

PROJECT-SPECIFIC ANALYSIS AND ADDENDUM TO THE CalVTP PROGRAM EIR

Haley Vegetation Treatment Project



Prepared for:



Ventura County
Fire Protection District

May 2023

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Prepared for:

Ventura County Fire Protection District

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ACRONYMS AND ABBREVIATIONS

BMPs	Best Management Practices
CalVTP	California Vegetation Treatment Program
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRHR	California Register of Historical Resources
FRI	Fire Return Interval
GHG	greenhouse gas
HCP	habitat conservation plan
IAP	Incident Action Plan
LCP	Local Coastal Program
MMRP	mitigation monitoring and reporting program
MMs	mitigation measures
NAHC	Native American Heritage Commission
NCCP	natural community conservation plan
PCA	Pest Control Advisor
PRC	Public Resources Code Section
PSA	Project-Specific Analysis
RPF	Registered Professional Forester
SCCIC	South Central Coastal Information Center
SENL	single event noise levels
SPRP	Spill Prevention and Response Plan
SPRs	standard project requirements
SR	State Route
TMP	Traffic Management Plan
USFWS	US Fish and Wildlife Service
VCAPCD	Ventura County Air Pollution Control District
VCFPD	Ventura County Fire Protection District
VMT	vehicle miles traveled
WDRs	Waste Discharge Requirements
WLPZs	Watercourse and Lake Protection Zones
WUI	wildland urban interface



THE CALIFORNIA VEGETATION TREATMENT PROGRAM ENVIRONMENTAL CHECKLIST



Project-specific Analysis/Addendum to the Program Environmental Impact Report

1 INTRODUCTION

Ventura County Fire Protection District (VCFPD) is proposing the Haley Vegetation Treatment Project (proposed project), which would include vegetation treatments on approximately 448 acres in Ventura County. The proposed project would consist of three California Vegetation Treatment Program (CalVTP) treatment types: wildland urban interface (WUI) fuel reduction, fuel breaks, and ecological restoration. Treatment activities would involve mechanical treatments, manual treatments, and prescribed burning (pile burning and broadcast burning).

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

Portions of the project area extend outside of the treatable landscape described in the CalVTP PEIR. In total, these areas outside the treatable landscape encompass approximately 52 acres of the 448-acre project area. The scattered array of acres outside of the CalVTP treatable landscape is due to the method by which the CalVTP treatable landscape was digitally developed and the resultant degree of mapping resolution. Using desktop applications to apply buffers around geographic and topographic features and demarcate jurisdictional boundaries (i.e., State Responsibility Area or SRA and Local Responsibility Area or LRA), resulted in some treatable landscape areas that are shown on maps to be disjointed and scattered and some that are in held LRA areas surrounded by SRA. 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 PEIR would be applicable.

An Addendum to an EIR is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts, consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In this case, there are no changed circumstances, but the proposed revision or change in the project, compared to the PEIR, is the inclusion of areas outside of the CalVTP treatable landscape. The checklist below (in Section 3) includes the criteria to support an Addendum to the CalVTP Program EIR for the inclusion of proposed treatment areas outside the CalVTP treatable landscape.

This PSA/Addendum and attachments together support the finding that the proposed project is within the scope of the CalVTP PEIR or, if not entirely within the scope, does not otherwise warrant additional CEQA documentation. Each resource topic below includes a discussion of impacts related to that resource area followed by discussions of standard project requirements (SPRs) and mitigation measures (MMs) that are applicable for avoiding, minimizing, and mitigating impacts for that resource area. Additional analysis and information supporting the impact discussions can be found in the corresponding attachments. A within the scope finding requires the following components:

- ▶ Description of the impact of the proposed treatment project (see impact discussions under Sections EC-1 through EC-16 below and Attachment B),
- ▶ Summary of the impact in the CalVTP PEIR (see impact discussions under Sections EC-1 through EC-16 below),
- ▶ Evidence the project impact is addressed by the PEIR and would not constitute a new or substantially more severe significant impact (see impact discussions under Sections EC-1 through EC-16 below and Attachment B),
- ▶ Identification of CalVTP SPRs and MMs applicable to the proposed project (see SPR and MM discussions under Sections EC-1 through EC-16 below and Attachment A), and
- ▶ Conclusion regarding consistency with the PEIR (see impact discussions under Sections EC-1 through EC-16 below).

This PSA/Addendum also serves as a mitigation monitoring and reporting program (MMRP) in accordance with CEQA and the State CEQA Guidelines (Public Resources Code Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097). A MMRP is required for approval of the proposed project because this PSA/Addendum identifies potential significant adverse impacts and all feasible mitigation measures have been adopted. SPRs, which are environmental protection features included as 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. The numbering of SPRs and mitigation measures follows the numbering used in the PEIR. SPRs and mitigation measures that are referenced in more than one resource topic are not duplicated in Attachment A. Instructions for project-specific implementation of certain SPRs and Mitigation Measures has been added to tailor the specific impact avoidance and minimization actions relevant to the proposed treatments, agency standard practices, and the conditions and resources present within each treatment site. The MMRP requirements covered in this PSA/Addendum are described below.

- ▶ SPRs and Mitigation Measures – Brief discussions indicating whether an SPR or mitigation measure is applicable to this project are included under each resource section below.
- ▶ Implementing Entity & Timing Relative to Implementation – This identifies the agency responsible for implementing the measure and time frame in which the SPR or mitigation measure will be implemented for each applicable SPR/mitigation measure.
- ▶ Verifying/Monitoring Entity – This column identifies the party responsible for verifying and monitoring implementation of the SPR or mitigation measure.
- ▶ VCFPD will document and describe the compliance of the project treatment work with the required SPRs and mitigation measures either by adapting a project-specific MMRP table or preparing a separate post-project implementation report pursuant to the requirements of SPR AD-7.

2 PROJECT INFORMATION

1. **Project Title:** Haley Vegetation Treatment Project

2. **CalVTP I.D. Number** 2022-18

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

Ventura County Fire Protection District
2471 Latigo Avenue
Oxnard, CA 93030

4. **Contact Person Information and Phone Number:**

Ryan Matheson, VNC VMP Coordinator,
805-914-7574,
ryan.matheson@ventura.org

5. **Project Location:** Ventura County, California; Quadrangles: Ventura, White Ledge Peak, Matilija, Pitas Point

The project is located east of the communities of Oak View and Casitas Springs, south of State Route (SR) 150 and Lake Casitas, west of the city of Carpinteria, and north of the oil fields near the coastal cities of Dulah and Faria Beach (Figures 1 and 2).

6. **Total Area to be Treated (acres):** 448

7. **Description of Project:**

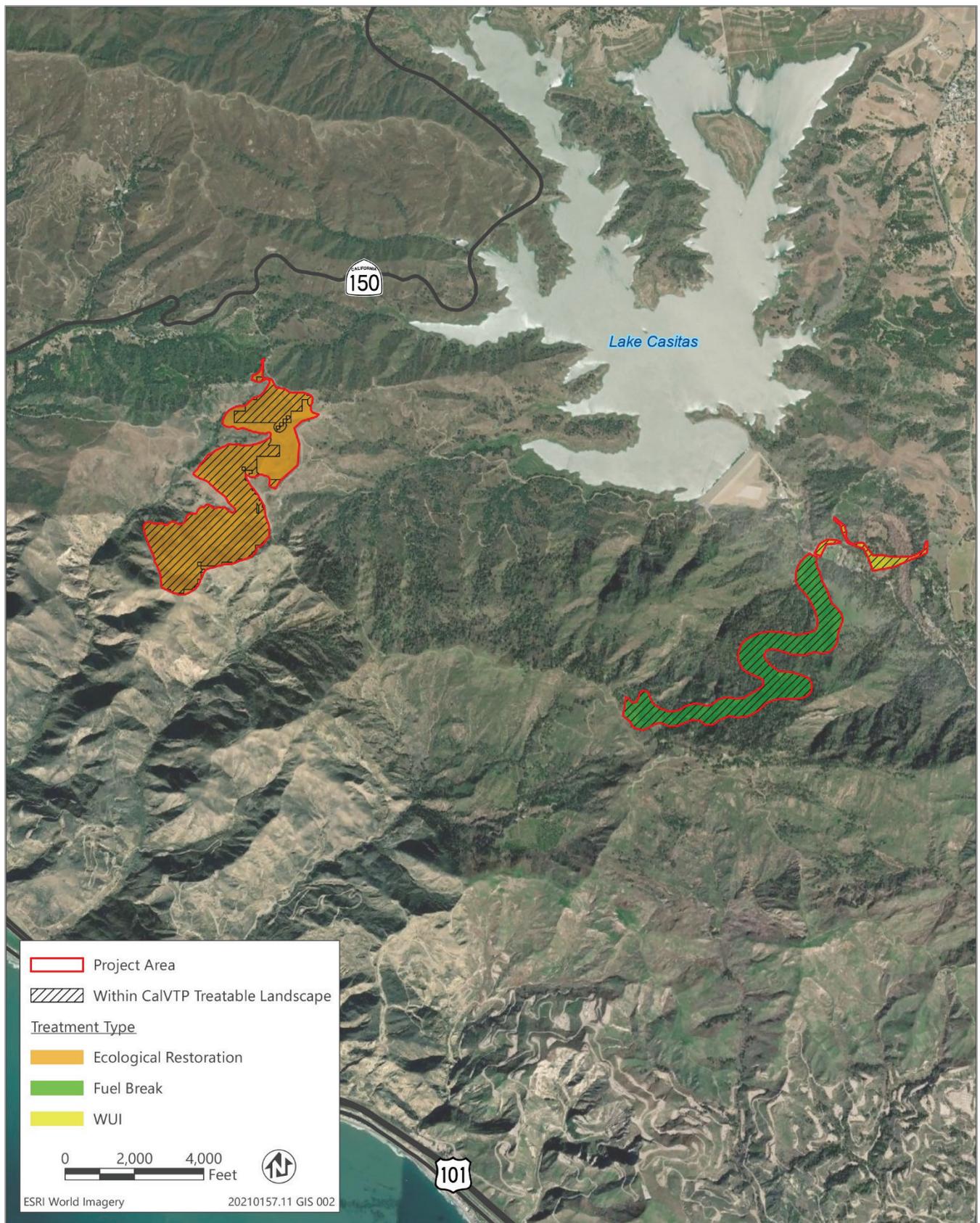
The proposed project would include vegetation treatments on approximately 448 acres in Ventura County, California. The project is located in western Ventura County approximately 5 miles from the town of Oak View. The entire project area is owned by the Haley family. This area has been burned several times previously, with the most recent fire being the 2017 Thomas fire. The primary objective of the project is to create a vegetative mosaic of age class and continuity to provide protection for critical infrastructure in the event of wildfires from the north or south. Infrastructure includes oil fields, communication repeaters, cellular towers, and SRs 150, 33, and 101.

The proposed project area ranges in elevation from 400 to 2,156 feet. Vegetation is variable given the broad elevational range, aspects, slope positioning, and soil type in the project area. Oak woodlands dominate the north slopes, with a large number of dead and downed trees from the 2017 Thomas fire. Ridgetops are predominantly chaparral, while the lower, west-facing slopes are characterized by black mustard (*Brassica nigra*) and other native and nonnative grasses and forbs. Table 1 summarizes the proposed treatments in the project area.



Sources: Data received from VCFPD in 2022; adapted by Ascent in 2022

Figure 1 Regional Location



Sources: Data received from VCFPD in 2022; adapted by Ascent in 2022

Figure 2 Project Area

Table 1 Proposed CalVTP Treatments

CalVTP Treatment Type	CalVTP Treatment Activities	Treatment Size (acres)	Equipment used for Treatments	Timing of CalVTP Treatments
WUI Fuel Reduction	Manual, mechanical (cutting, mastication, crushing, burning), and prescribed burning	Approximately 15	Bulldozers Masticators Hand crews Chippers	Year-round
Fuel Break	Manual, mechanical, and prescribed burning	Approximately 158	Bulldozers Masticator Hand crews Chippers	Year-round
Ecological Restoration	Manual, mechanical, and prescribed burning	Approximately 275	Hand crews Chippers Masticators Water trucks Fire engines Bulldozers	October-February

Source: Data and information provided by VCFPD in 2022

2.1 TREATMENT TYPES

Wildland-Urban Interface Fuel Reduction: Fuel reduction in WUI-designated areas would generally consist of strategic removal of vegetation to prevent or slow the spread of non-wind driven wildfire between structures and wildlands, and vice versa.

Fuel Breaks: In strategic locations, fuel breaks create zones of vegetation removal and ongoing maintenance, often in a linear layout, that support fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. While fuel breaks can passively interrupt the path of a fire or halt or slow its progress, this is not the primary goal of constructing fuel breaks. A fuel break would be created by treating vegetation on both sides of Red Mountain Fire Road. The width would vary from approximately 170 to 400 feet. In some areas along the road, the tree canopy would be completely removed, creating a non-shaded fuel break. In other areas, portions of the canopy would be retained, creating a shaded fuel break.

Ecological Restoration: Generally, outside of the WUI in areas that have departed from the natural fire regime as a result of fire exclusion, ecological restoration would focus on restoring ecosystem processes, conditions, and resiliency by moderating uncharacteristic wildland fuel conditions to reflect historic vegetative composition, structure, and habitat values. Prescribed burn areas will target black mustard.

2.2 TREATMENT ACTIVITIES

The proposed vegetation treatment activities are mechanical treatments, manual treatments, and prescribed burning (pile and broadcast burning). The treatment activities used in specific locations will be determined based on factors such as vegetation type, previous fuel management, slope/accessibility, landowner objectives, and funding.

The proposed treatments would reduce surface and ladder fuels in forested areas, creating shaded and non-shaded fuel breaks and areas of reduced fuels beneath canopies. Trees would not be removed unless they pose a public safety hazard, are dead or dying, or diseased. In chaparral dominated areas, treatments would break up continuous expanses of shrubs, creating a mosaic by retaining approximately one third of the shrubs. Treatments may occur year-round except when limited by biological restrictions, burn prescriptions, and access for vehicles and equipment during wet conditions. Treatments throughout the project area are expected to take approximately 10 years to complete. Treatments would occur between the hours of 7:00 a.m. and 4:00 p.m.

