Strawberry Canyon Grazing Management Plan

Property Name: Strawberry Canyon

Property Location Address: 1597 Burton Drive, Cambria, CA 93428

Owner Name(s): Greenspace – The Cambria Land Trust

Prepared by:

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Background and Site Information:

Greenspace- The Cambria Land Trust was established in 1988 and incorporated as a non-profit in 1989. Its primary mission is to acquire, protect and preserve open space within the Cambria region. Greenspace has acquired multiple forested and riparian properties including Strawberry Canyon. Strawberry Canyon consists of roughly 34 acres of pine forests and oak woodlands. The first acquisition of 3.8 acres took place in 1997; by 2012, 16.9 additional acres were acquired and most recently, in 2022, 13.35 acres were obtained on the West perimeter of the property (Appendix D, Figure 2).

Strawberry Canyon is an environmentally sensitive habitat area supporting one of three native Monterey pine stands in California. The Coastal Act of 1976 defines an Environmentally Sensitive Habitat Area (ESHA) as "any area in which plant or animal life, or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and that could be easily disturbed or degraded by human activities and developments" (Coastal Act Section 20107.5). Monterey pine is a special-status plant species with a California Rare Plant Rank of 1B.1 and is a dominant tree species in Strawberry Canyon, qualifying Strawberry Canyon for status as an ESHA. Additionally, California Department of Fish and Wildlife (CDFW) has designated Monterey pine stands as "sensitive natural communities". These communities are determined based on the rarity and are ranked based on the overall status of the plant communities within their respective areas. Because the Monterey pine is a rare and endangered species, it has been ranked as 1- Critically Impaired. Critically impaired is described as "at a very high risk of extinction due to extreme rarity (5 or fewer populations), or very steep declines" (CDFW, 2025). Though the property supports native Monterey pine forest, anthropogenic influences have altered the natural fire regime, including suppression, and as such, dense understory growth is present, which inhibits natural regeneration and overall health of the forest (US-LTRCD and CDFW 2023).

Strawberry Canyon is located in the Lodge Hill neighbourhood and is easily accessible by the surrounding community. As such Strawberry Canyon occurs in the Wildland Urban Interface and in a CALFIRE designated "Very High" Fire Hazard Severity Zone (FHSZ). There are no records of wildfire in the region although some adjacent forested stands do show signs of scorching. The zone of influence spans a one-mile radius from Strawberry Canyon and encompasses nearly 2,000 structures (San Luis Obispo Land Use View).

Current and Target Conditions:

Current site conditions include variable topography, shaped by Strawberry Creek (Class III), and San Simeon sandy loam soils (Appendix D, Figure 3). As a Class III watercourse, Strawberry Creek serves as a tributary to a Class II watercourse that spans approximately one mile before reaching the ocean. The forest type is dominated by Monterey pine (*Pinus radiata*), and oaks (*Quercus sp*.) (Appendix D, Figure 4) with typical oak woodland understory species present: coffeeberry (*Frangula californica*), toyon (*Heteromeles arbutifolia*), and poison oak (*Toxicodendron diversilobum*). Invasive species are present throughout the property, most notably kikuyugrass (*Pennisetum clandestinum*), cape ivy (*Delairea odorata*), velvetgrass *(Holcus lanatus)* and French broom (*Genista monspessulana*). Current invasive species management practices include hand-pulling. The Monterey pine-coast live oak woodlands and the riparian woodlands provide suitable habitat for a suite of upland wildlife species. Habitat features found in Strawberry Canyon include but are not limited to dead standing trees, fallen trees, hollowed out stumps, and old growth Monterey pine trees (90-150 years old) that provide ideal nesting habitat.

The forest was described as overstocked in a 2023 tree inventory and identified, on average, 352 trees per acre (TPA) (Appendix A: Table 1). The target number of trees per acre in Monterey pine stands is 150-250 TPA (Cambria Reserves Restoration and Vegetation Treatment Project PSA, 2023). The desired future condition involves sustaining Monterey pine stands with a diversity of age classes while maintaining adequate openings in the forest canopy to support regeneration. Through the use of various treatment activities in this case, manual

thinning followed by continued maintenance by prescribed herbivory, these actions aim to gradually create conditions similar to those found in healthy, native reference stands of Monterey pine (Cambria Reserves Restoration and Vegetation Treatment Project PSA, 2023). The targeted trees per acre is not a rigid objective, rather a figure of historical and ecological significance that reflects stand conditions prior to the disruption of indigenous management activities and prolonging of fire return intervals.

The stand with a 352 TPA has very little room to grow and is strained through competition for sunlight, nutrients, and water among so many trees. This creates weaker forest stand conditions where disease kill trees easier and allow weather driven wildfire to burn very hot impacting larger, healthy trees. To address this issue, a fuels reduction and vegetation management project in 2025 decreased forest density through manual forest health treatments (Appendix D, Figure 2). These treatments consisted of hand crews and a tracked chipper that selectively thinned the forest to achieve spacing consistent with a healthy Monterey pine forest. Chipped material was broadcasted in a mosaic pattern across approximately 30 acres. Where steep slopes prevented chipper access, the hand crews lopped and scattered material. Furthermore, hand crews constructed burn piles on the northwest portion of the preserve that spans approximately one acre. The hand crew processed larger, woody fuels across the preserve; however, fine fuels remain established across the site. The proposed prescribed herbivory treatment will target these remaining fine fuels, in the form of smaller woody material, herbaceous plants, and annual grasses which function as receptive fuel loads and can increase the rate of fire spread. Grazing will be prioritized in portions of Strawberry Canyon that are adjacent to homes and human resources to further safeguard the community from a potential wildfire as well as the trail system where there is a higher risk of invasive establishment via humans and dogs transporting seeds from surrounding areas (Appendix D, Figure 3). This treatment will take advantage of the complimentary benefits between selective thinning and grazing to support effective land management and meet the targeted conditions of the site (Roche, 2025).

The targeted conditions for the site post-treatment are that 30% of the vegetation has been grazed, 30% trampled, and 30% retained. This is also known as the 30/30/30 grazing principle; this is a regenerative grazing approach that is based on distributing pasture biomass into three functional pathways: consumed vegetation is converted into animal performance and manure, trampled vegetation provides surface cover and soil armor to protect from soil erosion, and residual vegetation retains structure and habitat. A detailed analysis of the benefits of this method is discussed in the management section.

The 30/30/30 grazing principle will aim to decrease the presence of invasive species, reduce fine fuels, and prepare a landscape that will be conducive to educational opportunities. Reducing invasive species and opening the forest understory will allow for the establishment of native plants, furthering biodiversity and ecosystem functionality. The reduction of fine fuels loads will decrease the rate of spread of potential wildfire, safeguarding forest resources and the surrounding communities. Grazing efforts at Strawberry Canyon will be highlighted during planned on-site educational opportunities focused on benefits of grazing for ecological restoration and community safety. Vegetation and habitat feature retention policies described in the SLO-RESIL PSA & Addendum are applicable, including SPR BIO-8 for environmentally sensitive habitat areas (ESHA) so that treatment actions are limited to eradication or control of invasive plants, removal of uncharacteristic fuel loads (e.g., removing dead, diseased, or dying vegetation), and select thinning of vegetation to restore densities that are characteristic of healthy stands of the vegetation types present in the ESHA.

Resource Concerns:

Resources of concern have been identified and will be protected prior to operations. Identified resources of concern include soil, water, plants, wildlife, human assets, and ongoing planting of native plant restoration sites. Moreover, avoidance measures will be implemented to reduce the potential of introducing and or spreading

pests and pathogens in the treatment area and surrounding ESHA habitat. Measures have been identified to avoid impacts to resources of concern and are listed in treatment specific Mitigation and Monitoring Reporting Program (MMRP) table.

To minimize erosion, grazing will not occur on slopes great than 50% per SPR GEO-7. Additionally, a 50-foot no work buffer will be established around watercourses to prevent compaction of saturated soils and protect riparian areas pursuant to SPR HYD-3. No work buffer zones will protect bank stability and reduce nutrient runoff into the watercourse and promote overall water quality and watercourse integrity. In accordance with SPR GEO-1 disturbance will be suspended and animals will be relocated if the National Weather Service forecasts a chance of precipitation exceeding 30%. Although it is not anticipated that grazing will result in exposure of bare soil over 50 percent or more, particularly since chips have been broadcasted in a mosaic formation as a result of recent fuels reduction efforts, the USLTRCD will remove grazers immediately and implement soil stabilization practices pursuant to SPR GEO-3 if such conditions occur. Prior to the rainy season, the project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations pursuant to SPR GEO-4. The project proponent will inspect for evidence or erosion after the first large storm or rainfall event. Any area of erosion that will result in substantial sediment discharge will be remediated. Animals will be herded out of an area if accelerated soil erosion is observed per SPR HYD-3.

Water resources will be protected via a 50-foot buffer from the stream bank (Appendix D, Figure 2) in accordance with SPR HYD-3. Typical riparian vegetation such as willow (*Salix lasiolepus*) is limited at the treatment site; however, in areas with riparian plant communities and/or where hydrophytic vegetation occurs, a 50-foot no work zone buffer will be established from the edge of hydrophytic vegetation occurrences such as groupings of native rush species (*Juncus patens*) pursuant to SPR HYD-3 and Mitigation Measure BIO-4.

Several special-status plant species are known to be present on or near the property. A complete list of species with potential to occur can be found in (Appendix C Table 4). Special status and rare species will be identified through a CDFW protocol survey conducted by a qualified biologist pursuant to SPR BIO-7 and fencing will be installed to reduce impacts to species of concern if any are detected, pursuant to Mitigation Measure BIO-1a and BIO-1b. Three perennial plant species with California Rare Plant Rank (CRPR) 4 have been previously identified on the treatment site: Michaels rein orchid (*Piperia michaelii*),Hoffman's sanicle (*Sanicula hoffmanii*), and Saints' daisy *(Erigeron sanctarum*); however, proposed herbivory treatments are not expected to result in adverse impacts to these perennial species and may actually result in a benefit to the species by reducing nonnative species competition . Monterey pine is a rare species (CRPR 1B.1) and a sensitive natural community, therefore, grazing must avoid the loss of this sensitive natural community pursuant to Mitigation Measure BIO-3a. Empirical observations from experienced shepherds suggest that grazing on Monterey pine saplings does not lead to significant mortality; rather, it may promote coppice growth and stimulate resprouting. Grazing will be focused in areas near structures, in areas with nonnative species and high densities of fine fuels. To reduce the risk of introducing or spreading invasive species and or pathogens USLTRCD will adhere to implement best management practices outlined in SPR BIO-6 and SPR BIO-9. Furthermore, the animals will be cleansed before arrival and if a flock has been grazing in areas with high invasive seed banks, they may be sheared before arriving on site. As a form of bio control the animals will be fed seed-free forage for 36 hours to cleanse their digestive systems and reduce the risk of transporting unwanted seeds.

According to the CNDDB inventory, there are special-status wildlife species with potential to occur on or near Strawberry Canyon. A complete list of species can be found in Appendix B (Table 3). However, as described in the SLO-RESIL PSA/Addendum, prescribed herbivory would not result in significant impacts on most of the special-status wildlife species. Potential impacts could occur on special-status birds or overwintering monarch, and measures will be implemented to avoid or mitigate adverse impacts. Environmental worker training awareness pamphlets have been developed for Strawberry Canyon as a result of the recent fuels reduction project and a qualified practitioner will review avoidance measures with the contract shepherd prior to implementation, as

required by SPR BIO-2. Woodrats and their middens commonly occur within the treatment area; however, prescribed herbivory is not anticipated to result in destruction of nests, injury, or mortality of individuals because nests are constructed of dead materials and would not be affected by grazing animals (CalVTP PEIR). Surveys will be conducted to identify special-status and common nesting birds, and the required buffers will be implemented to minimize impacts pursuant to SPR BIO-10, SPR BIO-12, Mitigation Measure BIO-2a, and Mitigation Measure BIO-2b. Additionally, wildlife friendly fencing will be used and approved by a qualified party prior to project implementation pursuant to SPR BIO-11.

