitive natural communities, the result would be representative of appropriate native habitat in the treatment area and a

naturally occurring sensitive natural community (e.g., Monterey pine forest) under a more natural disturbance regime.

Similarly, fuel break treatments in forested habitats (i.e., shaded fuel breaks) would remove dead, dying, and diseased trees and shrubs first, remove invasive plant species, and would then remove select live trees up to 8 inches dbh to reduce tree densities and fuel loads and increase sunlight penetration. Fuel break treatments in non-forested areas without an existing overstory (i.e., non-shaded fuel breaks) would follow a similar vegetation removal hierarchy as shaded fuel break treatments, with the primary focus to remove flammable vegetation to slow wildfire spread, create staging areas for safe firefighting efforts, and protect adjacent habitat.

Treatments would be subject to the retention standards for riparian woodlands, sensitive natural communities, chaparral, coastal sage scrub, and other sensitive communities, pursuant to the PSA/Addendum SPRs and mitigation measures.

Limit Equipment Types. All projects shall be carried out using the least invasive type of equipment feasible. Projects shall avoid the use of large masticators, track vehicles, and other heavy equipment, where feasible. When such heavy equipment is used, it shall remain on existing roads to the extent feasible. In riparian habitat, the use of heavy equipment shall be prohibited, except when authorized through a valid Lake and Streambed Alteration Agreement and/or, if applicable, Clean Water Act Section 401 Water Quality Certification, and when reviewed and approved by the Coastal Commission. Projects shall adhere to CalVTP SPR GEO-2 limiting heavy equipment use and SPR HYD-4 prohibiting heavy equipment use in WLPZ except on existing roads.

Response: The large volume of vegetation within the treatment area that would need to be removed to meet ecological restoration and fire prevention goals makes avoiding the use of all heavy equipment and limiting its use to existing roads during treatment infeasible. The project would use manual and mechanical treatment activities, as well as herbicide application, prescribed herbivory, and prescribed burning. Mechanical treatments would primarily be used for understory thinning and may use a variety of equipment, including a processing feller buncher, skidder, skid steer, excavator with masticating head, tracked or tow-behind chipper, crushing masticator, or dozer. Masticators would access treatment areas from existing roads and in certain situations operate on slopes up to 50 percent. Mechanical treatments may be used during burn unit prep to reduce fuels around the perimeter and/or in certain areas within the burn unit to help achieve burn plan objectives. Treatments may be used to create a burn perimeter before implementing prescribed burns. Prescribed herbivory may require the use of large trailers to transport animals. The project would implement SPR GEO-2 and HYD-4, as well as several other SPRs and mitigation measures, to reduce impacts from heavy equipment use (e.g., limiting heavy equipment use on steep slopes to minimize erosion). SPR HYD-4 prohibits mechanical treatment within Watercourse and Lake Protection Zones, and SPR GEO-2 limits use of high ground pressure vehicles on wet and saturated soils. Mechanical treatments would not occur in riparian woodlands, and prescribed herbivory treatments would not occur within 50 feet of the outer (i.e., landward) edge of riparian vegetation.

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

Response: Herbicides would be selectively used during initial and maintenance treatments to control invasive plant species as a last effort when other removal methods are not effective. Targeted herbicide application may be considered to manage nonnative or invasive species or to maintain non-shaded fuel breaks on up to 3,394 acres to promote regeneration of native species, reduce the spread of invasive vegetation, and maintain fuel breaks for wildland fire control or prescribed burning. Targeted herbicide treatment is expected to occur near roads, fuel breaks, trails, and in annual grasslands to promote growth of native grasslands or restore degraded coastal grassland communities Therefore, the actual treatment area for herbicide application may be substantially less than 3,394 acres. Herbicides would not be utilized within wet meadows or WLPZs. Herbicide application would only be implemented at ground-level from equipment on vehicles or by manual application devices (i.e., backpack sprayer, manual brush applicator). All herbicide use would be subject to the California red-legged frog

injunction, and would follow the requirements of SPRs HAZ-5, 6, 7, 8, 9, as well as SPR HYD-5. Together, these SPRs and Mitigation Measure BIO-1a and BIO-1b would avoid and minimize adverse effects to sensitive ecological resources by requiring 50 foot buffers around special-status plants (limited modifications to this buffer are documented in the PSA/Addendum and detailed under Mitigation Measure BIO-1a and BIO-1b), and within Watercourse and Lake Protection Zones, prohibiting application when weather parameters exceed label specifications or when sustained wind at the site of application exceeds 7 miles per hour, prohibiting application during or immediately prior to precipitation events, complying with all herbicide application regulations, and preparing and implementing a Spill Prevention and Response Plan.

Prescribed Herbivory Use. Prescribed herbivory may be allowed if it is found to be the least environmentally damaging feasible alternative to achieving project goals. Prescribed herbivory shall be conducted pursuant to an approved plan that ensures protection of habitat and other coastal resources, as documented in the PSA/Addendum.

Response: The project proposes use of prescribed herbivory to accomplish specific and measurable vegetation management objectives, including removing herbaceous biomass (e.g., fine fuel loads) and woody biomass; reducing populations of specific plant species; slowing the reestablishment of shrubs on ungrazed, burned, or mechanically thinned sites; and improving plant community structure for wildlife habitat values. Prescribed herbivory maintenance treatments would include the use of herbivores (e.g., goats sheep) to graze or browse target vegetation. A grazing management plan will be submitted to the Coastal Commission for approval prior to the start of prescribed herbivory maintenance treatments and would include a description of current conditions, the potential impacts of grazing on resources of concern, grazing management goals, objectives and performance standards, and a summary of requirements. The potential impacts of prescribed herbivory are addressed in the Project PSA/Addendum.

Control Invasive Species. Treatment activities and treatment types shall limit the spread of invasive species and prevent the spread of plant pathogens in all habitats, including those habitats that are not determined to be sensitive natural communities, riparian habitats, or oak woodlands subject to CalVTP SPRs BIO-4 and 9.

Response:

The proposed project includes removal of nonnative trees, and treatment of invasive species such as pampas grass, cape ivy, blue gum, and French broom. Additional invasive species would be treated as necessary to prevent their spread and protect native habitat. The project would implement SPR BIO-6 and BIO-9 for all treatment activities in all vegetation types to limit the spread of invasive species and plant pathogens, such as pitch canker, dwarf mistletoe, western gall rust, and sudden oak death. SPR BIO-6 requires implementation of best management practices to prevent the spread of plant pathogens and SPR BIO-9 requires implementation of measures to prevent spread of invasive plants and noxious weeds, including inspection and cleaning of equipment. As described under treatment maintenance, follow-up maintenance treatment to target invasive species may occur at any time. Invasive plant and noxious weed biomass would be treated on-site or would be disposed of off-site at an appropriate waste collection facility to prevent reestablishment or spread of invasive plants and noxious weeds. Diseased material would be burned, masticated, lopped and scattered, or chipped and spread on-site in the same affected treatment area. If diseased material is hauled off-site, it would be disposed of at an appropriate disposal location within the county.

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

Response: The project proposes use of prescribed herbivory as a targeted treatment to meet ecosystem restoration and fire prevention goals. The proposed project would be required to implement SPR BIO-11 and a qualified RPF or biologist would review the design of any fencing prior to installation to ensure adequate ground clearance to allow smaller species to avoid entrapment.

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

Response:

The project proposes use of prescribed burning to meet ecosystem restoration goals. The use of accelerants would follow the limitations on use pursuant to SPR HYD-4, which prohibits use of accelerants within Watercourse and Lake Protection Zones. Mitigation Measures BIO-1a and BIO-1b prohibit use of accelerants within special-status plant buffers, which are a minimum of 50 feet for plants listed under ESA or CESA (limited modifications to this buffer are documented in the PSA/Addendum and detailed under Mitigation Measure BIO-1a), and generally 50 feet for special-status plants not listed under ESA or CESA. Furthermore, Mitigation Measure BIO-4 prohibits use of accelerants within wetlands and wetland buffers around Coastal Act defined wetlands. Implementation of these SPRs and mitigation measures would avoid impacts from the project that would disrupt or degrade ESHA.

Limit the Need for Soil Stabilization. The use of riprap and/or chemical soil stabilizers that could significantly disrupt or degrade ESHAs is prohibited.

Response: No riprap or chemical soil stabilizers are proposed for use as part of the project.

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

Response: Most of the project area is on private land with limited to no recreational access. However, treatment activities have the potential to occur year-round and could disrupt recreational activities such as hiking and picnicking within the project area through temporary recreational area and trail closures during active treatments. Treatment activities may require closures for safety. Recreational users would be notified of temporary closures in advance of treatment activities per SPR REC-1. Where feasible, notice of recreational area closure would be posted 2 weeks prior to commencement of treatment activities consistent with SPR REC-1, which would reduce the risk of disruption of recreational activities within the treatment area. During prescribed broadcast burn operations, environmental prescriptions for operations may not allow a 2-week notice of trail closure; however, the project would provide as much advanced notice as is feasible. All coastal public access and recreational amenities that are temporarily closed due to treatment activities would be restored to pre-treatment conditions following treatment activities.

REFERENCES

Ayars, J., Kramer, H. A., and Jones, G. M. 2023. "The 2020 to 2021 California megafires and their impacts on wildlife habitat." Proceedings of the National Academy of Sciences (PNAS). Available: https://www.pnas.org/doi/10.1073/pnas.2312909120.

Stephens, S. L., Bernal, A. A., Collins, B. M., Finney, M. A., Lautenberger, C., and Saah, D. 2022 (August). "Mass fire behavior created by extensive tree mortality and high tree density not predicted by operational fire behavior models in the southern Sierra Nevada." Forest Ecology and Management 518. Available: https://www.sciencedirect.com/science/article/pii/S0378112722002523?via%3Dihub.

