

# Attachment A

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Mitigation Monitoring and  
Reporting Program  
for the  
Bear Creek Redwoods Open Space  
Preserve  
Vegetation Treatment Project  
CalVTP ID 2020-14

# MITIGATION MONITORING AND REPORTING PROGRAM

## INTRODUCTION

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

## PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

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

## ROLES AND RESPONSIBILITIES

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

## REPORTING

Midpen shall document and describe the compliance of the project treatment work with the required SPRs and mitigation measures either by adapting the project-specific MMRP table or preparing a separate post-project implementation report (referred to by CAL FIRE as a Completion Report) pursuant to the requirements of SPR AD-7.

## MITIGATION MONITORING AND REPORTING PROGRAM TABLE

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

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

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<b>Administrative Standard Project Requirements</b>				
<p><b>SPR AD-2: Delineate Protected Resources.</b> The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly-visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	<p><b>Initial Treatment: Y</b>  <b>Treatment Maintenance: Y</b></p>	<p>Prior to treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR AD-3: Consistency with Local Plans, Policies, and Ordinances:</b> The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types.</p>	<p><b>Initial Treatment: Y</b>  <b>Treatment Maintenance: Y</b></p>	<p>Prior to treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR AD-5: Maintain Site Cleanliness:</b> 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><b>Initial Treatment: Y</b>  <b>Treatment Maintenance: Y</b></p>	<p>During treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR AD-6: Public Notifications for Treatment Projects.</b> One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.</p>	<p><b>Initial Treatment: Y</b>  <b>Treatment Maintenance: Y</b></p>	<p>One to three days prior to treatments</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR AD-7: Provide Information on Proposed, Approved, and Completed Treatment Projects.</b> For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism.</p> <p>Information on proposed projects (PSA in progress):</p>	<p><b>Initial Treatment: Y</b>  <b>Treatment Maintenance: N</b></p>	<p>Prior to, during, and following treatment  Information has been submitted for the proposed project phase</p>	<p>Midpen</p>	<p>Midpen</p>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<ul style="list-style-type: none"> <li>▶ GIS data that include project location (as a point);</li> <li>▶ project size (typically acres);</li> <li>▶ treatment types and activities; and</li> <li>▶ contact information for a representative of the project proponent.</li> </ul> <p>The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public no later than two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent’s own website).</p> <p>Information on approved projects (PSA complete):</p> <ul style="list-style-type: none"> <li>▶ A completed PSA Environmental Checklist;</li> <li>▶ A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist);</li> <li>▶ GIS data that include a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction).</li> </ul> <p>Information on completed projects:</p> <ul style="list-style-type: none"> <li>▶ GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction)</li> <li>▶ A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes:                         <ul style="list-style-type: none"> <li>▪ Size of treated area (typically acres);</li> <li>▪ Treatment types and activities;</li> <li>▪ Dates of work;</li> <li>▪ A list of the SPRs and mitigation measures that were implemented</li> <li>▪ Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b).</li> </ul> </li> </ul> <p>This SPR applies to all treatment activities and all treatment types.</p>				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<b>Aesthetic and Visual Resource Standard Project Requirements</b>				
<p><b>SPR AES-1: Vegetation Thinning and Edge Feathering.</b> The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band. This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.</p>	<p><b>Initial Treatment: Y</b> <b>Treatment Maintenance: Y</b></p>	<p>During mechanical and manual treatment activities</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR AES-2: Avoid Staging within Viewsheds:</b> The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. This SPR applies to all treatment activities and treatment types.</p>	<p><b>Initial Treatment: Y</b> <b>Treatment Maintenance: Y</b></p>	<p>During treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR AES-3: Provide Vegetation Screening.</b> The project proponent will preserve sufficient vegetation within, at the edge of, or adjacent to treatment areas to screen views from public trails, parks, recreation areas, and roadways as reasonable or appropriate for vegetation conditions. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p>	<p><b>Initial Treatment: Y</b> <b>Treatment Maintenance: Y</b></p>	<p>During treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<b>Air Quality Standard Project Requirements</b>				
<p><b>SPR AQ-1: Comply with Air Quality Regulations:</b> The project proponent will comply with the applicable air quality requirements of air districts within whose jurisdiction the project is located. This SPR applies to all treatment activities and all treatment types.</p>	<p><b>Initial Treatment: Y</b> <b>Treatment Maintenance: Y</b></p>	<p>During treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR AQ-4: Minimize Dust:</b> To minimize dust during treatment activities, the project proponent will implement the following measures:</p> <ul style="list-style-type: none"> <li>▶ Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol.</li> <li>▶ If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by ARB, EPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the</li> </ul>	<p><b>Initial Treatment: Y</b> <b>Treatment Maintenance: Y</b></p>	<p>During treatment</p>	<p>Midpen</p>	<p>Midpen</p>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>water results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations.</p> <ul style="list-style-type: none"> <li>▶ Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113.</li> <li>▶ Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property," per Health and Safety Code Section 41700.</li> </ul> <p>This SPR applies to all treatment activities and treatment types.</p>				
<b>Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements</b>				
<p><b>SPR CUL-1: Conduct Record Search:</b> An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to treatment</p> <p>Record search of project area and 0.25-mile buffer surrounding project area has been conducted; see PSA for a summary of results.</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR CUL-2: Contact Geographically Affiliated Native American Tribes:</b> The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the project proponent will notify the California Native American Tribes in the counties where the treatment activity is located. The notification will contain the following:</p> <ul style="list-style-type: none"> <li>▶ A written description of the treatment location and boundaries.</li> <li>▶ Brief narrative of the treatment objectives.</li> <li>▶ A description of the activities used (e.g., prescribed burning, mastication) and associated acreages.</li> <li>▶ A map of the treatment area at a sufficient scale to indicate the spatial extent of activities.</li> </ul>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to treatment</p> <p>Tribes have been contacted and SLF query completed; see PSA for a summary of consultation and SLF results.</p>	<p>Midpen</p>	<p>Midpen</p>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<ul style="list-style-type: none"> <li>▶ A request for information regarding potential impacts to cultural resources from the proposed treatment.</li> <li>▶ A detailed description of the depth of excavation, if ground disturbance is expected.</li> </ul> <p>In addition, the project proponent will contact the NAHC for a review of their Sacred Lands File. This SPR applies to all treatment activities and treatment types.</p>				
<p><b>SPR-CUL-3: Pre-field Research:</b> The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. The purpose of this research is to properly inform survey design, based on the types of resources likely to be encountered within the treatment area, and to be prepared to interpret, record, and evaluate these findings within the context of local history and prehistory. The qualified archaeologist and/or archaeologically-trained resource professional will review records, study maps, read pertinent ethnographic, archaeological, and historical literature specific to the area being studied, and conduct other tasks to maximize the effectiveness of the survey. This SPR applies to all treatment activities and treatment types.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR CUL-4: Archaeological Surveys:</b> The project proponent will coordinate with an archaeologically-trained resource professional and/or qualified archaeologist to conduct a site-specific survey of the treatment area. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search, pre-field research, and/or Native American consultation identifies archaeological or historical resources near or within the treatment area. A survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR CUL-5: Treatment of Archaeological Resources:</b> If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist or archaeologically-trained resource professional will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. The project proponent, in consultation with culturally affiliated tribe(s), will develop effective protection measures for important cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. These protection measures will be written in clear, enforceable language, and will be included in the survey report in accordance with applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to and during treatment</p>	<p>Midpen</p>	<p>Midpen</p>



Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p><b>SPR CUL-6: Treatment of Tribal Cultural Resources:</b> The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types.</p>	<p><b>Initial Treatment: Y</b> <b>Treatment Maintenance: Y</b></p>	<p>Prior to and during treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR CUL-7: Avoid Built Historical Resources:</b> If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. Within a buffer of 100 feet of the built historical resource, there will be no prescribed burning or mechanical treatment activities. Buffers less than 100 feet for built historical resources will only be used after consultation with and receipt of written approval from a qualified archaeologist. If the records search does not identify known historical resources in the treatment area, but structures (i.e., buildings, bridges) over 50 years old that have not been evaluated for historic significance are present in the treatment area, they will similarly be avoided. This SPR applies to all treatment activities and treatment types.</p>	<p><b>Initial Treatment: Y</b> <b>Treatment Maintenance: Y</b></p>	<p>Prior to treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR CUL-8: Cultural Resource Training:</b> The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers will be trained to halt work if archaeological or tribal resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance). This SPR applies to all treatment activities and treatment types.</p>	<p><b>Initial Treatment: Y</b> <b>Treatment Maintenance: Y</b></p>	<p>Prior to and during treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>Biological Resources Standard Project Requirements</b></p>				
<p><b>SPR BIO-1: Review and Survey Project-Specific Biological Resources.</b> The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this PEIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological</p>	<p><b>Initial Treatment: Y</b> <b>Treatment Maintenance: Y</b></p>	<p>Prior to treatment Initial data review and reconnaissance-level survey have been conducted, see PSA for results.</p>	<p>Midpen</p>	<p>Midpen</p>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified RPF or biologist, will determine which one of the following best characterizes the treatment:</p>				
<p><b>1. Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided.</b> If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment:</p> <ul style="list-style-type: none"> <li>a. by physically avoiding the suitable habitat, or</li> <li>b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites).</li> </ul> <p>Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist.</p> <p><b>Project-Specific Implementation</b></p> <ul style="list-style-type: none"> <li>▶ To avoid impacts from manual treatment on herbaceous annual or geophyte special-status plant species, non-ground disturbing initial treatment activities would be conducted between September 1 and December 31; outside the growing season.</li> </ul>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to and during treatment</p>	<p>Midpen</p>	<p>Midpen</p>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<ul style="list-style-type: none"> <li>▶ To avoid impacts on foothill yellow-legged frog, a 200-foot buffer would be implemented along stream habitat prior to commencement of treatment activities, where feasible (if infeasible, see SPR BIO-10).</li> <li>▶ To avoid impacts on western pond turtle, a 200-foot buffer would be implemented along stream habitat prior to commencement of treatment activities, where feasible (if infeasible, see SPR BIO-10).</li> <li>▶ To avoid impacts on special-status birds, initial treatment activities would be conducted between September 1 and December 31; outside of the nesting bird season.</li> <li>▶ To avoid impacts on special-status bats, initial treatment activities would be conducted between September 1 and December 31; outside of the bat maternity season.</li> <li>▶ To avoid impacts on ringtail, treatment activities and maintenance treatments would be conducted between September and December 31; outside of the ringtail maternity season.</li> </ul> <p><b>2. Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided.</b> Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: <a href="https://www.wildlife.ca.gov/Conservation/Survey-Protocols">https://www.wildlife.ca.gov/Conservation/Survey-Protocols</a>. Specific survey requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7).</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>				
<p><b>SPR BIO-2: Require Biological Resource Training for Workers.</b> The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to and during treatment</p>	<p>Midpen</p>	<p>Midpen; CDFW and USFWS, as applicable</p>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>				
<b>Sensitive Natural Communities and Other Sensitive Habitats</b>				
<p><b>SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats.</b> If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, the project proponent will:</p> <ul style="list-style-type: none"> <li>▶ require a qualified RPF or biologist to perform a protocol-level survey following the CDFW “Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities” (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of <i>A Manual of California Vegetation</i> (including updated natural communities data at <a href="http://vegetation.cnps.org/">http://vegetation.cnps.org/</a>), or referring to relevant reports (e.g., reports found on the VegCAMP website).</li> <li>▶ map and digitally record, using a Global Positioning System (GPS), the limits of any potential sensitive habitat and sensitive natural community identified in the treatment area.</li> </ul> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR BIO-6: Prevent Spread of Plant Pathogens.</b> When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., lone chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of <i>Phytophthora</i> and other plant pathogens (e.g., pitch canker (<i>Fusarium</i>), goldspotted oak borer, shot hole borer, bark beetle):</p> <ul style="list-style-type: none"> <li>▶ clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk;</li> <li>▶ include training on <i>Phytophthora</i> diseases and other plant pathogens in the worker awareness training;</li> </ul>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to treatment</p>	<p>Midpen</p>	<p>Midpen</p>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<ul style="list-style-type: none"> <li>▶ minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment;</li> <li>▶ minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination;</li> <li>▶ clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low risk areas or between widely separated portions of a treatment area; and</li> <li>▶ follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (Working Group for <i>Phytoptheras</i> in Native Habitats 2016).</li> </ul> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>				
<b>Special-Status Plants</b>				
<p><b>SPR BIO-7: Survey for Special-Status Plants.</b> If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities."</p> <p>Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status.</p> <p>If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS.</p> <p>For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances:</p> <ul style="list-style-type: none"> <li>▶ If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys.</li> </ul>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to treatment</p>	<p>Midpen</p>	<p>Midpen</p>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>► If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment.</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>				
<b>Invasive Plants and Wildlife</b>				
<p><b>SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife.</b> The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail):</p> <ul style="list-style-type: none"> <li>► clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, or invasive wildlife;</li> <li>► for all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species;</li> <li>► inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas;</li> <li>► stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area;</li> <li>► identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include herbicide application, manual or mechanical treatments, prescribed burning, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present.</li> </ul>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to and during treatment</p>	<p>Midpen</p>	<p>Midpen</p>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles;</p> <ul style="list-style-type: none"> <li>▶ treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and</li> <li>▶ implement Fire and Fuel Management BMPs outlined in the “Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers” (Cal-IPC 2012, or current version).</li> </ul> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>				
<b>Wildlife</b>				
<p><b>SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites.</b> If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries, monarch overwintering sites) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols.</p> <p>The qualified RPF or biologist will determine if following an established protocol is required, and the project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed.</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p> <p><b>Project-Specific Implementation</b></p> <ul style="list-style-type: none"> <li>▶ To avoid impacts on special-status salamanders (i.e., California giant salamander, Santa Cruz black salamander), focused surveys (i.e., walk and turn surveys) would be conducted within habitat suitable for the species.</li> <li>▶ To determine whether California red-legged frogs are present within upland habitats in treatment areas, focused surveys would be conducted by a qualified biologist within 24 hours prior to implementation of all mechanical and manual treatments.</li> </ul>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>No more than 14 days prior to treatment (unless otherwise specified)</p>	<p>Midpen</p>	<p>Midpen</p>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<ul style="list-style-type: none"> <li>▶ If implementation of 200-foot buffers along stream habitat is deemed infeasible for certain treatments (e.g., habitat improvement treatments), then focused visual encounter surveys for foothill yellow-legged frog would be conducted within habitat areas suitable for the species prior to treatment activities.</li> <li>▶ If implementation of 200-foot buffers along stream habitat is deemed infeasible for certain treatments (e.g., habitat improvement treatments), then focused visual encounter surveys for western pond turtle would be conducted within habitat areas suitable for the species (i.e., aquatic and upland) prior to treatment activities.</li> <li>▶ For maintenance treatments that cannot be avoided during the nesting bird season and to avoid impacts on special-status birds (i.e., American peregrine falcon, bald eagle, golden eagle, loggerhead shrike, long-eared owl, northern harrier, olive-sided flycatcher, purple martin, Vaux's swift, white-tailed kite), focused surveys (i.e., nest searches) for nests of these species will be conducted prior to implementing treatment activities during the nesting bird season (February 1–August 31).</li> <li>▶ To avoid impacts on mountain lions, focused, non-invasive surveys for mountain lion nurseries within nursery habitat suitable for the species will be implemented by a qualified wildlife biologist. Nursery habitat suitable for the species will be determined through desktop analysis (e.g., land cover, slope, distance from development), coordination with local experts studying or tracking the species (if available), and field surveys. Potential mountain lion nursery dens will include caves, large natural cavities within rocky areas, or thickets deemed appropriate for use by mountain lions based on size and other characteristics (e.g., proximity to human development, surrounding habitat). The qualified wildlife biologist will survey for signs of mountain lion (e.g., tracks, scat, prey items) in the vicinity of potential nursery habitat to help determine whether an area may contain a mountain lion nursery.  If signs of a mountain lion nursery are found during surveys or monitoring, further investigation will be required to determine if a mountain lion nursery is present. No treatment will occur in the area while further investigation is occurring. Survey methods will include the use of trail cameras, track plates, hair snares, and/or other noninvasive methods, as well as coordination with local experts tracking the species (if available). Surveys using these noninvasive methods will be conducted for three days and three nights to determine whether a nursery may be present.</li> <li>▶ For maintenance treatments that cannot be avoided during the bat maternity season and to avoid impacts on special-status bats (i.e., pallid bat, Townsend's big-eared bat, western red bat), focused surveys for maternity roosts of these</li> </ul>				



Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>species will be conducted prior to implementing treatment activities during the bat maternity season (April 1–August 31).</p> <ul style="list-style-type: none"> <li>To avoid impacts on San Francisco dusky-footed woodrats, focused surveys for the specie would be conducted within habitat suitable for the species prior to implementation of mechanical and manual treatments.</li> </ul>				
<p><b>SPR BIO-12: Protect Common Nesting Birds, Including Raptors.</b> The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP PEIR. The active nesting season will be defined by the qualified RPF or biologist.</p> <p>If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identify the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food).</p> <p>If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following:</p> <ul style="list-style-type: none"> <li><b>Establish Buffer.</b> The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. Treatment activities will be implemented outside of the buffer. The buffer</li> </ul>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Conduct a survey for common nesting birds (if needed) at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies (typically, up to 3 weeks before treatment maintenance); if an active nest is observed, implement avoidance strategies prior to and during treatment maintenance</p>	<p>Midpen</p>	<p>Midpen</p>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>location will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician.</p> <ul style="list-style-type: none"> <li>▶ <b>Modify Treatment.</b> The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment methods). Treatment modifications will be determined by the project proponent in coordination with the qualified RPF or biologist.</li> <li>▶ <b>Defer Treatment.</b> The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician.</li> </ul> <p>Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report).</p> <p>The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests:</p> <ul style="list-style-type: none"> <li>▶ <b>Monitor Active Raptor Nest During Treatment.</b> A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest</li> </ul>				