While the treatment site has not been officially identified as an overwintering site for Monarchs (Xerces Society), the Monterey Pine forest provides the marginally suitable microclimate conditions, such as dappled sunlight, high humidity, access to fresh water, and absence of freezing temperatures or high winds and are considered suitable overwintering habitat . Monarchs utilize various milkweed species (*Asclepias* ssp.) as host plants for laying eggs, providing a food source and protection for the species during this vulnerable stage in its life cycle (Western Monarch Milkweed Mapper, 2026). No breeding host plant (milkweed) were observed during CDFW protocol-level surveys. As such, monarchs are not expected to be utilizing the project site for breeding and pupal development. Based on lack of host plants and the limited disturbance associated with the targeted grazing of understory herbaceous, no impacts to monarchs are expected as a part of the project and no supplemental habitat assessments, treatment plans, or focused surveys are needed. It should be noted that targeted grazing can be found to improve monarch butterfly habitat by decreasing invasive species cover, improving competitive ability for native plant establishment, and enhancing understory biodiversity (Brockway, 2002).

Human assets in the form of residences are resource of concern that USLTRCD, Greenspace Land Trust and the surrounding community are invested in protecting. Therefore, grazing efforts will be targeted adjacent to the residences. The USLTRCD and Greenspace Land Trust received positive reactions from the community during previous vegetation management operations and project partners anticipate a similar response from the community regarding grazing. Greenspace, Upper Salinas-Las Tablas Resource Conservation District and contracted Shepherd will notify local community and adjacent neighbours about operations prior to implementation. They will provide contact information to allow for communication of concerns. USLTRCD has funded and implemented native plant restoration in swaths in strategic locations (Appendix D, Figure 3) throughout Strawberry Canyon to increase understory diversity and promote pollinator habitat. Each planting location will serve as points of interest for regularly scheduled educational events at Strawberry Canyon. As such, these areas will be excluded from the grazing area to promote the survival rate of native plantings.

Resources of concern will have been identified and properly protected; essential wildlife habitat will be retained while fire receptive fuels will be altered to reduce horizontal continuity and vertical arrangement. Strawberry Canyon is well-prepared to serve as an educational opportunity to inform the community about the benefits of manual selective thinning followed by grazing. Greenspace Land Trust and USLTRCD have established a collaborative working relationship grounded in their shared goal of actively managing publicly accessible landscapes to promote the long-term ecological resilience of the inherently valuable Monterey pine ecosystem.

Goals, Objectives and Performance Standards:

The goals of this grazing and vegetation management treatment are to:

- Primarily, improve forest health/ecological restoration
- Decrease wildfire risk
- Provide opportunities for community education

Carefully planned grazing can enhance biodiversity, improve soil health, and sustain key ecosystem services such as carbon sequestration and water flow/supply while safeguarding sensitive species and habitats (Roche, 2025). This treatment will promote forest health by removing noxious invasive weeds, supporting biodiversity, improve soil health, and promote ecological resiliency.

Various invasive plant species are present at the proposed treatment site including kikuyugrass (*Pennisetum clandestinum*), cape ivy (*Delairea odorata*), *velvetgrass (Holcus lanatus)* and French broom (*Genista monspessulana*). Additionally, swaths of annual grasses occur sporadically throughout the preserve. Considering that the proposed treatment site is a Monterey pine forest, a special-status species and sensitive natural community, it is essential that vegetation management is conducted to cease and remediate the impacts of invasive species. Grazing is a highly effective way to reduce the presence of invasive species, especially if timed correctly (Porensky, 2018). Additionally, grazing has the added benefit of enhancing soil function and health resulting in increased carbon sequestration (Byrnes, 2018). Decreasing the presence of invasive species and simultaneously improving soil health, will reduce competition for resources between native and non-native plants, enhancing biodiversity and promoting forest health.

Strategic vegetation management will also decrease wildfire risk (Lovreglio, 2024) in an area that is adjacent to populated communities and located in a very high wildfire risk area. Grazing will interrupt continuous fuels, breaking up both horizontally and vertically arranged fuels. By removing fine fuels that can link surface fires to ladder fuels, the risk of a fire moving from the understory to the canopy is significantly decreased. Crown fires, or fires that consume fuel in the canopy are highly destructive because they burn at extreme temperatures, move rapidly, and are difficult to contain. Removing vertical fuels via grazing will significantly reduce the potential for a crown fire, safeguarding the surrounding community, and protecting the forest. Additionally, understory grazing will create a break in the horizontal fuel load, slowing the rate at which fire spreads across the landscape which can allow more time for emergency responders to contain a potential wildfire.

This vegetation management treatment will also provide opportunities for community engagement, and education. Strawberry Canyon is regularly used as a learning ground for local schools and community groups to learn about the rare native Monterey pine stand. As such, this treatment will educate the local community about the benefits of managing a forest. Furthermore, Strawberry Canyon will serve as a highly specialized case study of how selective thinning with hand crews followed by grazing can promote forest health and reduce the risk of wildfire.

The objectives of the treatment include:

- Reduce competition for resources with existing native plant communities and populations, and increase biodiversity
- Control invasive plant populations; decrease invasive species cover, decrease annual grass cover
- Reduce fine fuel loads, manage fuel continuity
- Promote educational opportunities for the local community and schools to learn about the benefits of grazing

The performance standards include retaining habitat features as described in the PSA, retaining grazed and trampled vegetation at >50% absolute cover (i.e., bare soil <50%), reducing percent cover of non-native and invasive vegetation, and reduce continuity of fine fuels both vertically and horizontally. These performance standards will be met through the subsequent management plan while protecting resources of concern and adhering to all relevant regulations and environmental protections. Before and after photos will be utilized to

measure performance standards and will be submitted to the Coastal Commission as part of the post-treatment implementation report within 10 days of the completion of the treatment.

Management/Details of the Grazing Program:

Grazing will follow the 30/30/30 principle; this is a regenerative grazing approach that is based on distributing pasture biomass into three functional pathways: grazing, trampling, and retaining vegetation.

- Grazing 30% of available forage biomass allows enough energy to be converted into animal performance and manure, while also allowing plants to retain sufficient leaf area for photosynthetic capacity. This method allows for optimal carbon input and root exudation while ensuring that the treatment area is not over-defoliated. Retaining foliage and photosynthetic capabilities is critical because active photosynthesis drives root exudation, one of the primary pathways for transferring carbon into soil. Grazing encourages deeper and more resilient root systems and supports the formation of mineral-associated organic carbon. Root exudation also feeds soil microbes which stimulate biological activity; this is essential because biological activity contributes to the formation of stable soil organic matter.

- Trampling 30% of vegetation provides surface cover which reduces soil surface temperatures, improves moisture retention, and enhances water infiltration. It also creates habitat and food sources for soil organisms and invertebrates while protecting the soil from erosion via biomass armor. This layer acts as a protective and biologically active interface between plant and soil systems.

- Retaining 30% of the vegetation maintains structural diversity within the ecosystem. It provides habitat for ground-nesting birds, shelter for mammals, reptiles and amphibians, refuge for invertebrates and maintains photosynthetic capacity of the ecosystem to drive root growth and carbon inputs. Maintaining a level of vertical structure supports biodiversity and preserves ecological resilience, while still meeting treatment objectives of forest health and wildfire resilience.

This balanced allocation mimics natural herbivory patterns supporting animal performance, plant recovery, soil carbon formation, biodiversity conservation, and ecosystem function. While the 30/30/30 grazing framework is a proven guideline for managing grazing intensity and recovery, it is not a one-size-fits-all solution. Every treatment site has unique characteristics such as soil type, vegetation, climate, and existing land use that influence grazing outcomes. Additionally, treatment timing and goals (e.g., erosion control, forage production, habitat restoration) may require different grazing durations or stocking rates. Therefore, the 30/30/30 ratio will be used as a flexible starting point and adjusted to meet specific treatment needs and desired outcomes. However, bare soil cover of >50% within the active paddock (1-2 ac) will trigger animal removal and erosion control measures. Additionally, habitat features will be retained as described in the PSA.

The stocking rate will be about 200 head, comprised of one-fifth goats and four-fifths sheep. Stocking will be at an average rate of ½ acre per day; however, this is subject change based on forage density, forage type, and treatment goals.

To meet desired project goals, grazing will occur outside of the rainy season. Grazing in 2026 will occur in the Summer/Fall and will target small woody fuel and dry annual grasses during peak wildfire season. Subsequent years 2027 and 2028 will be grazed in spring, with the objective of targeting annual grasses before they set seed. Paddocks will be strategically placed near the houses and trails which pose the largest threat to wildfire safety and invasive species establishment. (Appendix D, Figure 3 The USLTRCD and Greenspace have been allocated enough funding through a CALFIRE grant to target ten acres per year of grazing for the next three seasons

resulting in approximately 30 acres of grazed area in total. Performance standards will be assessed after the first year of grazing and targeted acres will be subject to change in subsequent years to ensure grazing goals and objectives are being met.

The estimated treatment start date will begin no sooner than 60 days after the submission of this plan. Paddocks, the area included inside of electric fencing, will be on average 1 to 2 acres. Exact paddock size will be determined by geography, resources of concern, and desired grazing goals. These will be moved periodically as determined by the Shepherd and as needed to complete treatment goals. Water infrastructure will be required during the duration of the treatment. Clean drinking water will be brought in on a trailer from a local source and monitored daily. Salt will be required for animal health during the duration of the treatment. Salt will be offered free choice in a safe livestock tub so as not to create unnecessary salt intrusion into the soil. No other supplements will be needed during the treatment. Temporary electric netting will be employed both for the safety of the livestock and the concentration and mobility of the grazers to achieve treatment outcomes. Electric fencing is charged by a 12v battery, controller, solar panel and grounding rod. All fencing will be well marked with "electric" signs, and all access points will be visibly identified. Electric netting will meet wildlife safety standards and will be maintained on "hot" or laid down during treatment. Electric netting and solar charging system will be checked daily and adjusted for optimal use and safety. A water trailer will be needed onsite, containing a 275-gallon water tote, hoses and water trough for use by grazers as well as additional fencing supplies. This will be maintained out of public view shed. Additionally, one to two trained livestock guardian dogs will be employed due to the presence of mountain lions in the vicinity. The dogs act as deterrent only to predation from mountain lions and coyotes and will remain within the fencing. A herder will be present onsite at least once daily for care of the dogs and maintenance of treatment infrastructure.

Summary of Grazing Management Requirements

To ensure compliance with PWP, Coastal VTS, and CalVTP SPRs and mitigation measures, all applicable regulations will be followed. A qualified party will be consulted with and will approve operations prior to implementation. The treatment area boundary, and all protected resources will be clearly defined on a map and on-site (SPR AD-2). In accordance with SPR BIO-1, the site has been surveyed for the presence of CESA and/or ESA listed species, and any other not yet identified protected species, by a qualified biologist in spring 2025. Three rare plant species, however regionally common, have previously been identified at the site: *Piperia michaelii*, *Sanicula hoffmanni* and *Erigeron spp.* Wildlife friendly fencing will be utilized and approved by a qualified party before treatment (SPR BIO-11). While precipitation is not anticipated during treatment implementation, because the project is slated for springtime, if there is a rain event, all operations will cease in areas with soils that are saturated enough to become compacted (SPR GEO-1). If treatment results in exposure of bare soil over 50% or more of the treatment area, project proponent will stabilize soils after treatment (SPR GEO-3). If a precipitation event is anticipated, treatment areas will be inspected for proper implementation of erosion controls (SPR GEO-4). The treatment area will exclude areas with over 50% slope (SPR GEO-7). Water will be provided for grazing animals (SPR HYD-3), and treatment areas will be designed to protect soil stability; if it identified that grazing is negatively impacting soil stability, animals will be herded out of the area. Grazing animals will be excluded from WLPZ.