Attachment C

Biological Resources

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

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Bristlecone fir *Abies bracteata*	—	—	1B.3	Old growth. Lower montane coniferous forest, broadleafed upland forest, chaparral, riparian woodland. Rocky sites in Monterey and San Luis Obispo counties. 590–5,100ft in elevation. Perennial.	Known to occur. Bristlecone fir is known to occur in the northeastern portion of the project area in the vicinity of Pine Top Mountain (CNDDB 2024a) and was observed in this area during SPR BIO-1 surveys.
Hoover's bent grass *Agrostis hooveri*	—	—	1B.2	Chaparral, cismontane woodland, closed-cone coniferous forest, valley and foothill grassland. Sandy sites. 200–2,510 ft in elevation. Blooms April–July. Perennial.	May occur. The project area contains chaparral, conifer forest, oak woodland, and grassland habitat with sandy substrate potentially suitable for this species.
Hickman's onion *Allium hickmanii*	—	—	1B.2	Closed-cone coniferous forest, chaparral, coastal scrub, coastal prairie, cismontane woodland. Sandy loam, damp ground and vernal swales; mostly in grassland though can be associated with chaparral or woodland. 20–660 ft in elevation. Blooms March–May. Geophyte.	Known to occur. Hickman's onion is known to occur in the northern part of the project area in the vicinity of Arroyo de la Cruz (CNDDB 2024a). Senesced plants likely to be Hickman's onion were observed within a prior mapped occurrence east of Adobe Creek during SPR BIO-1 surveys.
Arroyo de la Cruz manzanita *Arctostaphylos cruzensis*	—	—	1B.2	Broadleafed upland forest, coastal bluff scrub, closed-cone coniferous forest, chaparral, coastal scrub, and valley and foothill grassland. On sandy soils. 200–1,020 ft in elevation. Blooms December–March. Perennial.	Known to occur. Arroyo de la Cruz manzanita is known to occur in the vicinity of Cambria and the northern portion of the project area near Arroyo de la Cruz (CNDDB 2024a). This species was observed east of Point Piedras Blancas during SPR BIO-1 surveys.
Hearsts' manzanita *Arctostaphylos hookeri* ssp. *hearstiorum*	—	SE	1B.2	Chaparral, coastal prairie, coastal scrub, valley foothill grassland. On terraces, on sandy loam; also known from stabilized dunes and rarely from serpentine. 200–510 ft in elevation. Blooms February–April. Perennial.	Known to occur. Hearsts' manzanita is known to occur in the vicinity of Arroyo de la Cruz in the northern portion of the project area, as well as east of Point Piedras Blancas (CNDDB 2024a). This species was observed east of Point Piedras Blancas during SPR BIO-1 surveys.
Santa Lucia manzanita *Arctostaphylos luciana*	—	—	1B.2	On shale outcrops on slopes, in chaparral or sometimes cismontane woodland. Sometimes on serpentine. 350–2,610 ft in elevation. Blooms December–March. Perennial.	May occur. Santa Lucia manzanita is typically known from the Santa Lucia Range east of the project area; however, this species may occur on shale outcrops on slopes along the eastern border of the project area. A manzanita species that may be Santa Lucia manzanita was observed in the vicinity of Arroyo Hondo during SPR BIO-1 surveys, but identification could not be confirmed.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Morro manzanita *Arctostaphylos morroensis*	FT	SC	1B.1	Chaparral, cismontane woodland, coastal dunes, coastal scrub. On Baywood sands, usually with chaparral associates. 100–410 ft in elevation. Blooms December–March. Perennial.	Not expected to occur. Morro manzanita is only known from the immediate vicinity of Morro Bay, south of State Route 1; therefore, the project area is outside of the geographic range of this species.
Oso manzanita *Arctostaphylos osoensis*	—	—	1B.2	Chaparral, cismontane woodland. Usually occurs in openings within oak woodland on dacite porphyry buttes. 590–900 ft in elevation. Blooms February–March. Perennial.	Not expected to occur. Oso manzanita is only known from the immediate vicinity of Morro Bay and Los Osos; therefore, the project area is outside of the geographic range of this species.
Pecho manzanita *Arctostaphylos pechoensis*	—	—	1B.2	Closed-cone coniferous forest, chaparral, coastal scrub. Grows on siliceous shale with other chaparral associates. 200–2,810 ft in elevation. Blooms November–March. Perennial.	Not expected to occur. Pecho manzanita is only known from the Irish Hills near Los Osos and a portion of the Santa Lucia Range east of San Luis Obispo; therefore, the project area is outside of the geographical range of this species.
Santa Margarita manzanita *Arctostaphylos pilosula*	—	—	1B.2	Closed-cone coniferous forest, chaparral, broadleaved upland forest, cismontane woodland. Shale outcrops and slopes, and sometimes on decomposed granite or sandstone. 200–4,010 ft in elevation. Blooms December–May. Perennial.	May occur. Santa Margarita manzanita is typically known from the Irish Hills, the Santa Lucia Range, and the La Panza Range to the south and southeast of the project area; however, this species may occur on shale outcrops on slopes along the southeastern border of the project area.
Dacite manzanita *Arctostaphylos tomentosa* ssp. *daciticola*	—	—	1B.1	Chaparral, cismontane woodland. Only known from one site in SLO County on dacite porphyry buttes. 330-990 ft in elevation. Blooms March–May. Perennial.	Not expected to occur. Dacite manzanita is restricted to dacite porphyry buttes in the vicinity of Hollister Peak near Morro Bay; therefore, the project area is outside of the geographical range of this species.
Marsh sandwort *Arenaria paludicola*	FE	SE	1B.1	Growing up through dense mats of *Typha, Juncus, Scirpus*, etc. in freshwater marsh. Sandy soil. 10–560 ft in elevation. Blooms May–August. Perennial.	May occur. Freshwater marsh habitat in the project area may provide habitat for this species.
Indian Valley spineflower *Aristocapsa insignis*	—	—	1B.2	Cismontane woodland and chaparral on sandy substrates. 590–3,480 ft in elevation. Blooms May–September. Annual.	May occur. Sandy substrate in woodland habitat in the project area may provide habitat suitable for this species.
Miles' milk-vetch *Astragalus didymocarpus* var. *milesianus*	—	—	1B.2	Clay soils in coastal scrub. 170–1,270 ft in elevation. Blooms March–June. Annual.	Known to occur. Mile's milk-vetch is known to occur in the vicinity of Cayucos (CNDDB 2024a).