2.2.1 Manual Vegetation Treatment

Manual vegetation treatment techniques may include lopping and scattering, pruning, hand cutting of shrubs, bushes, and small live trees, and may occur on up to 100 acres. All trees 10 feet tall and greater would have their lower limbs pruned at the trunk to a minimum of 3 feet above the ground. Trees would not be removed unless they pose a public safety hazard, are dead or dying, or diseased. Equipment for manual treatments would include but is not limited to chainsaws, weed whippers, and pole saws. Manual treatments would require between 20 and 40 crew members depending on the treatment, along with their associated vehicles to travel to and from the project area. Up to three crews could be conducting treatments simultaneously throughout the project area. Manual treatments may occur year-round except when limited by biological restrictions. Manual treatment in coastal scrub and chaparral habitat areas would not uproot underground parts of coastal scrub and chaparral plants.

2.2.2 Mechanical Vegetation Treatments

Mechanical treatments would occur on up to 200 acres and could be used in combination with the other treatment activities described herein. This treatment activity may involve the use of masticators targeting vegetation previously treated by manual vegetation removal. Loaders and skidders may be used to move cut material. Tracked and wheeled chippers may dispose of some cut material. Bull dozers would be used to crush vegetation to pretreat fuels for prescribed burning, make piles for burning, and to construct control lines. All mechanized equipment would operate on slopes less than 35 percent, except during line construction where bulldozers may operate on slopes up to 50 percent. Mechanical treatments would require between two and four crew members depending on the treatment, along with their associated vehicles to travel to and from the project area. Up to three crews could be conducting treatments simultaneously throughout the project area. Mechanical work could occur year-round except when limited by biological restrictions and access for vehicles and equipment during wet conditions. Mechanical treatments may include chipping, cutting, crushing/compacting, or chopping existing vegetation. Mechanical treatment in coastal scrub and chaparral habitat areas would not uproot underground parts of coastal scrub and chaparral plants.

2.2.3 Prescribed Burning

The project would include broadcast burning (prescribed burning to reduce fuels over a larger area or restore fire resiliency in target fire-adapted plant communities and conducted under specific conditions related to fuels, weather, and other variables), pile burning (prescribed burning of piles of vegetative material to reduce fuel and/or remove biomass following treatment), and air curtain burning (burning piles of vegetative material in an aboveground air curtain burner). Broadcast burning would occur on up to 448 acres and pile burning/air curtain burning would be used to dispose of treated biomass on up to 100 acres. Prescribed burning could be used in combination with the other treatment activities described herein. This treatment activity could occur in every vegetation type. Prescribed burning would take place across the entirety of the project in the form of broadcast burning and pile burning as long as all prescriptions for burning are met.

Broadcast burning: Broadcast burning of approximately 448 acres would generally be limited to the east aspects and ridgelines of the project area. Broadcast burning would be implemented during the time of year with conditions conducive to safe and effective low-intensity burning, such as high humidity and high fuel moisture content (typically October to February). Broadcast burning may require the construction of new control lines or enhancement of existing control lines using manual and mechanical treatments (e.g., construction of dozer lines, mowing, using hand tools).

Broadcast burning would require one crew consisting of 30 to 60 crew members, depending on size and site characteristics of the burn unit. Typically, each burn would last 1 to 3 days. Equipment would include water trucks, fire engines, and bulldozer. All burning would occur in accordance with regulations regarding the use of prescribed burning. This would include the preparation and implementation of a burn plan that includes a smoke management plan, pursuant to regulatory requirements.

Pile burning¹: Pile burning of approximately 100 acres would consist of stacking dead and down oak trees reducing potential fire intensity and spread. After vegetation is removed through manual treatments, the vegetation would be piled using equipment or hand crews and burned at a later date when fuel moisture is lower and conducive to safe and effective consumption by burning. Pile burning would occur with all treatment types and would occur in areas with little to no live overstory.

Air curtain burning²: Biomass from manual and mechanical treatments would be burned inside an aboveground air curtain burner, called a "BurnBoss." This unit is self-contained and can be towed with a standard heavy-duty pickup truck. During treatments, it would be stationed on level, areas previously disturbed or previously burned by prescribed burning that are devoid of vegetation. Once the burning is complete, wood ash and biochar are left behind to turn back into the soil. A small US EPA Tier 4 diesel engine powers this system. At full power, it consumes one-third of a gallon of diesel fuel per hour.

2.2.4 Biomass Processing

The nearest biomass facility is more than 220 miles away making hauling biomass offsite inefficient for the project. Mechanically masticated (shredded) material, or chipped material would remain onsite and would be distributed with an average depth not to exceed 3 inches. Chip piles within suitable habitat for California red-legged frog will be limited to an average of 3 inches in depth and would not exceed 6 inches in depth. Chips would not cover more than 20 percent of a given treatment area. Within 300 feet of aquatic resources such as streams and rivers, chips will be spread in a mosaic pattern to ensure that vegetative growth is not prevented. Areas where masticated or chipped material exceeds this depth would require redistribution of the material to onsite locations or processing using pile burning or air curtain burners.

9. Treatment Types

- Wildland-Urban Interface Fuel Reduction
- Fuel Break
- Ecological Restoration

10. Treatment Activities

- Prescribed (Broadcast) Burning, **448** acres
- Prescribed (Pile) Burning, **100** acres
- Mechanical Treatment, **200** acres
- Manual Treatment, **100** acres
- Prescribed Herbivory, **0** acres
- Herbicide Application, **0** acres

11. Fuel Type

- Grass Fuel Type
- Shrub Fuel Type
- Tree Fuel Type

¹ Pile burning is a mechanism to consume biomass; however, the impact analysis in the CalVTP PEIR considers pile burning under prescribed burning to account for similar impacts as broadcast burning, which is also considered under prescribed burning. Similarly, mastication and chipping are biomass processing methods that have similar impacts to and are considered under mechanical treatments.

² Air curtain burners 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 3 under EC.7, "Greenhouse Gas Emissions"). Mitigation Measure GHG-2 in the CalVTP PEIR requires project proponents to implement feasible methods, including the use of air curtain burners, to reduce the greenhouse gas (GHG) emissions from pile burning.

12. Geographic Scope

- The treatment site is entirely within the CalVTP treatable landscape
- The treatment site is NOT entirely within the CalVTP treatable landscape

13. Surrounding Land Uses and Setting: (Briefly describe the project's surroundings)

The project area is privately owned by the Haley family and land uses are primarily for livestock and hunting. The surrounding area includes critical infrastructure, including oil fields, communication repeaters, cell towers, and SRs 150, 33, and 101. To the north, Lake Casitas provides drinking water, agricultural irrigation, and flood control to Ventura County. Several ranches and recreational areas are present to the north and west. South of the project area, agricultural fields and oil fields separate the project from residential and recreational areas along the coastline.

14. Other public agencies whose approval is required: (e.g., permits)

Ventura County Air Pollution Control District (VCAPCD) – smoke management plan and burn permit

15. Native American Consultation. Pursuant to PRC Sections 21080.3.1, 21080.3.2, and 21082.3, lead agencies undertaking CEQA review must, upon written request of a California Native American tribe, begin consultation before the release of an environmental impact report, negative declaration, or mitigated negative declaration. For treatment projects that require additional CEQA review and documentation, have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Pursuant to CalVTP SPR CUL-2, Native American tribal contacts in Ventura County were contacted on August 15, 2022, and included Barbareno/Ventureno Band of Mission Indians, Coastal Band of the Chumash Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino /Tongva Nation, Gabrielino-Tongva Tribe, Chumash Council of Bakersfield, Northern Chumash Tribal Council, Coastal Band of the Chumash Nation, San Luis Obispo County Chumash Council, and Santa Ynez Band of Chumash Indians. The Santa Ynez Band of Chumash Indians responded on September 6, 2022 requesting consultation on the project. No other responses were received.

16. Use of PSA for Treatment Maintenance:

Prior to retreating any area within the project boundary, the VCFPD will verify that site conditions described in the PSA/Addendum are still relevant. Maintenance activities would use the same treatment types and treatment activities as the initial treatments.

17. Standard Project Requirements and Mitigation Measures.

- All applicable SPRs and Mitigation Measures are feasible and will be implemented
- There is NO new information which would render mitigation measures previously considered infeasible or not considered in the CalVTP PEIR now feasible OR such mitigation measures have been adopted. [Guidelines Sec.15162(a)(3); PRC Sec. 21166(c)]
- All applicable SPRs and Mitigation Measures are NOT feasible or will NOT be implemented (provide explanation)

3 ENVIRONMENTAL CHECKLIST

EC-1 AESTHETICS AND VISUAL RESOURCES

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities	Impact AES-1, 3.2	LTS	<u>SPR AES-2</u> <u>SPR AQ-2, 3</u> <u>SPR REC-1</u>	Yes	LTS	<input checked="" type="checkbox"/>

The project area is entirely within the private property owned by the Haley family and is adjacent to private roads. The project area is located south of SR 150 and Lake Casitas, west of SR 33, and north of SR 101. The proposed treatments may be visible from SR 150; however, no highways in the project area are designated or eligible as state scenic highways (Caltrans 2022). The property is not accessible to the public and no public recreational trails exist within the project area or its viewshed. Although, there would be no degradation of a scenic vista or damage to scenic resources in a state scenic highway, proposed treatments including equipment and smoke from prescribed burning may be visible from SR 150 and Santa Ana Road while the treatments are being implemented. SR 150 and Santa Ana Road may provide public viewpoints of the project area. The potential for the proposed treatments activities to result in degradation of the visual character of an area and degradation of public viewpoints was examined in the PEIR. 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 PEIR because the proposed treatment activities are consistent with those analyzed in the PEIR. 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 PEIR. However, within the boundary of the project area, the existing scenic resources are essentially the same within and outside of the treatable landscape; therefore, the short-term aesthetic impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	Impact AES-2, 3.2	LTS	<u>SPR AES-1</u> <u>SPR AES-3</u> <u>SPR AD-4</u> <u>SPR REC-1</u>	Yes	LTS	<input checked="" type="checkbox"/>
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Initial and maintenance treatments would include WUI fuel reduction, shaded fuel breaks, and ecological restoration treatment types. The project is located on private land and does not have any scenic vistas and is not visible from any scenic highways (Caltrans 2022). However, proposed treatment areas, specifically the change in vegetation post-treatment, may be visible from SR 150 and Santa Ana Road. Therefore, although there would be no degradation of a scenic vista or damage to scenic resources in a state scenic highway, there could be long-term degradation of visual character or quality of public views as a result of vegetation removal. The potential for the proposed treatment types to result in long-term degradation of the visual character of an area was examined in the PEIR. 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 PEIR because the proposed treatment activities are consistent with those analyzed in the PEIR. 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 PEIR. 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. The proposed treatments would be consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Non-Shaded Fuel Break Treatment Type	Impact AES-3, 3.2	SU	<u>MM AES-3</u>	Yes	SU	<input checked="" type="checkbox"/>
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Initial and maintenance treatments would include non-shaded fuel breaks. The potential for these treatment types to result in long-term degradation of the visual character of an area was examined in the PEIR 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. The project is located on private lands and does not have any scenic vistas and is not visible from any scenic highways (Caltrans 2022); however, proposed treatments may be visible from SR 150 and Santa Ana Road. Therefore, there would be no degradation of a scenic vista or damage to scenic resources in a state scenic highway, but non-shaded fuel breaks could degrade the visual character and quality of public views. 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 PEIR because the proposed treatment activities are consistent with those analyzed in the PEIR. 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 PEIR. 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. For purposes of CEQA compliance, this impact is considered significant and unavoidable. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Other Impacts to Aesthetics: Would the project result in other impacts to aesthetics that are not evaluated in the CalVTP PEIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. VCFPD has evaluated and considered site specific characteristics to determine that the project treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the PEIR. 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 PEIR. 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.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
SPR AES-1 Vegetation Thinning and Edge Feathering: This SPR only applies to mechanical and manual treatment activities within all treatment types.	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>

PRIOR – Pre-field work to determine treatment types and boundaries will consider topographical features with the intent to create irregular vegetation densities and treatment area size to mimic natural conditions.

DURING – If there are areas within the mechanical treatment areas that cannot be completed with the use of equipment due to equipment limitations, they will be treated with manual treatment methods.

SPR AES-2 Avoid Staging within Viewsheds: This SPR applies to all treatment activities and all treatment types.	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>
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The project area is within private lands and is not visible from scenic vistas. Treatment activities may be visible from SR 150 and Santa Ana Road, and therefore equipment staging areas will be located away from these public roadways. There are no public parks, trails, or recreational areas within the project area.

SPR AES-3 Provide Vegetation Screening: This SPR applies to all treatment activities and all treatment types.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>
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This project is located on private property and treatments will predominantly occur outside of public viewsheds. Vegetation screening will be provided where necessary in areas visible to the public, mainly along SR 150 and Santa Ana Road.

MM AES-3: Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>
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Mitigation Measure AES-3 will be implemented for all non-shaded fuel breaks. Visual reconnaissance surveys will be conducted prior to implementation to identify the locations from where the non-shaded fuel breaks would be visible. VCFPD will identify feasible changes in the treatment design to reduce impacts to public views of non-shaded fuel breaks.

EC-2 AGRICULTURE AND FOREST RESOURCES

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact AG-1: Result Directly 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	Impact AG-1, 3.3	LTS	N/A	Yes	LTS	<input checked="" type="checkbox"/>

The dominant vegetation communities in the project area are oak woodlands on the north slopes, chaparral on ridgetops, and black mustard (*Brassica nigra*)-dominated grassland on lower, west facing slopes. The potential for these treatment types and treatment activities to result in the loss of forest land or conversion of forest land to non-forest use was examined in the PEIR. Within the chaparral and grassland vegetation communities, the existing tree canopy cover is less than 10 percent native tree cover except in scattered, isolated areas; therefore, these areas would not meet the definition of forest land as defined in Public Resources Code Section (PRC) 12220(g), which defines “forest land” as land that can support 10 percent native tree cover of any species under natural conditions. Portions of the oak woodlands would meet the definition of forest land. For those areas where the existing native tree cover exceeds 10 percent, consistent with the PEIR, the vegetation remaining after treatments in those areas would continue to meet the definition of forest land as defined in PRC Section 12220(g), which defines “forest land” as land that can support 10 percent native tree cover of any species under natural conditions. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the

boundary of the 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 substantially the same as described in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Other Impacts to Agriculture and Forest Resources: Would the project result in other impacts to agriculture and forest resources that are not evaluated in the CalVTP PEIR?				No	N/A	☒
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The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. VCFPD 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 PEIR (refer to Section 3.3.1, "Environmental Setting," and Section 3.3.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions 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 PEIR. 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 PEIR. Therefore, no new impact related to agriculture and forestry resources would occur that is not covered in the PEIR.