Coastal Vegetation Treatment Standards- Treatment activities will comply with North Coastal San Luis Obispo Regional Ecological Strategy for Improving Landscapes project specific analysis appendix B Coastal Vegetation Treatment Standards.

Monitoring and Reporting Requirements

Monitoring and Reporting requirements for this treatment will be consistent with Upper Salinas Las Tablas Resource Conservation District Forest Health and Fire Resiliency Public Works Plan, the California Vegetation Treatment Programmatic Environmental Impact Report and SLO-RESIL PSA/Addendum (Appendix D, Figure 8), Special Conditions pursuant to the North Coastal San Luis Obispo Regional Ecological Strategy for Improving Landscapes NOID, and Coastal Vegetation Treatment Standards.

The Upper Salinas Las Tablas RCD (USLTRCD) will submit monitoring reports for the review of the California Coastal Commission Executive Director that will be consistent with the requirements of Standard Project Requirement AD-7. The USLTRCD will post treatments implemented in the past year including treatment type, acres treated, maps of where treatments occurred, and anticipated treatments.

The USLTRCD will adhere to section 4. Substantial Conformance Review of SLO-RESIL NOID Special Conditions which states: NOT LESS THAN 45 DAYS PRIOR TO COMMENCEMENT OF ANY TREATMENT ACTIVITIES ON A PROPERTY IN THE PROJECT AREA, the RCD shall submit a summary of proposed treatments for the review and approval of the Executive Director. The summary shall include the following:

a. Treatment Types and Activities
b. Landowner Agreements
c. Rare Plant Surveys
d. Grazing Management Plan (not less than 60 days prior to commencement of prescribed herbivory treatment).

Operations will not begin until 60 days after this grazing plan has been submitted. To ensure compliance with the PSA and NOID, geospatial data and treatment information will be submitted once treatment is completed. After completion, post-treatment reporting will be submitted. Photo points will be established throughout the treatment area for reporting and qualitatively identifying success of grazing. Photo points will capture site characteristics before, during, and after grazing.

Appendix A

Strawberry Canyon Plot Data Represented by Tables 1-2

Table 1: Greenspace- the Cambria Land Trust Tree Inventory Summary Statistics (2023).

Greenspace Strawberry Canyon Property Summary Statistics								
	Plot 1	**Plot 2**	**Plot 3**	**Plot 4**	**Plot 5**	**Plot 6**	**Plot 7**	**Property Average/Acre**
% Slope	0	4	0	0	18	18	4	11
TPA	360	155	700	440	370	295	145	352
BA	65.91	96.5	155.02	149.51	66.58	93.6	150.1	111.03

*(Basal area measured as (ft^2/acre)

Table 2: Greenspace- the Cambria Land Trust Regeneration and Mortalist Statistics (2023)

Regeneration & mortality statistics									
		Plot 1	**Plot 2**	**Plot 3**	**Plot 4**	**Plot 5**	**Plot 6**	**Plot 7**	**Property Average/Acre**
Saplings/acre	PIRA	10	0	40	35	20	10	5	17
	QUAG	150	0	190	200	165	140	5	121
Snags/acre	PIRA	15	15	55	0	35	15	30	24
	QUAG	10	0	0	0	5	0	0	2

PIRA= Pinus radiata and QUAG= Quercus agrifolia

Appendix B

CDFW Wildlife Species of Special Concern with Potential to Occur on or Near Property

Table 3: Special Status Species Information via CNDDB. FP: Fully Protected. SSC: Species of special concern. WL: Watch List

Scientific Name	Common Name	Federal Status	State Status	CDFW Status
Rana draytonii	California red-legged frog	Threatened	None	SSC
Taricha torosa	Coast Range newt	None	None	SSC
Bombus caliginosus	obscure bumble bee	None	None	-
Danaus plexippus plexippus pop. 1	monarch - California overwintering population	Candidate	None	-
Myotis thysanodes	fringed myotis	None	None	-
Myotis yumanensis	Yuma myotis	None	None	-
Haliotis cracherodii	black abalone	Endangered	None	-
Emys marmorata	western pond turtle	Proposed Threatened	None	SSC
Thamnophis hammondii	two-striped gartersnake	None	None	SSC

Appendix C

CNPS Rare, Threatened, or Endangered Plants With Potential to Occur On or Near Strawberry Canyon

Table 4: Information via California Natural Diversity Database (CNDDB).

Scientific Name	Common Name	Federal Status	State Status	CA Rare Plant Rank
Sulcaria spiralifera	twisted horsehair lichen	None	None	1B.2
Sanicula hoffmannii	Hoffmanns sanicle	None	None	4.3
Erigeron sanctarum	Saints' daisy	None	None	4.2
Senecio aphanactis	chaparral ragwort	None	None	2B.2
Calystegia subacaulis ssp. Episcopalis	Cambria morning-glory	None	None	4.2
Carex obispoensis	San Luis Obispo sedge	None	None	1B.2
Arctostaphylos cruzensis	Arroyo de la Cruz manzanita	None	None	1B.2
Astragalus nuttallii var. nuttallii	ocean bluff milk-vetch	None	None	4.2
Hosackia gracilis	harlequin lotus	None	None	4.2
Pinus radiata	Monterey pine	None	None	1B.1
Horkelia cuneata var. sericea	Kelloggs horkelia	None	None	1B.1

List 1: Plants of highest Priority

List 1B.2: Plants rare and endangered in CA and elsewhere. Fairly Endangered in CA

List 2B.2: Plants rare, threatened or endangered in CA but common elsewhere. Fairly Endangered in CA

List 4.2: Plants of limited distribution – Watch List. Fairly endangered in CA

List 4.3: Plants of limited distribution – Watch List. Not very endangered in CA

Plants of Limited Distribution SWCA 2025 rare plant survey

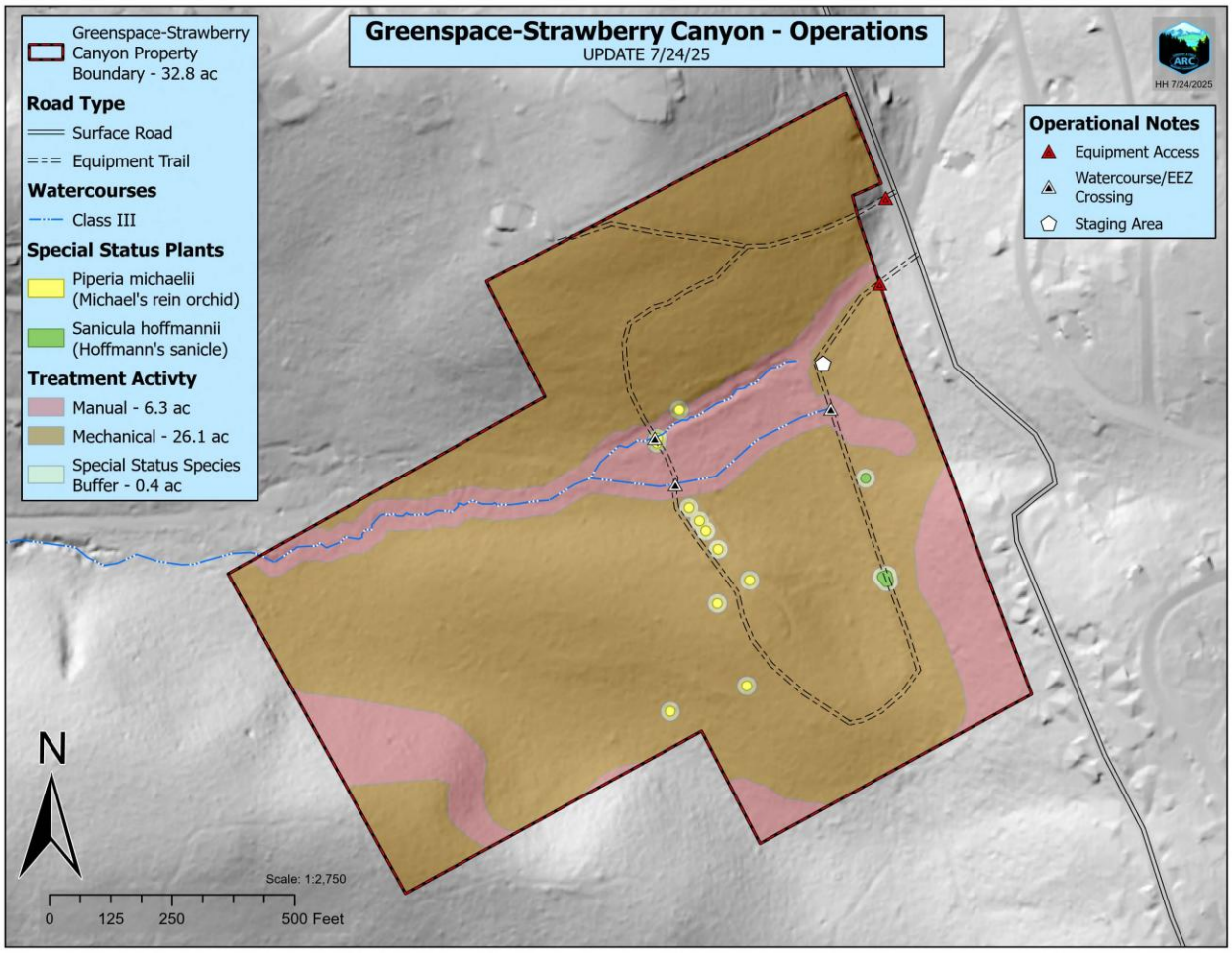

Figure 1: Piperia michaelii (CNPS 4.2 ranking) and Sanicula hoffmanii (CNPS rank 4.3) Occurrences at Strawberry Canyon. This map was used for planning purposes, therefore the treatment activities are not accurate. Refer to figure 2 for reporting map post treatments for accurate project activities.

