PROJECT-SPECIFIC ANALYSIS AND ADDENDUM TO THE CalVTP PROGRAM EIR

Jackson Creek Forest Health Project

CalVTP Project I.D. Number 2022-19

Prepared for:

AMADOR RESOURCE CONSERVATION DISTRICT

February 2023

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CalVTP Project I.D. Number 2022-19

Prepared for:

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LIST OF ABBREVIATIONS

ACAPCD	Amador County Air Pollution Control District
Board	Board of Forestry and Fire Protection
CAAQS	California ambient air quality standard
CalVTP	California Vegetation Treatment Program
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CEQA	California Environmental Quality Act
CGS	California Geological Survey
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
dbh	diameter at breast height
dB	decibel
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FRAP	Fire and Resource Assessment Program
GHG	greenhouse gas
HCP	habitat conservation plan
IPaC	Information for Planning and Consultation
LRA	local responsibility area
MMRP	mitigation monitoring and reporting program
NAAQS	national ambient air quality standard
NAHC	Native American Heritage Commission

NCCP	natural community conservation plan
NCIC	North Central Information Center
PEIR	program environmental impact report
PRC	public resources code
Project	Jackson Creek Forest Health Project
PSA	Project-Specific Analysis
RCD	Resource Conservation District
RPF	registered professional forester
SPR	standard project requirements
SR	state route
SRA	state responsibility area
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UTV	utility task vehicle
VMT	vehicle miles travelled
WLPZ	watercourse and lake protection zone

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1 INTRODUCTION

1.1 PROJECT OVERVIEW AND DOCUMENT PURPOSE

The California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR) was certified by the Board of Forestry and Fire Protection (Board) in December 2019. The PEIR evaluates the potential environmental effects of implementing qualifying vegetation treatments to reduce the risk of wildfire throughout the State Responsibility Area in California. It was designed for use by many state, special district, and local agencies to accelerate vegetation treatment project approvals by finding them to be within the scope of the PEIR. To support implementation of the CalVTP and facilitate use of the PEIR for qualifying treatments by many agencies, the Board initiated a technical assistance program.

This Project-Specific Analysis/Addendum to the PEIR (PSA/Addendum), which is being prepared for Amador Resource Conservation District's (RCD) proposed vegetation treatment project, is being prepared under the Board's technical assistance program to provide both California Environmental Quality Act (CEQA) compliance for Amador RCD to approve and implement the project, as well as serve as an example PSA/Addendum for other agencies seeking to use the CalVTP PEIR to accelerate approval of their own vegetation treatment projects.

1.1.1 Project Overview

Amador RCD proposes to implement vegetation treatments on up to 3,440 acres of land (proposed project) in Amador County in the Jackson Creek Watershed east of the City of Jackson (Figure 1-1). The proposed treatment type (i.e., ecological restoration) and the treatment activities (i.e., prescribed burning, mechanical treatments, manual treatments, prescribed herbivory, herbicide application) are consistent with those evaluated in the CalVTP PEIR. Maintenance treatments would involve the same vegetation treatment types and activities used in the initial treatments.