EC-3 AIR QUALITY

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	Impact AQ-1, 3.4	SU	<u>SPR AD-4</u> <u>SPR AQ-2, 6</u> <u>MM AQ-1</u>	Yes	SU	☒

Use of vehicles, mechanical equipment, prescribed (broadcast) burning, and pile burning would result in emissions of criteria pollutants that could exceed California ambient air quality standard or national ambient air quality standard thresholds. The proposed project falls within the jurisdiction of the Ventura County Air Pollution Control District (VCAPCD). The potential for emissions of criteria pollutants to exceed California Ambient Air Quality Standards or National Ambient Air Quality Standards thresholds was examined in the PEIR and found to be 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 treatment are within the scope of the impacts addressed in the PEIR because the proposed activities, as well as the associated equipment and duration of use, are consistent with those analyzed in the PEIR. VCFPD proposes the use of air curtain burning to process biomass, pursuant to Mitigation Measure GHG-2. Evaluation of criteria air pollutant emissions from these 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 substantially reduces ROG and PM emissions by approximately 96 percent when compared to pile burning. For NO_x, air curtains are estimated to reduce NO_x emissions by at least 73 percent (Ascent 2022). 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 potentially significant and unavoidable because of uncertainties in the extent of their use. 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 PEIR. However, within the boundary of the project area, the air quality conditions present and air basins 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. This impact would remain significant and unavoidable as explained in the PEIR, but for the reasons explained above, would not constitute a new or substantially more severe significant impact.

Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk	Impact AQ-2, 3.4	LTS	<u>SPR HAZ-1</u> <u>SPR NOI-4</u> <u>SPR NOI-5</u>	Yes	LTS	<input checked="" type="checkbox"/>
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The use of vehicles and mechanical equipment during initial and maintenance treatments could expose people to diesel particulate matter emissions. The potential to expose people to diesel particulate matter was examined in the PEIR. The proposed treatments would occur over a short duration and would neither occur in the same area, nor expose the same people to particulates for an extended period of time. Diesel particulate matter emissions from the proposed treatments are within the scope of the PEIR because the exposure potential is the same as analyzed in the PEIR, and the types and amount of equipment that would be used, as well as the duration of use, during proposed treatments are consistent with those analyzed in the PEIR. 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 PEIR. 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	Impact AQ-3, 3.4	LTS	<u>SPR AQ-4, 5</u>	No	N/A	<input checked="" type="checkbox"/>
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This impact does not apply to this proposed treatment because no naturally occurring asbestos is within the project area (NRCS 2022).

Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	Impact AQ-4, 3.4	SU	<u>SPR AD-4</u> <u>SPR AQ-2, 6</u>	Yes	SU	<input checked="" type="checkbox"/>
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Prescribed burn treatments could expose people to toxic air contaminants. The potential for prescribed burning to expose people to toxic air contaminants was examined in the PEIR and found to be significant and unavoidable after the application of all feasible mitigation measures because unpredictable changes in weather can occur during prescribed burns resulting in short-term exposure of people to concentrations of toxic air contaminants and associated levels of acute health risk with a Hazard Index greater than 1.0. The use of air curtain burners is proposed to reduce smoke emissions and associated toxic air contaminants in comparison to pile burning. Toxic air contaminants 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), use of air curtain burning would reduce ROG emissions by 96 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 biomass conversion technologies as compared with pile burning. The duration and parameters of the pile and broadcast burn treatments are within the scope of the activities addressed in the PEIR, and impacts would be reduced with the use of advanced biomass processing technologies. Therefore, the potential for exposure to toxic air contaminants is also within the scope of impacts covered in the PEIR. 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 PEIR. However, within the boundary of the project area, the air quality conditions present and air basins 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. This impact would remain significant and unavoidable as explained in the PEIR, but for the reasons explained above, would not constitute a new or substantially more severe significant impact.

Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust	Impact AQ-5, 3.4	LTS	<u>SPR HAZ-1</u> <u>SPR NOI-4, 5</u>	Yes	LTS	<input checked="" type="checkbox"/>
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The use of vehicles and mechanical equipment during initial and maintenance treatments could expose human receptors to the objectional odors from diesel exhaust. The potential to expose human receptors to diesel exhaust was analyzed in the PEIR. The release of objectional odors from diesel exhaust during proposed treatments is within the scope of the impacts stated in the PEIR because the proposed treatment activities are consistent with those analyzed in the PEIR. 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 PEIR. 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	Impact AQ-6, 3.4	SU	<u>SPR AD-4</u> <u>SPR AQ-2, 6</u>	Yes	SU	<input checked="" type="checkbox"/>
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Pile burning and broadcast burn treatments could expose people to objectionable odors. The potential to expose people to objectionable odors from prescribed burning was examined in the PEIR and found to be significant and unavoidable after the application of all feasible mitigation measures because short-term exposure to odorous smoke emissions from unpredictable weather changes could occur. The use of air curtain burners is proposed to reduce smoke emissions and associated odors in comparison to pile burning. When compared to pile burning, air curtain burning would substantially reduce smoke through filtering. The duration and parameters of the prescribed burning treatments are within the scope of the activities addressed in the PEIR, and impacts would be reduced with the use of proposed air curtain burning. Therefore, the resultant potential for exposure to objectionable odors from smoke is also within the scope of impacts covered in the PEIR. 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 PEIR. 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. This impact would remain significant and unavoidable as explained in the PEIR, but for the reasons explained above, would not constitute a new or substantially more severe significant impact.

Other Impacts to Air Quality: Would the project result in other impacts to air quality that are not evaluated in the CalVTP PEIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatment is consistent with the treatment types and activities evaluated in the CalVTP PEIR. VCFPD has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.4.1, "Regulatory Setting," and Section 3.4.2, "Environmental Setting," in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions 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 PEIR. 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 air quality would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
SPR AQ-1 Comply with Air Quality Regulations: This SPR applies to all treatment activities and all treatment types.	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>

All pile and broadcast burns are required to comply with applicable air quality regulations for the air district with jurisdiction in the project area. A Smoke Management Plan will be submitted to VCAPCD prior to burning and a burn permit from the VCAPCD will be obtained.

SPR AQ-2 Submit Smoke Management Plan: This SPR applies only to prescribed burning treatment activities and all treatment types.	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>
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VCFPD will prepare a Smoke Management Plan to be submitted to the VCAPCD prior to treatments.

SPR AQ-3 Create Burn Plan: The project proponent will create a burn plan for all prescribed burns. This SPR applies only to prescribed burning treatment activities and all treatment types.	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>
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A burn plan will be prepared by VCFPD prior to prescribed burning activities.

SPR AQ-4 Minimize Dust: This SPR applies to all treatment activities and treatment types.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>
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To minimize dust during treatment activities, VCFPD will implement the measures listed in under SPR AQ-4 in Attachment A.

SPR AQ-5 Avoid Naturally Occurring Asbestos: This SPR applies to all treatment activities and treatment types.	No	<u>VCFPD</u> N/A	<u>VCFPD</u>
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This SPR does not apply; there is no naturally occurring asbestos mapped in the project area. However, if naturally occurring asbestos not identified on current maps is discovered within the project area during treatment activities, then the area shall be avoided.

SPR AQ-6: Prescribed Burn Safety Procedures: Prescribed burns will follow all safety procedures, including the implementation of an approved Incident Action Plan (IAP).	Yes	<u>VCFPD</u> During	<u>VCFPD</u>
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A burn boss will prepare 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. The Incident Action Plan will also identify personnel to coordinate with the local air district for onsite briefings, posting notifications, and weather monitoring during burning.

MM 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.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>
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The components of Mitigation Measure AQ-1 that have been determined by VCFPD to be feasible and would be implemented to reduce emissions include use of gasoline-powered equipment rather than diesel-powered equipment whenever possible and encouraging carpooling to the project area. Equipment meeting Tier 4 emission standards and the use of renewable diesel fuel would be implemented to the extent feasible.

EC-4 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources	Impact CUL-1, 3.5	LTS	<u>SPR CUL-1</u> , 7, 8	Yes	LTS	<input checked="" type="checkbox"/>

Proposed treatment activities include mechanical treatments and prescribed burning, which could damage historical resources. The results of the records search at the South Central Coastal Information Center (SCCIC) identified one built environment feature (i.e., a transmission tower); however, the transmission tower has been evaluated for listing on the California Register of Historical Resources (CRHR) and was recommended not eligible. Therefore, the transmission tower is not a historical resource under CEQA. If structures (i.e., buildings, bridges, roadways) over 50 years old that have not been recorded or evaluated for historical significance are present in the project area, they will be avoided. The potential for these treatment activities to result in disturbance, damage, or destruction of built-environment structures that have not yet been evaluated for historical significance was examined in the PEIR. This impact is within the scope of the PEIR because treatment activities and the intensity of ground disturbance of the treatment activities are consistent with those analyzed in the PEIR. 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 PEIR. 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources	Impact CUL-2, 3.5	SU	<u>SPR CUL-2</u> , 3, 4, 5, 8 <u>MM CUL-2</u>	Yes	SU	<input checked="" type="checkbox"/>
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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 SCCIC records search did not reveal any archaeological resources. 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 PEIR. This impact was identified as significant and unavoidable in the PEIR 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. 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 PEIR; therefore, for purposes of CEQA compliance, this PSA/Addendum notes the impact as potentially significant and unavoidable. 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 PEIR. 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. This impact is within the scope of the PEIR because treatment activities and intensity of ground disturbance of the treatment project are consistent with those analyzed in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	Impact CUL-3, 3.5	LTS	<u>SPR CUL-1</u> , 2, 3, 5, 6, 8	Yes	LTS	<input checked="" type="checkbox"/>
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Native American contacts in Ventura County were contacted on August 15, 2022. One response was received from a Native American tribe within the 30-day window within which a response was requested. The Santa Ynez Band of Chumash Indians responded on September 6, 2022 requesting coordination on the project. Accordingly, VCFPD coordinated with the tribe to discuss the project. No other responses were received. 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 PEIR. This impact is within the scope of the PEIR because the intensity of ground disturbance of the treatment project is consistent with that analyzed in the PEIR. As explained in the PEIR, while tribal cultural resources may be identified within the treatable landscape during development of later treatment projects, implementation of SPRs, which may be tailored to the tribal cultural resources in the project area in coordination with tribes, would avoid any substantial adverse change to any tribal cultural resource. 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 PEIR. 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact CUL-4: Disturb Human Remains	Impact CUL-4, 3.5	LTS	N/A	Yes	LTS	<input checked="" type="checkbox"/>
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Vegetation treatment activities would include mechanical treatments using heavy equipment; these treatments may use masticators, loaders, and skidders, which could uncover human remains. The potential for treatment activities to uncover human remains was examined in the PEIR. This impact is within the scope of the PEIR because the treatment activities and intensity of ground disturbance are consistent with those analyzed in the PEIR. Additionally, consistent with the PEIR, 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 project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Other Impacts to Archeological, Historical, and Tribal Cultural Resources: Would the project result in other impacts to archeological, historical, or tribal cultural resources that are not evaluated in the CalVTP PEIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. VCFPD 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 PEIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions 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; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, therefore, no new impact related to archaeological, historical, or tribal cultural resources would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
SPR CUL-1 Conduct Record Search: An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types.	Yes	<u>VCFPD</u> Prior	<u>VCFPD</u>

Consistent with SPR CUL-1, a records search of the project area was performed by the SCCIC. Results were returned on October 4, 2022 (File No. 24027.10220). The results identified one built environment feature (i.e., a transmission tower); however, the transmission tower has been evaluated for listing on the CRHR and was recommended not eligible. No archaeological resources were identified.

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, as appropriate. This SPR applies to all treatment activities and treatment types.	Yes	<u>VCFPD</u> Prior	<u>VCFPD</u>
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Consistent with SPR CUL-2, an updated Native American contact list was obtained from the Native American Heritage Commission (NAHC) on August 2, 2022. This response also included search results from NAHC’s sacred lands database; a positive result was returned indicating that the project area contains a sacred tribal resource. On August 15, 2022, letters inviting the tribes to consult were mailed to the 10 tribal representatives indicated by NAHC’s Native American Contact List. These letters identified the location, treatment types, purpose of the treatments, and requested information concerning the location of any cultural resources that may exist within the project area. One response was received from a Native American tribe within the 30-day window within which a response was requested. The Santa Ynez Band of Chumash Indians responded on September 6, 2022 requesting coordination on the project. VCFPD coordinated with the tribe to discuss the project. No other responses were received.

SPR-CUL-3 Pre-field Research: VCFPD will conduct research prior to implementing treatments as part of the cultural resource investigation. This SPR applies to all treatment activities and treatment types	Yes	<u>VCFPD</u> Prior	<u>VCFPD</u>
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Pre-field research included review of site records from the SCCIC and reference materials.

SPR CUL-4 Archaeological Surveys: VCFPD will coordinate with an archaeologically trained resource professional or qualified archaeologist to conduct a site-specific survey of the treatment area. This SPR applies to all treatment activities and treatment types.	Yes	<u>VCFPD</u> Prior	<u>VCFPD</u>
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Pursuant to SPR CUL-4, an archaeological survey was conducted in December 2022 for the project area by an archaeologically trained resource professional or qualified archaeologist prior to the start of treatments. One isolate artifact was identified; however, it does not qualify as a historical resource. No other cultural resources were identified during the survey.

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. This SPR applies to all treatment activities and treatment types.	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>
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No archeological resources were identified during the December 2022 survey. Culturally affiliated tribes will be notified if any cultural resources are identified that cannot be avoided.

SPR CUL-6 Treatment of Tribal Cultural Resources: If a tribal cultural resource is identified within a treatment area, and cannot be avoided, the project proponent in consultation the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. This SPR applies to all treatment activities and treatment types.	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>
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Tribal cultural resources will be avoided. No cultural resource concerns were raised by any tribes.

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. This SPR applies to all treatment activities and treatment types.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>
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The results identified one built environment feature (i.e., a transmission tower); however, the transmission tower has been evaluated for listing on the CRHR and was recommended not eligible. Built environment historical resources, if present within the project area, will be avoided during project implementation.

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. This SPR applies to all treatment activities and treatment types.	Yes	<u>VCFPD</u> Prior	<u>VCFPD</u>
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VCFPD will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological or tribal cultural resources prior to the start of treatments.