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Coulter's saltbush *Atriplex coulteri*	—	—	1B.2	Coastal bluff scrub, coastal dunes, coastal scrub, valley and foothill grassland. Usually on ocean bluffs, ridgetops, as well as alkaline low places. On alkaline or clay soils. 10–1,510 ft in elevation. Blooms March–October. Perennial.	Not expected to occur. Most of the documented occurrences of Coulter's saltbush are from the Santa Barbara region and south of that, with just a few occurrences near Los Osos. Therefore, the project area is outside of the geographical range of this species.
San Simeon Baccharis *Baccharis plummerae* ssp. *glabrata*	—	—	1B.2	Coastal scrub. In open shrub-grassland associations. 300–1,590 ft in elevation. Blooms June. Perennial.	Known to occur. San Simeon Baccharis is known to occur in the vicinity of San Simeon and Arroyo de la Cruz (CNDDB 2024a).
Dwarf goldenstar *Bloomeria humilis*	—	SR	1B.2	Coastal bluff scrub, chaparral, valley and foothill grassland. Known mainly from Arroyo de La Cruz area on coastal bluffs. 40–200 ft in elevation. Blooms June. Geophyte.	Known to occur. Dwarf goldenstar is known to occur in the vicinity of Arroyo de la Cruz in the northern portion of the project area (CNDDB 2024a).
Arroyo de la Cruz mariposa-lily *Calochortus clavatus* var. *recurvifolius*	—	—	1B.2	Coastal bluff scrub, maritime chaparral, coastal prairie, lower montane coniferous forest. Usually on ocean bluffs, grassy slopes, above riparian zones, and in grassland bordering chaparral. 40–410 ft in elevation. Blooms June–July. Geophyte.	Known to occur. Arroyo de la Cruz mariposa-lily is known to occur in the vicinity of Arroyo de la Cruz in the northern portion of the project area (CNDDB 2024a).
Late-flowered mariposa-lily *Calochortus fimbriatus*	—	—	1B.3	Ultramafic. On serpentine in dry, open coastal woodland or chaparral. 890–4,710 ft in elevation. Blooms June–August. Geophyte.	May occur. Late-flowered mariposa-lily is known to occur directly adjacent to the project area near the border of San Luis Obispo and Monterey County. (CNDDB 2024a). The project area contains woodland and chaparral habitat on serpentine substrate potentially suitable for this species.
San Luis mariposa-lily *Calochortus obispoensis*	—	—	1B.2	Ultramafic. Chaparral, coastal scrub, valley and foothill grassland. Typically in serpentine grassland. 170–2,400 ft in elevation. Blooms May–July. Geophyte.	May occur. The project area contains chaparral, coastal scrub, and grassland habitat with serpentine substrate potentially suitable for this species.
La Panza mariposa-lily *Calochortus simulans*	—	—	1B.3	Valley and foothill grassland, cismontane woodland, chaparral, lower montane coniferous forest. Decomposed granite. 170–3,810 ft in elevation. Blooms April–June. Geophyte.	Not expected to occur. The closest known occurrences are from the eastern Santa Lucia Range, with most occurrences further south and inland; therefore, the project area is outside of the geographical range of this species.
Small-flowered calycadenia *Calycadenia micrantha*	—	—	1B.2	Chaparral, valley and foothill grassland, meadows and seeps. Rocky talus or scree; sparsely vegetated areas. occasionally on roadsides; sometimes on serpentine. 1,430–4,610 ft in elevation. Blooms June–September. Annual.	May occur. The project area contains sparsely vegetated areas within chaparral and grassland habitat and serpentine substrates potentially suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Dwarf calycadenia *Calycadenia villosa*	—	—	1B.1	Chaparral, cismontane woodland, valley and foothill grassland, meadows and seeps. Open, dry meadows, hillsides, gravelly outwashes. 790–4,430 ft in elevation. Blooms May–October. Annual.	May occur. The project area contains chaparral, woodland, grassland, and hillside habitat potentially suitable for this species.
Santa Cruz Mountains pussypaws *Calyptridium parryi* var. *hesseae*	—	—	1B.1	Chaparral, cismontane woodland. Sandy or gravelly openings. 990–5,040 ft in elevation. Blooms May–August. Annual.	May occur. The project area may contain sandy or gravelly openings in chaparral and woodland habitat potentially suitable for this species.
Hardham's evening-primrose *Camissoniopsis hardhamiae*	—	—	1B.2	Limestone. Chaparral, cismontane woodland. On sandy, decomposed carbonate. 460–3,100 ft in elevation. Blooms March–May. Annual.	May occur. The project area may contain sandy, decomposed carbonate substrate in chaparral and woodland habitats potentially suitable for this species.
San Luis Obispo sedge *Carex obispoensis*	—	—	1B.2	Closed-cone coniferous forest, chaparral, coastal prairie, coastal scrub, valley and foothill grassland. Usually in transition zone on sand, or in seeps, on clay, serpentine, or gabbro. 20–2,770 ft in elevation. Blooms April–June. Perennial.	Known to occur. San Luis Obispo sedge is known to occur in the vicinity of Arroyo de la Cruz in the northern portion of the project area, as well as the general vicinity of Red Mountain along the eastern border of the project area (CNDDB 2024a).
Heckard's owl's-clover *Castilleja ambigua* var. *heckardii*	—	—	1B.1	Vernally mesic, sandy openings in coastal prairie. 170–590 ft in elevation. Blooms May–July. Annual.	Known to occur. Heckard's owl's-clover is known to occur in the vicinity of Arroyo de la Cruz in the northern portion of the project area (CNDDB 2024a).
San Luis Obispo owl's-clover *Castilleja densiflora* var. *obispoensis*	—	—	1B.2	Valley and foothill grassland, meadows and seeps. Sometimes on serpentine. 40–1,590 ft in elevation. Blooms March–May. Annual.	Known to occur. There are many occurrences of San Luis Obispo owl's-clover along the coastline in the project area (CNDDB 2024a).
California jewelflower *Caulanthus californicus*	FE	SE	1B.1	Chenopod scrub, valley and foothill grassland, pinyon and juniper woodland. Sandy soils. 210–6,100 ft in elevation. Blooms February–May. Annual.	Not expected to occur. California jewelflower is only known to occur in San Luis Obispo County within the Carrizo Plain (CNDDB 2024; USFWS 2013: USFWS 2020); therefore, the project area is out of the geographical range of this species (Calflora 2025).
Lemmon's jewelflower *Caulanthus lemmonii*	—	—	1B.2	Pinyon and juniper woodland, valley and foothill grassland. 250–5,200 ft in elevation. Blooms February–May. Annual.	Not expected to occur. Lemmon's jewelflower is only known from the inner coast ranges typically a minimum of 13 miles from the coast; therefore, the project area is out of the geographical range of this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Hearsts' ceanothus *Ceanothus hearstiorum*	—	SR	1B.2	Maritime chaparral, coastal prairie, coastal scrub. Sometimes with *Arctostaphylos cruzensis*. 230–1,000 ft in elevation. Blooms March–April. Perennial.	Known to occur. Hearst's ceanothus is known to occur in the vicinity of Arroyo de la Cruz in the northern portion of the project area as well as east of Point Piedras Blancas (CNDDB 2024a). It was observed in the vicinity of the known occurrence east of Point Piedras Blancas during SPR BIO-1 surveys.
Maritime ceanothus *Ceanothus maritimus*	—	SR	1B.2	Ultramafic. Coastal bluff scrub, chaparral, valley and foothill grassland. Often at edges of coastal sage scrub and scattered in grassland, sometimes on serpentine. 40–490 ft in elevation. Blooms January–April. Perennial.	Known to occur. Maritime ceanothus is known to occur in the vicinity of Arroyo de la Cruz in the northern portion of the project area (CNDDB 2024a).
San Luis Obispo ceanothus *Ceanothus thyrsiflorus* var. *obispoensis*	—	—	1B.1	Chaparral, cismontane woodland. Dacite. 460–740 ft in elevation. Blooms June. Perennial.	Not expected to occur. San Luis Obispo ceanothus is only known from the hills directly east of the Morro Estuary Natural Preserve; therefore, the project area is outside of the geographical range of this species (CNDDB 2024a).
Congdon's tarplant *Centromadia parryi* ssp. *congdonii*	—	—	1B.1	Valley and foothill grassland. Alkaline soils, sometimes described as heavy white clay. 0–760 ft in elevation. Blooms May–October. Annual.	May occur. The project area contains grasslands that may provide habitat suitable for this species.
Coastal goosefoot *Chenopodium littoreum*	—	—	1B.2	Coastal dunes. 40–100 ft in elevation. Blooms April–August. Annual.	May occur. The project area contains coastal dune habitat potentially suitable for this species.
Dwarf soaproot *Chlorogalum pomeridianum* var. *minus*	—	—	1B.2	Ultramafic. On serpentine in chaparral. 1,000–3,280 ft in elevation. Blooms May–August. Geophyte.	May occur. The project area contains chaparral habitat with serpentine substrate suitable for this species.
Salt marsh bird's-beak *Chloropyron maritimum* ssp. *maritimum*	FE	SE	1B.2	Limited to the higher zones of coastal salt marsh habitat. 0–40 ft in elevation. Blooms May–October. Annual.	May occur. Most occurrences are from Santa Barbara and south to San Diego, with just a few occurrences directly adjacent to Morro Bay. However, coastal salt marsh habitat in the southern portion of project area may provide habitat suitable for this species.
Point Reyes salty bird's-beak *Chloropyron maritimum* ssp. *palustre*	—	—	1B.2	In coastal salt marsh with *Salicornia*, *Distichlis*, *Jaumea*, *Spartina*, etc. 0–380 ft in elevation. Blooms June–October. Annual.	May occur. The project area contains coastal salt marsh habitat suitable for this species.
Irish Hills spineflower *Chorizanthe aphanantha*	—	—	1B.1	Chaparral, coastal scrub. Serpentinite, rocky to gravelly. 330–1,220 ft in elevation. Blooms April–August. Annual.	Not expected to occur. Irish Hills spineflower is only known to occur in a portion of the Irish Hills near the town of San Luis Obispo. The project area is outside of the known geographical range of this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Brewer's spineflower *Chorizanthe breweri*	—	—	1B.3	Ultramafic. Chaparral, cismontane woodland, coastal scrub, closed-cone coniferous forest. Rocky or gravelly serpentine sites; usually in barren areas. 150–2,510 ft in elevation. Blooms April–August. Annual.	Known to occur. Brewer's spineflower is known to occur along San Carpoforo Canyon in the northern portion of the project area (CNDDB 2024a)
Monterey spineflower *Chorizanthe pungens* var. *pungens*	FT	—	1B.2	Sandy soils in coastal dunes and coastal scrub or more inland within chaparral, cismontane woodland, and grassland. 0–560 ft in elevation. Blooms April–June. Annual.	May occur. There is a historical observation of Monterey spineflower in the vicinity of San Simeon Point from 1842 (CNDDB 2024a). This observation is the southernmost observation, with most observations from the coast along Monterey Bay.
Straight-awned spineflower *Chorizanthe rectispina*	—	—	1B.2	Chamise chaparral, cismontane woodland, coastal scrub. Sometimes on granite. 170–3,410 ft in elevation. Blooms April–July. Annual.	May occur. The project area contains chaparral, oak woodland, and coastal scrub habitat suitable for this species.
Chorro creek bog thistle *Cirsium fontinale* var. *obispoense*	FE	SE	1B.2	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland. Serpentine seeps. 20–1,270 ft in elevation. Blooms February–July. Perennial.	Known to occur. Chorro creek bog thistle is known to occur near San Simeon Creek along the eastern border of the project area (CNDDB 2024a).
Compact cobwebby thistle *Cirsium occidentale* var. *compactum*	—	—	1B.2	On coastal dunes and on clay in chaparral and coastal prairie. 20–490 ft in elevation. Blooms April–June. Perennial.	Known to occur. Compact cobwebby thistle is known to occur in various locations along the coastline throughout the project area (CNDDB 2024a).
Cuesta Ridge thistle *Cirsium occidentale* var. *lucianum*	—	—	1B.2	Chaparral. Openings on serpentinite; often on steep rocky slopes and along disturbed roadsides. 1,590–2,510 ft in elevation. Blooms April–June. Perennial.	Not expected to occur. Cuesta Ridge thistle is only known from the southern tip of the inner Santa Lucia range, southeast of the project area; therefore, the project area is outside of the known geographical range of this species.
Popcorn lichen *Cladonia firma*	—	—	2B.1	On soil and detritus on stabilized sand dunes and in coastal scrub, in pure stands or intermixed with other lichens and mosses forming biotic soil crusts, covering areas up to several meters. 100–260 ft in elevation. Annual.	Not expected to occur. Popcorn lichen is only known from the vicinity of southern Morro Bay in Los Osos; therefore, the project area is outside of the known geographical range of this species.
Jolon clarkia *Clarkia jolonensis*	—	—	1B.2	Cismontane woodland, chaparral, coastal scrub, riparian woodland. 40–4,200 ft in elevation. Blooms April–June. Annual.	May occur. Jolon clarkia is known from throughout the Santa Lucia Range and the coast in Monterey County, with the closest occurrence 12 miles northeast of the project area. However, oak woodland, chaparral, coastal scrub, and riparian woodland habitat in the northern portion of the project area may provide habitat suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Pismo clarkia *Clarkia speciosa* ssp. *immaculata*	FE	SR	1B.1	Chaparral, cismontane woodland, valley and foothill grassland. Typically in openings on ancient sand dunes not far from the coast. 80–610 ft in elevation. Blooms May–July. Annual.	Not expected to occur. Pismo clarkia is only known from the hills northeast of Pismo Beach; therefore, the project area is likely outside of the geographical range of this species.
San Antonio collinsia *Collinsia antonina*	—	—	1B.2	Chaparral, cismontane woodland. Shale substrates. 920–1,200 ft in elevation. Blooms March–May. Annual.	May occur. The project area contains chaparral and oak woodland habitat with shale substrate potentially suitable for this species.
Mendocino dodder *Cuscuta pacifica* var. *papillata*	—	—	1B.2	Interdune depressions in coastal dunes, on coastal seabluffs, and coastal prairie. A parasitic vine observed on Gnaphalium, Silene and *Lupinus*. 0–170 ft in elevation. Blooms July–October. Annual.	Known to occur. There are Mendocino dodder collections from the vicinity of Arroyo de la Cruz and Hearst San Simeon State Park in the project area (CCH 2025).
Hutchinson's larkspur *Delphinium hutchinsoniae*	—	—	1B.2	Broadleafed upland forest, chaparral, coastal prairie, coastal scrub. On semi-shaded, slightly moist slopes, usually west facing. 50–1,760 ft in elevation. Blooms March–June. Perennial.	Not expected to occur. Hutchinson's larkspur is only known from the middle and northern coast of Monterey county; therefore, this project area is outside of the geographical range of this species.
Dune larkspur *Delphinium parryi* ssp. *blochmaniae*	—	—	1B.2	Maritime chaparral and coastal dunes. On rocky areas and dunes. 50–1,230 ft in elevation. Blooms April–June. Perennial.	Known to occur. Dune larkspur is known to occur along Highway 1 near San Simeon (CNDDB 2024a).
Eastwood's larkspur *Delphinium parryi* ssp. *eastwoodiae*	—	—	1B.2	Ultramafic. Chaparral, valley and foothill grassland. Openings in serpentine. 200–2,100 ft in elevation. Blooms March-May. Perennial.	May occur. There are historic records of Eastwood's larkspur along Steiner Creek near San Luis Obispo, though the exact location is unknown (CNDDB 2024a). It is possible that this species occurs along the portion of Steiner Creek within the project area.
Umbrella larkspur *Delphinium umbraculorum*	—	—	1B.3	Cismontane woodland and chaparral. Mesic sites. 1,310–5,250 ft in elevation. Blooms April–June. Perennial.	May occur. The project area contains stream and possibly other mesic habitat in woodland and chaparral that would be suitable for this species.
Beach spectaclepod *Dithyrea maritima*	—	ST	1B.1	Sea shores, sand dunes, coastal scrub, and sandy places near the shore. 10–220 ft in elevation. Blooms March–May. Geophyte.	May occur. The project area contains coastal scrub habitat potentially suitable for this species.
Betty's dudleya *Dudleya abramsii* ssp. *bettinae*	—	—	1B.2	On rocky, barren exposures of serpentine within scrub vegetation. 65–820 ft in elevation. Blooms May–July. Perennial.	Known to occur. Betty's dudleya is known to occur south of Cayucos (CNDDB 2024a).
Mouse-gray dudleya *Dudleya abramsii* ssp. *murina*	—	—	1B.3	Ultramafic. Chaparral, cismontane woodland, valley and foothill grassland. Serpentine outcrops. 80–1,760 ft in elevation. Blooms May–June. Perennial.	Known to occur. Mouse-gray dudleya is known to occur in Cayucos (CNDDB 2024a).
Blochman's dudleya *Dudleya blochmaniae* ssp. *blochmaniae*	—	—	1B.1	Coastal scrub, coastal bluff scrub, chaparral, valley and foothill grassland. Open, rocky slopes; often in shallow clays over serpentine or in rocky areas with little soil. 20–1,480 ft in elevation. Blooms April–June. Perennial.	Known to occur. Blochman's dudleya is known to occur in the southern section of the project area (CNDDB 2024a).