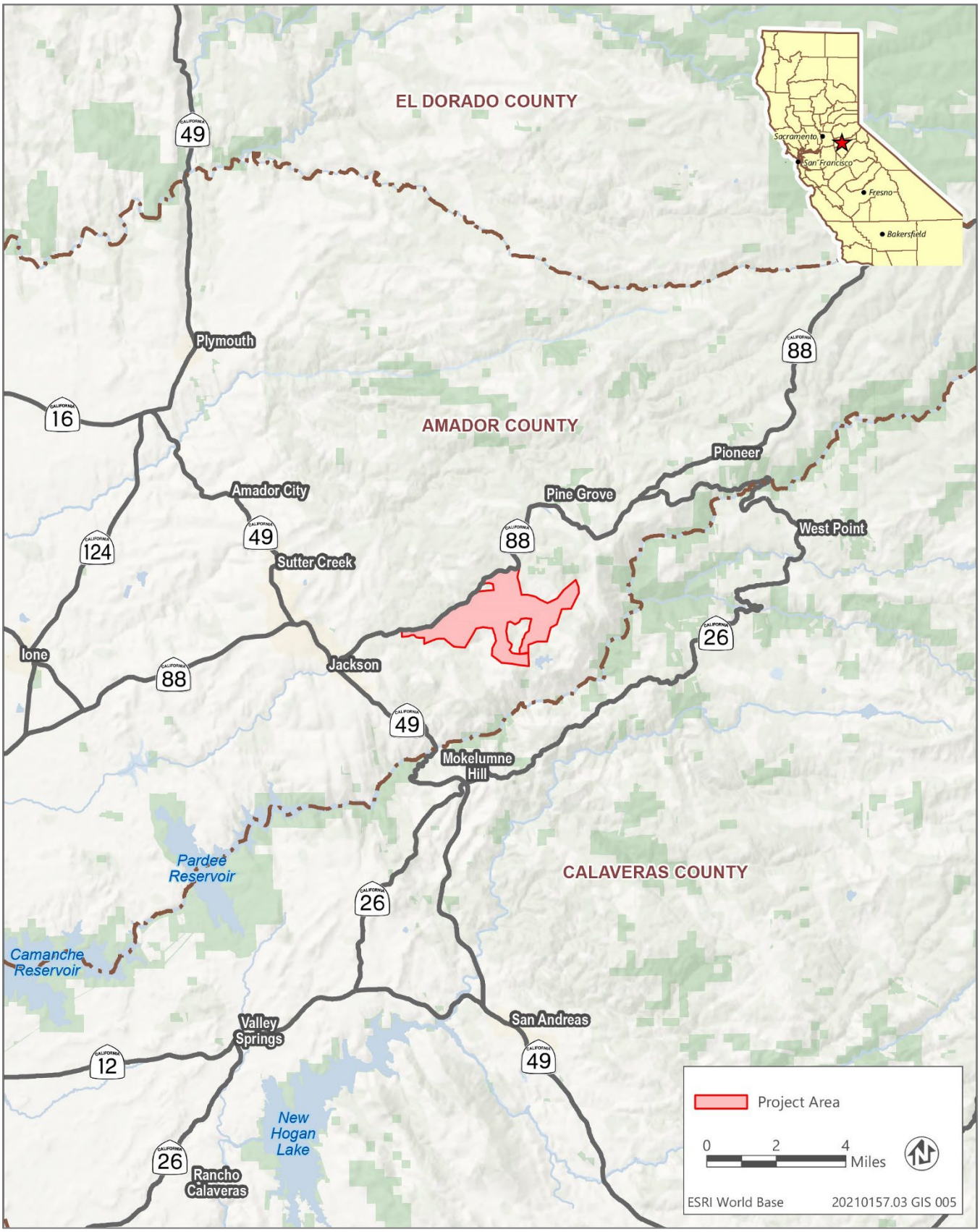
1.1.2 Agency Roles

For the purposes of the CalVTP PEIR and this PSA/Addendum, a project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. This document is being prepared for Amador RCD to comply with CEQA for the implementation of vegetation treatments that require a discretionary action. Amador RCD is the CEQA lead agency.

1.1.3 Purpose of the PSA/Addendum

This document evaluates if the proposed treatments are within the scope of the CalVTP PEIR. If a proposed vegetation treatment project is covered by the evaluation of environmental effects in the PEIR, it may be approved using a finding that the project is within the scope of the PEIR for its CEQA compliance, consistent with State CEQA Guidelines Section 15168(c)(2).

An addendum to an EIR is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts, consistent with CEQA Section 21166 and State CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In this case, there are no changed circumstances, but the proposed revision or change in the project, compared to the PEIR, are the inclusion of areas outside of the CalVTP treatable landscape, inclusion of water drafting for prescribed herbivory watering, and revisions to a mitigation measure (see "Proposed Project Revisions," below). The PSA checklist (refer to Chapter 4, "Project-Specific Analysis/Addendum") includes the criteria to support an addendum to the CalVTP Program EIR for the inclusion of proposed treatment areas outside the CalVTP treatable landscape. The checklist evaluates each



Sources: Data received from Amador RCD in 2022; adapted by Ascent in 2022.

Figure 1-1 Project Vicinity

resource in terms of whether the later treatment project, including the "changed condition" of additional geographic area, would result in significant impacts that would be substantially more severe than those covered in the Program EIR and/or would result in any new impacts that were not covered in the Program EIR.

This document serves as both a PSA and an addendum to the CalVTP PEIR for RCD review and analysis under CEQA with regard to the Amador RCD's proposed treatments within and outside the treatable landscape covered by the PEIR. It will provide environmental information to the Amador RCD in its consideration of approval of grant funding allocations and implementation of the work by the RCD or its contractor(s). The project-specific mitigation monitoring and reporting program (MMRP), which identifies the CalVTP standard project requirements (SPRs) and mitigation measures applicable to the proposed project is presented in Attachment A. The SPRs identified in the MMRP have been incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation.

PROPOSED PROJECT REVISIONS

The proposed revisions to the CalVTP PEIR are the inclusion of areas outside of the CalVTP treatable landscape, inclusion of water drafting a new activity to provide water for animals during prescribed herbivory treatments, and revisions to Mitigation Measure BIO-4 to allow water drafting. These proposed revisions would not result in any new or substantially more severe significant impacts on any of the resources evaluated in the PEIR and described in this PSA/Addendum. Evidence to explain this conclusion is presented under each applicable resource, as summarized below and presented throughout Section 4.

Project Area Outside the CalVTP Treatable Landscape

Among the criteria for determining whether a treatment project is within the scope of the CalVTP PEIR is whether it is within the CalVTP treatable landscape (i.e., the geographic extent of analysis covered in the PEIR). Portions of the project area extend outside of the treatable landscape described in the CalVTP PEIR. In total, these areas outside the treatable landscape encompass approximately 155 acres of the 3,440-acre project area; however, they are small sections dispersed throughout the project area (refer to Chapter 2, "Treatment Description"). The scattered array of acres outside of the CalVTP treatable landscape is due to the method by which the CalVTP treatable landscape was digitally developed and the resultant degree of mapping resolution. Using desktop applications to apply buffers around geographic and topographic features and demarcate jurisdictional boundaries (i.e., State Responsibility Area or SRA and Local Responsibility Area or LRA), the method resulted in some treatable landscape areas that are shown on maps to be disjoined and scattered and some that are inheld LRA areas surrounded by SRA. If the areas of the proposed project outside of the CalVTP treatable landscape have essentially the same, or at least substantially similar, landscape conditions as the adjacent areas within the treatable landscape, the environmental analysis in the PEIR would be applicable.