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases.</p> <p>► <b>Retention of Raptor Nest Trees.</b> Trees with visible raptor nests, whether occupied or not, will be retained.</p> <p>This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>				
<b>Geology, Soils, and Mineral Resource Standard Project Requirements</b>				
<p><b>SPR GEO-1: Suspend Disturbance during Heavy Precipitation:</b> The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>During treatment if there is a "chance" (30 percent or more) of rain within the next 24 hours</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR GEO-2: Limit High Ground Pressure Vehicles:</b> The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use. This SPR applies only to mechanical treatment activities and all treatment types.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>During treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR GEO-3: Stabilize Disturbed Soil Areas:</b> The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments, and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, prescribed</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>During mechanical activities that result in exposure of bare soil over 50 percent or more of the treatment area</p>	<p>Midpen</p>	<p>Midpen</p>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>herbivory, or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery, animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical, prescribed herbivory, and prescribed burns that result in exposure of bare soil over 50 percent of the project area treatment activities and all treatment types.</p>				
<p><b>SPR GEO-4: Erosion Monitoring:</b> The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types.</p>	<p><b>Initial Treatment: Y</b>  <b>Treatment Maintenance: Y</b></p>	<p>Prior to and during treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR GEO-5: Drain Stormwater via Water Breaks:</b> The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (February 2019 version). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies only to mechanical, manual, and prescribed burn treatment activities and all treatment types.</p>	<p><b>Initial Treatment: Y</b>  <b>Treatment Maintenance: Y</b></p>	<p>During treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR GEO-7: Minimize Erosion:</b> To minimize erosion, the project proponent will:</p> <ul style="list-style-type: none"> <li>(1) Prohibit use of heavy equipment where any of the following conditions are present: <ul style="list-style-type: none"> <li>(i) Slopes steeper than 65 percent.</li> <li>(ii) Slopes steeper than 50 percent where the erosion hazard rating is high or extreme.</li> <li>(iii) Slopes steeper than 50 percent that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake.</li> </ul> </li> </ul>	<p><b>Initial Treatment: Y</b>  <b>Treatment Maintenance: Y</b></p>	<p>During treatment</p>	<p>Midpen</p>	<p>Midpen</p>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>(2) On slopes between 50 percent and 65 percent where the erosion hazard rating is moderate, and all slope percentages are for average slope steepness based on sample areas that are 20 acres, or less, heavy equipment will be limited to:</p> <ul style="list-style-type: none"> <li>(i) Existing tractor roads that do not require reconstruction, or</li> <li>(ii) New tractor roads flagged by the project proponent prior to the treatment activity.</li> </ul> <p>(3) Prescribed herbivory treatments will not be used in areas with over 50 percent slope. This SPR applies to all treatment activities and all treatment types.</p>				
<p><b>SPR GEO-8: Steep Slopes:</b> The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). If unstable areas or soils are identified within the treatment area, are unavoidable, and will be potentially directly or indirectly affected by the treatment, a licensed geologist (P.G. or C.E.G.) will determine the potential for landslide, erosion, of other issue related to unstable soils and identify measures (e.g., those in SPR GEO-7) that will be implemented by the project proponent such that substantial erosion or loss of topsoil would not occur. This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to and during treatment on slopes greater than 50 percent</p>	<p>Midpen</p>	<p>Midpen</p>
<b>Hazardous Material and Public Health and Safety Standard Project Requirements</b>				
<p><b>SPR HAZ-1: Maintain All Equipment:</b> The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to and during treatment</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR HAZ-2: Require Spark Arrestors:</b> The project proponent will require mechanized hand tools to have federal- or state-approved spark arrestors. This SPR applies only to manual treatment activities and all treatment types.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>During manual treatment activities</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR HAZ-3: Require Fire Extinguishers:</b> 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.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>During manual treatment activities</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>SPR HAZ-4: Prohibit Smoking in Vegetated Areas:</b> The project proponent will require that smoking is only permitted in designated smoking areas barren or cleared to mineral soil at least 3 feet in diameter (PRC Section 4423.4). This SPR applies to all treatment activities and treatment types.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>During treatment</p>	<p>Midpen</p>	<p>Midpen</p>