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Yellow-flowered eriastrum *Eriastrum luteum*	—	—	1B.2	Broadleafed upland forest, cismontane woodland, chaparral. On bare sandy decomposed granite slopes. 790–1,910 ft in elevation. Blooms May–June. Annual.	May occur. The project area may contain sandy decomposed granitic slopes in chaparral, woodland, and forest habitat potentially suitable for this species.
Blochman's leafy daisy *Erigeron blochmaniae*	—	—	1B.2	Sand dunes and hills in coastal dunes and coastal scrub. 10–150 ft in elevation. Blooms June–August. Geophyte.	May occur. The project area contains dune habitat potentially suitable for this species.
Condit's fleabane daisy *Erigeron conditii*	—	—	1B.1	Riparian forest. Canyon walls; sometimes in crevices of sandstone outcrops. 200–710 ft in elevation. Blooms May–September. Perennial.	Known to occur. Condit's fleabane daisy is known to occur along San Carpoforo Creek within the project area (CNDDB 2024a).
Indian Knob mountainbalm *Eriodictyon altissimum*	FE	SE	1B.1	Maritime chaparral, cismontane woodland, coastal scrub. Ridges in open, disturbed areas on Pismo sandstone. 300–890 ft in elevation. Blooms March–June. Perennial.	Not expected to occur. Indian Knob mountainbalm is only known from five extant occurrences across 13 square miles in southwestern San Luis Obispo County (USFWS 2025a); therefore, this project area is outside of the geographical range of this species.
Hoover's button-celery *Eryngium aristulatum* var. *hooveri*	—	—	1B.1	Alkaline depressions, vernal pools, roadside ditches and other wet places near the coast. 10–170 ft in elevation. Blooms in July. Annual/Perennial.	May occur. There is an 1876 collection of Hoover's button celery from the vicinity of Cambria (CNDDB 2024a). The project area contains alkaline depressions, vernal pool, roadside ditches, and other mesic habitat potentially suitable for this species.
Menzies' wallflower *Erysimum menziesii*	FE	SE	1B.1	Coastal dunes. Localized on dunes and coastal strand. 5–80 ft in elevation. Blooms March–September. Perennial.	Not expected to occur. The project area is outside of the documented range of the species that does not extend south of the Monterey Peninsula (CalFlora 2025) This species is only known from 16 locations in Mendocino, Humboldt, and Monterey counties (CNPS 2025).
Santa Lucia monkeyflower *Erythranthe hardhamiae*	—	—	1B.1	Ultramafic. Chaparral. Sandy soils in openings, sand-filled crevices of sandstone outcrops, sometimes serpentinite. 990–2,320 ft in elevation. Blooms March–May. Annual.	May occur. The project area may contain sandy soils and crevices in chaparral habitat suitable for this species.
Irish Hills monkeyflower *Erythranthe serpentinicola*	—	—	1B.1	Openings in chaparral, edges of meadows and seeps; on rocky, mesic, serpentine substrate. 200–1,180 ft in elevation. Blooms February–May. Annual.	May occur. The project area may contain rocky, mesic, or serpentine substrate in chaparral or meadow habitat suitable for this species.
San Joaquin spearscale *Extriplex joaquinana*	—	—	1B.2	In seasonal alkali wetlands or alkali sink scrub with *Distichlis spicata, Frankenia*, etc. 10–2,740 ft in elevation. Blooms April–October. Annual.	May occur. The project area contains alkali wetland habitat potentially suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Ojai fritillary *Fritillaria ojaiensis*	—	—	1B.2	Ultramafic. Broadleaved upland forest (mesic), chaparral, lower montane coniferous forest, cismontane woodland. Usually loamy soil. Sometimes on serpentine; sometimes along roadsides. 740–3,280 ft in elevation. Blooms February–May. Geophyte.	May occur. The project area may contain mesic, serpentine, or roadside areas in chaparral, forest, or woodland habitat potentially suitable for this species.
San Benito fritillary *Fritillaria viridea*	—	—	1B.2	Ultramafic. Chaparral, cismontane woodland. Serpentine slopes. Sometimes on rocky streambanks. 1,200–4,460 ft in elevation. Blooms March–May. Geophyte.	May occur. The project area contains serpentine slopes and rocky streambanks in chaparral and woodland habitat potentially suitable for this species.
Cone Peak bedstraw *Galium californicum* ssp. *luciense*	—	—	1B.3	In forest duff or gravelly talus of pine and oak forest, in partial shade. Sometimes in chaparral. 1,310–5,010 ft in elevation. Blooms March–September. Perennial.	May occur. There is a 1940 collection of Cone Peak bedstraw from the vicinity of Cambria (CNDDB 2024a). The project area may contain duff and gravelly talus in forest or chaparral habitat potentially suitable for this species.
Santa Lucia bedstraw *Galium clementis*	—	—	1B.3	Ultramafic. Lower montane coniferous forest, upper montane coniferous forest. Forming soft mats in shady rocky patches; on granite or serpentine; mostly on exposed peaks. 3,710–5,840 ft in elevation. Blooms May–July. Perennial.	Not expected to occur. The project area is outside of the elevation range of this species.
Hardham's bedstraw *Galium hardhamiae*	—	—	1B.3	Ultramafic. Closed-cone coniferous forest, chaparral. On serpentine with *Cupressus sargentii*. 990–3,050 ft in elevation. Blooms April–October. Perennial.	May occur. The project area contains chaparral and closed-cone coniferous forest habitat with serpentine substrate potentially suitable for this species.
Monterey gilia *Gilia tenuiflora* ssp. *arenaria*	FE	ST	1B.2	Coastal dunes, coastal scrub, chaparral (maritime), cismontane woodland. Sandy openings in bare, wind-sheltered areas. Often near dune summit or in the hind dunes; two records from Pleistocene inland dunes. 15–805 ft in elevation. Blooms April–June. Annual.	Not expected to occur. The project area is outside of the documented range of the species that does not extend south of the Big Creek in Pfeiffer Big Sur State park (CalFlora 2025). This species is only known from the southern Monterey Bay area and inland areas formerly occupied by Ford Ord (USFWS 2020).
Santa Lucia purple amole *Hooveria purpurea* var. *purpurea*	FT	—	1B.1	Often in open grasslands, sometimes within scattered oak woodlands and open areas in shrublands. Gravelly clay soils. 790-1,280 ft in elevation. Blooms May-June. Perennial.	May occur. The project area may contain gravelly clay soils in openings in grassland and chaparral habitat potentially suitable for this species.
Mesa horkelia *Horkelia cuneata* var. *puberula*	—	—	1B.1	Chaparral, cismontane woodland, coastal scrub. Sandy or gravelly sites. 50–5,400 ft in elevation. Blooms February–July. Perennial.	May occur. There is a 1959 collection of Mesa horkelia from the vicinity of Cambria (CNDDB 2024a). The project area contains sandy and gravelly sites in chaparral, woodland, and coastal scrub habitat potentially suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Kellogg's horkelia *Horkelia cuneata* var. *sericea*	—	—	1B.1	Openings in old coastal dunes, coastal sandhills, closed-cone coniferous forest, coastal scrub, and chaparral. 20–710 ft in elevation. Blooms April–September. Perennial.	Known to occur. Kellogg's horkelia is known to occur at San Simeon State Park and in the vicinity of Cambria within the project area (CNDDB 2024a).
Santa Lucia dwarf rush *Juncus luciensis*	—	—	1B.2	Vernal pools, ephemeral drainages, wet meadow habitats and stream sides in lower montane coniferous forest and chaparral,. 990–6,700 ft in elevation. Blooms April–July. Annual.	May occur. The project area may contain ephemeral drainages and streams in forest and chaparral habitat potentially suitable for this species.
Baker's goldfields *Lasthenia californica* ssp. *bakeri*	—	—	1B.2	Closed-cone coniferous forest, coastal scrub, meadows and seeps, marshes and swamps. Openings. 200–1,710 ft in elevation. Blooms April–October. Perennial.	Known to occur. Baker's goldfields is known to occur in the vicinity of Arroyo del Oso within the project area (CNDDB 2024a).
Perennial goldfields *Lasthenia californica* ssp. *macrantha*	—	—	1B.2	Coastal bluff scrub, coastal dunes, coastal scrub. 20–610 ft in elevation. Blooms January–November. Perennial.	Known to occur. Perennial goldfields is known to occur north of Arroyo de los Chinos and in the vicinity of Cambria within the project area (CNDDB 2024a).
Coulter's goldfields *Lasthenia glabrata* ssp. *coulteri*	—	—	1B.1	Coastal salt marshes, playas, and vernal pools. Typically found on alkaline soils in playas, sinks, and grasslands. 10–4,510 ft in elevation. Blooms February–June. Annual.	May occur. The project area contains vernal pool habitat potentially suitable for this species.
Blushing layia *Layia erubescens*	—	—	1B.2	Coastal dunes and coastal scrub. Prefers loose, fine sand of stabilized dunes and sandhills. 40–810 ft in elevation. Blooms March–June. Annual.	May occur. The project area contains coastal dunes and coastal scrub habitat potentially suitable for this species.
Pale-yellow layia *Layia heterotricha*	—	—	1B.1	Open areas in cismontane woodland, coastal scrub, pinyon and juniper woodland, valley and foothill grassland. Alkaline or clay soil. 300–5,910 ft in elevation. Blooms March–June. Annual.	May occur. Pale-yellow layia is generally found further inland in San Luis Opisbo county, with the closest occurrence 13 miles northeast of the project area. However, alkaline and clay soils in woodland, coastal scrub, and grassland habitat in project area may provide habitat suitable for this species.
Jones' layia *Layia jonesii*	—	—	1B.2	Ultramafic. Chaparral, valley and foothill grassland. Clay soils and serpentine outcrops. 20–1,310 ft in elevation. Blooms March–May. Annual.	Known to occur. Jones' layia is known to occur from several locations in the southern part of the project area (CNDDB 2024a).
Tidestrom's lupine *Lupinus tidestromii*	FE	SE	1B.1	Coastal dunes. Partially stabilized dunes, immediately near the ocean. 15–80 ft in elevation. Blooms April–June. Geophyte.	Not expected to occur. The project area is outside of the documented range of the species that does not extend south of the Carmel Valley (CalFlora 2025)
Abbott's bushmallow *Malacothamnus abbottii*	—	—	1B.1	Riparian scrub. Among willows near rivers and along roadsides. 450–1,540 ft in elevation. Blooms May–October. Perennial.	May occur. The project area contains riparian scrub habitat potentially suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Davidson's bushmallow *Malacothamnus davidsonii*	—	—	1B.2	Coastal scrub, riparian woodland, chaparral, and cismontane woodland. Sandy washes. 490–5,010 ft in elevation. Blooms June–January. Perennial.	May occur. The project area may contain sandy wash areas in coastal scrub, riparian woodland, chaparral, and woodland habitat potentially suitable for this species.
Carmel Valley bushmallow *Malacothamnus involucratus*	—	—	1B.2	Cismontane woodland, chaparral, coastal scrub. Talus hilltops and slopes, sometimes on serpentine. Fire dependent. 20–1,710 ft in elevation. Blooms February–July. Perennial.	Known to occur. Carmel Valley bushmallow is known to occur along Santa Rosa Creek, east of Cambria (CCH 2025).