Water Drafting for Prescribed Herbivory

Amador RCD proposes to draft water from existing concrete stock ponds, earthen stock ponds, and the Amador Canal for livestock watering. Sources from which water could be drafted would be limited to those that do not provide habitat suitable for California red-legged frog (*Rana draytonii*) breeding as determined by a qualified registered professional forester (RPF) or biologist. Water would be drafted from these sources with a hose placed in a bucket to fill stock tanks. The bucket would be covered by mesh (less than 1-inch) and the mouth of the hose would be covered by ¼-inch mesh. Water drafting would occur one to two times per day depending on the size of the stock tanks used. Where a stock pond is connected to a watercourse, the water level in the pond will always be maintained so there would be no effect on downstream flow. No riparian vegetation would be removed during water drafting activities. Potential impacts resulting from this revision are discussed below under Section 4.5, "Biological Resources," Section 4.10, "Hydrology and Water Quality," and Section 4.15, "Public Services, Utilities and Service Systems." As explained in these sections, the proposed revision would not result in any new or substantially more severe significant impacts than were analyzed in the PEIR. Impacts on other resources would not occur as a result of these revisions, because water drafting would not result in environmental effects to any other resources from implementation of the project.

Mitigation Measure BIO-4

Revisions to mitigation measures would constitute a change to the CalVTP PEIR. CEQA Guidelines Section 15168(c)(3) requires incorporation of feasible mitigation when approving later activities. If the mitigation measure is simply "incorporated" (i.e., without revision), it would contribute to a within the scope finding. If revisions to a mitigation measure are proposed, it could be evaluated within an Addendum pursuant to CEQA Guidelines Section 15164. This can occur either because the change is simply a clarification or other revision that does not meet the requirements for supplemental or subsequent review in CEQA Guidelines Section 15162; or it is a case, as explained in CEQA Guidelines Section 15162(a)(3)(D), where a mitigation measure is "considerably different" from those in the PEIR, would substantially reduce significant effect(s), and the proponent will adopt it as part of the project.

As presented in the Program EIR, Mitigation Measure BIO-4 does not allow prescribed herbivory or equipment and vehicle access or staging within buffers surrounding state or federally protected wetlands. Amador RCD is proposing to revise Mitigation Measure BIO-4 to allow the use of non-ground-disturbing equipment within these buffers to facilitate water drafting for prescribed herbivory activities, as described above, which may qualify as state or federally protected wetlands (per Mitigation Measure BIO-4).

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

2 TREATMENT DESCRIPTION

The proposed project consists of vegetation treatments in the Jackson Creek Watershed east of the City of Jackson and south of SR 88 (Figure 1-1, Figure 2-1). The CalVTP treatments would occur within several treatment areas totaling 3,440 acres, all of which are in Amador County. The CalVTP treatment type that would be implemented is ecological restoration, and proposed treatment activities to implement this treatment type are prescribed burning, mechanical treatments, manual treatments, prescribed herbivory, and targeted ground application of herbicides. The proposed CalVTP treatments are shown in Figure 2-1 and are summarized in Table 2-1, below.