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity										
<b>Hydrology and Water Quality Standard Project Requirements</b>														
<p><b>SPR HYD-1: Comply with Water Quality Regulations:</b> Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or vegetation management activities. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types.</p>	<p><b>Initial Treatment: Y</b> <b>Treatment Maintenance: Y</b></p>	<p>During treatment</p>	<p>Midpen</p>	<p>Midpen</p>										
<p><b>SPR HYD-2: Avoid Construction of New Roads:</b> 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.</p>	<p><b>Initial Treatment: Y</b> <b>Treatment Maintenance: Y</b></p>	<p>Prior to treatment</p>	<p>Midpen</p>	<p>Midpen</p>										
<p><b>SPR HYD-4: Identify and Protect Watercourse and Lake Protection Zones:</b> The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.</p> <p><b>Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) Widths</b></p> <table border="1" data-bbox="174 1308 976 1456"> <thead> <tr> <th data-bbox="174 1308 323 1349">Water Class</th> <th data-bbox="323 1308 489 1349">Class I</th> <th data-bbox="489 1308 655 1349">Class II</th> <th data-bbox="655 1308 821 1349">Class III</th> <th data-bbox="821 1308 976 1349">Class IV</th> </tr> </thead> <tbody> <tr> <td data-bbox="174 1349 323 1456">Water Class Characteristics or</td> <td data-bbox="323 1349 489 1456">1) Domestic supplies, including springs, on site</td> <td data-bbox="489 1349 655 1456">1) Fish always or seasonally present offsite within 1000</td> <td data-bbox="655 1349 821 1456">No aquatic life present, watercourse</td> <td data-bbox="821 1349 976 1456">Man-made watercourses, usually</td> </tr> </tbody> </table>	Water Class	Class I	Class II	Class III	Class IV	Water Class Characteristics or	1) Domestic supplies, including springs, on site	1) Fish always or seasonally present offsite within 1000	No aquatic life present, watercourse	Man-made watercourses, usually	<p><b>Initial Treatment: Y</b> <b>Treatment Maintenance: Y</b></p>	<p>Establish WLPZs prior to treatment; implement WLPZ protections during treatments</p>	<p>Midpen</p>	<p>Midpen</p>
Water Class	Class I	Class II	Class III	Class IV										
Water Class Characteristics or	1) Domestic supplies, including springs, on site	1) Fish always or seasonally present offsite within 1000	No aquatic life present, watercourse	Man-made watercourses, usually										

Standard Project Requirements					Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
Key Indicator Beneficial Use	and/or within 100 feet downstream of the operations area and/or 2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning.	feet downstream and/or 2) Aquatic habitat for nonfish aquatic species. 3) Excludes Class III waters that are tributary to Class I waters.	showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations.	downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.				
<b>WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ</b>								
< 30 % Slope	75	50	Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.					
30-50 % Slope	100	75						
> 50 % Slope	150	100						
<p>Source: 14 CCR Section 916.5 [936.5, 956.5] (February 2019 version)</p> <p>The following WLPZ protections will be applied for all treatments:</p> <ul style="list-style-type: none"> <li>▶ Treatment activities with WLPZs will retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced a qualified RPF will provide the project proponent with a site- and/or treatment activity-specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version).</li> <li>▶ Equipment, including tractors and vehicles, must not be driven in wet areas or WLPZs, except over existing roads or watercourse crossings where vehicle tires or tracks remain dry.</li> </ul>								

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<ul style="list-style-type: none"> <li>▶ Equipment used in vegetation removal operations will not be serviced in WLPZs, within wet meadows or other wet areas, or in locations that would allow grease, oil, or fuel to pass into lakes, watercourses, or wet areas.</li> <li>▶ WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately.</li> <li>▶ Burn piles will be located outside of WLPZs.</li> <li>▶ No fire ignition (nor use of associated accelerants) will occur within WLPZs however low intensity backing fires may be allowed to enter or spread into WLPZs.</li> <li>▶ Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of soil into water bodies and may include but are not limited to mulching, rip-rap, grass seeding, or chemical soil stabilizers.</li> <li>▶ Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse.</li> <li>▶ Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes.</li> <li>▶ Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water.</li> </ul> <p>This SPR applies to all treatment activities and treatment types.</p>				
<p><b>SPR HYD-6: Protect Existing Drainage Systems:</b> If a treatment activity is adjacent to a roadway with stormwater drainage infrastructure, the existing stormwater drainage infrastructure will be marked prior to ground disturbing activities. If a drainage structure or infiltration system is inadvertently disturbed or modified during project activities, the project proponent will coordinate with owner of the system or feature to repair any damage and restore pre-project drainage conditions. This SPR applies to all treatment activities and treatment types.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to and during treatment</p>	<p>Midpen</p>	<p>Midpen</p>



Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<b>Noise Standard Project Requirements</b>				
<p><b>SPR NOI-1: Limit Heavy Equipment Use to Daytime Hours:</b> The project proponent will require that operation of heavy equipment associated with treatment activities (heavy off-road equipment, tools, and delivery of equipment and materials) will occur during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship). Cities and counties in the treatable landscape typically restrict construction-noise (which would apply to vegetation treatment noise) to particular daytime hours. If the project proponent is subject to local noise ordinance, it will adhere to those to the extent the project is subject to them. If the applicable jurisdiction does not have a noise ordinance or policy restricting the time-of-day when noise-generating activity can occur noise-generating vegetation treatment activity will be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday and federal holidays. If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area. This SPR applies to all treatment activities and treatment types.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	During treatment	Midpen	Midpen
<p><b>SPR NOI-2: Equipment Maintenance:</b> The project proponent will require that all powered treatment equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. This SPR applies to all activities and all treatment types.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	During treatment	Midpen	Midpen
<p><b>SPR NOI-3: Engine Shroud Closure:</b> 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.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	During treatment	Midpen	Midpen
<p><b>SPR NOI-4: Locate Staging Areas Away from Noise-Sensitive Land Uses:</b> The project proponent will locate treatment activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible, to minimize noise exposure. This SPR applies to all treatment activities and treatment types.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	During treatment	Midpen	Midpen
<p><b>SPR NOI-5: Restrict Equipment Idle Time:</b> 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.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	During treatment	Midpen	Midpen