Appendix D

Current Conditions and Proposed Treatments

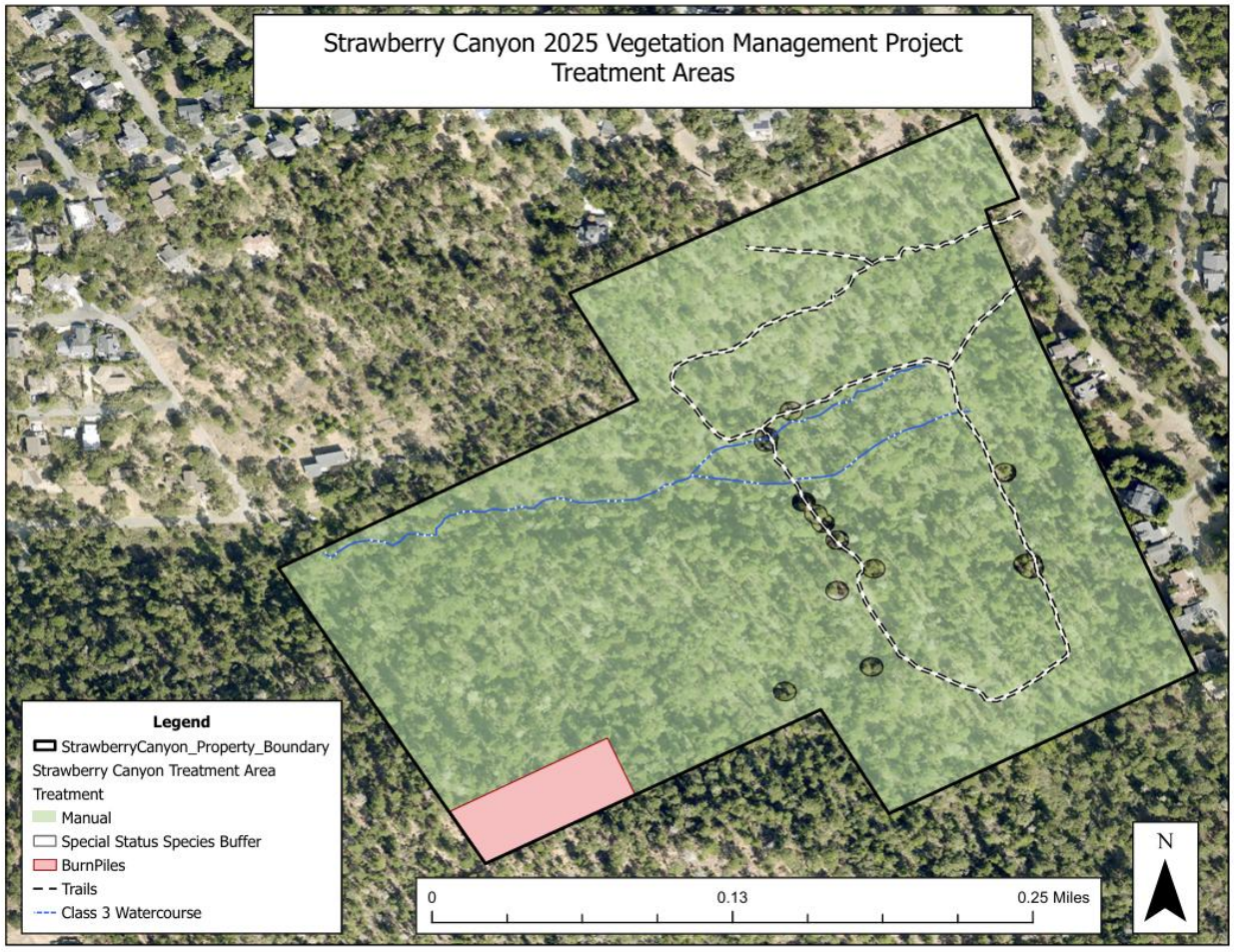

Figure 2: Manual thinning and tracked chipper work at Strawberry Canyon including one acre of burn piles.

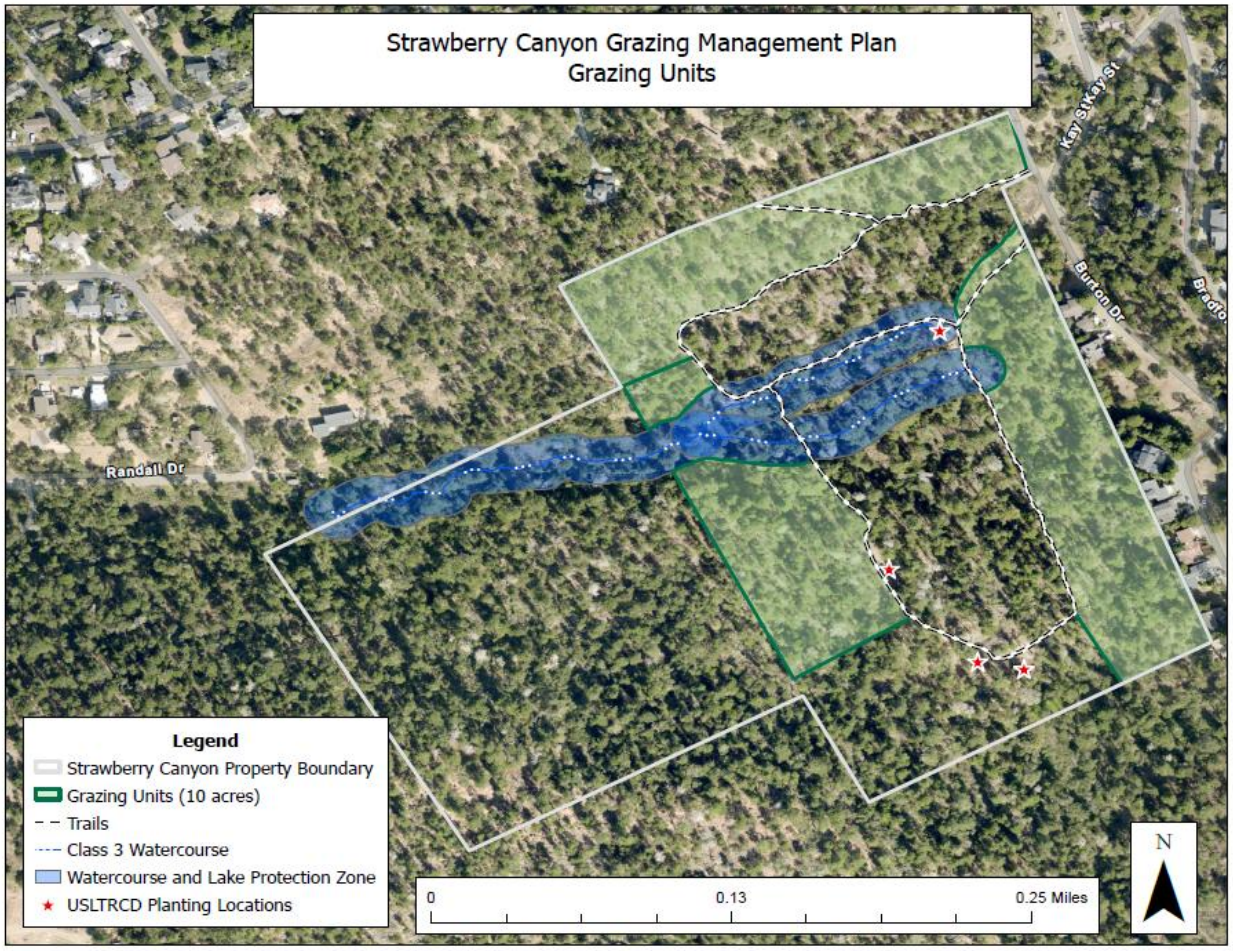

Figure 3: Strawberry Canyon Priority Grazing Units (ESRI, ArcGIS Pro)

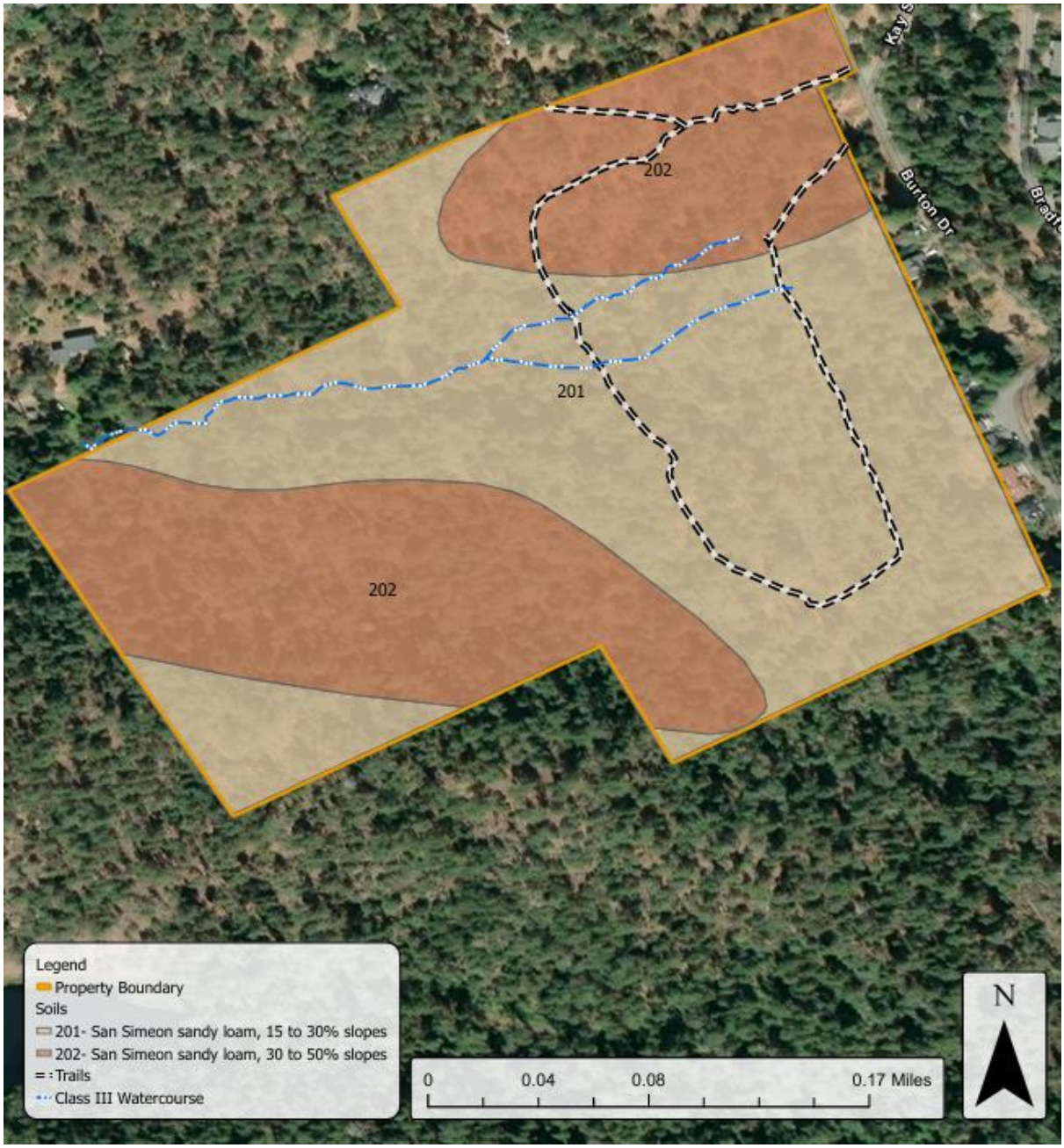

Figure 4: Strawberry Canyon Soil Types Map (Esri, ArcGIS Pro) (NRCS, Web Soil Survey)