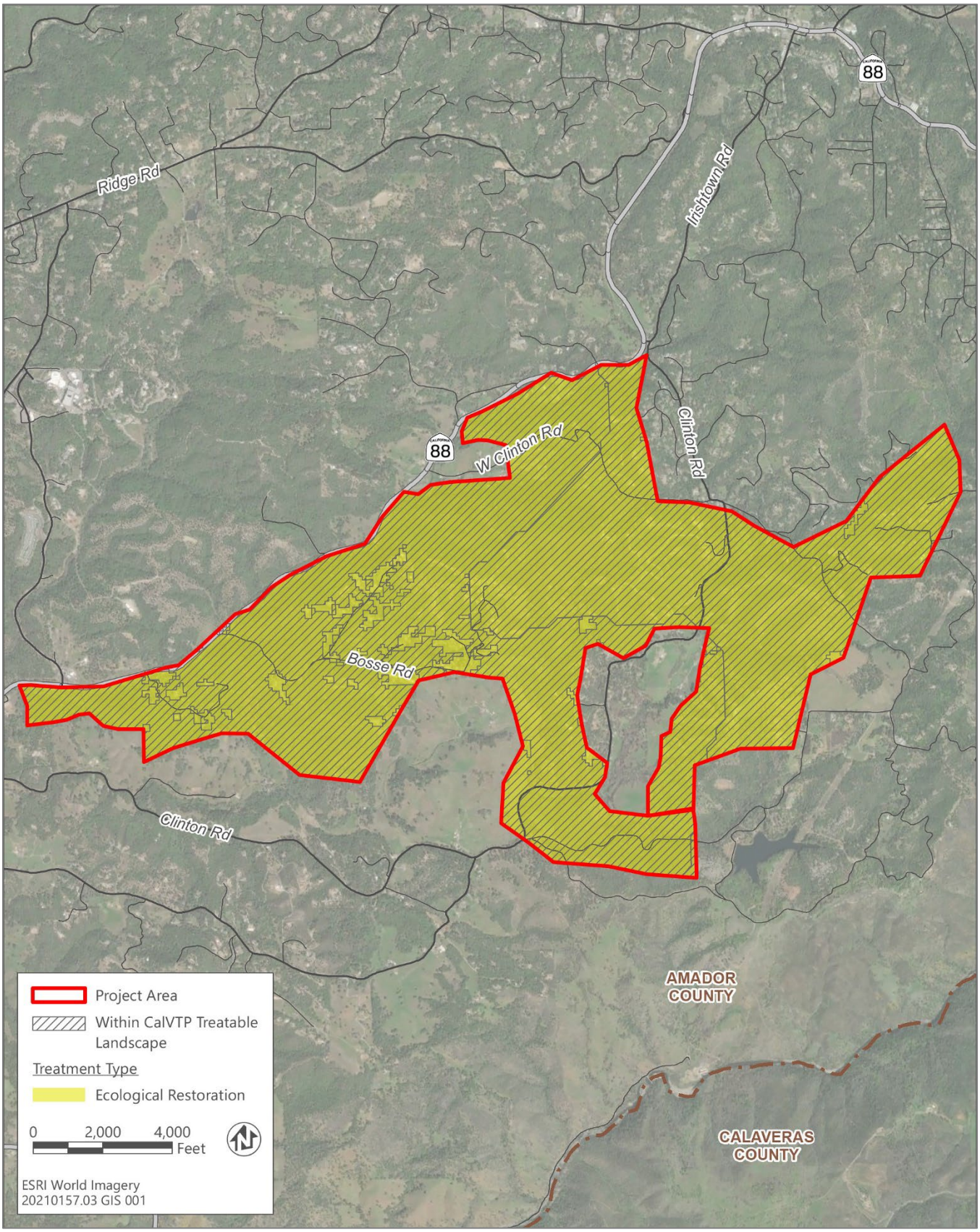
Implementation of initial treatments would require between two and 50 crew members depending on the treatment, along with their associated vehicles to travel to and from the treatment areas. Up to four crews could be conducting treatments simultaneously throughout the project area. Treatment activities would typically occur during the daytime seven days per week, between approximately 7:00 a.m. and 7:00 p.m., depending on season and proximity to residences; however, some activities such as prescribed burning and prescribed herbivory may occur outside these hours. For treatment activities utilizing heavy equipment from 6:00 a.m. to 7:00 a.m., crews will remain 1,500 feet from the noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship).

Treatments would begin in fall 2022 depending on funding, equipment/contractor availability, weather conditions, and other restrictions. Mechanical and manual treatments could occur year-round, except on days with extreme fire danger. Prescribed burning would adhere to seasonal restrictions imposed by CAL FIRE or acquire burn permits. Prescribed herbivory and targeted ground application of herbicides could also occur year-round. All proposed treatments could occur within any portion of the 3,440-acre project area (Table 2-1).

Table 2-1 Proposed CalVTP Treatments

Treatment Description	CalVTP Treatment Activity	Equipment used for Treatments
Herbaceous vegetation treatments; treatment of areas with flashy fuels (i.e., grasses, leaves, and other fine vegetation that ignite and burn rapidly)	Prescribed herbivory, Prescribed burning	Truck, electric netting, livestock watering system, tractor/skidders, mower, dozers, chainsaws, water trucks, fire engines
Shrubland treatments; treatment of areas with dense shrubs and flashy fuels	Prescribed herbivory, Prescribed burning, Mechanical (cutting, skidding, biomass chipping)	Truck, electric netting, livestock watering system, mower, dozers, chainsaws, water trucks, fire engines, tractor/skidders, masticators, chippers
Mixed Conifer-Hardwood-type forest treatments; treatment of areas with dense shrubs; fire resiliency treatments	Prescribed burning, Mechanical (cutting, mastication, skidding, biomass chipping), Manual (cutting, thinning), Herbicide (cut stump treatment)	Mower, dozers, chainsaws, water trucks, fire engines, tractor/skidders, masticators, chippers, chainsaws, handsaws, brush cutters, utility task vehicle (UTV) with a reservoir tank, backpack sprayers
Hardwood-type forest treatments; treatment of areas with dense shrubs; fire resiliency treatments	Prescribed burning, Mechanical (cutting, mastication, skidding, biomass chipping), Manual (cutting, thinning), Herbicide (cut stump treatment)	Mower, dozers, chainsaws, water trucks, fire engine, tractor/skidders, masticators, chippers, chainsaws, handsaws, brush cutters, UTV with a reservoir tank, backpack sprayers
Conifer-type forest treatments; treatment of areas with dense shrubs; fire resiliency treatments	Prescribed burning, Mechanical (cutting, mastication, skidding, biomass chipping), Manual (cutting, thinning), Herbicide (cut stump treatment)	Mower, dozers, chainsaws, water trucks, fire engines, tractor/skidders, masticators, chippers, chainsaws, handsaws, brush cutters, UTV with a reservoir tank, backpack sprayers
Maintenance treatments	Prescribed herbivory, Prescribed burning (broadcast burning, pile burning), Mechanical (cutting, mastication, skidding, biomass chipping), Manual (cutting, thinning), Herbicide (hand application)	Truck, electric netting, livestock watering system, tractor/skidders, mower, chainsaws, water trucks, fire engines, tractor/skidders, masticators, chippers, chainsaws, handsaws, brush cutters, UTV with reservoir tank, backpack sprayers

Source: Data provided by Amador RCD 2022.