Santa Lucia bushmallow *Malacothamnus palmeri*	—	—	1B.2	Chaparral. Dry rocky slopes, mostly near summits, but occasionally extending down canyons to the sea. 10–2,200 ft in elevation. Blooms May–August. Perennial.	Known to occur. Santa Lucia bushmallow is known to occur along San Simeon Creek and in the vicinity of Cambria in the project area (CNDDB 2024a).
Oregon meconella *Meconella oregana*	—	—	1B.1	Coastal prairie, coastal scrub. Open, moist places. 200–2,100 ft in elevation. Blooms March–April. Annual.	May occur. The project area may contain open, mesic areas in coastal prairie and coastal scrub habitat potentially suitable for this species.
Marsh microseris *Microseris paludosa*	—	—	1B.2	Closed-cone coniferous forest, cismontane woodland, coastal scrub, valley and foothill grassland. 20–990 ft in elevation. Blooms April–June. Perennial.	Known to occur. Marsh microseris is known to occur from the vicinity of Arroyo de la Cruz in the project area (CNDDB 2024a).
Palmer's monardella *Monardella palmeri*	—	—	1B.2	Ultramafic. Cismontane woodland, chaparral. On serpentine, often found associated with Sargent cypress forests. 660–2,630 ft in elevation. Blooms June–August. Geophyte.	Known to occur. Palmer's monardella is known to occur from several locations in the northern part of the project area (CNDDB 2024a).
Southern curly-leaved monardella *Monardella sinuata* ssp. *sinuata*	—	—	1B.2	Coastal dunes, coastal scrub, chaparral, cismontane woodlands. Sandy soils. 0–990 ft in elevation. Blooms April–September. Annual.	May occur. There is an undated collection from San Simeon point; however this population is believed to be extirpated (CNDDB 2024a). The project area contains sandy soils in coastal dune, coastal scrub, chaparral, and woodland habitat potentially suitable for this species.
Woodland woollythreads *Monolopia gracilens*	—	—	1B.2	Ultramafic. Chaparral, valley and foothill grassland, cismontane woodland, broadleafed upland forest, north coast coniferous forest. Grassy sites, in openings; sandy to rocky soils. Sometimes seen on serpentine after burns. 330–3,940 ft in elevation. Blooms March–July. Annual.	Known to occur. Woodland woollythreads is known to occur in the vicinity of Santa Rosa Creek Road, along San Simeon Creek, and north of Arroyo de la Cruz in the project area (CNDDB 2024a).
Aparejo grass *Muhlenbergia utilis*	—	—	2B.2	Ultramafic. Meadows and seeps, marshes and swamps, chaparral, coastal scrub, cismontane woodland. Sometimes alkaline, sometimes serpentinite. 80–7,630 ft in elevation. Blooms October–March. Geophyte.	May occur. The project area may contain meadow, seep, and marsh areas in chaparral, coastal scrub, and woodland habitat potentially suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Spreading navarretia *Navarretia fossalis*	FT	—	1B.1	Alkali playa, wetland. Vernal pools, chenopod scrub, marshes and swamps, playas. San Diego hardpan and San Diego claypan vernal pools; in swales and vernal pools, often surrounded by other habitat types. 50–2,790 ft in elevation. Blooms April–June. Annual.	Not expected to occur. The only known occurrence of the species in San Luis Obispo County is possibly extirpated, and the range of the species is now limited to Los Angeles County south to Baja (USFWS 2023a); therefore, the project area is out of the geographical range of this species.
Shining navarretia *Navarretia nigelliformis* ssp. *radians*	—	—	1B.2	Wetland habitat in valley and foothill grassland and cismontane woodland; occasionally in vernal pools. 200–3,200 ft in elevation. Blooms April–July. Annual.	May occur. The project area contains vernal pools and wetlands in grassland and woodland habitat potentially suitable for this species.
Prostrate vernal pool navarretia *Navarretia prostrata*	—	—	1B.2	Mesic, akaline soils in grassland and coastal scrub, or in vernal pools. 10–4,050 ft in elevation. Blooms April–July. Annual.	May occur. The project area contains vernal pools and mesic, alkaline soils in grassland and coastal scrub habitat potentially suitable for this species.
Coast woolly-heads *Nemacaulis denudata* var. *denudata*	—	—	1B.2	Coastal dunes. 0–330 ft in elevation. Blooms April–September. Annual.	May occur. The project area contains coastal dune habitat potentially suitable for this species.
Arroyo de la Cruz lousewort *Pedicularis rigginsiae*	—	—	1B.1	Maritime chaparral. Highly weathered ultramafic, clay. 330–510 ft in elevation. Blooms April–June. Perennial.	Known to occur. Arroyo de la Cruz lousewort is known to occur in the vicinity of Arroyo de la Cruz in the project area (CNDDB 2024a).
San Benito pentachaeta *Pentachaeta exilis* ssp. *aeolica*	—	—	1B.2	Valley and foothill grassland and grassy openings in cismontane woodland. 1,200–2,810 ft in elevation. Blooms March–May. Annual.	May occur. The project area contains grassland and grassy openings in woodland habitat potentially suitable for this species.
Monterey pine *Pinus radiata*	—	—	1B.1	Closed-cone coniferous forest, cismontane woodland. Three primary stands are native to California. Dry bluffs and slopes. 200–410 ft in elevation. Perennial.	Known to occur. Monterey pine is known to occur throughout the project area; the main native stand in this area occurs in the vicinity of Cambria (CNDDB 2024a).
Hooked popcornflower *Plagiobothrys uncinatus*	—	—	1B.2	Chaparral, cismontane woodland, valley and foothill grassland. Sandstone outcrops and canyon sides; often in burned or disturbed areas. 990–2,500 ft in elevation. Blooms April–May. Annual.	May occur. The project area may contain sandstone outcrops in chaparral, woodland, and grassland habitat potentially suitable for this species.
Diablo Canyon blue grass *Poa diaboli*	—	—	1B.2	Chaparral (mesic sites), cismontane woodland, coastal scrub, closed-cone coniferous forest. On shale and sometimes in burned areas. 400–1,310 ft in elevation. Blooms March–April. Geophyte.	May occur. Shale substrates in mesic chaparral, woodland, coastal scrub, and closed-cone coniferous forest in the project area may provide habitat suitable for this species.
Santa Lucia mint *Pogogyne clareana*	—	SE	1B.2	Chaparral, cismontane woodland, riparian woodland. In intermittent streams; in moist sandy soil. 1,070–1,660 ft in elevation. Blooms April–July. Annual.	May occur. Sandy soils along intermittent streams in chaparral, woodland, and riparian woodland habitat in the project area may provide suitable habitat for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Pine rose *Rosa pinetorum*	—		1B.2	Closed-cone coniferous forest, cismontane woodland. 20–3,580 ft in elevation. Blooms May–July. Perennial.	May occur. The project area contains closed-cone coniferous forest and woodland habitat potentially suitable for this species.
Adobe sanicle *Sanicula maritima*	—	SR	1B.1	Meadows and seeps, valley and foothill grassland, chaparral, coastal prairie. Moist clay or ultramafic soils. 100–790 ft in elevation. Blooms February–May. Perennial.	Known to occur. Adobe sanicle is known to occur in the vicinity of Arroyo de la Cruz in the project area (CNDDB 2024a).
Chaparral ragwort *Senecio aphanactis*	—	—	2B.2	Chaparral, cismontane woodland, coastal scrub. Drying alkaline flats. 70–2,810 ft in elevation. Blooms January–April. Annual.	Known to occur. Chaparral ragwort is known to occur along Steiner Creek in the project area (CNDDB 2024a).
Cuesta Pass checkerbloom *Sidalcea hickmanii* ssp. *anomala*	—	SR	1B.2	Ultramafic. Closed-cone coniferous forest and chaparral. Rocky serpentine soil; associated with Sargent cypress forest. 1,970–2,630 ft in elevation. Blooms May–June. Perennial.	May occur. The project area contains closed-cone coniferous forest and chaparral habitat on serpentine substrate potentially suitable for this species.
Hickman's checkerbloom *Sidalcea hickmanii* ssp. *hickmanii*	—	—	1B.3	Grassy openings in chaparral, and on dry ridges. 1,100–3,940 ft in elevation. Blooms May–July. Perennial.	May occur. Dry ridges and grassy openings in chaparral habitat in the project area may provide habitat suitable for this species.
Most beautiful jewelflower *Streptanthus albidus* ssp. *peramoenus*	—	—	1B.2	Ultramafic. Chaparral, valley and foothill grassland, cismontane woodland. Serpentine outcrops, on ridges and slopes. 310–3,280 ft in elevation. Blooms April–September. Annual.	Known to occur. Most beautiful jewelflower is known to occur in the vicinity of Arroyo de la Cruz and east of Cambria in the project area (CNDDB 2024a).
Mason's neststraw *Stylocline masonii*	—	—	1B.1	Sandy washes, chenopod scrub, and pinyon and juniper woodland. 330–3,940 ft in elevation. Blooms March–May. Annual.	Not expected to occur. Chenopod scrub and pinyon and juniper woodland habitats are not present in the project area.
California seablite *Suaeda californica*	FE	—	1B.1	Margins of coastal salt marshes. 0–20 ft in elevation. Blooms July–October. Perennial.	Known to occur. California seablite is known to occur in the vicinity of Cayucos in the project area (CNDDB 2024a).
Splitting yarn lichen *Sulcaria isidiifera*	—	—	1B.1	On branches of oaks and shrubs in old growth coastal scrub. 70–180 ft in elevation. Perennial.	May occur. The project area may contain old growth coastal scrub habitat potentially suitable for this species.
Twisted horsehair lichen *Sulcaria spiralifera*	—	—	1B.2	North Coast coniferous forest (immediate coast) and coastal dunes. Usually on conifers. 0–300 ft in elevation. Perennial.	Known to occur. Twisted horsehair lichen is known to within Hearst San Simeon State Park in the project area (CNDDB 2024a).
Saline clover *Trifolium hydrophilum*	—	—	1B.2	Marshes and swamps, valley and foothill grassland, vernal pools. Mesic, alkaline sites. 0–990 ft in elevation. Blooms April–June. Annual.	May occur. The project area contains vernal pool and wetland habitat potentially suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Monterey clover *Trifolium trichocalyx*	FE	SE	1B.1	Closed-cone coniferous forest. Openings, burned areas, and roadsides. Sandy soils. 195–690 ft in elevation. Blooms April–June. Annual.	Not expected to occur. The project area is outside of the documented range of the species that does not extend south of the Carmel Valley (CalFlora 2025). This species was historically only known from the Monterey peninsula but a second population was discovered in Mendocino County in 2011 (USFWS 2025b).
Cook's triteleia *Triteleia ixioides* ssp. *cookii*	—	—	1B.3	Ultramafic. Cismontane woodland, closed-cone coniferous forest. Stream sides, wet ravines; on serpentine and in serpentine seeps. Sometimes near cypresses. 400–2,410 ft in elevation. Blooms May–June. Geophyte.	Known to occur. Cook's triteleia is known to occur in the vicinity of Arroyo de la Cruz in the project area (CNDDB 2024a).
Caper-fruited tropidocarpum *Tropidocarpum capparideum*	—	—	1B.1	Valley and foothill grassland. Alkaline clay. 0–1,180 ft in elevation. Blooms March–April. Annual.	May occur. The project area contains grassland habitat with alkaline clay substrate potentially suitable for this species.