Standard Project Requirements	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p><b>SPR NOI-6: Notify Nearby Off-Site Noise-Sensitive Receptors:</b> For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. Notification will include anticipated dates and hours during which treatment activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification. This SPR applies only to mechanical treatment activities and all treatment types.</p>	<p><b>Initial Treatment: Y</b>  <b>Treatment Maintenance: Y</b></p>	<p>Prior to mechanical treatment activities within 1,500 feet of noise-sensitive receptors</p>	<p>Midpen</p>	<p>Midpen</p>
<p><b>Transportation Standard Project Requirements</b></p>				
<p><b>SPR TRAN-1: Implement Traffic Control during Treatments:</b> Prior to initiating vegetation treatment activities the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. A TMP will be needed if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments. If needed, a TMP will be prepared to provide measures to reduce potential traffic obstructions, hazards, and service level degradation along affected roadway facilities. The scope of the TMP will depend on the type, intensity, and duration of the specific treatment activities under the CalVTP. Measures included in the TMP could include (but are not be limited to) construction signage to provide motorists with notification and information when approaching or traveling along the affected roadway facilities, flaggers for lane closures to provide temporary traffic control along affected roadway facilities, treatment schedule restrictions to avoid seasons or time periods of peak vehicle traffic, haul-trip, delivery, and/or commute time restrictions that would be implemented to avoid peak traffic days and times along affected roadway facilities. If the TMP identifies impacts on transportation facilities outside of the jurisdiction of the project proponent, the TMP will be submitted to the agency with jurisdiction over the affected roadways prior to commencement of vegetation treatment projects. This SPR applies to all treatment activities and treatment types, including treatment maintenance.</p>	<p><b>Initial Treatment: Y</b>  <b>Treatment Maintenance: Y</b></p>	<p>Prepare TMP prior to treatment and implement during treatments</p>	<p>Midpen</p>	<p>Midpen</p>

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<b>Archaeological, Historical, and Tribal Cultural Resources</b>				
<p><b>Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources</b></p> <p>If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist or archaeologically-trained resource professional will assess the significance of the find. The qualified archaeologist or archaeologically-trained resource professional will work with the project proponent to develop a primary records report that will comply with applicable state or local agency procedures. If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan will be prepared. If the find is determined to be significant by the qualified archaeologist or archaeologically-trained resource professional (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or tribal cultural resource), the archaeologist or archaeologically-trained resource professional will work with the project proponent to develop appropriate procedures to protect the integrity of the resource. Procedures could include preservation in place (which is the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or recovery of scientifically consequential information from and about the resource. If a tribal cultural resource is identified, the culturally affiliated tribe will be consulted regarding their preferred method of treatment for the feature. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>During ground-disturbing activities</p>	<p>Midpen</p>	<p>Midpen</p>
<b>Biological Resources</b>				
<p><b>Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA</b></p> <p>If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway), exceptions to this requirement are listed later in this measure. The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to and during treatment</p>	<p>Midpen</p>	<p>Midpen</p>

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report) with a science-based justification for the deviation. No fire ignition (and associated use of accelerants) will occur within 50 feet of listed plants.</p> <p>For species listed under ESA or CESA, if the project proponent cannot avoid loss by implementing no-disturbance buffers, the project proponent will implement Mitigation Measure BIO-1c.</p> <p>The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist, in consultation with CDFW and USFWS, as appropriate depending on species status and location, that the listed plants would benefit from treatment in the occupied habitat area even though some of the listed plants may be lost during treatment activities. For a treatment to be considered beneficial to listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to listed plants, no compensatory mitigation for loss of individuals will be required.</p> <p><b>Project-Specific Implementation.</b></p> <p>If listed special-status plant species are detected during protocol-level surveys, a no-disturbance buffer of at least 50 feet will be established around the area occupied by the species within which mechanical treatment and manual treatment will not occur.</p>				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p><b>Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed under ESA or CESA</b></p> <p>If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement the following measures to avoid loss of individuals and maintain habitat function of occupied habitat:</p> <ul style="list-style-type: none"> <li>▶ Physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape.</li> <li>▶ Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank.</li> <li>▶ Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the special-status plant itself, habitat function would be diminished and the treatment would need to be modified or precluded from implementation.</li> </ul>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to and during treatment</p>	<p>Midpen</p>	<p>Midpen</p>

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>▶ No fire ignition (nor use of associated accelerants) will occur within the special-status plant buffer.</p> <p>A qualified RPF or botanist with knowledge of the special-status plant species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment would not maintain habitat function of the special-status plant habitat (i.e., the habitat would be rendered unsuitable) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If the project proponent determines the impact on special-status plants would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1c will be implemented.</p> <p>The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required.</p> <p><b>Project-Specific Implementation.</b></p> <p>If special-status plant species are detected during protocol-level surveys, a no-disturbance buffer of at least 50 feet will be established around the area occupied by the species within which mechanical treatment and manual treatment will not occur.</p> <p>For habitat improvement treatments to support Hickman’s popcornflower, treatment activities may occur within the no-disturbance buffer because Midpen determined that Hickman’s popcornflower would benefit from treatment in the occupied area even though some of the individual plants may be adversely affected during treatment activities (see PSA for substantial evidence).</p>				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p><b>Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)</b></p> <p>If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species by implementing the following.</p> <p><u>Avoid Mortality, Injury, or Disturbance of Individuals</u></p> <p>The project proponent will implement one of the following 2 measures to avoid mortality, injury, or disturbance of individuals:</p> <ol style="list-style-type: none"> <li>1. Treatment will not be implemented within the occupied habitat. Any treatment activities outside occupied habitat will be a sufficient distance from the occupied habitat such that mortality, injury, or disturbance of the species will not occur, as determined by a qualified RPF or biologist using the most current and commonly-accepted science and considering published agency guidance; OR</li> <li>2. Treatment will be implemented outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, CDFW and/or USFWS/NOAA Fisheries will be consulted to determine if there is a period of time within which treatment could occur that would avoid mortality, injury, or disturbance of the species. <ul style="list-style-type: none"> <li>▶ For species listed under ESA or CESA, if the project proponent cannot avoid mortality, injury or disturbance by implementing one of the two options listed above, the project proponent will implement Mitigation Measure BIO-2c.</li> <li>▶ Injury or mortality of California Fully Protected Species is prohibited pursuant to Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code and will be avoided.</li> </ul> </li> </ol> <p><u>Maintain Habitat Function</u></p> <p>The project proponent will design treatment activities to maintain the habitat function, by implementing the following:</p> <ul style="list-style-type: none"> <li>▶ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement)</li> </ul>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to and during treatment</p>	<p>Midpen</p>	<p>Midpen</p>