Sources: Data received from Amador RCD in 2022; adapted by Ascent in 2022.

Figure 2-1 Proposed Treatment Type

2.1 PROPOSED TREATMENTS

The proposed project comprises one treatment type: ecological restoration. The vegetation treatment activities proposed to implement this treatment type are prescribed burning, mechanical treatments, manual treatments, prescribed herbivory, and herbicide application. The treatment types and treatment activities are described below.

2.1.1 Treatment Types

Ecological restoration is the only treatment type proposed for the Jackson Creek Forest Health Project. This treatment type is described in more detail below and is consistent with the treatment types described in the CalVTP. Refer to Figure 1-1 and Figure 2-1 for the location of this treatment type. Table 2-1 provides a summary of treatments.

ECOLOGICAL RESTORATION

Historically, fires in the Sierra Nevada foothills occurred more frequently and at lower intensity than present day fires in the region. Fire suppression over the past 100 years has resulted in increased accumulation of vegetation fuel loading throughout the region of the project area and a high risk of catastrophic wildfire to communities in the Jackson Creek watershed. Ecological restoration treatments would be designed to reduce wildfire risk and enhance natural habitats. Proposed ecological restoration treatments would seek to return the landscape closer to natural conditions to create more resilient landscapes to reduce the risk of catastrophic fire, and improve habitat quality, including controlling and eliminating nonnative, invasive plants and excess buildup of fire fuel. Ecological restoration objectives for the project area are defined for several different habitat types: herbaceous, shrubland, mixed conifer-hardwood-type forest, hardwood-type forest, and conifer forest. Specific ecological restoration objectives include:

- Thin overstocked trees, reduce shrub density, and remove invasive species (e.g., yellow starthistle [*Centaurea solstitialis*], barbed goatgrass [*Aegilops triuncialis*], broom [*Cytisus* spp.], Himalayan blackberry [*Rubus armeniacus*]) to increase spacing, reduce fire load, and promote forest health and resiliency.
- Provide ecosystem and habitat improvements to increase fire resiliency and to support the success of fire-resilient plant communities.
- Reduce ladder fuels and uncharacteristic fuel loads resulting from historic fire suppression while favoring large, healthy trees and tree species diversity.

2.1.2 Treatment Activities

The proposed vegetation treatment activities are prescribed burning, mechanical treatments, manual treatments, prescribed herbivory, and targeted ground application of herbicides. Herbicide application would occur sparingly and would primarily be used for maintenance treatments. Biomass would be disposed of through biomass chipping, lopping and scattering, mastication, and pile burning. Each of these activities is included in the CalVTP PEIR and is described in more detail below.

PRESCRIBED BURNING

Prescribed burning would occur throughout the project area and consists of two general types, broadcast burning and pile burning.

Broadcast burning: Broadcast burning would be implemented in areas determined to be safe and effective in consideration of the landscape's slope, fuel type, topography, and where control lines would be easy to establish. Broadcast burning would be used to reduce fuel loads, thin advanced regeneration (i.e., seedlings or saplings present in the understory), stimulate germination of native plants, and create patchy vegetation patterns for forest restoration and patchy fuels patterns for fire resilience. Construction of new control lines or enhancement of existing control lines

would require the use of manual treatments or mechanical treatments (e.g., mowing, tractor/skidder). Prescribed herbivory could also be used to enhance control lines in some treatment areas.

Pile burning: Pile burning would be used to consume slash piles created by landowners and/or by mastication treatments within the project area. Burning of slash piles and masticated materials would be done to reduce future fire hazard. Pile burning would be implemented using the following parameters:

- Piles will be placed at least 20 feet from Class III watercourses and outside of the Watercourse and Lake Protection Zone (WLPZ) buffer for Class I and Class II watercourses.
- Piles will be a minimum in 4 feet in diameter and no greater than 14 feet in diameter.
- Pile height will be at least two-thirds of the diameter of the pile to a maximum height of 5 feet.
- A 2 foot by 2 foot (minimum), 6-millimeter sheet of plastic will be placed within the upper two-thirds of each pile to allow for burning in wet weather (this will be removed prior to ignition).
- A fire line of a minimum of 18 inches wide will be constructed around each pile, dug to bare mineral soil.
- Where feasible, piles will be placed outside of the dripline of trees.