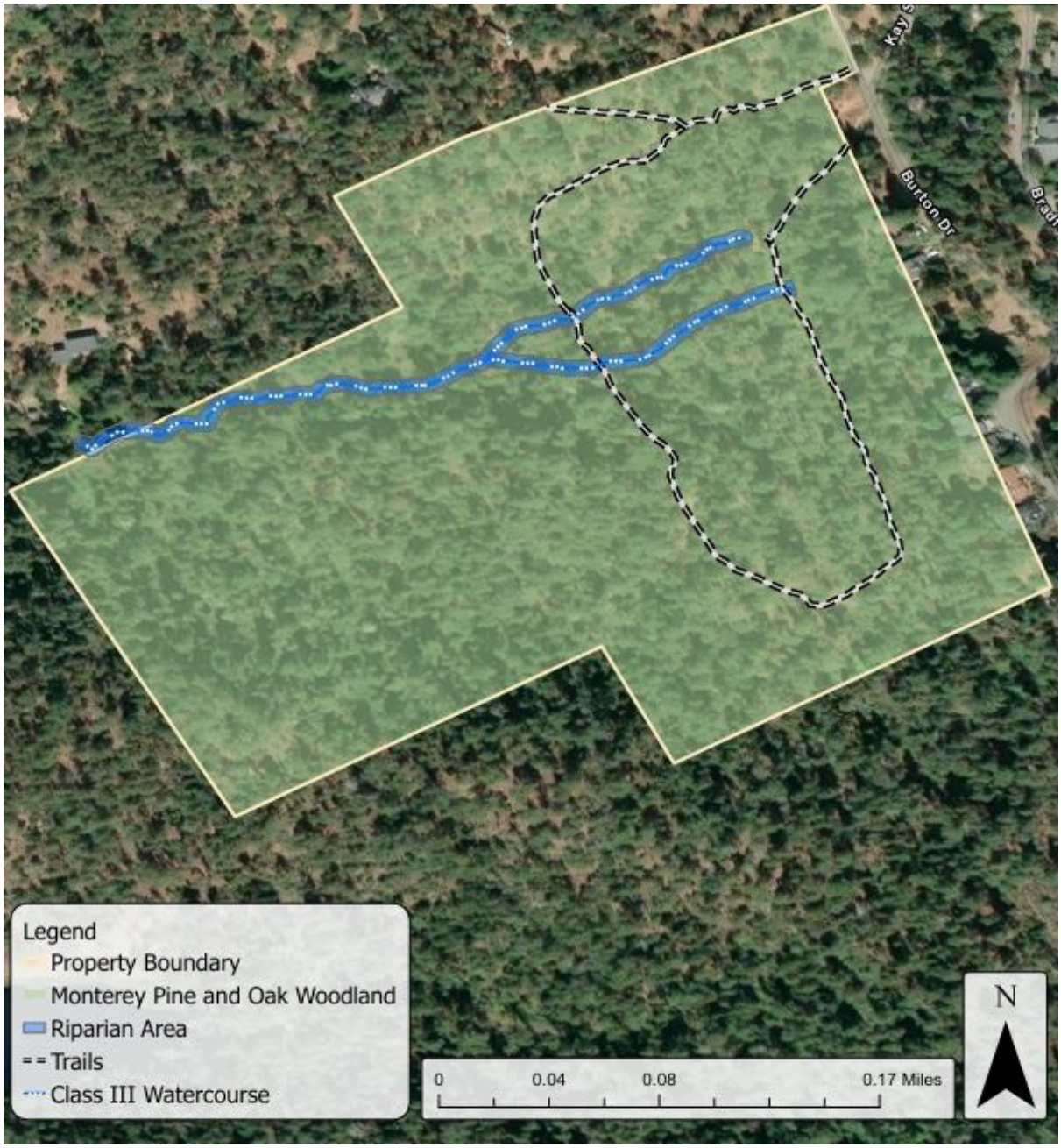

Figure 5: Forested Land Cover (ESRI, ArcGIS Pro)

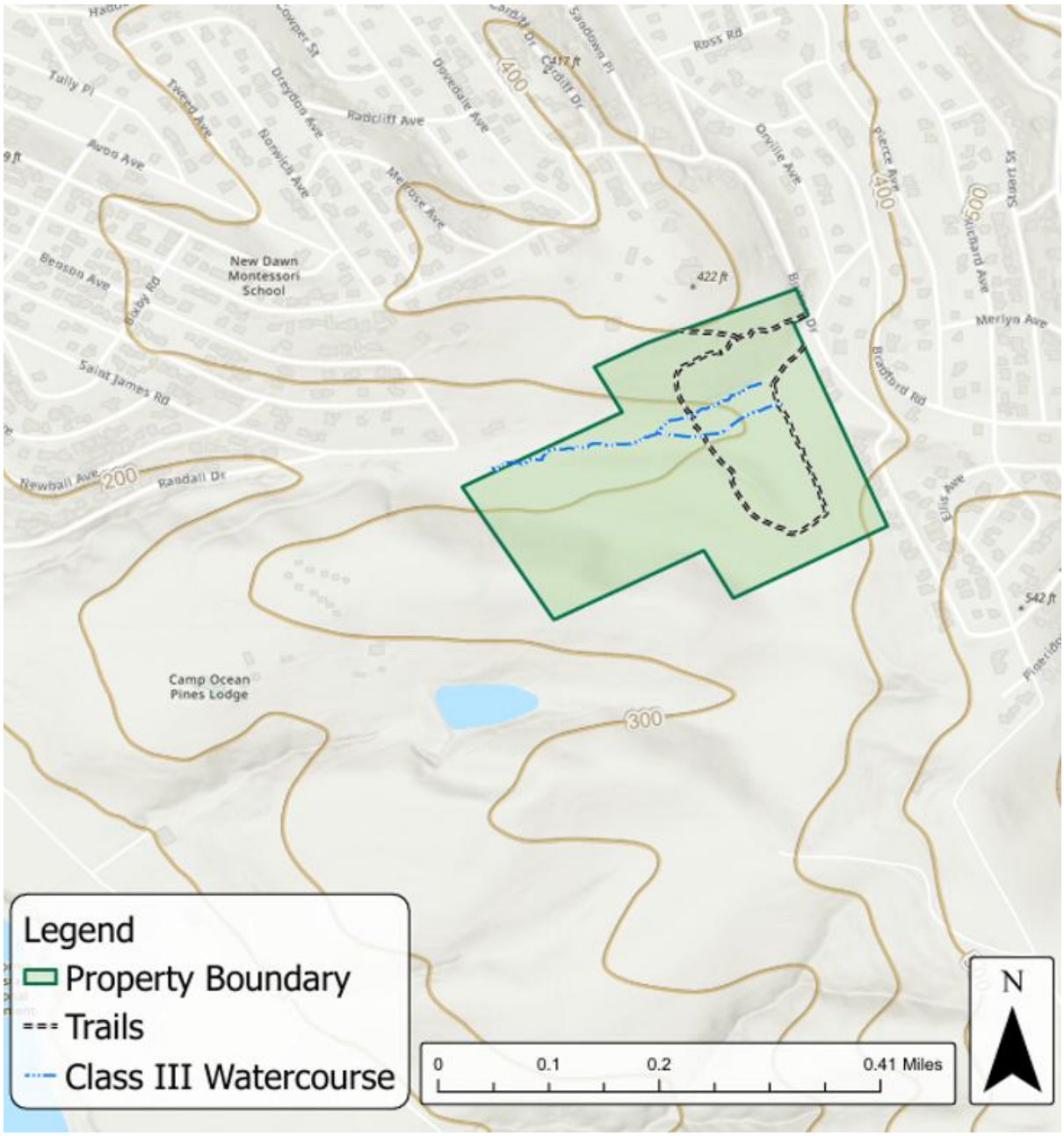

Figure 6: Strawberry Canyon Topographic Map with Watercourses and Trails (ESRI, ArcGIS Pro)

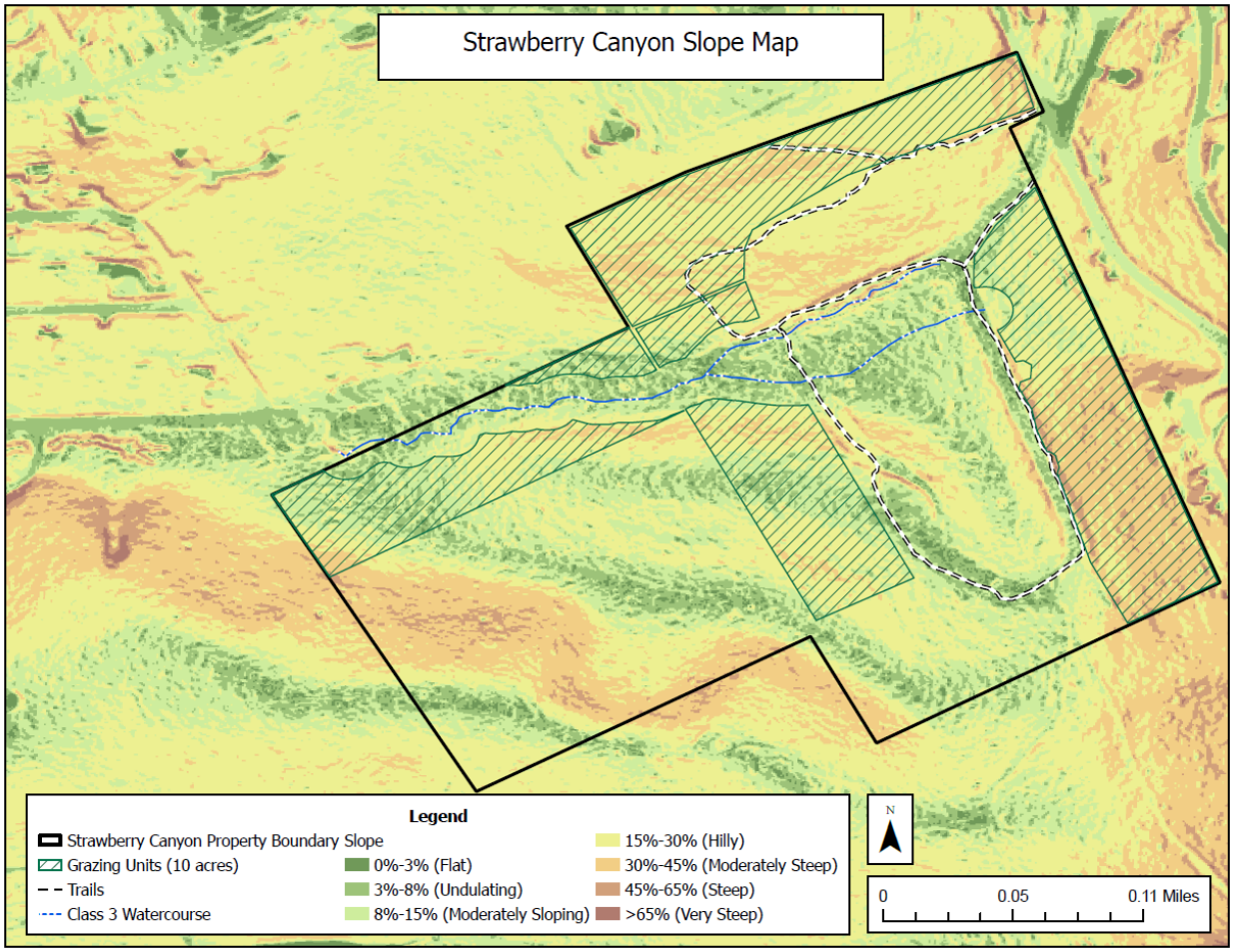

Figure 7: Strawberry Canyon Slope Map (ESRI, ArcGIS Pro)