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

1 Legal Status Definitions

Federal:

FE Federally Listed as Endangered (legally protected by ESA)
FT Federally Listed as Threatened (legally protected by ESA)

State:

SE State Listed as Endangered (legally protected by CESA)
ST State Listed as Threatened (legally protected by CESA)
SR State Listed as Rare (legally protected by NPPA)

California Rare Plant Ranks (CRPR):

1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA).
2B Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA).

CRPR Threat Ranks:

0.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)
0.2 Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)
0.3 Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

2 Potential for Occurrence Definitions

Not expected to occur: Species is unlikely to be present because of poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.
May occur: Suitable habitat is available and there have been nearby recorded occurrences of the species.
Known to occur: The species has been observed within the project area.

Sources: Calflora 2025; CNDDB 2024a, CCH 2025; CNPS 2024; CNPS 2025; USFWS 2013; USFWS 2020; USFWS 2023a; USFWS 2025b.

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

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Amphibians and Reptiles				
Arroyo toad *Anaxyrus californicus*	FE	SSC	Semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, and desert wash. Rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly areas of streams in drier parts of range.	Not expected to occur. The project area is located outside of the range of the species, which is located to the north and east further inland (CNDDB 2024b).
California red-legged frog *Rana draytonii*	FT	SSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11–20 weeks of permanent water for larval development. Must have access to estivation habitat.	Known to occur. California red-legged frog is known to occur in streams throughout the vicinity of Cambria (CNDDB 2024a). Aquatic habitat, perennial streams, and stock ponds are present throughout the project area. Upland habitat (within 300 feet of aquatic habitat) and dispersal habitat are also present.
California tiger salamander - central California DPS *Ambystoma californiense* pop. 1	FT	ST	Lives in vacant or mammal-occupied burrows throughout most of the year; in grassland, savanna, or open woodland habitats. Need underground refuges, especially ground squirrel burrows, and vernal pools or other seasonal water sources for breeding.	Not expected to occur. The species has not been documented to occur west of the Nacimiento River north and east of the project area, or west of the Salinas River to the east of the project area (CNDDB 2024a). These rivers provide barriers to dispersal into the project area. Portions of San Luis Obispo county were surveyed in 1993 and no California tiger salamanders were detected in that effort west of Paso Robles (CDFW 2010). The range of the species, as described in Alvarez et al. 2013 and the recovery plan for the species (USFWS 2017), does not include the project area. In addition, the latest 5-year status review (USFWS 2023b) indicates that there has been no change in the distribution of the species since the recovery plan was written.
Coast horned lizard *Phrynosoma blainvillii*	—	SSC	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	May occur. Shrub habitat on sandy soils in the project area may provide habitat suitable for this species, which has been documented to occur just south of the project area within Morro Strand State Beach (CNDDB 2024a).
Coast Range newt *Taricha torosa*	—	SSC	Coastal drainages from Mendocino County to San Diego County. Lives in terrestrial upland habitats such as grassland, woodland, and forest and will migrate over 1 kilometer to breed in ponds, reservoirs and slow moving streams.	Known to occur. Ponds, reservoirs, and streams in the project area may provide breeding habitat and adjacent grassland, woodland, and forest habitat may provide upland habitat for this species. The project area is within the portion of the species' range considered to be of special concern, and the species has been documented to occur within the project area (Thomson et al. 2016).

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Foothill yellow-legged frog (South Coast DPS) *Rana boylii* pop. 6	FE	SE	Partly-shaded, shallow streams and riffles with a rocky substrate in a variety of habitats. Need at least some cobble-sized substrate for egg-laying. Need at least 15 weeks to attain metamorphosis.	Known to occur. The species has been documented along San Carpoforo Creek, Arroyo del la Cruz, and Santa Rosa Creek within the project area (CNDDB 2024a). May occur in other intermittent and perennial waters within the project area.
Lesser slender salamander *Batrachoseps minor*	—	SSC	Broadleaved upland forest. South Santa Lucia Mountains in tanbark oak, coast live oak, blue oak, sycamore and laurel. Shaded slopes with abundant leaf litter.	Not expected to occur. The project area is outside of the range of this species which is restricted to the Santa Lucia Mountains (CNDDB 2024c).
Northern California legless lizard *Anniella pulchra*	—	SSC	Chaparral, coastal dunes, and coastal scrub. Sandy or loose loamy soils under sparse vegetation. Soil moisture is essential. Prefers soils with a high moisture content.	May occur. The species has not been documented to occur along the coast north of Morro Bay; however, potentially suitable habitat in the southern portion of the project area is within approximately 3 miles of the nearest documented occurrence (CNDDB 2024a) and the species may be present in these habitats.
Southwestern pond turtle *Actinemys pallida*	FP	SSC	A thoroughly aquatic turtle of ponds, marshes, rivers, streams and irrigation ditches, usually with aquatic vegetation, below 6,000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to approximately 1,300 feet from aquatic habitat for egg-laying (USFWS 2023c) east-facing (Reese and Welsh 1997) or south-facing areas that are less than 25 percent slope (Buskirk 2002). Adults may overwinter in aquatic resources or buried in leaf litter on land generally within 442 feet (135 meters) of aquatic habitat (Zaragosa et al. 2015), and western pond turtles may be found on land during all times of the year (Reese and Welsh 1997).	Known to occur. Southwestern pond turtle is known to occur in ponds, reservoirs, streams, and rivers throughout the project area (CNDDB 2024a). Nesting habitat is present within open fields on moderate to gentle slopes within approximately 1,300 feet from aquatic habitat (USFWS 2023c).
Two-striped gartersnake *Thamnophis hammondii*	—	SSC	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 7,000 feet elevation. Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth	Known to occur. The species is documented to occur in Pico Creek and Little Pico Creek within the project area (CNDDB 2024a), and may also occur along permanent streams elsewhere in the project area.
Western spadefoot *Spea hammondii*	FP	SSC	Occurs primarily in grassland habitats, but can be found in valley-foothill hardwood woodlands and coastal scrub. Vernal pools are essential for breeding and egg-laying.	Not expected to occur. The project area is west of and outside of the range of the species (CNDDB 2024a).
Birds				
Bald eagle *Haliaeetus leucocephalus*	FD	SE FP	Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests within 1 mile of water. Nests in large, old-growth, or dominant live tree with open branches, especially ponderosa pine. Roosts communally in winter.	Known to occur. Bald eagle has been documented to occur along the coast throughout the project area (eBird 2024; iNaturalist 2024). Large trees along the coast may provide nesting habitat suitable for this species. Species observed during SPR BIO-1 surveys.

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Black swift *Cypseloides niger*	—	SSC	Breeds in small colonies on cliffs behind or adjacent to waterfalls in deep canyons and sea-bluffs above the surf; forages widely.	May occur. The larger streams within the project may provide suitable waterfalls in their upper reaches, and the project area extends to the cliffs above the ocean where nesting may also occur.
Burrowing owl *Athene cunicularia*	—	SC	Open, dry annual or perennial grasslands, deserts and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	Known to occur. The project area is within the wintering range of burrowing owl (CNDDB 2025a) and this species has been documented in a few locations throughout the project area (iNaturalist 2024). During the overwintering season (September 1–January 31), grasslands and coastal scrub habitat in the project area provide habitat suitable for this species. Species observed during SPR BIO-1 surveys.
California black rail *Laterallus jamaicensis coturniculus*	—	ST FP	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.	May Occur. The species has been documented to occur south of the project area in Morro Bay (CNDDB 2024a), and suitable marsh habitat is found in project area.
California condor *Gymnogyps californianus*	FE	SE FP	Require vast expanses of open savannah, grasslands, and foothill chaparral in mountain ranges of moderate altitude. Deep canyons containing clefts in the rocky walls provide nesting sites. Forages up to 100 miles from roost/nest.	Known to occur. Condors have been documented frequently throughout the project area (eBird 2024; iNaturalist 2024). There is a California condor hack site (i.e. designated area, usually a cliff or elevated platform, where young birds are released into the wild in a controlled manner after being raised in captivity) at Rocky Butte 1.3 miles east of the project area near San Simeon. The project area contains large expanses of open grassland habitat suitable for foraging and more remote portions of the project contain cliffs and rock outcrops that may be suitable for nesting.
California Ridgway's rail *Rallus obsoletus obsoletus*	FE	SE FP	Salt-water and brackish marshes traversed by tidal sloughs in the vicinity of San Francisco Bay. Associated with abundant growths of pickleweed, but feeds away from cover on invertebrates from mud-bottomed sloughs.	Not expected to occur. While the species has been documented to occur in Morro Bay, the project area does not contain the brackish marshes with pickleweed that are associated with the species.
California spotted owl *Strix occidentalis occidentalis*	FP	SSC	Broadleaved upland forest, lower montane coniferous forest, and upper montane coniferous forest. Mixed conifer forest, often with an understory of black oaks and other deciduous hardwoods. Requires canopy closure greater than 40 percent. Most often found in deep-shaded canyons, on north-facing slopes, and within 300 meters of water.	May occur. The species is known to occur just north and east of the project area (CNDDB 2025b), and habitat for the species occurs within dense forest stands in the higher elevation portions of the project area (CNDDB 2025b).

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Golden eagle *Aquila chrysaetos*	—	FP	Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.	Known to occur. Golden eagle has been documented along the coast throughout the project area (eBird 2024; iNaturalist 2024). Large trees and cliff ledges along the coast in the project area may provide nesting habitat and grasslands may provide foraging habitat. Species observed during SPR BIO-1 surveys.
Grasshopper sparrow *Ammodramus savannarum*	—	SSC	Dense grasslands on rolling hills, lowland plains, in valleys and on hillsides on lower mountain slopes. Favors native grasslands with a mix of grasses, forbs, and scattered shrubs. Loosely colonial when nesting.	Known to occur. Grasshopper sparrow has been documented frequently along the coast throughout the project area (CNDDB 2024a; eBird 2024). Grasslands in the project area may provide habitat for this species.
Least Bell's vireo *Vireo bellii pusillus*	FE	SE	Summer resident of southern California in low riparian in vicinity of water or in dry river bottoms; below 2,000 feet. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, coyote brush, mesquite.	May Occur. The species has been documented in the region along the Salinas River, but is not documented within the project area. The larger creeks (e.g., San Carpoforo Creek) in the project area contain riparian corridors that may be suitable for this species.
Loggerhead shrike *Lanius ludovicianus*	—	SSC	Broken woodlands, savannah, pinyon-juniper, riparian woodlands, scrub, and washes. Prefers open country for hunting, with perches for scanning, and fairly dense shrubs and brush for nesting.	Known to occur. Some portions of the project area near Cambria are within the breeding range of loggerhead shrike (Shuford and Gardali 2008). This species has been documented frequently along the coast in the project area (eBird 2024; iNaturalist 2024). Shrublands in the project area may provide habitat suitable for nesting and grasslands in the project area provide habitat suitable for foraging.
Northern harrier *Circus hudsonius*	—	SSC	Nest and forage in grasslands, from salt grass in desert sink to mountain cienagas. Nests on ground in shrubby vegetation, usually at marsh edge; nest built of a large mound of sticks in wet areas.	Known to occur. Northern harrier has been documented within the project area (CNDDB 2024a) and grassland and marsh areas provide nesting habitat for the species. Species observed during SPR BIO-1 surveys.
Olive-sided flycatcher *Contopus cooperi*	—	SSC	Lower montane coniferous forest, redwood, upper montane coniferous forest. Nesting habitats are mixed conifer, montane hardwood-conifer, Douglas fir, redwood, red fir and lodgepole pine. Most numerous in montane conifer forests where tall trees overlook canyons, meadows, lakes or other open terrain.	May occur. Potential nesting habitat for olive-sided flycatcher is present in the conifer forest at higher elevation portions of the project area.
Purple martin *Progne subis*	—	SSC	Broadleaved upland forest, lower montane coniferous forest. Inhabits woodlands, low elevation coniferous forest of Douglas fir, ponderosa pine, and Monterey pine. Nests in old woodpecker cavities mostly, also in human-made structures. Nest often located in tall, isolated tree/snag.	Known to occur. Purple martin has been documented along the coast in the project area (eBird 2024). Large trees and snags in the project area may provide habitat suitable for nesting.