Prescribed burning would require between 10 and 50 crew members, depending on size and site characteristics of the burn unit. Typically, each burn would last 1 day to 1 week. Equipment would include tractor/skidders, dozers, mowers, water trucks, fire engines, and chainsaws. Most prescribed fires would be conducted outside the fire season (as designated by CAL FIRE), which typically begins in the late fall after wetting rains have reduced wildfire threats, until May 1 when CAL FIRE typically declares the need for burn permits. Some burns may occur during the CAL FIRE burn permit season, as weather and project needs dictate.

MECHANICAL VEGETATION TREATMENT

Mechanical treatments would occur throughout the project area and would primarily include chipping and masticating target vegetation. Equipment would include tractors/skidders and masticators. Mechanical treatments would typically require between one and 50 crew members, and up to four crews. Mechanical treatments would:

- Thin trees less than 12 inches diameter at breast height (dbh).
- In areas with a single canopy layer, thin trees to 20-foot spacing or two-thirds pre-treatment density, favoring trees with a dominant crown position and of good health.
- Retain three to five snags per acre for wildlife habitat, where present, with a preference for snags greater than 12 inches dbh.
- Prune residual conifers to 10 feet above ground level.
- Prune dead hardwood branches to 10 feet above ground level.
- Favor retention of sugar pine (*Pinus lambertiana*) and less-prominent conifers in each treatment area.
- Favor removal of live oaks (e.g., interior live oak [*Quercus wislizeni*], canyon live oak [*Quercus chrysolepis*]) over deciduous oaks (e.g., black oak [*Quercus kelloggii*], valley oak [*Quercus lobata*], blue oak [*Quercus douglasii*]).
- Retain 50 percent of understory (i.e., shrubs, herbs) and 75 percent of overstory (i.e., trees) cover in WLPZ. Mechanical treatments would not be permitted in the WLPZ pursuant to SPR HYD-4.
- Masticate understory shrubs and saplings in forest-type habitats to 10 percent cover.
- Masticate downed woody debris to a 3-foot-long, 10-inch diameter size.
- Chipped and masticated biomass would not exceed 2–6 inches in depth.

- Maintain at least 35 percent relative final density of chaparral vegetation. Cover would not be reduced by more than 20 percent. Adjacent non-treatment chaparral patches may count towards the minimum cover requirements.

MANUAL VEGETATION TREATMENT

Manual treatments would be implemented throughout the project area, and would often be used in combination with mechanical treatments. Equipment would include chainsaws, hand saws, and/or brush cutters. Manual treatments would typically require between one and 50 crew members, and up to four crews. Manual treatments would:

- Thin trees less than 12 inches dbh.
- In areas with a single canopy layer, thin trees to 20-foot spacing or two-thirds pre-treatment density, favoring trees with a dominant crown position and of good health.
- Retain three to five snags per acre for wildlife habitat, where present, with a preference for snags greater than 12 inches dbh.
- Prune residual conifers to 10 feet above ground level.
- Prune dead hardwood branches to 10 feet above ground level.
- Favor retention of sugar pine and less-prominent conifers in each treatment area.
- Favor removal of live oaks (e.g., interior live oak, canyon live oak) over deciduous oaks (e.g., black oak, valley oak, blue oak).
- Retain 50 percent of understory (i.e., shrubs, herbs) and 75 percent of overstory (i.e., trees) cover in WLPZ. Manual treatments would be permitted within WLPZs.

PRESCRIBED HERBIVORY

Prescribed herbivory would occur throughout the project area. The most appropriate livestock species would be determined based on vegetation type(s) and condition (e.g., height, age class), and may include cattle, sheep, or goats (or a combination thereof). Herds may be moved as often as every 1 to 3 days and one to two workers would be required on average to implement this treatment activity. Existing concrete stock ponds, earthen stock ponds and the Amador Canal would be used for water drafting to provide water to livestock. Sources from which water could be drafted would be limited to those that do not provide habitat suitable for California red-legged frog breeding as determined by a qualified RPF or biologist. Water would be drafted from these sources with a hose placed in a bucket to fill stock tanks. The bucket would be covered by mesh (less than 1-inch) and the mouth of the hose would be covered by ¼-inch mesh. Water drafting would occur one to two times per day depending on the size of the stock tanks used. The estimated water demand for goats and sheep is 5 gallons per head; therefore, the estimated demand for 1,000 head of goats or sheep would equal 5,000 gallons per day of water. Where a stock pond is connected to a watercourse, the water level in the pond would always be maintained so there is no effect on downstream flow. Prescribed herbivory treatments would:

- Prohibit livestock within 50 feet of environmentally sensitive areas (e.g., Class I and Class II streams, ponds (including stock ponds suitable for California red-legged frog as determined by a qualified RPF or biologist), wetlands, riparian habitat).
- Remove fine fuels (e.g., annual grasses, annual forbs). Fuel removal will be managed according to residual dry matter levels recommended by the University of California Cooperative Extension to ensure protection of soil resources and water quality.
- Defoliate target shrub species less than 6 feet in height.

- Target invasive species that contribute to fuel loads and other undesirable ecological conditions (e.g., yellow starthistle, barbed goatgrass, broom, Himalayan blackberry).