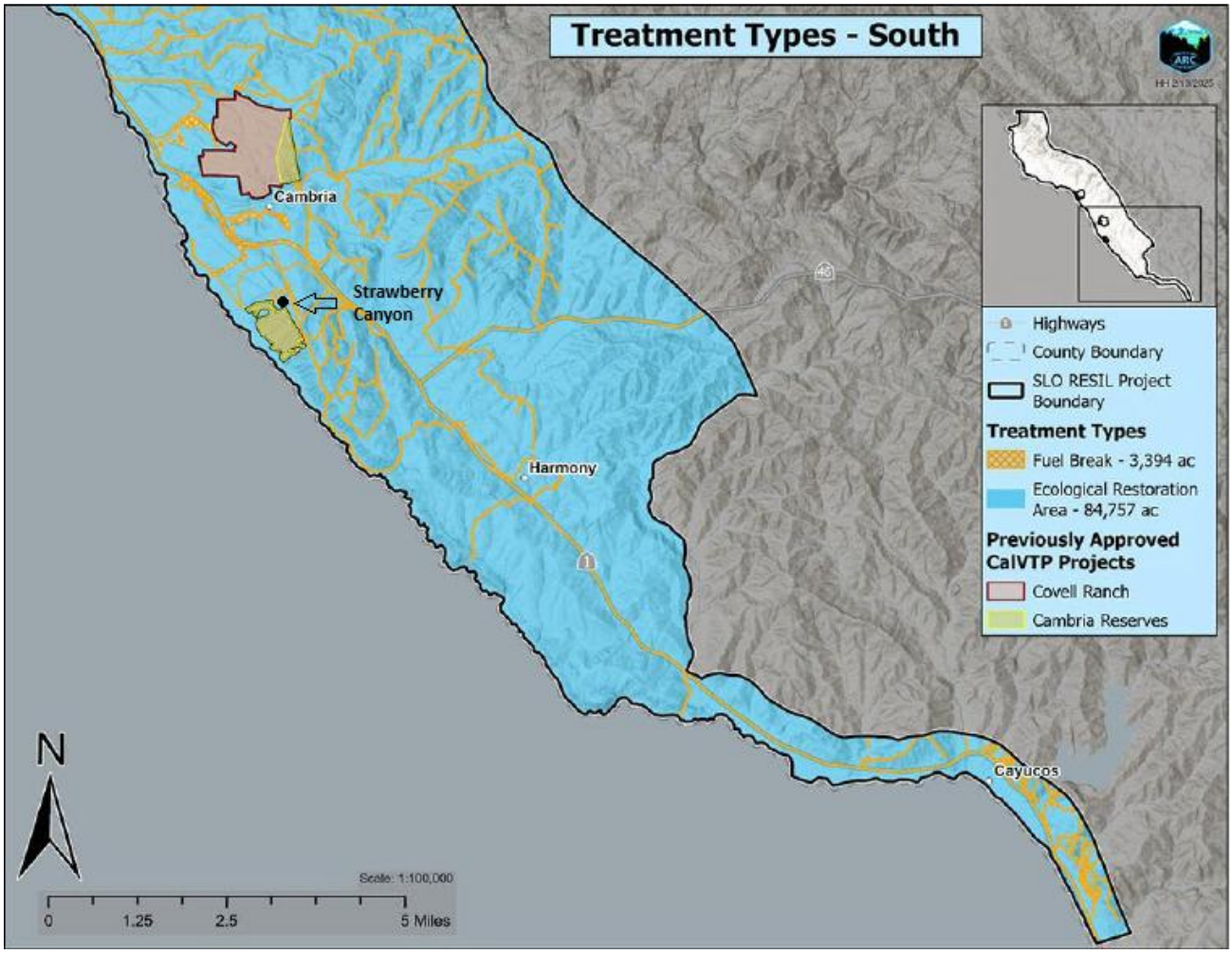

Figure 8: Location of Strawberry Canyon within CalVTP approved treatment type map.

Appendix E

Mitigation Monitoring and Reporting Program

Applicable to SLO-RESIL Grazing Management Plan 2026

Standard Project Requirements
Administrative Standard Project Requirements
SPR AD-2: Delineate Protected Resources: The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. "Protected Resources" refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.
SPR AD-3: Consistency with Local Plans, Policies, and Ordinances: The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.
SPR AD-5: Maintain Site Cleanliness: If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.
SPR AD-6: Public Notifications for Treatment Projects One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.
SPR AD-7: Provide Information on Proposed, Approved, and Completed Treatment Projects (Proposed and approved reporting requirements have been completed via SLO-RESIL approval process) For any vegetation treatment project using the CalVTP Program EIR for CEQA compliance, the project proponent will provide the information listed below to the Board of Forestry and Fire Protection (Board) or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. Information on completed projects (following initial treatment): GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction) A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes Size of treated area (typically acres); Treatment types and activities; Dates of work; A list of the SPRs and mitigation measures that were implemented Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). This SPR applies to all treatment activities and all treatment types, including treatment maintenance.

Standard Project Requirements
Aesthetic and Visual Resource Standard Project Requirements
SPR AES-2: Avoid Staging within Viewsheds The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. This SPR applies to all treatment activities and treatment types, including treatment maintenance.
Air Quality Standard Project Requirements
SPR AQ-1: Comply with Air Quality Regulations The project proponent will comply with the applicable air quality requirements of air districts within whose jurisdiction the project is located. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.
SPR AQ-4: Minimize Dust To minimize dust during treatment activities, the project proponent will implement the following measures: Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol. If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by ARB, EPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the water results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations. Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113. Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property," per Health and Safety Code Section 41700. This SPR applies to all treatment activities and treatment types, including treatment maintenance.
Archaeological, Historical, and Tribal Cultural Resources Standard Project Requirements
(SPR CUL-1-6 have been completed via SLO-RESIL PSA/Addendum process) SPR CUL-7: Avoid Built Historical Resources If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. Within a buffer of 100 feet of the built historical resource, there will be no prescribed burning or mechanical treatment activities. Buffers less than 100 feet for built historical resources will only be used after consultation with and receipt of written approval from a qualified archaeologist. If the records search does not identify known historical resources in the treatment area, but structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historic significance are present in the treatment area, they will similarly be avoided. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

Standard Project Requirements
SPR CUL-8: Cultural Resource Training The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance). This SPR applies to all treatment activities and treatment types, including treatment maintenance.
Biological Resources Standard Project Requirements
SPR BIO-1: Review and Survey Project-Specific Biological Resources The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this Program EIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will 1.) identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2.) assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified RPF or biologist, will determine which one of the following best characterizes the treatment: 1. Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided. If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment: a. by physically avoiding the suitable habitat, or b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites). Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist. Project-Specific Guidance to Implement SPR BIO-1 <u>Special-Status Plants</u> For special-status plants not listed under CESA or ESA, to avoid impacts on the annual and geophyte species identified in Attachment C of the PSA/Addendum, only non-ground-disturbing treatment activities (i.e., manual treatments, herbicide application, prescribed herbivory, and prescribed burning) will be implemented and only during the dormant season for these species (i.e., when the plant has no aboveground parts), if feasible, provided the treatment will not alter habitat in a way that would make it unsuitable for the special-status plants to reestablish following treatment, or destroy seedbanks, stumps, or roots, rhizomes, bulbs and other underground parts of these species. If the limited operating period for annual and geophyte species (i.e., only non-ground-disturbing treatment activities conducted during the dormant season) is determined to be infeasible, then protocol-level surveys will be required per SPR BIO-7. Note that ground-disturbing treatment activities (i.e., mechanical treatments) and pile burning may result in impacts on these plant species even when dormant and will not be conducted without prior implementation of SPR BIO-7. <u>Special-Status Wildlife</u>

Standard Project Requirements
To avoid impacts on special-status nesting birds (i.e., bald eagle, olive-sided flycatcher, purple martin), a limited operating period for all treatment activities from December 1–July 31 for golden eagle and bald eagle, January 1–August 31 for white-tailed kite, and February 1–August 31 for other special-status nesting birds will be implemented within habitats determined to be suitable for these species by a qualified RPF or biologist, if feasible. If conducting treatments outside of the nesting bird season is determined to be infeasible, then SPR BIO-10 will be implemented.
To avoid impacts on monarch butterfly, the following measures will be implemented:
To avoid impacts on overwintering monarch butterflies, prescribed burning, mechanical, manual, herbicide, and prescribed herbivory treatments would be avoided within forested habitats potentially suitable for overwintering monarchs as determined by a qualified RPF or biologist. If it is not feasible to avoid treatments within potential overwintering habitat, SPR BIO-10 will be implemented.
This SPR applies to all treatment activities and treatment types, including treatment maintenance.
SPR BIO-2: Require Biological Resource Training for Workers The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled). This SPR applies to all treatment activities and treatment types, including treatment maintenance.
Sensitive Natural Communities and Other Sensitive Habitats
SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats
If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, the project proponent will:
require a qualified RPF or biologist to perform a protocol-level survey following the CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of *A Manual of California Vegetation* (including updated natural communities data at http://vegetation.cnps.org/), or referring to relevant reports (e.g., reports found on the VegCAMP website).
map and digitally record, using a Global Positioning System (GPS), the limits of any potential sensitive habitat and sensitive natural community identified in the treatment area.
This SPR applies to all treatment activities and treatment types, including treatment maintenance.
Project-Specific Guidance to Implement SPR BIO-3
If fine-scale mapping to the alliance level using the state's Vegetation Classification and Mapping Program (VegCAMP) methodology has been completed for the treatment area, the qualified RPF or biologist can rely on that existing fine-scale mapping, with filed verification, to identify sensitive natural communities.
SPR BIO-6: Prevent Spread of Plant Pathogens When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., Ione chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of *Phytopthora* and other plant pathogens (e.g., pitch canker (*Fusarium*), goldspotted oak borer, shot hole borer, bark beetle):
clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk;

Standard Project Requirements
include training on *Phytopthora* diseases and other plant pathogens in the worker awareness training; minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment; minimize movement of soil and plant material within the site, especially between areas with high and low risk of contamination; clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low risk areas or between widely separated portions of a treatment area; and follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (Working Group for *Phytoptheras* in Native Habitats 2016). This SPR applies to all treatment activities and treatment types, including treatment maintenance.
SPR BIO-7: Survey for Special-Status Plants If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities." Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status. If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS. For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this Program EIR, surveys will not be required under the following circumstances: If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment. This SPR applies to all treatment activities and treatment types, including treatment maintenance. Project-Specific Guidance to Implement SPR BIO-7 If the limited operating period for non-ESA and -CESA annual and perennial geophyte species (i.e., non-ground-disturbing treatment activities conducted during the dormant season) is determined to be infeasible, then protocol-level surveys for these species will be conducted prior to implementation of treatments. Protocol-level surveys will be conducted for all special-status plants listed under ESA or CESA and perennial species not listed under ESA or CESA prior to implementation of treatments. The results of protocol-level surveys for special-status plant species will be submitted to Coastal Commission staff before activities occur in a treatment area.
Environmentally Sensitive Habitat Areas
SPR BIO-8: Identify and Avoid or Minimize Impacts in Coastal Zone ESHAs When planning a treatment project within the Coastal Zone, the project proponent will, in consultation with the Coastal Commission or a local government with a certified Local Coastal Program (LCP) (as applicable), identify the habitat types and species present to determine if the area qualifies as an Environmentally Sensitive Habitat Area (ESHA). If the area is an ESHA, the

Standard Project Requirements
treatment project may be allowed pursuant to this Program EIR, if it meets the following conditions. If a project requires a CDP by the Coastal Commission or a local government with a certified LCP (as applicable), the CDP approval may require modification to these conditions to further avoid and minimize impacts:
The treatment will be designed, in compliance with the Coastal Act or LCP if a site is within a certified LCP area, to protect the habitat function of the affected ESHA, protect habitat values, and prevent loss or type conversion of habitat and vegetation types that define the ESHA, or loss of special-status species that inhabit the ESHA.
Treatment actions will be limited to eradication or control of invasive plants, removal of uncharacteristic fuel loads (e.g., removing dead, diseased, or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the vegetation types present in the ESHA.
A qualified biologist or RPF familiar with the ecology of the treatment area will monitor all treatment activities in ESHAs.
Appropriate no-disturbance buffers will be developed in compliance with the Coastal Act or relevant LCP policies for treatment activities in the vicinity of ESHAs to avoid adverse direct and indirect effects to ESHAs.
This SPR applies to all treatment activities and all treatment types, including treatment maintenance.
Project-Specific Guidance to Implement SPR BIO-8
All treatments will be implemented consistent with the approved Coastal VTS from the Upper Salinas-Las Tablas Resource Conservation District certified Forest Health and Fire Resilience Public Works Plan.
Invasive Plants and Wildlife
SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail):
clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, noxious weeds, or invasive wildlife;
for all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species;
inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas;
stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area;
identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include herbicide application, manual or mechanical treatments, prescribed burning, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles;
treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and
implement Fire and Fuel Management BMPs outlined in the "Preventing the Spread of Invasive Plants: Best Management Practices for Land Mangers" (Cal-IPC 2012, or current version).
This SPR applies to all treatment activities and treatment types, including treatment maintenance.