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Tricolored blackbird *Agelaius tricolor*	—	ST SSC	Requires open water, protected nesting substrate, and foraging area with insect prey within a few kilometers of the colony.	Known to occur. Tricolored blackbirds have been documented to occur within the project area (CNDDB 2024a), and suitable nesting habitat is present a multiple location within the project area.
Tufted puffin *Fratercula cirrhata*	—	SSC	Protected deepwater coastal communities. Open-ocean bird; nests along the coast on islands, islets, or (rarely) mainland cliffs. Requires sod or earth into which the birds can burrow, on island cliffs or grassy island slopes.	Known to occur. Tufted puffins have been documented to historically occur on the large rock just off of Point Piedras Blancas (CNDDB 2024a), and may occur at suitable cliff habitat within the project area.
Western snowy plover *Charadrius nivosus nivosus*	FT	SSC	Sandy beaches, salt pond levees and shores of large alkali lakes. Needs sandy, gravelly or friable soils for nesting.	Known to occur. Western snowy plovers have been documented to nest and overwinter at several locations within the project area (CNDDB 2024a), and suitable sandy beaches are present at many portions of the coast within the project area.
White-tailed kite *Elanus leucurus*	—	FP	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.	Known to occur. White-tailed kites have been documented in multiple locations in the project area (eBird 2024; iNaturalist 2024). Oak woodlands and grassland in the project area may provide habitat suitable for this species.
Fish				
Southern coastal roach *Hesperoleucus venustus subditus*	—	SSC	Aquatic. Found in the drainages of Tomales Bay and northern San Francisco Bay in the north, and drainages of Monterey Bay in the south.	Not expected to occur. The project area is outside of the range of this species (Baumsteiger and Moyle 2019).
Steelhead - south-central California coast DPS *Oncorhynchus mykiss irideus* pop. 9	FT	—	Aquatic. Sacramento/San Joaquin flowing waters. South coast flowing waters. Federal listing refers to runs in coastal basins from the Pajaro River south to, but not including, the Santa Maria River.	Known to occur. This species is documented to occur in multiple creeks and streams throughout the project area (CNDDB 2024a).
Steelhead - southern California DPS *Oncorhynchus mykiss irideus* pop. 10	FE	—	Aquatic. South coast flowing waters. Federal listing refers to populations from Santa Maria River south to southern extent of range (San Mateo Creek in San Diego County). Southern steelhead likely have greater physiological tolerances to warmer water and more variable conditions	Not expected to occur. This species is only known from south of the Santa Maria River; therefore, the project area is outside of the range of this species.
Tidewater goby *Eucyclogobius newberryi*	FE	SSC	Aquatic. Klamath/north coast flowing waters, Sacramento/San Joaquin flowing waters, South coast flowing waters. Brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego County to the mouth of the Smith River. Found in shallow lagoons and lower stream reaches, they need fairly still but not stagnant water and high oxygen levels.	Known to occur. The lower reaches of the larger streams in the project area may provide brackish water habitat for this species. Documented to occur within the project area in the lower reaches and lagoons of several creeks (CNDDB 2024a).

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Invertebrates				
Crotch's bumble bee *Bombus crotchii*	—	SC	Coastal California east to the Sierra-Cascade crest and south into Mexico. Suitable habitats include grasslands and scrub. Food plant genera include *Antirrhinum, Phacelia, Clarkia, Dendromecon, Eschscholzia*, and *Eriogonum*.	Known to occur. Crotch's bumble bee has been documented near the Piedras Blancas Lighthouse in the project area (Bumble Bee Watch 2024). Grasslands and coastal scrub habitat in the project area may provide habitat suitable for nesting and foraging. Woodlands may provide overwintering habitat.
Monarch *Danaus plexippus*	FP	—	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	Known to occur. Monarch has been documented to use multiple sites for overwintering throughout the project area (CNDDB 2024a; Xerces Society 2024a) and has also been observed breeding in the project area (Xerces Society 2024b).
Morro shoulderband *Helminthoglypta walkeriana*	FE	—	Restricted to the coastal strand in the immediate vicinity of Morro Bay. Inhabits the duff beneath *Haplopappus*, *Salvia, Dudleya*, and *Mesembryanthemum*.	Not expected to occur. Although the project area contains plant species that may support Morro shoulderband, the southern end of the project area does not extend into the range of this species which is restricted to the Morro Strand and inland of Morro Bay (CNDDB 2024a).
Smith's blue butterfly *Euphilotes enoptes smithi*	FE	—	Typically associated with coastal dunes and coastal sage scrub plant communities in Monterey and Santa Cruz counties. Hostplants are *Eriogonum latifolium* and *Eriogonum parvifolium*, utilized as both larval and adult foodplants.	May occur. The species has been documented at the northern edge of the project area just north of San Carpoforo Creek (CNDDB 2024a). Coastal sage scrub communities are present elsewhere in the project area, and the species may occur in these locations as well, if hostplants are present.
Vernal pool fairy shrimp *Branchinecta lynchi*	FT	—	Endemic to the grasslands of the Central Valley, Central Coast mountains, and South Coast mountains, in astatic rain-filled vernal pools. Inhabit small, clear-water sandstone-depression pools and grassed swale, earth slump, or basalt-flow depression pools.	May occur. The species has been documented to occur in Paso Robles and Camp Roberts east of the project area (USFWS 2024), and vernal pools were documented within the project area during the SPR BIO-1 survey.
Western bumble bee *Bombus occidentalis*	—	SC	Once common throughout much of its range in California, this species is currently largely restricted to high elevation sites in the Sierra Nevada and the northern California coast. Habitat includes open grassy areas, chaparral, scrub, and meadows. Requires suitable nesting sites for the colonies, availability of nectar and pollen from floral resources throughout the duration of the colony period (spring, summer, and fall), and suitable overwintering sites for the queens.	Not expected to occur. While the project area is in the historic range of western bumble bee, it is not within the current known range of this species, which is restricted to northern California (CDFW 2023).

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Mammals				
American badger *Taxidea taxus*	—	SSC	Found in a variety of habitats but are typically found in treeless areas including tallgrass and shortgrass prairies, grass-dominated meadows and fields within forested habitats, and shrub-steppe communities. Most abundant in drier open stages of most shrub, forest, and herbaceous habitats. Needs friable soils and open, uncultivated ground for burrowing, and sufficient food sources.	May occur. Grassland, open scrub, and open woodland habitat in the project area may provide habitat for this species. The species has been observed just outside the project area east of Cayucos State Beach (iNaturalist 2025).
Big free-tailed bat *Nyctinomops macrotis*	—	SSC	Low-lying arid areas. Need high cliffs or rocky outcrops for roosting sites. Feeds principally on large moths.	May occur. While this species is typically restricted to two population areas near San Francisco Bay and San Diego in California, big free-tailed bat has been documented within San Luis Obispo County (CNDDB 2024a; Conservation Biology Institute 2024). Cliffs and rocky outcrops within the project area may provide roosting habitat for this species.
Monterey dusky-footed woodrat *Neotoma macrotis luciana*	—	SSC	Found in forest habitats of moderate canopy and moderate to dense understory, and in chaparral habitats. Nests constructed of grass, leaves, sticks, and feathers. Population may be limited by availability of nest materials.	May occur. The project area is within the range of the species (Koenig 2015) and forest and chaparral habitat suitable for woodrats occurs within the project area.
Morro Bay kangaroo rat *Dipodomys heermanni morroensis*	FE	SE FP	Coastal bluffs and coastal sage scrub on the south side of Morro Bay. Needs sandy soil, but not active dunes. Prefers early seral stages.	Not expected to occur. The project area is outside of the known range of this species, which is restricted to the area south of Morro Bay (USFWS n.d.).
Mountain lion *Puma concolor*	—	SC	Mountain lions inhabit a wide range of ecosystems, including mountainous regions, forests, deserts, and wetlands. Mountain lions establish and defend large territories and can travel large distances in search of prey or mates. In April of 2020, the California Fish and Game Commission found that listing of the Central Coast and Southern California Evolutionarily Significant Units may be warranted, and designated mountain lion within these ESUs as a candidate species	Known to occur. Mountain lion has been documented in the project area within the vicinity of Cambria and Ragged point (iNaturalist 2024). More remote portions of the project area containing structures such as rock outcrops, downed trees, large tree hollows, or shrub thickets in woodlands may provide denning or nursery habitat for the species; however, portions of the project area adjacent to highways, towns, neighborhoods, and other areas frequented by humans are not likely to support denning or nursery habitat due to ongoing human disturbance.

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Northern elephant seal *Mirounga angustirostris*	MMPA	FP	The range of northern elephant seals covers a vast area of the North Pacific Ocean extending from Central America north to Arctic waters of the Bering Sea and west as far as Japan and the Commander Islands of Russia. In California, northern elephant seals breed on the southern Channel Islands, Año Nuevo Island, Gorda, Cape San Martin, San Simeon, Southeast Farallon Islands, and Point Reyes. At sea, females forage at midwater depths (i.e., 1,000 feet) in the North Pacific Gyre and males forage on the bottom of the ocean along the continental margin.	Known to occur. Northern elephant seals breed on beaches within the project area in the area of San Simeon northward directly adjacent to the project area.
Pallid bat *Antrozous pallidus*	—	SSC	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Tree roosting has also been documented in large conifer snags, inside basal hollows of redwoods and giant sequoias, and bole cavities in oaks. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	Known to occur. Pallid bat has been documented in the vicinity of San Simeon (CNDDB 2024a). Large trees and rock outcrops in the project area may provide habitat suitable for roosting.
Ringtail *Bassariscus astutus*	—	FP	Riparian habitats, forest habitats, and shrub habitats in lower to middle elevations. Often found near, but not limited to, a permanent water source.	May occur. Woodland, forest, coastal scrub, chaparral (with scattered trees and other denning structures), rock outcrops, and riparian habitats within the project area may provide habitat suitable for this species.
Salinas pocket mouse *Perognathus inornatus psammophilus*	—	SSC	Valley and foothill grassland. Annual grassland and desert shrub communities in the Salinas Valley. Fine-textured, sandy, friable soils. Burrows for cover and nesting.	Not expected to occur. This species is restricted to the Salinas Valley; therefore, the project area is outside of the range of this species.
San Diego desert woodrat *Neotoma lepida intermedia*	—	SSC	Coastal scrub. Moderate to dense canopies preferred. They are particularly abundant in rock outcrops and rocky cliffs and slopes.	Not expected to occur. The closest known occurrence of San Diego desert woodrat is approximately ten miles south of the project area, south of Morro Bay (CNDDB 2024a). Therefore, the project area is likely outside of the range of this species (Koenig 2015).
San Joaquin kit fox *Vulpes macrotis mutica*	FE	ST	Annual grasslands or grassy open stages with scattered shrubby vegetation. Need loose-textured sandy soils for burrowing, and suitable prey base.	Not expected to occur. While grassland and shrubland are present within the project area, the project area is outside of the range of the species (CNDDB 2024d).
Steller sea lion *Eumetopias jubatus*	FD MMPA	—	Marine intertidal and splash zone communities, protected deepwater coastal communities, rock shore. Breeds on Ano Nuevo, San Miguel and Farallon islands, Pt. St. George, and Sugarloaf. Hauls-out on islands and rocks. Needs haul-out and breeding sites with unrestricted access to water, near aquatic food supply and with no human disturbance.	May occur. The project area is directly adjacent to rocky areas that provide haul-outs for the species. Not expected to breed in the project area or vicinity.