MM 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 professional archaeologist or CAL FIRE archeological trained Registered Professional Forester will assess the significance of the find.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>
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Should project activities reveal cultural or archaeological resources, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified professional archaeologist or CAL FIRE archeologically trained Registered Professional Forester will assess the significance of the find.

EC-5 BIOLOGICAL RESOURCES

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	Impact BIO-1, 3.6	LTSM	<u>SPR BIO-1</u> , 2, 7, 9 <u>SPR AQ-3</u> , 4, <u>SPR GEO-1</u> , 3, 4, 5, 7 <u>SPR HYD-4</u> <u>MM BIO-1a</u> , 1b	Yes	LTSM	<input checked="" type="checkbox"/>

Treatment activities (i.e., mechanical treatments, manual treatments, prescribed burning) could result in adverse effects on special-status plant species (see Attachment B for additional detail). The potential for treatment activities to result in adverse effects on special-status plant species was examined in the PEIR. This impact on special-status plants is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the potential for special-status plant species to occur within the project area is essentially the same within and outside the treatable landscape (i.e., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact related to special-status plant species is also the same as described above. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

<p>Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications</p>	<p>Impact BIO-2, 3.6</p>	<p>LTSM</p>	<p>SPR BIO-1, 2, 3, 4, 5, 8, 10, 11 SPR HYD-1, 4 SPR HAZ-5, 6 MM BIO-2a, 2b, 2d, 2e, 2f, 2g, 2h, 3a, 3b, 3c, 4</p>	<p>Yes</p>	<p>LTSM</p>	<p><input checked="" type="checkbox"/></p>
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Treatment activities (i.e., mechanical treatments, manual treatments, prescribed burning) could result in adverse effects on special-status wildlife (see Attachment B for additional detail). The potential for treatment activities to result in adverse effects on special-status wildlife was examined in the PEIR. This impact on special-status wildlife is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the potential for special-status wildlife species to occur within the project area is essentially the same within and outside the treatable landscape (i.e., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact related to special-status wildlife species is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

<p>Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function</p>	<p>Impact BIO-3, 3.6</p>	<p>LTSM</p>	<p>SPR BIO-1, 2, 3, 4, 5, 6, 8, 9 SPR HYD-4 MM BIO-3a, 3b, 3c</p>	<p>Yes</p>	<p>LTSM</p>	<p><input checked="" type="checkbox"/></p>
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Treatment activities (i.e., mechanical treatments, manual treatments, prescribed burning) could result in adverse effects on sensitive habitats, including riparian habitat and designated sensitive natural communities (see Attachment B for additional detail). The potential for treatment activities to result in adverse effects on riparian habitat or other sensitive natural communities was examined in the PEIR. This impact on riparian and sensitive habitats is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape (i.e., no resource is affected outside the treatable landscape that would not also be similarly affected within the

treatable landscape); therefore, the potential impact on sensitive habitats is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	Impact BIO-4, 3.6	LTSM	SPR BIO-1 SPR HYD-1, 3, 4, MM BIO-4	Yes	LTSM	<input checked="" type="checkbox"/>
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Treatment activities (i.e., mechanical treatments, manual treatments, prescribed burning) could result in direct or indirect adverse effects on state or federally protected wetlands. The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the PEIR.

Based on review and survey of project-specific biological resources, the project area contains numerous intermittent (Class II) and ephemeral (Class III) streams, and seasonal fresh emergent wetland and riparian wetland features; however, all stream classes have the potential to be present in the project area. During the August 2, 2022 reconnaissance survey, Coyote Creek was an intermittent flowing waterway; however, it is not formally classified. Watercourse and Lake Protection Zones (WLPZs) ranging from 50 to 100 feet will be established adjacent to all Class II streams within the project area, and WLPZs sufficient to prevent the degradation of downstream beneficial uses of water (determined on a site-specific basis) will be established adjacent to all Class III streams within the project area (e.g., tributaries to Coyote Creek in the fuel break and environmental restoration treatment areas). In addition, Equipment Limitation Zones (ELZs) of at least 25 feet will be established around all Class III ephemeral streams within the project area. In portions of the project area where prescribed burning is proposed, no fire ignition (or use of associated accelerants) will occur within WLPZs.

In addition to streams present within and adjacent to the project area, there are several seasonal fresh emergent wetlands and seasonal wetland areas with associated riparian vegetation within the project area. Because WLPZs would not apply to seasonal wetland habitat, a qualified RPF or biologist will delineate the boundaries of these seasonal wetlands and associated riparian habitat and will establish a no-disturbance buffer of at least 25 feet with flagging or fencing. Ground disturbance will be prohibited within this buffer. In portions of the project area where prescribed burning is proposed, no fire ignition (and associated use of accelerants) will occur within the wetland buffer, and prescribed burning will not be used within the riparian habitat associated with the wetlands unless a qualified RPF or biologist determines that the prescribed burn is within the normal Fire Return Interval (FRI) for the wetland vegetation types present.

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

Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	Impact BIO-5, 3.6	LTSM	SPR BIO-1, 4, 5, 10, 11 SPR HYD-1, 4 MM BIO-5	Yes	LTSM	<input checked="" type="checkbox"/>
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Treatment activities (i.e., mechanical treatments, manual treatments, and prescribed burning) could result in adverse effects on wildlife movement corridors and nursery sites. The potential for treatment activities to result in adverse effects on wildlife movement corridors and nursery sites was examined in the PEIR.

A review of Essential Connectivity Areas (CNDDDB 2022) indicated that the project area is not located in a regional wildlife movement corridor; however, the project area is likely used for local movement by wildlife (e.g., mule deer, mountain lion). Mule deer were observed using the environmental restoration treatment area for foraging habitat during the August 2, 2022 reconnaissance survey, and suitable habitat for other wildlife was observed throughout the project area. The implementation of mechanical treatments, manual treatments, and prescribed burning for WUI fuel reduction and ecological restoration treatments and the implementation of fuel breaks within the project area would not result in substantial loss of movement habitat or result in the construction of any permanent barrier to wildlife movement because treatment would occur over a small physical and temporal scale and surrounding habitat areas would be preserved in their current condition. The surrounding landscape contains habitat consistent with the treatment areas and these areas would function as wildlife corridors if any existing corridor was temporarily inaccessible during treatment. Additionally, WLPZ setbacks would retain untreated vegetation such that the riparian areas would continue to serve as wildlife corridors during and after treatment activities. Treatment activities may temporarily interrupt wildlife movement in the portions of the project area where activities are occurring; however, the proposed treatments would occur over approximately 10 years and would not be implemented in the entire project area in any given year. Treatments would therefore not have a substantial adverse effect on movement through the project area as a whole.

There are no known common wildlife nursery sites (e.g., deer fawning areas, wading bird rookeries) within the project area and no indications of nursery sites were identified during field survey. However, mule deer are known to use the area, and could use portions of the project area that contain dense oak woodland and chaparral and experience low levels of human-caused disturbance for fawning during the fawning season (May 1 to August 31), and therefore have the potential to serve as wildlife nursery sites (Sommer et al. 2007).

This impact on wildlife movement corridors and nursery sites is within the scope of the PEIR because effects on wildlife movement corridors and nursery sites were covered in the PEIR, and the proposed treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the potential existence of wildlife movement corridors and wildlife nurseries within the project area is essentially the same within and outside the treatable landscape (i.e., no resource is affected outside the treatable landscape that would not also be similarly affected within the treatable landscape); therefore, the potential impact related to wildlife movement corridors and wildlife nurseries is also the same, as described above. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	Impact BIO-6, 3.6	LTS	SPR BIO-1, 2, 3, 4, 5, 12	Yes	LTS	<input checked="" type="checkbox"/>
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Treatment activities (i.e., mechanical treatments, manual treatments, prescribed burning) could result in adverse effects on the habitat or abundance of common wildlife. The potential for treatment activities to result in adverse effects on the habitat or abundance of common wildlife was examined in the PEIR.

The chaparral, coastal scrub, and grassland habitats (see Table B-1 in Attachment B) within the project area provide nesting habitat for common ground nesting and shrub nesting birds, and trees in the coastal oak woodland habitat in the project area provide nesting habitat for common tree and cavity nesting species. Additionally, habitat suitable for common reptiles and amphibian species is present throughout the project area, especially in coastal scrub and chaparral habitats, and areas adjacent to waterways. Common reptiles and amphibians use dense vegetation, mammal burrows, and leaf litter for refuge. Treatment activities in coastal oak woodland, coastal scrub, chaparral, and grassland habitats would result in removal of some habitat suitable for common bird nesting habitat or reptile and amphibian refugia.

Treatments implemented in coastal scrub and chaparral will be designed to avoid type conversion of chaparral vegetation and to maintain chaparral habitat function, which will maintain the function of coastal scrub and chaparral as habitat suitable for scrub-adapted nesting birds, reptiles, and amphibians. Work in coastal scrub and chaparral will include determining appropriate treatments based on current FRI departure and condition class of the chaparral vegetation onsite, retaining at least 35 percent relative final density of mature coastal scrub and chaparral vegetation, and retaining a mix of middle to older aged shrubs to maintain

heterogeneity and cover. In addition, the project would be implemented over approximately 10 years and only a portion of the chaparral habitat within the project area would be removed at any one time. Furthermore, because treatments would occur over the course of several years, areas of initial treatment would be partially recovered (i.e., within 3 years (Potts 2010)) and fully recovered (i.e., within 10 years (McMurray 1990)) prior to completion of the final treatments.

Therefore, chaparral habitat treated in the first years of treatment would provide habitat value to reptile species of special concern prior to implementation of the last treatments. Therefore, the adverse effects of the treatments on habitat would not be substantial and habitat function would be maintained for common wildlife.

Treatment activities may occur within portions of the nesting bird season (February 1–August 31). Therefore, treatment activities could result in direct loss of active nests or disturbance to active nests of cavity, ground, and shrub nesting species from auditory and visual stimulus (e.g., heavy equipment, chainsaws, vehicles, personnel, prescribed burning), potentially resulting in abandonment and loss of eggs or chicks. If treatments are conducted within the nesting bird season, surveys will be conducted prior to treatment activities per the requirements of SPR BIO-10. If nests are detected during nesting bird surveys, active nests including raptor nests will be protected per the requirements of SPR BIO-12, either by establishing a no-disturbance buffer, modifying treatment activity, or deferring treatment (Attachment A). Potential adverse effects to nesting birds and common wildlife will be avoided with the implementation of SPRs BIO-10 and BIO-12.

This impact on habitat or abundance of common wildlife, including nesting birds, is within the scope of the PEIR because effects on habitat or abundance of common wildlife were covered in the PEIR, and the proposed treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the habitat characteristics within the project area are essentially the same within and outside the treatable landscape; therefore, the potential impact related to habitat and abundance for common wildlife is also the same, as described above. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	Impact BIO-7, 3.6	No Impact	SPR AD-3 MM BIO-3a	Yes	LTS	<input checked="" type="checkbox"/>
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The potential for treatment activities to result in conflicts with local policies or ordinances was examined in the PEIR. Several ordinances in Ventura County are applicable to biological resources.

The Ventura County Tree Protection Ordinance, which is part of the Non-Coastal Zoning Ordinance (Ventura County 2022, section 9211, Native Plants) states that, “It shall be unlawful for any person to dig up, pick, break off, cut or destroy any native tree, plant, berry-bearing shrub, fern or any wild flower... within three hundred (300) feet of the middle of any leveled road or highway within the County, unless, in the case of private lands, the owner thereof gives his written consent thereto.” All portions of the proposed project are on the Haley family’s private property, and VCFPD will acquire written consent from the Haley family prior to project initiation. Additionally, the Ventura County Oak Woodlands Management Plan (Ventura County, 2007) is designed to encourage conservation of coastal oak woodland habitat in Ventura County. Project treatment activities would be designed to maintain habitat function within oak woodland habitat areas.

Implementation of the project would not conflict with local ordinances. In addition, no tree removal is proposed as part of the treatments. Therefore, a permit for tree removal would not be required.

The potential for the proposed treatments to conflict with local policies is within the scope of the PEIR because vegetation treatment locations, types, and activities are consistent with those analyzed in the PEIR. 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 PEIR. However, the applicable local policies or ordinances protecting biological resources within the project area are essentially the same within and outside the treatable landscape; therefore, the potential impact related to conflicts with local policies or

ordinances protecting biological resources is also the same, as described above. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	Impact BIO-8, 3.6	No Impact	N/A	No	N/A	<input checked="" type="checkbox"/>
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Implementation of the proposed project would not conflict with the provisions of an adopted natural community conservation plan (NCCP), habitat conservation plan (HCP), or other approved habitat plan because there are no adopted NCCPs, HCPs or other adopted plans within or adjacent to the project area.

Other Impacts to Biological Resources: Would the project result in other impacts to biological resources that are not evaluated in the CalVTP PEIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. VCFPD has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.6.1, "Environmental Setting," and Section 3.6.2, "Regulatory Setting," in Volume II of the Final PEIR). The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to biological resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those considered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to biological resources would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
SPR BIO-1: Review and Survey Project-Specific Biological Resources. 1. Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided. 2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided. This SPR applies to all treatment activities and treatment types.	Yes Yes Yes	<u>VCFPD</u> Prior	<u>VCFPD</u>

The California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants (CNPS 2022) and CDFW California Natural Diversity Database (CNDDDB) (CNDDDB 2022) were reviewed on August 10, 2022, for specific information on documented observations of special-status species previously recorded in the project area and vicinity. A search of the CNDDDB and CNPS was conducted for the following US Geological Survey 7.5-minute quadrangles including and surrounding the project area: White Ledge Peak, Matilija, Pitas Point, Ventura, Carpinteria, Hildreth Peak, Old Man Mountain, Wheeler Springs, Lion Canyon, Ojai, Saticoy, and Oxnard (CNDDDB 2022; CNPS 2022). In addition, Appendix BIO-3 (Tables 3.6-27, 16a,16b, and 19) in Volume II of the Final PEIR was reviewed for sensitive natural communities, habitat information, and special-status plants and wildlife that could occur in the southern California coast ecoregion.