HERBICIDE APPLICATION

Herbicides would be used sparingly to control vegetation that threatens the native biodiversity and/or increases wildfire hazards and would be used to maintain initial treatments. The occasional use of herbicides to treat invasive plant species and to control regrowth of native species (e.g., shrubs, hardwoods) may be implemented to promote native biodiversity. Cut stump herbicide treatment or post-resprout foliar spray would be implemented on hardwoods that have been removed through manual and mechanical treatments (i.e., to achieve canopy separation, to remove suppressed trees), which would prevent resprouting and the need for reapplication of herbicides on the hardwoods in one to two growing seasons. Invasive plant and noxious weed infestations may be treated to prevent their reestablishment. Consistent with the definitions applied in the CalVTP, invasive species are those plant species identified as invasive by the California Invasive Plant Council (Cal-IPC) or defined as noxious weeds under California law by the California Department of Food and Agriculture.

The following herbicides, which are consistent with those considered for use in the CalVTP PEIR, may be applied:

- Clopyralid (monoethanolamine salt);
- Glyphosate (isopropylamine salt, potassium salt, dimethylamine salt & diammonium salt);
- Hexazinone;
- Imazapyr (isopropylamine salt);
- Sulfometuron methyl;
- Triclopyr (butoxyethyl ester and triethylamine salt); and
- Velpar (hexazinone).

Only ground-level application would occur; no aerial spraying of herbicides would occur. The least impactful method would be used at any given site. Several herbicide application methods are available for use on-the-ground by personnel, including painting on cut stems and stumps and using backpack hand-applicators. For large treatment areas, herbicide treatments would typically use a one- to five-person crew, a UTV with a sprayer/reservoir tank, and backpack sprayers. Treatment would involve removing invasive plant species (e.g., yellow starthistle, barbed goatgrass, broom, Himalayan blackberry) and noxious weeds through herbicide application. Herbicide application would comply with the U.S. Environmental Protection Agency (EPA) label directions, as well as California EPA and California Department of Pesticide Regulation label standards. All herbicide application would be performed by certified and licensed pesticide applicators in accordance with all local, state, and federal regulations.

BIOMASS DISPOSAL

Vegetation removed during implementation of the proposed vegetation treatments described above would primarily be disposed of by the following means:

- Biomass Chipping and Mastication (70 percent of biomass): Chipped or masticated biomass remaining in the project area would not exceed 6 inches in thickness/depth. Priority would be placed on spreading chipped or masticated biomass onto disturbed areas or areas with nonnative vegetation in order to minimize the depth of chipped and masticated material in other portions of the treatment area where downed woody debris and herbaceous vegetation serve as cover for amphibians.
- Lopping and Scattering (5 percent of biomass): Cut vegetation would be scattered within the treatment area. In shrubland habitats, scattered piece size would be less than 8 inches in length. In forest-type habitats, scattered piece sizes would be less than 12 inches in length.

- Pile Burning (25 percent of biomass): In some areas, pile burning may be used to dispose of slash, chipped, and masticated materials. Piling would not occur within WLPZs.

Invasive plant and noxious weed biomass would be treated on-site to eliminate seed and propagules and to prevent reestablishment or spread of invasive plants and noxious weeds. Invasive plants and noxious weeds would not be chipped and spread, scattered, or mulched on-site.

2.2 TREATMENT MAINTENANCE

Maintenance, or retreatment, of the areas treated under the proposed project would include the same treatment type (i.e., ecological restoration) and treatment activities (i.e., prescribed burning, mechanical treatments, manual treatments, prescribed herbivory, herbicide application) as described above for the initial treatments. Treatment maintenance would be dependent on regrowth conditions and would differ by location. However, treatment maintenance is anticipated to occur between 5 and 10 years.

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

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

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3 ENVIRONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

1. **Project Title:** Jackson Creek Forest Health Project
2. **CalVTP I.D. Number:** 2022-19
3. **Project Proponent's Name and Address:** Amador Resource Conservation District
   12200 B Airport Road, Jackson, CA 95642
4. **Contact Person Information and Phone Number:** Amanda Watson
   209.217.1090
   Amanda@AmadorRCD.org
5. **Project Location:** Amador County, south of SR 88, east of the City of Jackson, and north of the North Fork Mokelumne River
6. **Total Area to Be Treated (acres)** 3,440 acres
7. **Description of Project**: Treatments would involve prescribed burning, mechanical and manual treatments, prescribed herbivory, and herbicide application. See Chapter 2, "Project Description," for additional details.

   a. Initial Treatment

   Initial treatments would include ecological restoration treatments using prescribed burning, mechanical and manual treatments, prescribed herbivory, and herbicide application. See Chapter 2, "Project Description," for additional details.

   Treatment Types

   ☐ Wildland-Urban Interface Fuel Reduction

   ☐ Fuel Break

   ☒ Ecological Restoration

   Treatment Activities

   ☒ Prescribed Burning (Broadcast), 3,440 acres

   ☒ Prescribed Burning (Pile Burning), 3,440 acres

   ☒ Mechanical Treatment, 3,440 acres

   ☒ Manual Treatment, 3,440 acres

   ☒ Prescribed Herbivory, 3,440 acres

   ☒ Herbicide Application, 3,440 acres

   Fuel Type

   ☒ Grass Fuel Type

   ☒ Shrub Fuel Type

   ☒ Tree Fuel Type

   b. Treatment Maintenance

   Treatments would involve prescribed burning, mechanical and manual treatments, prescribed herbivory, and herbicide application. See Section 2.2, above for additional details.