Species	Listing Status[1] Federal	Listing Status[1] State	Habitat	Potential for Occurrence[2]
Townsend's big-eared bat *Corynorhinus townsendii*	—	SSC	Throughout California in a wide variety of habitats. Most common in mesic sites. Requires large cavities for roosting, which may include abandoned buildings and mines, caves, and basal cavities of trees. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	Known to occur. Townsend's big-eared bat has been documented in the vicinity of San Simeon (CNDDB 2024a). Abandoned buildings, caves, and larger trees in the project area may provide habitat suitable for roosting.
Western mastiff bat *Eumops perotis californicus*	—	SSC	Found in a variety of habitats, including chaparral, oak woodland, coastal scrub, and grasslands. The distribution of this species is likely geomorphically determined, with the species being present only where there are significant rock features offering roosting habitat.	May occur. The project area contains many large rock outcropings and cliffs that may provide roosting habitat for this species.
Western red bat *Lasiurus blossevillii*	—	SSC	Cismontane woodland, lower montane coniferous forest, riparian forest, riparian woodland. Roosts primarily in trees, 2-40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	May occur. Large trees in the project area may provide habitat suitable for roosting.

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

1 Legal Status Definitions

Federal:

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

State:

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

2 Potential for Occurrence Definitions

Not expected to occur: Species is unlikely to be present because of poor habitat quality, lack of suitable habitat features, or restricted current distribution of the species.
May occur: Suitable habitat is available; however, there are little to no other indicators that the species might be present.
Known to occur: Species has been documented within or directly adjacent to the project area.

Sources: Alverez et al. 2013; Baumsteiger and Moyle 2019; Bumble Bee Watch 2024; Buskirk 2002; CDFW 2010; CDFW 2023; CNDDB 2024a; CNDDB 2024b; CNDDB 2024c; CNDDB 2024d; Conservation Biology Institute 2024; eBird 2024; iNaturalist 2024; iNaturalist 2025; Koenig 2015; Reese and Welsh 1997; Thomson et al. 2016; USFWS n.d.; USFWS 2017; USFWS 2023b; USFWS 2023c; USFWS 2024; USFWS 2025; Zaragosa et al. 2015.

REFERENCES

Alvarez, J. A., M. A. Shea, J. T. Wilcox, M. L. Allaback, S. M. Foster, G. E. Padgett-Flohr, and J. L. Haire. 2013. "Sympatry in California tiger salamander and California red-legged frog breeding habitat within their overlapping range." California Fish and Game 99(1):42-48.

Baumsteiger, J., and P.B. Moyle. 2019. A reappraisal of the California Roach/Hitch (*Cypriniformes, Cyprinidae, Hesperoleucus/Lavinia*) species complex. *Zootaxa* 4543 (2): 221–240 Available: https://doi.org/10.11646/zootaxa.4543.2.3. Accessed November 12, 2024.

Bumble Bee Watch. 2024. The Xerces Society, Wildlife Preservation Canada, York University, University of Ottawa, The Montreal Insectarium, The London Natural History Museum, BeeSpotter. Data accessed from Bumble Bee Watch, a collaborative website to track and conserve North America's bumble bees. Available: https://www.bumblebeewatch.org/maps/. Retrieved November 12, 2024.

Buskirk, J. 2002. "The Western Pond Turtle, Emys marmorata." *Radiata. Journal of DGHT-AG Schildkroten*. 11-2: 3–30.

Calflora. 2025. Information on California plants for education, research and conservation. [web application]. Results of electronic records searches of the following species: *Caulanthus californicus, Erysimum menziesii, Gilia tenuiflora* ssp. *Arenaria, Lupinus tidestromii,* and *Trifolium trichocalyx.* The Calflora Database. Available: https://www.calflora.org/. Accessed May, 16 and 21, 2025.

California Department of Fish and Game. 2010. *A Status Review of the California Tiger Salamander (Ambystoma californiense)*. January. 2010.

California Department of Fish and Wildlife. 2023. *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species*. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline. Accessed November 12, 2024.

California Native Plant Society. 2024. Inventory of Rare and Endangered Plants of California (online edition, v9-01 1.5). Available: http://www.rareplants.cnps.org. Accessed November 6, 2024.

_____. 2025. Inventory of Rare and Endangered Plants of California (online edition, v9-01 1.5). Taxon Details *Erysimum menziesii*. Available: https://rareplants.cnps.org/Plants/Details/3665. Accessed May 27, 2025.

California Natural Diversity Database. 2024a. Results of electronic records search. Sacramento: California Department of Fish and Wildlife, Biogeographic Data Branch. Retrieved November 7, 2024.

_____. 2024b. Arroyo Toad Range – CWHR A035 [ds612]. Retrieved November 15, 2024.

_____. 2024c. Lesser Slender Salamander Range [ds 1174]. Sacramento: California Department of Fish and Wildlife, Biogeographic Data Branch. Retrieved October 4, 2024.

_____. 2024d. San Joaquin Kit Fox Range – CWHR M148 [ds911]. Retrieved November 15, 2024.

_____. 2025a. Burrowing Owl Range [ds 907]. Retrieved March 10, 2025.

_____. 2025b. Spotted Owl Predicted Habitat [ds 2185]. Retrieved January 27, 2025.

Conservation Biology Institute. 2024. Species distribution map for *Nyctinomops macrotis* (Big Free-tailed Bat). Available at: https://visualize.batamp.databasin.org/species/nyma/. Retrieved November 12, 2024.

Consortium of California Herbaria. 2025. Specimen data from CCH contributing herbaria, retrieved from Caflora.org. Available: https://www.calflora.org/. Retrieved March 16, 2025.

CCH. *See* Consortium of California Herbaria.

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

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

CNDDB. *See* California Natural Diversity Database.

CNPS. *See* California Native Plant Society.

eBird. 2024. eBird. Ithaca, NY. Available: http://www.ebird.org. Retrieved November 8, 2024.

iNaturalist. 2024. Available: https://www.inaturalist.org. Retrieved November 12, 2024.

_____. 2025. Available: https://www.inaturalist.org. Retrieved February 10, 2025.

Koenig, M. M. 2015. *Morphological Response in Sister Taxa of Woodrats (Genus: Neotoma) Across a Zone of Secondary Contact*. A thesis presented to the Faculty of California Polytechnic State University San Luis Obispo. September 2015.

Reese, D. A., and H. H. Welsh. 1997. "Use of Terrestrial Habitat by Western Pond Turtles, *Clemmys marmorata*: Implications for Management." Proceedings: *Conservation, Restoration, and Management of Tortoises and Turtles. An International Conference*: 352–357.

Shuford, W. D., and T. Gardali. 2008. Species Accounts for Loggerhead Shrike (*Lanius ludovicianus*) (mainland populations). *From California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California*. Studies of Western Birds 1. Western Field Ornithologists, Camarillo, California, and California Department of Fish and Game, Sacramento.

Thomson, R.C., A. N. Wright, and H. B. Shaffer. 2016. *California Amphibian and Reptile Species of Special Concern*. California Department of Fish and Wildlife, and University of California Press, Oakland California.

U.S. Fish and Wildlife Service. n.d. Morro Bay kangaroo rat (*Dipodomys heermanni morroensis*). Available: https://www.fws.gov/species/morro-bay-kangaroo-rat-dipodomys-heermanni-morroensis. Accessed November 12, 2024.

U.S. Fish and Wildlife Service. 2017. *Recovery Plan for the Central California Distinct Population Segment of the California Tiger Salamander (Ambystoma californiense)*. Region 8. US Fish and Wildlife Service. Sacramento, California.

_____. 2020. 5-Year Review: Summary and Evaluation: Monterey gilia (*Gilia tenuiflora* ssp. arenaria). Ventura Fish and Wildlife Office. Ventura, California.

_____. 2023. 5-Year Review: Summary and Evaluation: *Navarretia fossalis* (*Spreading navarretia*). Ventura Fish and Wildlife Office. Ventura, California.

———. 2023b. 5-Year Review. *California Tiger Salamander. Central California Distinct Population Segment (Ambystoma californiense)*. Sacramento Fish and Wildlife Office. Sacramento, California.

———. 2023c. "Endangered and Threatened Wildlife and Plants; Threatened Species Status With Section 4(d) Rule for the Northwestern Pond Turtle and Southwestern Pond Turtle." Proposed Rule. *Federal Register* 88: 68370 – 68399.

_____. 2024. Vernal Pool Fairy Shrimp (Branchinecta lynchi), Vernal Pool Tadpole Shrimp (Lepidurus packardi), Conservancy Fairy Shrimp (Branchinecta conservatio), 5-Year Review: Summary and Evaluation. Appendix. U.S. Fish and Wildlife Service, Sacramento Fish and Wildlife Office. Sacramento, California

———. 2025a. *Indian Knob Mountainbalm*. Available: https://www.fws.gov/species/indian-knob-mountainbalm-eriodictyon-altissimum. Accessed March 15, 2025.

_____. 2025b. -Year Review: Summary and Evaluation: Monterey Clover (*Trifolium trichocalyx*). Ventura Fish and Wildlife Office. Ventura, California.

_____. n.d. Morro Bay kangaroo rat (*Dipodomys heermanni morroensis*). Available: https://www.fws.gov/species/morro-bay-kangaroo-rat-dipodomys-heermanni-morroensis. Accessed November 12, 2024.

USFWS. *See* U.S. Fish and Wildlife Service.

Xerces Society for Invertebrate Conservation. 2024a. Western Monarch Overwintering Site Viewer. Available: https://westernmonarchcount.org/map-of-overwintering-sites/. Retrieved November 12, 2024.

_____. 2024b. Western Monarch Milkweed Mapper. Available: https://www.monarchmilkweedmapper.org/. Retrieved November 12, 2024.

Xerces Society. *See* Xerces Society for Invertebrate Conservation.

Zaragosa, G., J. P. Rose, K. Purcell, and B.D. Todd. 2015. *Terrestrial Habitat use by Western Pond Turtles (Actinemys marmorata) in the Sierra Foothills*. Journal of Herpetology, Vol. 49, No. 3, 437–441.