Following the database queries, a reconnaissance survey of the project area was conducted on August 2, 2022. Based on this reconnaissance survey, the database queries, habitat suitability, habitat quality, other reports of occurrence, distance from known detections, and other factors, of the 35 special-status plants and 68 special-status wildlife species identified in the CNDDDB and CNPS databases as occurring in the 12-quad search area, 23 special-status plants and 44 special-status wildlife species may or are known to occur within the project area. Complete lists of special-status species and their potential to occur within the project area are presented in Attachment B. Based on the results of the data review and reconnaissance-level survey, VCFPD determined that adverse

effects can be clearly avoided for some special-status wildlife with suitable habitat in the project area (Attachment B). However, adverse effects cannot be clearly avoided for other special-status wildlife species and all special-status plants with suitable habitat as well as sensitive natural communities (Attachment B). For these biological resources that may occur, but adverse effects cannot be clearly avoided, further review and surveys will be conducted.

<p>SPR BIO-2: Require Biological Resource Training for Workers. The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p><u>VCFPD</u> Prior-During</p>	<p><u>VCFPD</u></p>
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Biological resource training for workers will be conducted prior to and during implementation of treatments.

<p>SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats. If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided. This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p><u>VCFPD</u> Prior</p>	<p><u>VCFPD</u></p>
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SPR BIO-1 determined that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided. A qualified RPF or biologist will conduct a survey following the CDFW *“Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities”* prior to the start of treatment activities (CDFW 2018). Sensitive natural communities and other sensitive habitats, including oak woodlands and riparian habitat, within the project area will be mapped by a qualified biologist, RPF, or botanist during this survey.

<p>SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function. Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions. This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p><u>VCFPD</u> Prior-During</p>	<p><u>VCFPD</u></p>
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Class I, Class II and Class III watercourses that contain riparian habitat have the potential to occur in the project area. WLPZs and ELZs will be established adjacent to all Class II and Class III streams within the project area. No herbicide treatment is proposed. Treatments in riparian habitats will retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation and will largely be limited to removal of uncharacteristic fuel loads (e.g., dead or dying vegetation, invasive plants). Additionally, prior to any treatments in riparian habitat, VCFPD will notify CDFW pursuant to California Fish and Game Code 1602, when required.

<p>SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub. The project proponent will design treatment activities to avoid type conversion where native coastal sage scrub and chaparral are present. These SPR requirements apply to all treatment activities and all treatment types. Additional measures will be applied to ecological restoration treatment types</p>	<p>Yes</p>	<p><u>VCFPD</u> Prior-During</p>	<p><u>VCFPD</u></p>
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The project area contains sensitive habitats including coastal oak woodland, coastal scrub, mixed chaparral, annual grassland, and riparian habitats. Treatments implemented in coastal scrub and chaparral will be designed to avoid type conversion of coastal scrub and chaparral vegetation and to maintain function of these habitats. This will include designing treatments based on current FRI departure and condition class of the coastal scrub and chaparral vegetation onsite, maintaining a minimum percent cover of mature native shrubs, and retaining a mix of middle to older aged shrubs to maintain heterogeneity. Refer to the discussion of coastal scrub and chaparral under *“Sensitive Natural Communities Impact Analysis”* in Attachment B for details on treatment design parameters that would maintain chaparral and coastal sage scrub habitat function. Treatments in all sensitive habitats in the project area will be designed to maintain the membership rules of the affected vegetation alliance, maintain ecological function, and improve wildfire resilience.

<p>SPR BIO-6: Prevent Spread of Plant Pathogens. When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., lone chaparral, blue oak woodland), the project proponent will implement best management practices to prevent the spread of <i>Phytophthora</i> and other plant pathogens (e.g., pitch canker (<i>Fusarium</i>), goldspotted oak borer, shot hole borer, bark beetle). This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p><u>VCFPD</u> During</p>	<p><u>VCFPD</u></p>
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There are no known plant pathogens in the project area. It is likely that personnel and equipment assigned to work on the project will be from the local area and the likelihood of pathogens entering from other areas will be low. However, because crews and associated equipment (e.g., chainsaws, hand tools) and vehicles could have been used in outside of the project vicinity either fighting wildfires or implementing other fuel treatment projects, VCFPD will implement Best Management Practices (BMPs) listed under SPR BIO-6 in Attachment A.

<p>SPR BIO-7: Survey for Special-Status Plants. If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW’s “Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities.” This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p><u>VCFPD</u> Prior</p>	<p><u>VCFPD</u></p>
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It has been determined that habitat potentially suitable for special-status plants may be present in the project area for 23 special-status plant species (see Impact BIO-1). Protocol-level surveys for the special-status plant species identified in Attachment B will be conducted in habitat suitable for special-status plants prior to treatments commencing if treatments are unable to be conducted during the time of year that would be conducive to avoiding impacts based on the phenology of the species.

<p>SPR BIO-8: Identify and Minimize Impacts in Coastal Zone ESHAs. This SPR applies to all treatment activities and only the ecosystem restoration treatment type.</p>	<p>No</p>	<p><u>VCFPD</u> N/A</p>	<p><u>VCFPD</u></p>
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The project area is outside of the Coastal Zone; therefore, this SPR does not apply.

<p>SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife. This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p><u>VCFPD</u> During</p>	<p><u>VCFPD</u></p>
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During the August 2, 2022 reconnaissance survey, invasive plant species such as yellow star-thistle (*Centaurea solstitialis*), Italian thistle (*Carduus pycnocephalus*), milk thistle (*Silybum marianum*), wild mustard (*Hirshfeldia incana*), scotch broom (*Cytisus scoparius*) and numerous nonnative grasses were noted within the project area. VCFPD will implement BMPs listed under SPR BIO-9 in Attachment A to prevent the spread of invasive plants, noxious weeds, and invasive wildlife.

<p>SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites. If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries) 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. This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p><u>VCFPD</u> Prior-During</p>	<p><u>VCFPD</u></p>
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Surveys will be required prior to treatment activities in habitat suitable for the following special-status wildlife species identified with the potential to occur in the project area (Attachment B, Table B-2): California legless lizard, northern legless lizard, southern California legless lizard, coast horned lizard, coast patch-nosed snake, coast range newt, coastal whiptail, south coast gartersnake, two-striped gartersnake, western pond turtle, western spadefoot toad, burrowing owl, loggerhead shrike, mountain plover, summer tanager, vermilion flycatcher, yellow warbler, yellow-breasted chat, American badger, Mexican long-tongued bat, mountain lion, pallid bat, ringtail, San Diego desert woodrat, Townsend’s big-eared bat, and western mastiff bat. If VCFPD assumes that the species is present within the project area and feasible mitigation is implemented based on that assumption, surveys are not required for monarch butterfly, Crotch bumble bee, California red-legged frog, bald eagle, bank swallow, California condor, coastal California gnatcatcher, golden eagle, least Bell’s vireo, southwestern willow flycatcher, Swainson’s hawk, and white-tailed kite. Surveys will be conducted based on formal US Fish and Wildlife Service (USFWS) protocols when available, including the Burrowing owl protocol (California Burrowing Owl Consortium, 1993), coastal California gnatcatcher (USFWS 2019), California red-legged frog

(USFWS 2005), and Swainson’s hawk (Swainson’s Hawk Technical Advisory Committee, 2000). Where approved survey protocols are not available, survey protocols will be developed based on the best and most recent scientific recommendations.

SPR BIO-11. Install Wildlife-Friendly Fencing (Prescribed Herbivory). This SPR applies only to prescribed herbivory and all treatment types.	No	<u>VCFPD</u> N/A	<u>VCFPD</u>
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This impact does not apply to the proposed project because prescribed herbivory is not a proposed treatment activity.

SPR BIO-12. Protect Common Nesting Birds, Including Raptors. The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP PEIR. The active nesting season or peak nesting season will be defined by the qualified RPF or biologist. This SPR applies to all treatment activities and treatment types.	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>
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For treatments implemented during the nesting bird season (February 1–August 31), a survey for common nesting birds will be conducted within the project area prior to treatment activities. If active nests of common birds or raptors are observed during focused surveys, disturbance to the nests will be avoided by, modifying treatments to avoid disturbance to the nests, deferring treatment until the nests are no longer active as determined by an RPF or qualified biologist, or establishing an appropriate buffer around the nests. Buffers may be reduced by a qualified biologist or RPF based on rationale such as species sensitivity, vegetative cover, nest height, and topography that will attenuate noise and visual disturbance. In addition, trees with visible raptor nests will be retained, whether or not the nest is occupied.

MM 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).	No	<u>VCFPD</u> N/A	<u>VCFPD</u>
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This mitigation measure does not apply because no special-status plants listed under ESA or CESA have potential to occur in the project area (Attachment B, Table B-2).

MM BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement measures to avoid loss of individuals and maintain habitat function of occupied habitat.	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>
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Measures to avoid loss of individuals and maintain habitat function of occupied habitat for Miles' milk-vetch, South coast saltscale, Davidson's saltscale, late-flowered mariposa-lily, Lemmon's jewelflower, southern tarplant, umbrella larkspur, Ojai fritillary, mesa horkelia, California satintail, Coulter's goldfields, pale-yellow layia, Santa Barbara honeysuckle, Davidson's bush-mallow, white-veined monardella, Aparejo grass, Ojai navarretia, chaparral nolina, white rabbit-tobacco, Nuttall's scrub oak, Salt Spring checkerbloom, and Sonoran maiden fern will be implemented (Table B-2). Impacts to non-listed special-status plants will be avoided by physically avoiding the location of special-status plants using avoidance buffers, designing projects to maintain the function of special-status plant habitat, and prohibiting fire ignition within the special-status plant buffer.

<p>MM BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. If the special-status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above.</p>	<p>No</p>	<p><u>VCFPD</u> N/A</p>	<p><u>VCFPD</u></p>
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This mitigation measure does not apply to the project. VCFPD will implement Mitigation Measure BIO-1b to avoid impacts to species; therefore, no compensatory mitigation will be required.

<p>MM BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)</p>	<p>Yes</p>	<p><u>VCFPD</u> Prior-During</p>	<p><u>VCFPD</u></p>
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The measures listed in Attachment A will be implemented to avoid impacts to and maintain habitat function (e.g., suitable vegetation cover, nesting trees, host plants) for California red-legged frog, bald eagle, California condor, coastal California gnatcatcher, golden eagle, least Bell’s vireo, southwestern willow flycatcher, Swainson’s hawk, white-tailed kite, and ringtail. In addition, VCFPD consulted with CDFW and USFWS in conformance with the requirements of MM BIO-2a. CDFW consultation was completed on February 9, 2023, with a follow-up call on March 7, 2023. USFWS consultation was completed on March 9, 2023.

<p>MM 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.</p>	<p>Yes</p>	<p><u>VCFPD</u> Prior-During</p>	<p><u>VCFPD</u></p>
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The measures listed in Attachment A will be implemented to avoid impacts to and maintain habitat function (e.g., suitable vegetative cover, nesting trees, host plants) for Crotch bumble bee, California legless lizard, northern legless lizard, Southern California legless lizard, coast horned lizard, coast patch-nosed snake, coast range newt, coastal whiptail, south coast gartersnake, two-striped gartersnake, western pond turtle, western spadefoot toad, burrowing owl, loggerhead shrike, mountain plover, summer tanager, vermilion flycatcher, yellow warbler, yellow-breasted chat, American badger, Mexican long-tongued bat, mountain lion, pallid bat, San Diego desert woodrat, Townsend’s big-eared bat, and western mastiff bat.

<p>MM BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities) If the provisions of Mitigation Measure BIO-2a, BIO-2b, BIO-2d, BIO-2e, BIO-2f, or BIO-2g cannot be implemented and the project proponent determines that additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or protecting land that provides (or will provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit), if these requirements are equally or more effective than the mitigation identified above.</p>	<p>No</p>	<p><u>VCFPD</u> N/A</p>	<p><u>VCFPD</u></p>
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This mitigation measure does not apply to the project. As required, Mitigation Measures BIO-2a, BIO-2b, BIO-2e, and BIO-2g will be implemented to reduce impacts to species.

MM BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)	No	<u>VCFPD</u> N/A	<u>VCFPD</u>
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This mitigation measure does not apply to the project because the project area is outside of the range of valley elderberry longhorn beetle.

MM BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities) 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 would benefit from treatment in the occupied habitat area even though some may be killed, injured or disturbed during treatment activities. If it is determined that treatment activities would be beneficial to special-status butterflies, no compensatory mitigation will be required.	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>
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Measures listed in Attachment A will be implemented to avoid impacts to and maintain habitat function for and monarch butterfly. MM BIO-2e applies because habitat suitable for monarch breeding may potentially be present in the project area. MM BIO-2e states that prescribed burning treatments in habitat suitable for monarch butterfly foraging (as identified by a qualified biologist or RPF) will be conducted from October 31 through March 15, if feasible, and that treatment will be designed to occur in a way that ensures the entirety of the habitat is not burned or removed in a single year (Appendix A).

MM BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities)	No	<u>VCFPD</u> N/A	<u>VCFPD</u>
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This mitigation measure does not apply because no special-status beetles, flies, grasshoppers, or snails have the potential to occur within the project area.

MM BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities) 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 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. If it is determined that treatment activities would be beneficial to special-status bumble bees, no compensatory mitigation will be required.	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>
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Measures listed in Attachment A will be implemented to avoid or minimize impacts to and maintain habitat function (e.g., floral resources) for Crotch bumble bee. Habitat potentially suitable for Crotch bumble bee has been documented extensively in the vicinity of the project area (Table B-2). Pursuant to MM BIO-2g, prescribed burning will occur from October through February, or outside of the bumble bee flight season, and treatment will be designed to avoid impacts to all habitat treated in a single year (Appendix A).

MM BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory)	No	<u>VCFPD</u> N/A	<u>VCFPD</u>
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This mitigation measure does not apply to the proposed project because prescribed herbivory is not a proposed treatment activity.

MM 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: 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. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.	Yes	<u>VCFPD</u> Prior	<u>VCFPD</u>
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The project area potentially contains 20 sensitive natural communities as defined by the Manual of California Vegetation and one oak woodland type (Coast live oak woodland) (Attachment B). Under Mitigation Measure BIO-3a, a qualified RPF or biologist will determine the natural fire regime, condition class, and FRI

for each sensitive natural community and oak woodland type. Treatment activities in sensitive natural communities and oak woodlands will be designed to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function.

<p>MM BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands. If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects.</p>	<p>Yes</p>	<p><u>VCFPD</u> During-Post</p>	<p><u>VCFPD</u></p>
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If habitat function of oak woodlands would not be maintained through implementation of Mitigation Measure BIO-3a, unavoidable losses of these resources will be compensated through restoration or preservation of these vegetation types within or outside of the project area.