Standard Project Requirements
Wildlife
SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries, monarch overwintering sites) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. The qualified RPF or biologist will determine if following an established protocol is required, and the project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed. This SPR applies to all treatment activities and treatment types, including treatment maintenance. Project-Specific Guidance to Implement SPR BIO-10 If it is not feasible to avoid all treatments during the nesting bird season (i.e., December 1–July 31 for golden eagle and bald eagle, January 1–August 31 for white-tailed kite, and February 1–August 31 for other special-status nesting birds (as adjusted by a qualified RPF or biologist), pursuant to SPR BIO-1, focused surveys (i.e., nest searches) for nests of special-status species (i.e., bald eagle, , olive-sided flycatcher, purple martin,) will be conducted in habitat suitable for the species prior to implementing treatment activities during the nesting bird season. If nesting special-status birds are detected during focused surveys, Mitigation Measure BIO-2a or BIO-2b will be implemented depending on the species detected. If it is not feasible to avoid prescribed burning, mechanical, manual, herbicide, and prescribed herbivory treatments within potential monarch overwintering habitat pursuant to SPR BIO-1, to avoid impacts to special-status overwintering monarch butterflies, the following will be implemented: A qualified RPF or biologist will assess the treatment area for stands suitable for overwintering monarch butterflies and overwintering activity. If overwintering stands suitable for monarch are present within the treatment area, these stands will be recorded and surveyed for overwintering monarchs and, Mitigation Measure BIO-2b will be implemented.
SPR BIO-11: Install Wildlife-Friendly Fencing (Prescribed Herbivory) If temporary fencing is required for prescribed herbivory treatment, a wildlife-friendly fencing design will be used. The project proponent will require a qualified RPF or biologist to review and approve the design before installation to minimize the risk of wildlife entanglement. The fencing design will meet the following standards: Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale or snag a leaping animal; and, if feasible, keeping electric netting-type fencing electrified at all times or laid down while not in use. Charge temporary electric fencing with intermittent pulse energizers; continuous output fence chargers will not be permitted. Allow wildlife to jump over easily without injury by installing fencing that can flex as animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass. Be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers. This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.
SPR BIO-12: Protect Common Nesting Birds, Including Raptors The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP Program EIR. The active nesting season will be defined by the qualified RPF or biologist.

Standard Project Requirements
If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identity the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following: Establish Buffer. The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. Treatment activities will be implemented outside of the buffer. The buffer location will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. Modify Treatment. The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment methods). Treatment modifications will be determined by the project proponent in coordination with the qualified RPF or biologist. Defer Treatment. The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician. Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests: Monitor Active Raptor Nest During Treatment. A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases. Retention of Raptor Nest Trees. Trees with visible raptor nests, whether occupied or not, will be retained. This SPR applies to all treatment activities and treatment types, including treatment maintenance.
Geology, Soils, Paleontology, and Mineral Resource Standard Project Requirements

Standard Project Requirements
SPR GEO-1: Suspend Disturbance during Heavy Precipitation The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types, including treatment maintenance.
SPR GEO-3: Stabilize Disturbed Soil Areas The project proponent will stabilize soil disturbed during prescribed herbivory treatments that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, prescribed herbivory, or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery, animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR only applies to mechanical, prescribed herbivory, and prescribed burns that result in exposure of bare soil over 50 percent of the project area treatment activities and all treatment types, including treatment maintenance.
SPR GEO-4: Erosion Monitoring The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.
SPR GEO-7: Minimize Erosion To minimize erosion, the project proponent will: (3) Prescribed herbivory treatments will not be used in areas with over 50 percent slope. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.
Hazardous Material and Public Health and Safety Standard Project Requirements
SPR HAZ-1: Maintain All Equipment The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and treatment types, including treatment maintenance.
SPR HAZ-4 Prohibit Smoking in Vegetated Areas The project proponent will require that smoking is only permitted in designated smoking areas barren or cleared to mineral soil at least 3 feet in diameter (PRC Section 4423.4). This SPR applies to all treatment activities and treatment types, including treatment maintenance.

Standard Project Requirements
Hydrology and Water Quality Standard Project Requirements
SPR HYD-1: Comply with Water Quality Regulations Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each WDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer WDRs or Waivers for fuel reduction or vegetation management activities. The current applicable WDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and treatment types, including treatment maintenance. Project-Specific Guidance to Implement SPR HYD-1 Vegetation treatment activities may result in discharges to waters of the state; therefore; compliance with Water Code sections 13260(a)(1) and 13264 are required. The project proponent will use the State Water Board's Vegetation Treatment General Order, which provides a mechanism for Water Code compliance for projects that prepare a CalVTP PSA or PSA/Addendum. The project will be automatically enrolled (through implementation of SPR AD-7) in the State Water Board's Vegetation Treatment General Order. The project's automatic enrollment satisfies the requirements of SPR HYD-1.
SPR HYD-2: Avoid Construction of New Roads The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.
SPR HYD-3: Water Quality Protections for Prescribed Herbivory The project proponent will include the following water quality protections for all prescribed herbivory treatments: Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified in the treatment prescription and excluded from prescribed herbivory project areas using temporary fencing or active herding. A buffer of approximately 50 feet will be maintained between sensitive and actively grazed areas. Water will be provided for grazing animals in the form of an on-site stock pond or a portable water source located outside of environmentally sensitive areas. Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed. This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.
SPR HYD-4: Identify and Protect Watercourse and Lake Protection Zones The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916.5 of the California Forest Practice Rules (February 2019 version). WLPZ's are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.

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

Water Class	Class I	Class II	Class III	Class IV
Water Class Characteristics or Key Indicator Beneficial Use	1) Domestic supplies, including springs, on site and/or within 100 feet downstream of	1) Fish always or seasonally present offsite within 1000	No aquatic life present, watercourse showing evidence of being capable of sediment transport to	Man-made watercourses, usually downstream, established

Water Class	Class I	Class II	Class III	Class IV
	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.	Class I and II waters under normal high-water flow conditions after completion of timber operations.	domestic, agricultural, hydroelectric supply or other beneficial use.
WLPZ Width (ft) – Distance from top of bank to the edge of WLPZ				
< 30 % Slope	75	50	Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.	
	100	75	Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.	
>50 % Slope	150	100	Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.	

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

Standard Project Requirements
The following WLPZ protections will be applied for all treatments:
Treatment activities with WLPZs will retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced a qualified RPF will provide the project proponent with a site- and/or treatment activity-specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version).
Equipment, including tractors and vehicles, must not be driven in wet areas or WLPZs, except over existing roads or watercourse crossings where vehicle tires or tracks remain dry.
Equipment used in vegetation removal operations will not be serviced in WLPZs, within wet meadows or other wet areas, or in locations that would allow grease, oil, or fuel to pass into lakes, watercourses, or wet areas.
WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately.
Burn piles will be located outside of WLPZs.

Standard Project Requirements
No fire ignition (nor use of associated accelerants) will occur within WLPZs however low intensity backing fires may be allowed to enter or spread into WLPZs.
Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of soil into water bodies and may include but are not limited to mulching, rip-rap, grass seeding, or chemical soil stabilizers.
Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse.
Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes.
Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water.
This SPR applies to all treatment activities and treatment types, including treatment maintenance. Revisions to the SPR: Text of the original SPR will be removed and replaced with new language. The original language states, "The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (February 2019 version)." The revised language states, "The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses within 300 feet of proposed manual, mechanical, prescribed burning, prescribed herbivory, and herbicide treatments, as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (February 2019 version)."
SPR HYD-6: Protect Existing Drainage Systems If a treatment activity is adjacent to a roadway with stormwater drainage infrastructure, the existing stormwater drainage infrastructure will be marked prior to ground disturbing activities. If a drainage structure or infiltration system is inadvertently disturbed or modified during project activities, the project proponent will coordinate with owner of the system or feature to repair any damage and restore pre-project drainage conditions. This SPR applies to all treatment activities and treatment types, including treatment maintenance.
Noise Standard Project Requirements
SPR NOI-1: Limit Heavy Equipment Use to Daytime Hours The project proponent will require that operation of heavy equipment associated with treatment activities (heavy off-road equipment, tools, and delivery of equipment and materials) will occur during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship). Cities and counties in the treatable landscape typically restrict construction-noise (which would apply to vegetation treatment noise) to particular daytime hours. If the project proponent is subject to local noise ordinance, it will adhere to those to the extent the project is subject to them. If the applicable jurisdiction does not have a noise ordinance or policy restricting the time-of-day when noise-generating activity can occur noise-generating vegetation treatment activity will be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday and federal holidays. If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area. This SPR applies to all treatment activities and treatment types, including treatment maintenance.
SPR NOI-2: Equipment Maintenance

Standard Project Requirements
The project proponent will require that all powered treatment equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. This SPR applies to all activities and all treatment types, including treatment maintenance.
SPR NOI-4: Locate Staging Areas Away from Noise-Sensitive Land Uses The project proponent will locate treatment activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible, to minimize noise exposure. This SPR applies to all treatment activities and treatment types, including treatment maintenance.
SPR NOI-5: Restrict Equipment Idle Time The project proponent will require that all motorized equipment be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.
Recreation Standard Project Requirements
SPR REC-1: Notify Recreational Users of Temporary Closures If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent will coordinate with the owner/manager of that recreation area or facility. If temporary closure of a recreation area or facility is required, the project proponent will work with the owner/manager to post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. Additionally, notification of the treatment activity will be provided to the Administrative Officer (or equivalent official responsible for distribution of public information) of the county(ies) in which the affected recreation area or facility is located. This SPR applies to all treatment activities and treatment types, including treatment maintenance.

Mitigation Measures
Air Quality
Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment. It is acknowledged that due to cost, availability, and the limits of current technology, there may be circumstances where implementation of certain emission reduction techniques will not feasible. The project proponent will document the emission reduction techniques that will be applied and will explain the reasons other techniques that could reduce emissions are infeasible. Techniques for reducing emissions may include, but are not limited to, the following: Diesel-powered off-road equipment used in construction will meet EPA's Tier 4 emission standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. Tier 3 models can be used if a Tier 4 version of the equipment type is not yet produced by manufacturers. This measure can also be achieved by using battery-electric off-road equipment as it becomes available. Prior to implementation of treatment activities, the project proponent will demonstrate the ability to supply the compliant equipment. A copy of each unit's certified tier specification or model year specification and operating permit (if applicable) will be available upon request at the time of mobilization of each unit of equipment. Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria: meet California's Low Carbon Fuel Standards and be certified by CARB Executive Officer; be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables; contain no fatty acids or functionalized fatty acid esters; and

Mitigation Measures
have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines.
Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment.
Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes.
Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NO_X and PM.
Archaeological, Historical, and Tribal Cultural Resources
Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist will assess the significance of the find. The qualified archaeologist will work with the project proponent to develop a primary records report that will comply with applicable state or local agency procedures. If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan will be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or tribal cultural resource), the archaeologist will work with the project proponent to develop appropriate procedures to protect the integrity of the resource. Procedures could include preservation in place (which is the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or recovery of scientifically consequential information from and about the resource. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center.
Biological Resources
Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway), exceptions to this requirement are listed later in this measure. The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report) with a science-based justification for the deviation. No fire ignition (and associated use of accelerants) will occur within 50 feet of listed plants. For species listed under ESA or CESA, if the project proponent cannot avoid loss by implementing no-disturbance buffers, the project proponent will implement Mitigation Measure BIO-1c. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist, in consultation with CDFW and USFWS, as appropriate depending on species status and location, that the listed plants would benefit from treatment in the occupied habitat area even though some of the listed plants may be lost during treatment activities. For a treatment to be considered beneficial to listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to listed plants, no compensatory mitigation for loss of individuals will be required.