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; dens; tree snags; large raptor nests [including inactive nests]; downed woody debris; food sources). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science.</p> <ul style="list-style-type: none"> <li>▶ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that listed or fully protected wildlife with specific requirements for high canopy cover (e.g., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted [e.g., 50 percent for coastal California gnatcatcher]) such that habitat function is maintained.</li> <li>▶ A qualified RPF or biologist <u>of the lead agency</u> will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. <del>If consultation determines</del> <u>If the lead agency determines after consultation</u> that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c.</li> </ul> <p><b>Project-Specific Implementation.</b></p> <ul style="list-style-type: none"> <li>▶ Pursuant to recovery permit (Permit Number TE2259774-2) conservation measures, biological monitoring by a qualified biologist during treatment activities would be implemented to avoid injury to or mortality of California red-legged frogs. If a California-red legged frog enters a treatment area, all work would stop, and the frog would be allowed to leave on its own. If a California red-legged frog enters a treatment area and will not or cannot leave on its own, the biological monitor will contact a USFWS-approved Midpen biologist who will relocate the individual frog outside of the treatment area.</li> </ul>				



Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<ul style="list-style-type: none"> <li>▶ If foothill yellow-legged frogs are detected during focused surveys, biological monitoring by a qualified biologist during treatment activities within or adjacent to sensitive habitat areas (e.g., streams) will be implemented to avoid injury to or mortality of foothill yellow-legged frogs. If a foothill yellow-legged frog enters a treatment area, all work would stop, and the frog would be allowed to leave on its own. Additionally, if detected, Midpen will determine whether habitat function will remain for foothill yellow-legged frogs after implementation of the treatment, and will consult with CDFW regarding Midpen’s determination.</li> <li>▶ If a bald eagle or white-tailed kite nest is detected during focused surveys, a no-disturbance buffer of at least 500 feet will be established around the nest, and no treatment activities will occur within this buffer until the chicks have fledged as determined by a qualified RPF or biologist. Additionally, if detected, Midpen will determine whether habitat function will remain for bald eagle or white-tailed kite after implementation of the treatment, and will consult with CDFW regarding Midpen’s determination.</li> <li>▶ If an occupied mountain lion den is identified or assumed to be present during focused surveys, a buffer of at least 2,000 feet will be established around the den, within which treatment activities will not occur.</li> </ul>				
<p><b>Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)</b></p> <p>If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following.</p> <p><u>Avoid Mortality, Injury, or Disturbance of Individuals</u></p> <p>The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals:</p> <ul style="list-style-type: none"> <li>▶ For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will</li> </ul>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to and during treatment</p>	<p>Midpen</p>	<p>Midpen</p>

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include, but not be limited to, the species’ tolerance to disturbance; the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; baseline levels of noise and human activity; and treatment activity. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below 100 feet from an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report).</p> <ul style="list-style-type: none"> <li>▶ No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, or other occurrence is no longer active; or reducing the buffer would not likely result in disturbance, mortality, or injury. A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species.</li> <li>▶ For prescribed burning, the project proponent will implement the treatment outside the sensitive period of the species’ life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, the qualified RPF or biologist will determine the period of time within which prescribed burning could occur</li> </ul>				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>that will avoid or minimize mortality, injury, or disturbance of the species. The project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate limited operating periods.</p> <p><u>Maintain Habitat Function</u></p> <p>For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following:</p> <ul style="list-style-type: none"> <li>▶ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; tree snags; large raptor nests [including inactive nests]; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science.</li> <li>▶ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained.</li> <li>▶ A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function.</li> <li>▶ A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment</li> </ul>				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If the project proponent determines the impact on special-status wildlife would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented.</p> <p>The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the non-listed special-status wildlife would benefit from treatment in the occupied habitat area even though some of the non-listed special-status wildlife may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding the determination that a non-listed special-status species would benefit from the treatment.</p> <p><b>Project-Specific Implementation:</b></p> <ul style="list-style-type: none"> <li>▶ If special-status salamanders (i.e., California giant salamander, Santa Cruz black salamander) are detected during focused surveys, biological monitoring by a qualified biologist during treatment activities within or adjacent to sensitive habitat areas (e.g., streams, seeps, springs, talus slopes) will be implemented to avoid injury to or mortality of individual salamanders. If the qualified biologist detects a special-status salamander during treatments, treatment activities will cease until the salamander has left the area or has been moved out of harm's way and to other nearby habitat suitable for the species by the qualified biologist.</li> <li>▶ If western pond turtles are detected during focused surveys, biological monitoring by a qualified biologist during treatment activities within or</li> </ul>				