<p>MM BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., Lake and Streambed Alteration Agreement), if these requirements are equally or more effective than the mitigation identified above.</p>	<p>No</p>	<p><u>VCFPD</u> N/A</p>	<p><u>VCFPD</u></p>
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This mitigation measure does not apply to the project because WLPZs and ELZs will be established adjacent to all Class I, Class II, and Class III streams within the project area, and protections applied in all WLPZs and ELZs will avoid the loss or degradation of riparian habitat functions. Therefore, compensatory mitigation is not required.

<p>MM BIO-4: Avoid State and Federally Protected Wetlands</p>	<p>Yes</p>	<p><u>VCFPD</u> Prior-During</p>	<p><u>VCFPD</u></p>
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This mitigation measure will be applied to delineate the boundaries of federally and state protected wetlands and waters, and a minimum 25-foot buffer will be established around wetlands.

<p>MM BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites</p>	<p>Yes</p>	<p><u>VCFPD</u> Prior-During</p>	<p><u>VCFPD</u></p>
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If wildlife nursery habitat is identified during SPR BIO-10 surveys, treatment activities could result in disturbance of nursery behavior causing loss of young or result in direct removal of nursery habitat and this mitigation measure will apply. A qualified RPF or biologist will establish buffers around active nursery sites during the maternity season for species such as deer, bats, herons, and other species which breed in nursery sites. Buffers will be established of the appropriate size prior to implementation of treatment activities. The appropriate size and shape of the buffer will be based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors.

Refer to Attachment A, for guidance on the project-specific review and survey procedures for biological resources.

EC-6 GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	Impact Geo-1, 3.7	LTS	SPR GEO-1, 2, 3, 4, 5, 6, 7, 8, SPR HYD-3 SPR AQ-3 SPR HYD-4	Yes	LTS	<input checked="" type="checkbox"/>

The table below includes a summary of the six dominant soil types that may be present in the project area. Erosion factor K indicates the susceptibility of a soil to sheet and rill erosion by water. The estimates are based primarily on percentage of silt, sand, and organic matter and on soil structure and saturated hydraulic conductivity. Values of K range from 0.02 to 0.69. Other factors being equal, the higher the value, the more susceptible the soil is to sheet and rill erosion by water (NRCS 2022).

Table 2 Summary Of The Six Dominant Soil Types That May Be Present In The Project Area

Soil Type	Erosion Factor K	Erosion Potential
Sespe clay loam, 50 to 75 percent slopes	.32	Moderate
Millsholm-Malibu complex, 30 to 50 percent slopes, eroded	.43	High
Lodo rocky loam, 30 to 50 percent slopes	.37	Moderate
Nacimiento silty clay loam, 30 to 50 percent slopes	.43	High
Los Osos clay loam, warm, 20 to 50 percent slopes	.37	Moderate
Sespe clay loam, 30 to 50 percent slope	.32	Moderate

Initial treatment and maintenance treatments would include mechanical treatment, manual treatment, and prescribed burning (broadcast and pile burning). All of these activities would result in vegetation removal and soil disturbance. The potential for these treatment activities to cause substantial erosion or loss of topsoil was examined in the PEIR. This impact is within the scope of the PEIR because the use of and type of equipment, extent of vegetation removal, and intensity of prescribed burning are consistent with those analyzed in the PEIR. 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 PEIR. However, the soil characteristics of the project area are essentially the same within and outside the treatable landscape; therefore, the potential impact related to soil erosion is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact GEO-2: Increase Risk of Landslide	Impact Geo-2, 3.7	LTS	<u>SPR GEO-3, 4, 7, 8, SPR AQ- 3</u>	Yes	LTS	<input checked="" type="checkbox"/>
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Initial and maintenance treatments would include vegetation removal in areas with steep slopes. Much of the project area is on hillsides, and the Red Mountain fault zone borders the project area to the south (USGS 2006). Additionally, the Shepard Mesa fault runs through the northern part of the project area (USGS 2017). Much of the soil in the project area has a moderate to high erosion potential (see table under Impact GEO-1). All mechanized equipment would operate on slopes less than 35 percent, except during control line construction for broadcast burning where bull dozers may operate on slopes up to 50 percent. Manual treatment may occur on slopes steeper than 35 percent. The potential for treatment activities to increase landslide risk was examined in the PEIR. This impact is within the scope of the PEIR because the extent of vegetation removal and required avoidance of steep slopes and areas of instability are consistent with those analyzed in the PEIR. 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 PEIR. 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 not substantially greater than described in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Other Impacts to Geology, Soils, Paleontology, and Mineral Resources: Would the project result in other impacts to geology, soils, paleontology, and mineral resources that are not evaluated in the CalVTP PEIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. VCFPD 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 PEIR (refer to Section 3.7.1, "Environmental Setting," and Section 3.7.2, "Regulatory Setting," in Volume II of the Final PEIR). Inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the 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 PEIR. 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 geology and soils would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
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. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>

Mechanical activities will be suspended depending on forecasted precipitation to minimize the risk of soil compaction and disturbance. The project does not propose prescribed herbivory or herbicide treatment activities.

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. This SPR applies only to mechanical treatment activities and all treatment types.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>
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VCFPD will avoid driving heavy equipment and other high ground pressure vehicles on saturated soils to minimize the risk of soil compaction and disturbance.

<p>SPR GEO-3 Stabilize Disturbed Soil Areas: The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. This SPR only applies to mechanical and prescribed herbivory treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>VCFPD</u> During-Post</p>	<p><u>VCFPD</u></p>
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VCFPD will stabilize soils following proposed mechanical treatments and prescribed burns that result in exposure of bare soil over 50 percent or more of the project area. This project includes chipping materials and scattering the chips within the treated areas, which will reduce the amount of exposed bare soil following treatments.

<p>SPR GEO-4 Erosion Monitoring: The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. This SPR applies only to mechanical and prescribed burning treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>VCFPD</u> During</p>	<p><u>VCFPD</u></p>
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After the first storm event where 1.5 inches of rain or more falls within a 24-hour period, the project area will be inspected to determine if erosion control measures functioned properly. If any area is identified where erosion could result in substantial discharge, the area will be stabilized within 48 hours of the rainfall event.

<p>SPR GEO-5 Drain Stormwater via Water Breaks: The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>VCFPD</u> During</p>	<p><u>VCFPD</u></p>
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Stormwater runoff will be drained via water breaks to minimize the risk of erosion occurring within the project area or on road infrastructure following mechanical and manual treatments that may compact or disturb soils.

<p>SPR GEO-6 Minimize Burn Pile Size: The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>VCFPD</u> During</p>	<p><u>VCFPD</u></p>
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Pile burning activities will be implemented and supervised by VCFPD. Burn piles will not exceed 20 feet in length, width, or diameter, unless implemented in accordance with the exceptions described in the PEIR (CalVTP Final PEIR Volume II Section 2.7.6, 47).

<p>SPR GEO-7 Minimize Erosion, Slope Restrictions for Heavy Equipment and Tractor Roads: This SPR applies to all treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>VCFPD</u> During</p>	<p><u>VCFPD</u></p>
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The use of heavy equipment (i.e., bulldozers, masticators, and chippers) will not occur on slopes over 35 percent except during control line construction for broadcast burning where bull dozers may operate on slopes up to 50 percent.

<p>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). This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types.</p>	<p>Yes</p>	<p><u>VCFPD</u> Prior-During</p>	<p><u>VCFPD</u></p>
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The use of heavy equipment (i.e., bulldozers, masticators, and chippers) for mechanical treatment activities will not occur on slopes over 50 percent. For other treatment activities, an RPF or licensed geologist will evaluate project areas with slopes greater than 50 percent for any unstable areas and unstable soils. If these areas are unavoidable, additional measures would be implemented to ensure that substantial erosion or loss of topsoil would not occur.

EC-7 GREENHOUSE GAS EMISSIONS

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact GHG-1: Conflict with applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs	Impact GHG-1, 3.8	LTS	<u>SPR GHG-1</u>	Yes	LTS	<input checked="" type="checkbox"/>

The use of vehicles, 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 PEIR. Consistent with the PEIR, 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 PEIR because the proposed activities, as well as the associated equipment, duration of use, and resultant GHG emissions, are consistent with those analyzed in the PEIR. 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 PEIR. 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact GHG-2: Generate Greenhouse Gas Emissions through Treatment Activities	Impact GHG-2, 3.8	SU	<u>SPR AQ-3</u> <u>MM GHG-2</u>	Yes	SU	<input checked="" type="checkbox"/>
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The use of vehicles, mechanical equipment, and prescribed burning during initial and maintenance treatments would result in GHG emissions. The potential for treatments under the CalVTP to generate GHG emissions was examined in the PEIR and found to be 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 PEIR requires project proponents to implement feasible methods to reduce the GHG emissions from prescribed burning, including pile burning. Accordingly, VCFPD is proposing the use of air curtain burners. The essential function of this technology 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 emit 54 percent less CO₂ emissions compared to pile burning (Puetzman et. al. 2015 as cited in Ascent 2022). Additionally, the production of biochar and subsequent application as a soil amendment provides long-term carbon sequestration benefits that are not available from pile burning.

The GHG emissions produced from this proposed treatment project are within the scope of the impacts evaluated in the PEIR because the proposed activities, equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions associated with wildfire are consistent with those analyzed in the PEIR. Although use of air curtain burners would substantially reduce GHG emissions, emissions generated by the treatment 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 PEIR.

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 PEIR. However, within the boundary of the project area, the climate conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the GHG impact is also the same, as described above. Although use of an air curtain burner would substantially reduce GHG emissions, this impact would remain significant and unavoidable as explained in the PEIR, but for the reasons explained above, would not constitute a new or substantially more severe significant impact.

Other Impacts to related to Greenhouse Gases: Would the project result in other impacts related to greenhouse gases that are not evaluated in the CalVTP PEIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. VCFPD 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 PEIR (refer to Section 3.8.1, "Regulatory Setting," and Section 3.8.2, "Environmental Setting," in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the PEIR. 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 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 PEIR. No changed circumstances are present, and the proposed treatments and 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.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
SPR GHG-1 Contribute to the AB 1504 Carbon Inventory Process: The project proponent of treatment projects subject to the AB 1504 process will provide all necessary data about the treatment that is needed by the U.S. Forest Service and FRAP to fulfill requirements of the AB 1504 carbon inventory, and to aid in the ongoing research about the long-term net change in carbon sequestration resulting from treatment activity. This SPR applies to all treatment activities and all treatment types.	No	<u>VCFPD</u> N/A	<u>VCFPD</u>

SPR GHG-1 is not applicable to the proposed project; the VCFPD is not subject to the requirement to provide information to inform reporting under the Board of Forestry and Fire Protection's Assembly Bill 1504 Carbon Inventory Process because this project is not a registered offset project.

MM GHG-2. Implement GHG Emission Reduction Techniques During Prescribed Burns. 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.	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>
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A Burn Plan pursuant to SPR AQ-3 will be prepared by VCFPD prior to pile and broadcast burn treatments.

Use of an air curtain burner is proposed, pursuant to MM GHG-2, to reduce GHG emissions from pile burning. Use of an air curtain burner would substantially reduce smoke and associated GHG emissions (i.e., CO₂) compared to pile burning, as explained above.

EC-8 ENERGY

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy	Impact ENG-1, 3.9	LTS	N/A	Yes	LTS	<input checked="" type="checkbox"/>

The use of vehicles and mechanical equipment 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 PEIR. The consumption of energy during implementation of the treatment project is within the scope of the PEIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the PEIR. 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 PEIR. However, existing energy consumption is essentially the same within and outside the treatable landscape; thus, the increase in the use of vehicles and mechanical equipment, and related energy use, would not be substantially greater than that analyzed in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

Other Impacts to Energy Resources: Would the project result in other impacts to energy resources that are not evaluated in the CalVTP PEIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. VCFPD has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.9.1, "Regulatory Setting," and Section 3.9.2, "Environmental Setting," in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those considered in the PEIR. 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 energy resources would occur.

EC-9 HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials	Impact HAZ-1, 3.10	LTS	<u>SPR HAZ-1</u>	Yes	LTS	<input checked="" type="checkbox"/>

Initial and maintenance treatments would include mechanical treatments, manual treatments, and prescribed burning (broadcast and pile burning). 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 PEIR. This impact is within the scope of the PEIR because the types of treatments and associated equipment and types of hazardous materials that would be used are consistent with those analyzed in the PEIR. 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 PEIR. 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	Impact HAZ-2, 3.10	LTS	<u>SPR HAZ-5, 6, 7, 8, 9</u>	No	N/A	<input checked="" type="checkbox"/>
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This impact does not apply to the proposed project because herbicides would not be used within the project area.

Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites	Impact HAZ-3, 3.10	LTSM	<u>MM HAZ-3</u>	Yes	LTS	<input checked="" type="checkbox"/>
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The project area is inaccessible to the public because it is entirely within the private property owned by the Haley family. However, initial and maintenance treatments would include soil disturbance and prescribed burning, which could expose workers 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 or the environment to hazardous materials was examined in the PEIR. This impact was identified as potentially significant in the PEIR because hazardous materials sites could be present within treatment sites, and soil disturbance or burning in those areas could expose people or the environment to hazards. As directed by Mitigation Measure HAZ-3, database searches for hazardous materials sites within the project area have been conducted, and no hazardous materials sites were identified within 0.25 mile of the project area (DTSC 2022; CalEPA 2016; SWRCB 2022) (Attachment C). Therefore, this impact would be less than significant. 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 PEIR. 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Other Impacts to Hazardous Materials, Public Health and Safety: Would the project result in other impacts to hazardous materials, public health and safety that are not evaluated in the CalVTP PEIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. VCFPD 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 PEIR (refer to Section 3.10.1, "Environmental Setting," and Section 3.10.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the 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 PEIR. 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 hazardous materials, public health, or safety would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
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. This SPR applies to all treatment activities and treatment types.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>

Mechanical and manual treatment crews and pile burn crews will maintain all equipment in compliance with SPR HAZ-1 to minimize the risk of impacts resulting from leaks.

SPR HAZ-2 Require Spark Arrestors: This SPR applies only to manual treatment activities and all treatment types	Yes	<u>VCFPD</u> During	<u>VCFPD</u>
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All mechanized hand tools will have federal- or state-approved spark arrestors.

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.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>
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Manual treatment crews will carry one fire extinguisher per chainsaw and vehicles will be equipped with one long-handled shovel and one axe or Pulaski.