Mitigation Measures
Project-Specific Guidance to Implement Mitigation Measure BIO-1a Mechanical treatment, prescribed burning, and prescribed herbivory would not occur within the 50-foot buffer.
Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement the following measures to avoid loss of individuals and maintain habitat function of occupied habitat: Physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no-disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape. Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank. Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the special-status plant itself, habitat function would be diminished and the treatment would need to be modified or precluded from implementation. No fire ignition (and associated use of accelerants) will occur within the special-status plant buffer. A qualified RPF or botanist with knowledge of the special-status plant species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment would not maintain habitat function of the special-status plant habitat (i.e., the habitat would be rendered unsuitable) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If the project proponent determines the impact on special-status plants would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non-listed special-status plants may be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required. Project-Specific Guidance to Implement Mitigation Measure BIO-1b: If special-status plant species, other than Monterey pine, are detected during protocol-level surveys, a no-disturbance buffer of at least 50 feet will be established around the area occupied by the species within which treatments will not occur. A no-disturbance buffer is not required for Monterey pine because this species will benefit from treatments.

Mitigation Measures
If special-status plant species are detected during protocol-level surveys, an evaluation of the appropriate treatment design and frequency to maintain habitat function within habitat suitable for special-status plants will be carried out by a qualified RPF, biologist, or botanist. Therefore, habitat function for special-status plants would be maintained because treatment activities and maintenance treatments would be designed to ensure that treatments, including follow-up maintenance, maintain habitat function for the special-status plant species present. The 50-foot buffer may be reduced to allow for the treatment of invasive plants to protect rare plant species from encroachment. Only localized, targeted removal methods, including manual or selective herbicide treatments (i.e., cut-stump method), will be implemented to minimize disturbance to rare plant species while preventing long-term habitat degradation. Mechanical treatment, prescribed burning, and prescribed herbivory would not occur within the 50-foot buffer.
Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities) If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species by implementing the following. <u>Avoid Mortality, Injury, or Disturbance of Individuals</u> The project proponent will implement one of the following two measures to avoid mortality, injury, or disturbance of individuals: 1. Treatment will not be implemented within the occupied habitat. Any treatment activities outside occupied habitat will be a sufficient distance from the occupied habitat such that mortality, injury, or disturbance of the species will not occur, as determined by a qualified RPF or biologist using the most current and commonly-accepted science and considering published agency guidance; OR 2. Treatment will be implemented outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, CDFW and/or USFWS/NOAA Fisheries will be consulted to determine if there is a period of time within which treatment could occur that would avoid mortality, injury, or disturbance of the species. For species listed under ESA or CESA, if the project proponent cannot avoid mortality, injury or disturbance by implementing one of the two options listed above, the project proponent will implement Mitigation Measure BIO-2c. Injury or mortality of California Fully Protected Species is prohibited pursuant to Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code and will be avoided. <u>Maintain Habitat Function</u> The project proponent will design treatment activities to maintain the habitat function, by implementing the following: While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; dens; tree snags; large raptor nests [including inactive nests]; downed woody debris; food sources). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science. If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that listed or fully protected wildlife with specific requirements for high canopy cover (e.g., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted [e.g., 50 percent for coastal California gnatcatcher]) such that habitat function is maintained. A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries

regarding the determination that habitat function is maintained. If the lead agency determines after consultation that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c.

Project-Specific Guidance to Implement Mitigation Measure BIO-2a

Other Special-Status Birds

If active special-status bird nests are detected during focused surveys, a no-disturbance buffer for ground and aerial treatment activities of at least 0.5 mile for bald eagle nests. For helicopter and drone operations, this buffer will be a vertical buffer as well as a horizontal buffer (e.g., for golden eagle, 1 mile of horizontal distance or 5,280 feet above ground level [AGL]). No treatment activities will occur within these buffers until the chicks have fledged, or the nest is otherwise no longer active, as determined by a qualified RPF or biologist. Nest buffers may be adjusted by a qualified RPF or biologist, based on vegetative and topographic screening and other factors.

Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)

If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following.

Avoid Mortality, Injury, or Disturbance of Individuals

The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals:

For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include, but not be limited to, the species' tolerance to disturbance; the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; baseline levels of noise and human activity; and treatment activity. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below 100 feet from an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, or other occurrence is no longer active; or reducing the buffer would not likely result in disturbance, mortality, or injury. A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species.

Maintain Habitat Function

For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following:

While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; tree snags; large raptor nests [including inactive nests]; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science.

Mitigation Measures
A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function. A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species. If the project proponent determines the impact on special-status wildlife would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the non-listed special-status wildlife would benefit from treatment in the occupied habitat area even though some of the non-listed special-status wildlife may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding the determination that a non-listed special-status species would benefit from the treatment. Project-Specific Guidance to Implement Mitigation Measure BIO-2b <u>Special-Status Birds</u> If an active olive-sided flycatcher, or purple martin nest is detected during SPR BIO-10 focused surveys, a no-disturbance buffer of at least 100 feet will be established around the nest. For northern harrier nests the no-disturbance buffer will be 500 feet around the nest. For helicopter and drone operations, this buffer will be a vertical buffer as well as a horizontal buffer (e.g., 100 feet horizontal distance or 100 feet AGL). No treatment activities will occur within this buffer until the chicks have fledged as determined by a qualified RPF or biologist. The buffer distance may be modified by a qualified RPF or biologist based on presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, and expected treatment activities. <u>Overwintering Monarch Butterfly</u> If stands are determined to be suitable for overwintering monarch butterflies, prescribed burning, mechanical, manual, targeted herbicide application, and prescribed herbivory treatments will not occur during the overwintering period. Furthermore, for stands with documented use by overwintering monarch butterfly, a treatment plan that maintains the suitability of these stands for overwintering monarchs will be implemented as described in *Protecting California's Butterfly Groves: Management Guidelines for Monarch Butterfly Overwintering Habitat* (Xerces 2017) and CDFW will be contacted prior to treatment to confirm best practices. Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3: Reference the *Manual of California Vegetation*, Appendix 2, Table A2, *Fire Characteristics* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class and fire return interval departure of the vegetation alliances present will also be determined. Design treatments in sensitive natural communities and oak woodlands to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function of the affected sensitive natural community. Treatments will be designed to replicate the fire regime attributes for the affected sensitive natural community or oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fireline intensity, severity, and fire type as described in *Fire in California's Ecosystems* (Van

Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval (i.e., time since last burn is less than the average time required for that vegetation type to recover from fire) or within Condition Class 1.

To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled).

To the extent feasible, fuel breaks will not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in sensitive natural communities with a rarity rank of S3 (vulnerable) or in oak woodlands. In forest and woodland sensitive natural communities with a rarity rank of S3, and in oak woodlands, only shaded fuel breaks will be installed, and they will not be installed in more than 20 percent of the stand of sensitive natural community or oak woodland vegetation (i.e., if the sensitive natural community covers 100 acres, no more than 20 acres will be converted to create the fuel break).

Use prescribed burning as the primary treatment activity in sensitive natural communities that are fire dependent (e.g., closed-cone forest and woodland alliances, chaparral alliances characterized by fire-stimulated, obligate seeders), to the extent feasible and appropriate based on the fire regime attributes as described in *Fire in California's Ecosystems* (Van Wagtendonk et al. 2018) and the *Manual of California Vegetation* (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/).

Time prescribed herbivory to occur when non-target vegetation is not susceptible to damage (e.g. non-target vegetation is dormant or has completed its reproductive cycle for the year). For example, use herbivores to control invasive plants growing in sensitive habitats or sensitive natural communities when sensitive vegetation is dormant but invasive plants are growing. Timing of herbivory to avoid non-target vegetation will be determined by a qualified botanist, RPF, or biologist based on the specific vegetation alliance being treated, the life forms and life conditions of its characteristic plant species, and the sensitivity of the non-target vegetation to the effects of herbivory.

The feasibility of implementing the avoidance measures will be determined by the project proponent based on whether implementation of this mitigation measure will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. If the avoidance measures are determined by the project proponent to be infeasible, the project proponent will document the reasons implementation of the avoidance strategies are infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report).

A qualified RPF or botanist with knowledge of the affected sensitive natural community will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat functions of the sensitive natural community or oak woodland. If the project proponent determines the impact on sensitive natural communities or oak woodlands would be less than significant, no further mitigation will be required. If the project proponent determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-3b will be implemented.

The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the occupied habitat area even though some loss may occur during treatment activities. For a treatment to be considered beneficial to a sensitive natural community or oak woodland, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the community (or similar community) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.

Project-Specific Guidance to Implement Mitigation Measure BIO-3a

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

Mitigation Measures
No prescribed herbivory would occur in chaparral sensitive natural communities ranked S1, S2, or S3.
Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands Impacts to wetlands will be avoided using the following measures: The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented. The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures). A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified RPF or biologist and will depend on the type of wetland present (e.g., seasonal wetland, wet meadow, freshwater marsh, vernal pool), the timing of treatment (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the species' vulnerability to the treatment activities, environmental conditions and terrain, and the treatment activity being implemented. A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided. Within this buffer, herbicide application is prohibited. Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical treatments, prescribed herbivory, equipment and vehicle access or staging. Only prescribed (broadcast) burning may be implemented in wetland habitats if it is determined by a qualified RPF or biologist that: No special-status species are present in the wetland habitat. The wetland habitat function would be maintained. The prescribed burn is within the normal fire return interval for the wetland vegetation types present Fire containment lines and pile burning are prohibited within the buffer No fire ignition (and associated use of accelerants) will occur within the wetland buffer Project-Specific Implementation In addition to those wetlands defined as waters of the state or federally protected waters, wetlands will include Coastal Act wetlands where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes. Impacts to all wetlands (i.e., state protected wetlands, federally protected wetlands, wetlands meeting the definition of Coastal Act wetlands) will be avoided using the following measures: Wetlands and a 50-foot buffer around wetlands will be delineated; Within wetland boundaries: Treatment activities will be limited within wetland boundaries to those that would restore ecological benefits to the wetlands or would maintain wetland habitat quality while improving surrounding ecosystems, including ESHAs. Treatment activities would be limited to the implementation of prescribed (broadcast) burning, and this would only be allowed where determined by a qualified RPF or qualified professional that: no special-status species are present, other than the cysts of special-status vernal pool invertebrates; habitat function would be maintained or enhanced/restored;

Mitigation Measures
the burn occurs within the expected fire return interval for the vegetation communities present; no soil disturbance (including hand containment lines), mechanical treatments, or equipment or vehicle access shall occur; no pile burning shall occur; and, no fire ignition (including the associated use of accelerants) shall occur within wetlands. Treatment activities will be limited within wetland buffers to those that would restore ecological benefits to the wetlands or would maintain wetland habitat quality while improving surrounding ecosystems, including ESHAs. No fire ignition (including the associated use of accelerants) shall occur within wetland buffers. No herbicide application shall occur within 25 feet of state or federally protected wetlands; and, hand containment lines intended to facilitate prescribed (broadcast) burns are the only type of containment lines that shall be allowed within the wetland buffer.
Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites The project proponent will implement the following measures while working in treatment areas that contain nursery sites identified in surveys conducted pursuant to SPR BIO-10: Retain Known Nursery Sites. A qualified RPF or biologist will identify the important habitat features of the wildlife nursery and, prior to treatment activities, will mark these features for avoidance and retention during treatment. Establish Avoidance Buffers. The project proponent will establish a non-disturbance buffer around the nursery site if activities are required while the nursery site is active/occupied. The appropriate size and shape of the buffer will be determined by a qualified RPF or biologist, based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors. No treatment activity will commence within the buffer area until a qualified RPF or biologist confirms that the nursery site is no longer active/occupied. Monitoring of the effectiveness of the non-disturbance buffer around the nursery site by a qualified RPF, biologist, or biological technician during and after treatment activities will be required. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to special-status species.

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Appendix F

Example of Neighborhood Notification Card

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