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>adjacent to sensitive habitat areas (e.g., streams) will be implemented to avoid injury to or mortality of western pond turtle. If the qualified biologist detects a western pond turtle during treatments, treatment activities will cease until the turtle has left the area or has been moved out of harm's way and to other nearby habitat suitable for the species by the qualified biologist.</p> <ul style="list-style-type: none"> <li>▶ If a loggerhead shrike, long-eared owl, northern harrier, olive-sided flycatcher, purple martin, or Vaux's swift nest is detected during focused surveys, a no-disturbance buffer of at least 100 feet will be established around the nest, and no treatment activities will occur within this buffer until the chicks have fledged as determined by a qualified RPF or biologist.</li> <li>▶ If a pallid bat, Townsend's big-eared bat, or western red bat roost is detected during focused surveys, a no-disturbance buffer of 250 feet will be established around the roost, and no treatment activities will occur within this buffer until the roost is no longer being used as determined by a qualified RPF or biologist.</li> <li>▶ If woodrat nests are detected within treatment areas during focused surveys, a no-disturbance buffer of sufficient size to prevent disturbance would be established around the nests to prevent accidental encroachment by vehicles, equipment, or personnel. If woodrat nests within treatment areas cannot be avoided, a qualified biologist will implement nest relocation procedures outside of the woodrat breeding season (April through mid-July). The biologist would determine whether the nest is active through live-trapping, dismantle the woodrat nest by hand, and rebuild the nest outside of the treatment footprint.</li> </ul>				
<p><b>Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands</b></p> <p>The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3:</p> <ul style="list-style-type: none"> <li>▶ Reference the <i>Manual of California Vegetation, Appendix 2, Table A2, Fire Characteristics</i> (Sawyer et al. 2009 or current version, including updated natural communities data at <a href="http://vegetation.cnps.org/">http://vegetation.cnps.org/</a>) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class</li> </ul>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to and during treatment</p>	<p>Midpen</p>	<p>Midpen</p>

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>and fire return interval departure of the vegetation alliances present will also be determined.</p> <ul style="list-style-type: none"> <li>▶ Design treatments in sensitive natural communities and oak woodlands to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function of the affected sensitive natural community. Treatments will be designed to replicate the fire regime attributes for the affected sensitive natural community or oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fireline intensity, severity, and fire type as described in <i>Fire in California's Ecosystems</i> (Van Wagtendonk et al. 2018) and the <i>Manual of California Vegetation</i> (Sawyer et al. 2009 or current version, including updated natural communities data at <a href="http://vegetation.cnps.org/">http://vegetation.cnps.org/</a>). Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval (i.e., time since last burn is less than the average time required for that vegetation type to recover from fire) or within Condition Class 1.</li> <li>▶ To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled).</li> <li>▶ To the extent feasible, fuel breaks will not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in sensitive natural communities with a rarity rank of S3 (vulnerable) or in oak woodlands. In forest and woodland sensitive natural communities with a rarity rank of S3, and in oak woodlands, only shaded fuel breaks will be installed, and they will not be installed in more than 20 percent of the stand of sensitive natural community or oak woodland vegetation (i.e., if the sensitive natural community covers 100 acres, no more than 20 acres will be converted to create the fuel break).</li> <li>▶ Use prescribed burning as the primary treatment activity in sensitive natural communities that are fire dependent (e.g., closed-cone forest and woodland alliances, chaparral alliances characterized by fire-stimulated, obligate seeders), to the extent feasible and appropriate based on the fire regime attributes as described in <i>Fire in California's Ecosystems</i> (Van Wagtendonk et al. 2018) and the <i>Manual of California Vegetation</i> (Sawyer et al. 2009 or current version, including updated natural communities data at <a href="http://vegetation.cnps.org/">http://vegetation.cnps.org/</a>).</li> </ul>				

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

Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the community (or similar community) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.</p>				
<p><b>Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands</b></p> <p>If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will implement the following actions:</p> <ul style="list-style-type: none"> <li>▶ Compensate for unavoidable losses of sensitive natural community and oak woodland acreage and function by:                     <ul style="list-style-type: none"> <li>▪ restoring sensitive natural community or oak woodland functions and acreage within the treatment area;</li> <li>▪ restoring degraded sensitive natural communities or oak woodlands outside of the treatment area at a sufficient ratio to offset the loss of acreage and habitat function; or</li> <li>▪ preserving existing sensitive natural communities or oak woodlands of equal or better value to the sensitive natural community lost through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function.</li> </ul> </li> <li>▶ The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and:                     <ol style="list-style-type: none"> <li>1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project</li> </ol> </li> </ul>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to treatment projects</p>	<p>Midpen</p>	<p>Midpen</p>



Mitigation Measures	Applicable? (Y/N)	Timing	Implementing Entity	Verifying/Monitoring Entity
<p>proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity.</p> <p>2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat.</p> <p>The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan.</p>				
<b>Hazardous Materials, Public Health and Safety</b>				
<p><b>Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites</b></p> <p>Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments) or prescribed burning, CAL FIRE and other project proponents will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials. If it is determined that hazardous materials sites could be located within the boundary of a treatment site, the project proponent will conduct a DTSC EnviroStor web search (<a href="https://www.envirostor.dtsc.ca.gov/public/">https://www.envirostor.dtsc.ca.gov/public/</a>) and consult DTSC's Cortese List to identify any known contamination sites within the project site. If a proposed mechanical treatment or prescribed burn is located on a site included on the DTSC Cortese List as containing potential soil contamination that has not been cleaned up and deemed closed by DTSC, the area will be marked and no prescribed burning or soil disturbing treatment activities will occur within 100 feet of the site boundaries. If it is determined through coordination with landowners or after review of the Cortese List that no potential or known contamination is located on a project site, the project may proceed as planned.</p>	<p><b>Initial Treatment: Y</b></p> <p><b>Treatment Maintenance: Y</b></p>	<p>Prior to treatment projects</p> <p>Database searches are complete; see results in the PSA</p>	<p>Midpen</p>	<p>Midpen</p>