SPR HAZ-4 Prohibit Smoking in Vegetated Areas. This SPR applies to all treatment activities and treatment types.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>
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Crews will not be permitted to smoke in vegetated areas prior to or during treatment activities.

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. This SPR applies only to herbicide treatment activities and all treatment types.	No	<u>VCFPD</u> N/A	<u>VCFPD</u>
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SPR-HAZ-5 does not apply to the proposed project because herbicides would not be used within the project area.

SPR HAZ-6 Comply with Herbicide Application Regulations. This SPR applies only to herbicide treatment activities and all treatment types.	No	<u>VCFPD</u> N/A	<u>VCFPD</u>
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SPR-HAZ-6 does not apply to the proposed project because herbicides would not be used within the project area.

SPR HAZ-7 Triple Rinse Herbicide Containers. This SPR applies only to herbicide treatment activities and all treatment types.	No	<u>VCFPD</u> N/A	<u>VCFPD</u>
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SPR-HAZ-7 does not apply to the proposed project because herbicides would not be used within the project area.

SPR HAZ-8 Minimize Herbicide Drift to Public Areas. This SPR applies only to herbicide treatment activities and all treatment types.	No	<u>VCFPD</u> N/A	<u>VCFPD</u>
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SPR-HAZ-8 does not apply to the proposed project because herbicides would not be used within the project area.

SPR HAZ-9 Notification of Herbicide Use in the Vicinity of Public Areas. This SPR applies only to herbicide treatment activities and all treatment types.	No	<u>VCFPD</u> N/A	<u>VCFPD</u>
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SPR-HAZ-9 does not apply to the proposed project because herbicides would not be used within the project area.

MM 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, VCFPD 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.	Yes	<u>VCFPD</u> Prior	<u>VCFPD</u>
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As discussed above, database searches for hazardous materials sites within the project area have been conducted, and no hazardous materials sites were identified within 0.25 mile of the project area (DTSC 2022; CalEPA 2016; SWRCB 2022) (Attachment C).

EC-10 HYDROLOGY AND WATER QUALITY

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning	Impact HYD-1, 3.11	LTS	<u>SPR HYD-4</u> <u>SPR AQ-3</u> <u>SPR BIO-4, 5</u> <u>SPR GEO-4, 6</u> <u>MM BIO-3b</u>	Yes	LTS	<input checked="" type="checkbox"/>

The project area is within the South Coast hydrologic region and is under the jurisdiction of the Los Angeles Regional Water Quality Control Board. The project area falls within the Ventura – San Gabriel Coastal watershed. There are several watercourses within the project area. Two unnamed intermittent watercourses cross the proposed ecological restoration treatment area. These join and drain southwest into the Pacific Ocean. In the proposed fuel break treatment area, an intermittent drainage/wetland shrub area is mapped crossing the proposed fuel break in the southern end of the project and again near Casitas Vista Road, at which point it drains into Coyote Creek. Coyote Creek, which is a perennial waterway, crosses through both proposed WUI fuel reduction treatment areas. Coyote Creek flows into Ventura River, which feeds into the Pacific Ocean at the city of Ventura.

Initial and maintenance treatments would include prescribed burning. Ash and debris from the project area could be washed by runoff into adjacent drainages and streams. WLPZs ranging from 50 to 150 feet will be implemented for any watercourses that are within the project area. The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR because the use of low-intensity prescribed burns and associated impacts to water quality are consistent with those analyzed in the PEIR. 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 PEIR. 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities	Impact HYD-2, 3.11	LTS	<u>SPR HYD-1, 4, 5</u> <u>SPR BIO-1</u> <u>SPR GEO-1, 2, 3, 4, 7, 8</u> <u>SPR HAZ-1, 5</u>	Yes	LTS	<input checked="" type="checkbox"/>
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Initial and maintenance treatments would include mechanical and manual treatments. WLPZs ranging from 50 to 150 feet will be implemented for any watercourses that are within the project area. The potential for mechanical and manual treatment activities to violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR 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 PEIR. 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 PEIR. 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory	Impact HYD-3, 3.11	LTS	<u>SPR HYD-3</u>	No	N/A	<input checked="" type="checkbox"/>
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This impact does not apply to the proposed project because prescribed herbivory is not a proposed treatment activity.

Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides	Impact HYD-4, 3.11	LTS	<u>SPR HYD-5</u> <u>SPR BIO-4</u> <u>SPR HAZ-5, 7</u>	No	N/A	<input checked="" type="checkbox"/>
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This impact does not apply to the proposed project because application of herbicides is not a proposed treatment activity.

Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	Impact HYD-5, 3.11	LTS	<u>SPR HYD-4, 6</u> <u>SPR GEO-5</u>	Yes	LTS	<input checked="" type="checkbox"/>
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Initial and maintenance treatments could cause ground disturbance that could directly or indirectly modify existing drainage patterns. The potential for treatment activities to substantially alter the existing drainage pattern of a project area was examined in the PEIR. This impact to site drainage is within the scope of the PEIR because the types of treatments and treatment intensity are consistent with those analyzed in the PEIR. 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 PEIR. 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Other Impacts to Hydrology and Water Quality: Would the project result in other impacts to hydrology and water quality that are not evaluated in the CalVTP PEIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. VCFPD 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 PEIR (refer to Section 3.11.1, "Environmental Setting," and Section 3.11.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to hydrology and water quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to hydrology and water quality would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
SPR HYD-1 Comply with Water Quality Regulations: Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. This SPR applies to all treatment activities and treatment types.	Yes	VCFPD Prior-During	VCFPD

Initial and maintenance treatments will be implemented in conformance with applicable regulatory requirements of the Waste Discharge Requirements and/or related Waivers and the water quality control plan for the South Coast hydrologic region, pursuant to the standards adopted by the Los Angeles Regional Water Quality Control Board (Region 4). This project is automatically enrolled in the Vegetation Treatment General Order (ORDER WQ 2021-0026-DWQ).

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.	Yes	VCFPD During	VCFPD
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No new roads will be constructed under the proposed project.

SPR HYD-3 Water Quality Protections for Prescribed Herbivory: This SPR applies to prescribed herbivory treatment activities and all treatment types.	No	VCFPD N/A	VCFPD
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SPR-HYD-3 does not apply to the proposed project because prescribed herbivory would not be used within the project area.

SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones: The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) as defined in 14 CCR Section 916 .5 of the California Forest Practice Rules on either side of watercourses. This SPR applies to all treatment activities and treatment types.	Yes	VCFPD Prior-During	VCFPD
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WLPZs will be established for watercourses within the project area based on the widths and protective measures established for each water and slope class defined in Table I of 14 California Code of Regulations Section 916.5 (CalVTP Final PEIR Section 3.7-24). Coyote Creek, a Class I Watercourse, and tributaries to

Coyote Creek which are Class II watercourses, are present in the project area. Coyote Creek flows east from the project area into Ventura River, which then flows south along Highway 33 into the Pacific Ocean. Additionally, two unnamed watercourses in the northwest of the project are Class III watercourses, and flow downstream toward the west and south into the Pacific Ocean.

SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides: This SPR applies to herbicide treatment activities and all treatment types.	No	VCFPD N/A	VCFPD
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SPR-HYD-5 does not apply to the proposed project because herbicides would not be used within the project area.

SPR HYD-6 Protect Existing Drainage Systems: This SPR applies to all treatment activities and treatment types.	Yes	VCFPD During	VCFPD
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All stormwater drainage infrastructure will be flagged prior to treatment activities to prevent disturbance or modification. If stormwater drainage infrastructure is inadvertently disturbed or modified, VCFPD will repair any damage and restore pre-project drainage conditions.

EC-11 LAND USE AND PLANNING, POPULATION AND HOUSING

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation	Impact LU-1, 3.12	LTS	<u>SPR AD-</u> 3, 9	Yes	LTS	<input checked="" type="checkbox"/>

The project area is entirely within the private property owned by the Haley family. Treatment activities on lands owned or managed by private owners and conducted by local government agencies (e.g., VCFPD) are generally required to comply with applicable city and county general plans and other local policies and ordinances. As discussed in Section EC-5, "Biological Resources," all portions of the proposed project are on the Haley family's private property, and VCFPD will acquire written consent from the Haley family prior to project initiation in accordance with the Ventura County Tree Protection Ordinance, and treatment activities will be designed to maintain habitat function within oak woodland habitat areas in accordance with the Ventura County Oak Woodlands Management Plan. As noted in Section EC-12, "Noise," below, treatment activities would take place during daytime hours consistent with the Ventura County Noise Ordinance (Ventura County 2020). The potential for vegetation treatment activities to cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation was examined in the PEIR. This impact is within the scope of the PEIR because the treatment types and activities are consistent with those analyzed in the PEIR. 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 PEIR. 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. Treatment types would be consistent with those described in the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

Impact LU-2: Induce Substantial Unplanned Population Growth	Impact LU-2, 3.12	LTS	N/A	Yes	LTS	<input checked="" type="checkbox"/>
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The potential for initial treatments and maintenance treatments to result in substantial population growth as a result of increases in demand for employees was examined in the PEIR. The PEIR assumed that treatment activities would have an average crew size of 20 workers for mechanical treatments, 45 workers for prescribed burns, and 20 to 40 workers for manual treatments. The proposed project assumes crew sizes of 2 to 20 workers for mechanical treatments, 10 to 50 workers for prescribed burns, and up to 80 workers for manual treatments. Because the crew sizes would be within the ranges of the crew sizes assumed in the PEIR and because of the temporary nature of the increase in demand for workers, the proposed treatments would not cause a need for new housing, roads, or infrastructure, and impacts associated with short-term increases in the demand for workers during implementation of the treatment project are within the scope of the PEIR. In addition, the proposed project would not require the hiring of new permanent employees. 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 PEIR. However, the population and housing characteristics of the project area are essentially the same within and outside the treatable landscape; therefore, the population and housing impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

Other Impacts related to Land Use and Planning, Population and Housing: Would the project result in other impacts related to land use and planning, and population and housing that are not evaluated in the CalVTP PEIR?				No	N/A	☒
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The proposed project is consistent with the treatment types and activities considered in the CalVTP PEIR. VCFPD 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 PEIR (refer to Section 3.12.1, "Environmental Setting," and Section 3.12.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land in the project area that is outside the treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing conditions that are pertinent to land use and planning, population and housing 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 PEIR. 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 land use and planning, population and housing would occur.

EC-12 NOISE

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation	Impact NOI-1, 3.13	LTS	SPR NOI-1, 2, 3, 4, 5, 6 SPR AD- 3	Yes	LTS	☒

The initial and maintenance treatments would include the use of mechanical treatment that requires heavy-duty, noise-generating equipment (i.e., masticators). The potential for substantial short-term increase in ambient noise levels was analyzed in the PEIR. The short-term increase in noise from the use of heavy equipment is within the scope of the activities and impacts addressed in the PEIR because the types and number of equipment proposed, and the duration of use of the equipment are consistent with those analyzed in the PEIR. There are a few rural residences near the project area and WUI fuel reduction treatment will occur

near the small town of Oak View. Therefore, treatments may be located near residences; however, treatment activities would occur during daytime hours, typically between 7:00 a.m. and 4:00 p.m., which is consistent with the County Noise Ordinance which states grinding and chipping cannot occur within 500 feet of occupied property between the hours of 7:00 p.m. and 7:00 a.m. (Ventura County 2022). This would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. In addition, treatments would be dispersed throughout the 448-acre project area so noise increases at any one sensitive receptor would be limited. 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 PEIR. 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 PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities	Impact NOI-2, 3.13	LTS	<u>SPR NOI-1</u>	Yes	LTS	<input checked="" type="checkbox"/>
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The initial and maintenance treatments would require large trucks to haul heavy equipment and crews to the project area. These work trucks would pass near residential receptors, which could increase the single event noise levels (SENL). The potential for a substantial short-term increase in SENL was evaluated in the PEIR. Short-term increases in noise from the use of heavy equipment during project implementation is within the scope of the treatment activities and impacts addressed in the PEIR because the number and types of equipment proposed are consistent with those analyzed in the PEIR. All truck trips and use of heavy equipment will be limited to daytime hours to avoid sleep disturbance of nearby residents. 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 PEIR. 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Other Impacts Related to Noise: Would the project result in other impacts related to noise that are not evaluated in the CalVTP PEIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatment is consistent with the treatment types and activities discussed in the PEIR. VCFPD has considered all site-specific characteristics of the proposed treatment project and determined they are consistent with the regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.13.1, "Environmental Setting," and Section 3.13.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions 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 PEIR. No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to noise would occur that is not analyzed in the PEIR.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
SPR NOI-1 Limit Heavy Equipment Use to Daytime Hours: VCFPD 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). This SPR applies to all treatment activities and treatment types.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>

Noise-generating vegetation treatment activities will be limited to Monday – Friday between 7:00 am to 4:00 pm.

SPR NOI-2 Equipment Maintenance: 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.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>
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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.

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.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>
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VCFPD will ensure that engine shrouds are closed during equipment operation.

SPR NOI-4 Locate Staging Areas Away from Noise-Sensitive Land Uses. This SPR applies to all treatment activities and treatment types.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>
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Equipment will be staged within the property boundaries and not immediately adjacent to any sensitive receptors.

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.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>
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VCFPD will ensure that equipment will be shut down when not in use and idling of equipment and haul trucks will be limited to 5 minutes.

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. This SPR applies only to mechanical treatment activities and all treatment types.	Yes	<u>VCFPD</u> Prior	<u>VCFPD</u>
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Proposed treatment activities using heavy equipment will occur within 1,500 feet of residential noise-sensitive receptors. Several rural residences are present within 1,500 feet of treatment activities. No schools, hospitals, or places of worship are present within 1,500 feet of the project area. All noise-sensitive receptors will be notified prior to treatments.

EC-13 RECREATION

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas	Impact REC-1, 3.14	LTS	<u>SPR REC-1</u>	No	N/A	<input checked="" type="checkbox"/>

This impact does not apply to the proposed project because the project area is entirely within private land owned by the Haley Family. There are no designated recreation areas within the project area. No areas within the project area are accessible to the public without prior consent obtained from the landowner.

Other Impacts to Recreation: Would the project result in other impacts to recreation that are not evaluated in the CalVTP PEIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed project is consistent with the treatment types and activities considered in the CalVTP PEIR. VCFPD 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 PEIR (refer to Section 3.14.1, "Environmental Setting," and Section 3.14.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land in the project area that is outside the treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental conditions pertinent to recreation that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. 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.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
SPR REC-1 Notify Recreational Users of Temporary Closures. 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 approximately 2 weeks prior to the commencement of the treatment activities. This SPR applies to all treatment activities and treatment types.	No	VCFPD N/A	VCFPD

SPR REC-1 does not apply to the proposed project because the project area is located on privately-owned land and does not contain recreational resources.

EC-14 TRANSPORTATION

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact TRAN-1: Result in temporary traffic operations impacts by conflicting with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures	Impact TRAN-1, 3.15	LTS	<u>SPR TRAN-1</u> <u>SPR AD-3</u>	Yes	LTS	<input checked="" type="checkbox"/>

Initial and maintenance treatments would temporarily increase vehicular traffic on SR 150 and private roadways in the project area (e.g., Red Mountain Fire Road, Lake Casitas Fire Road, and Casitas Vista Road). The potential for a temporary increase in traffic to conflict with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures was examined in the PEIR. The proposed treatments would be short term, and temporary increases in traffic related to treatments are within the scope of the PEIR 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 PEIR. 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 project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact TRAN-2: Substantially increase hazards due to a design feature or incompatible uses	Impact TRAN-2, 3.15	LTS	<u>SPR TRAN-1</u> SPR AD-3	Yes	LTS	<input checked="" type="checkbox"/>
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Initial and maintenance treatments would not require the construction or alteration of any roadways. However, the proposed treatments would include prescribed burning, which would produce smoke and could potentially affect visibility along nearby roadways such that a transportation hazard could occur. The potential for smoke to affect visibility along roadways during implementation of the treatment project was examined in the PEIR. This impact is within the scope of the activities and impacts addressed in the PEIR because the burn duration is consistent with that analyzed in the PEIR. 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 PEIR. 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact TRAN-3: Result in a net increase in VMT for the proposed CalVTP	Impact TRAN-3, 3.15	SU	<u>MM AQ-1</u>	Yes	SU	<input checked="" type="checkbox"/>
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Initial and maintenance treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the project area is in a remote location and would require vehicle trips to access the project area. The potential for treatment activities to increase VMT was evaluated in the PEIR. As noted under Impact TRAN-3 in the PEIR, individual vegetation treatment projects under the CalVTP are reasonably expected to generate fewer than 110 trips per day, which would cause a less-than-significant transportation impact for 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). Specifically, the PEIR assumed that individual vegetation treatment projects would accommodate up to 50 vehicles bringing crews and equipment to a treatment site in a day (i.e., 100 trips commuting to and from a treatment site each day, plus a few additional incidental trips during the day). Although the PEIR determined that individual vegetation treatments would likely be less than significant, the overall impact was identified as potentially significant and unavoidable in the PEIR because implementation of the CalVTP would result in a net increase in VMT. The proposed treatments are expected to require between 20 and 40 crew members for manual treatments, between two and four crew members for mechanical treatments, and between 30 and 60 crew members for broadcast burning. The proposed treatments would not all occur concurrently and increases in vehicle trips associated with the treatments would be dispersed on multiple roadways. It is expected that the proposed project would generate fewer than 110 trips. Because the project would generate VMT during project implementation, it would contribute to the environmental significance conclusion in the PEIR; therefore, for purposes of CEQA compliance, this PSA/Addendum notes the impact as significant and unavoidable. 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 PEIR. 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 for areas outside the CalVTP treatable landscape is also potentially significant and unavoidable, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Other Impacts to Transportation: Would the project result in other impacts to transportation that are not evaluated in the CalVTP PEIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. VCFPD 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 PEIR (refer to Section 3.15.1, "Environmental Setting," and Section 3.15.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the 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 PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to transportation would occur.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
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. This SPR applies to all treatment activities and treatment types.	Yes	VCFPD Prior	VCFPD

The proposed project would not result in a permanent increase in traffic beyond existing conditions for the local area. During treatment activities, vehicles would access the project area from SR 150 and private roadways in the project area (e.g., Red Mountain Fire Road, Lake Casitas Fire Road, and Casitas Vista Road). VCFPD will coordinate with the California Department of Transportation, County of Ventura, or other applicable agencies with jurisdiction to determine if traffic control is needed at any affected roadway segment within or surrounding the project area. At a minimum, signs will be placed along all affected roadways to advise motorists of slow vehicles entering and exiting these roadways. Additionally, signs will be placed along affected roadways to advise of smoke conditions during prescribed burning operations.

EC-15 PUBLIC SERVICES, UTILITIES, AND SERVICE SYSTEMS

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs	Impact UTL-1, 3.16	LTS	N/A	Yes	LTS	<input checked="" type="checkbox"/>

Treatment activities requiring the provision of water include prescribed burning (pile and broadcast). An on-site water supply (water trucks) would be available as a safety precaution during prescribed burning. The potential increased demand for water was examined in the PEIR. This impact is within the scope of the activities and impacts addressed in the PEIR because the size of the area proposed for prescribed burn treatments, amount of water required for prescribed burning, and water

source type are consistent with those analyzed in the PEIR. 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 PEIR. 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	Impact UTL-2, 3.16	SU	<u>SPR UTIL-1</u>	No	N/A	<input checked="" type="checkbox"/>
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The initial and maintenance treatments would generate biomass as a result of vegetation removal within the project area. Biomass generated would be chipped and scattered on-site or consumed with pile burning or an air curtain burner. This impact was identified as potentially significant and unavoidable in the PEIR because biomass hauled off-site could exceed the capacity of existing infrastructure for handling biomass. For the proposed treatment project, no biomass would be hauled off-site; therefore, there is no potential to exceed the capacity of existing infrastructure, and this impact does not apply to the proposed project.

Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste	Impact UTL-3, 3.16	LTS	<u>SPR UTIL-1</u>	No	N/A	<input checked="" type="checkbox"/>
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This impact does not apply to the proposed project because all biomass generated from the proposed treatments would be disposed of on-site.

Other Impacts to Public Services, Utilities, and Service Systems: Would the project result in other impacts to public services, utilities, and service systems that are not evaluated in the CalVTP PEIR?				No	N/A	<input checked="" type="checkbox"/>
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The proposed treatment is consistent with the treatment types and activities considered in the PEIR, and the project is consistent with the regulatory and environmental conditions presented in the PEIR (refer to Section 3.16.1, "Environmental Setting," and Section 3.16.2, "Regulatory Setting," in Volume II of the Final PEIR). 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 treatment project are also consistent with those covered in the PEIR. No changed circumstances would lead to new significant impacts not addressed in the PEIR. Therefore, no new impact related to public services, utilities, or service systems would occur that is not covered in the PEIR.

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
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. This SPR applies only to mechanical and manual treatment activities and all treatment types.	No	<u>VCFPD</u> N/A	<u>VCFPD</u>

This SPR does not apply to this project because no biomass will be hauled off-site.

EC-16 WILDFIRE

	PEIR specific			Project specific		
	Identify location of impact Analysis in the PEIR	Identify impact Significance in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Does the Impact Apply to the project Treatments proposed	Identify Impact Significance for the Treatment Project	No New Impact
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	Impact WIL-1, 3-17	LTS	<u>SPR HAZ-2</u> , 3, 4	Yes	LTS	<input checked="" type="checkbox"/>

Initial and maintenance treatments would include prescribed burning and mechanical treatments using heavy equipment, both of which could pose a risk of wildfire ignition or risk of a prescribed fire escaping its control lines. The project is mapped within high and very high fire severity zone areas (CAL FIRE 2022). The potential increase in exposure to wildfire during implementation of treatments was examined in the PEIR. Increased wildfire risk associated with prescribed burning and use of heavy equipment in vegetated areas are within the scope of the PEIR because the types of equipment and treatment duration of the proposed project are consistent with those analyzed in the PEIR. 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 PEIR. 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides	Impact WIL-2, 3-17	LTS	<u>SPR AQ-3</u> <u>SPR GEO-3</u> , 4, 5, 8	Yes	LTS	<input checked="" type="checkbox"/>
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Initial and maintenance treatments would include prescribed burning, and steep slopes are present within the project area. The potential for post-fire landslides to occur was examined in the PEIR. The project area has experienced a high frequency of landslides in recent years and historically (DOC and CGS 2015). This is likely because of the relatively sandy soil and continuing impacts from the 2017 Thomas fire related to removal of vegetation, reductions in soil infiltration capacity, and increases in soil erodibility. The potential risk of exposure of people or structures to post-fire landslides is within the scope of the PEIR because the severity and duration of the proposed prescribed burn are consistent with those analyzed in the PEIR. 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 PEIR. However, within the boundary of the project area, the post-fire landslide 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

Other Impacts related to Wildfire: Would the project result in other impacts related to wildfire that are not evaluated in the CalVTP PEIR?				No	N/A	<input checked="" type="checkbox"/>
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VCFPD has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.17.1, "Regulatory Setting," and Section 3.17.2, "Environmental Setting," in Volume II of the Final PEIR). Including land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the 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 PEIR. 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 wildfire risk would occur.

EC-17 ADMINISTRATIVE STANDARD PROJECT REQUIREMENTS

	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
SPR AD-1 Project Proponent Coordination: For treatments coordinated with CAL FIRE, CAL FIRE would 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, VCFPD would also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types.	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>

VCFPD is a Contract County and would implement the proposed project in close coordination with CAL FIRE.

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.	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>
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Prior to beginning any treatment activities, VCFPD will clearly define the boundaries of the project area and protected resources on maps for the project area and with highly-visible flagging or clear, existing landscape demarcations.

SPR AD-3 Consistency with Local Plans, Policies, and Ordinances: The project proponent would 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.	Yes	<u>VCFPD</u> During	<u>VCFPD</u>
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As noted in EC-11, "Land Use," the proposed project would not conflict with any local plans, policies, or ordinances.

SPR AD-4 Public Notifications for Prescribed Burning: At least three days prior to the commencement of prescribed burning operations, the project proponent would: 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 would 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.	Yes	<u>VCFPD</u> Prior-During	<u>VCFPD</u>
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At least 3 days prior to the commencement of prescribed burning, VCFPD will post signs along SRs 150, 33, and Santa Anna Road describing the activity and timing and publish a public interest notification in a local newspapers or other widely distributed media source.

<p>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.</p>	<p>Yes</p>	<p><u>VCFPD</u> During-Post</p>	<p><u>VCFPD</u></p>
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Trash receptacles will not be required on-site. VCFPD staff will be instructed to remove all trash generated daily. Following completion of treatment activities, all flagging, trash, debris, and barriers will be removed from the project area.

<p>SPR AD-6 Public Notifications for Treatment Projects. One to three days prior to the commencement of a treatment activity, the project proponent would 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 would 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.</p>	<p>Yes</p>	<p><u>VCFPD</u> Prior</p>	<p><u>VCFPD</u></p>
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One to three days prior to the commencement of a treatment activity, VCFPD will post signs in a conspicuous location near the project area describing the activity and timing and requesting persons in the area to contact a designated VCFPD representative.

<p>SPR AD-7 Provide Information on Proposed, Approved, and Completed Treatment Projects. For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. This SPR applies to all treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>VCFPD</u> Prior-During-Post</p>	<p><u>VCFPD</u></p>
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Information on the proposed treatment project has been submitted to the Board. Once the project is approved and completed, respectively, updated information will be submitted to the Board for online posting on the CalVTP Project Viewer.

<p>SPR AD-8 Request Access for Post-Treatment Assessment. During contract development, VCFPD would 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 would be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>VCFPD</u> Post</p>	<p><u>VCFPD</u></p>
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VCFPD contracts with the landowner would allow for post-treatment assessments.

<p>SPR AD-9. Obtain a Coastal Development Permit for Proposed Treatment Within the Coastal Zone Where Required. When planning a treatment project within the Coastal Zone, the project proponent would 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. This SPR applies to all treatment activities and all treatment types.</p>	<p>No</p>	<p><u>VCFPD</u> N/A</p>	<p><u>VCFPD</u></p>
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The project is not within the Coastal Zone and this SPR does not apply to the proposed treatments.

4 REFERENCES

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Additional information:

- List of Standard Project Requirements (SPRs) and Mitigations Measures (MMs). (See Attachment A)
- Vicinity map on a USGS quad map (SPR AD-2)
 - Aerial imagery of subsequent activity area (see vicinity and location maps)
 - Subsequent activity location on Treatable Landscape & Ecoregions Map
 - Parcel map with APN's covering all ownerships within subsequent activity area
 - Soil survey map of subsequent activity area
- Smoke Management Plan/Burn Plan (SPR AQ-2 & 3) – **SMP will be submitted/approved prior to burning**
 - Public Notice for Prescribed Burning - **will be posted prior to burning**
 - Model run of FOFEM, BEHAVE, or other appropriate fire behavior modeling simulation
 - Burn Unit Maps – Ortho and Topographic - **will be submitted prior to burning & with completion report**
- Air District Asbestos Dust Control Plan (SPR AQ-5) – **Not Applicable**
- Incident Action Plan (IAP) (SPR AQ-6) – **will be submitted with completion report**
- Archaeological reviews/surveys (Confidential addendum) (EC-4) - **confidential**
- Biological review/surveys (EC-5)
 - CNDDDB Records Search
 - Biologist Consultation/Notification
 - Water Quality consultation – **Not Applicable**
 - Consult Attachment C (and Cal VTP Appendix BIO-3)
- Biological Compensation Plan (MM BIO-1c, 2c, 2d, 2e, 2f, 3b, 3c,) – **Not Applicable. See MM BIO-2d**
- Geological Review (MM GEO-2)
- Spill Prevention & Response Plan (SPR HAZ-5) – **Not Applicable**
- Traffic Management Plan (SPR TRAN-1) – **Not Applicable**
- Organic waste Disposal Plan (SPR UTIL-1) – **Not Applicable**
- Air Quality and GHG Emissions Estimates – **Not Applicable**
 - Air Quality consultations – **Not Applicable**
- Off-Site Noise-Sensitive Receptors Notification (SPR NOI-6) – **Not Applicable**

Other _____

DELIVERABLES POST APPROVAL

- Public Notification (News/Press Release)
- Authorized PFIRS Ignition Request
- Live Fire Notification
- Approved FC 400
- Public Notifications to neighbors
- Weather Forecasts/Spot weather Forecasts
- Go NO Go Checklist
- Incident Action Plans (IAP's, Prescribed burn activities)
- Completion Reports to Region
- Other: FC 33, Project Photos