Treatment Types

☐ Wildland-Urban Interface Fuel Reduction

☐ Fuel Break

☒ Ecological Restoration

Treatment Activities

☒ Prescribed Burning (Broadcast), 3,440 acres

☒ Prescribed Burning (Pile Burning), 3,440 acres

☒ Mechanical Treatment, 3,440 acres

☒ Manual Treatment, 3,440 acres

☒ Prescribed Herbivory, 3,440 acres

☒ Herbicide Application, 3,440 acres

Fuel Type

☒ Grass Fuel Type

☒ Shrub Fuel Type

☒ Tree Fuel Type

Use of the PSA for Treatment Maintenance

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

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

8. Regional Setting and Surrounding Land Uses:

   The project area is situated in the Jackson Creek Watershed east of the City of Jackson and south of SR 88. Surrounding land uses include privately-owned rural residential land, agricultural land (e.g., vineyards), some areas managed by the Bureau of Land Management, the Lake Tabeaud day use area managed by Pacific Gas and Electric, and Mt. Zion Demonstration Forest managed by CAL FIRE.

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

   Pesticide application permit from Amador County Agricultural Commissioner

   Burn permits from CAL FIRE, when required

   Smoke management plan will be prepared for Amador Air District, when required

   Burn permits from Amador Air District, when required

   Coastal Act Compliance

   ☒ The proposed project is NOT within the Coastal Zone

   ☐ The proposed project is within the Coastal Zone (*check one of the following boxes*)

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

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

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

Pursuant to SPR CUL-2, Native American contacts in Amador County were contacted on July 8, 2022, and included Rhonda Morningstar Pope, Chairperson, Buena Vista Rancheria of Me-Wuk Indians; Gloria Grimes, Chairperson, Calaveras Band of Mi-Wuk Indians; Debra Grimes, Cultural Resources Specialist, Calaveras Band of Mi-Wuk Indians – Grimes; Lloyd Mathiesen, Chairperson, Chicken Ranch Rancheria of Me-Wuk Indians; Sara Dutschke, Chairperson, Ione Band of Miwok Indians; Rolland Fillmore, Cultural Preservation Representative, Jackson Rancheria; Adam Dalton, Chairperson, Jackson Rancheria Band of Miwuk Indians; Cosme Valdez, Chairperson, Nashville Enterprise Miwok-Maidu-Nishinam Tribe; Gene Whitehouse, Chairperson, United Auburn Indian Community of the Auburn Rancheria; Darrel Cruz, Cultural Resources Department, Washoe Tribe of Nevada and California; Dahlton Brown, Director of Administration, Wilton Rancheria; Jesus Tarango, Chairperson, Wilton Rancheria; and Steven Hutchason, THPO, Wilton Rancheria. A response was received from Wilton Rancheria on July 28, 2022. Amador RCD met with Lou Griffin and Venesa Kremer of the Wilton Rancheria on October 13, 2022 and no additional project changes were proposed.

DETERMINATION

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

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

☒ I find that proposed project revisions will not result in substantial changes in the project, no substantial changes in circumstances have occurred, and no new information of substantial importance has been identified. The proposed project revisions will not result in any new or substantially more severe significant impacts. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred; therefore, an **ADDENDUM** is adopted to address the project areas outside geographic extent presented in the PEIR.

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

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

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

Signature

16 FEB 2023
Date

STEVE G CAWSON
Printed Name

ARCD BOARD PRESIDENT
Title

AMADOR RESOURCE CONSERVATION DISTRICT
Agency

4 PROJECT-SPECIFIC ANALYSIS/ADDENDUM

4.1 AESTHETICS AND VISUAL RESOURCES

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

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

New Aesthetic and Visual Resource Impacts: Would the treatment result in other impacts to aesthetics and visual resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT AES-1

Initial and maintenance treatments would include prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and targeted ground application of herbicides. The potential for these treatment activities to result in short-term degradation of the visual character of a treatment area was examined in the PEIR. The nearest eligible state scenic highways to the project area are State Route (SR) 88 immediately north/northwest of the project area and SR 49 west/southwest of the project area (Caltrans 2022). The proposed treatments would occur on public and private lands. Public viewpoints within and near the project area from which treatments would be visible include public trails and recreation areas near Lake Tabeaud and Mt. Zion Demonstration State Forest, as well as SR 88 and other public roadways (e.g., Clinton Road, West Clinton Road, Bosse Road). Although portions of the project area are visible from public viewpoints and an eligible state scenic highway, the project area is densely vegetated with trees and shrubs and is characterized by varied topography, which would substantially reduce the visibility of treatments from public viewpoints. In addition, treatments would remove shrubs and trees smaller than 12 inches dbh, leaving overstory vegetation. Although in the short-term after treatment, the removal of vegetation could be noticeable, mature vegetation would remain to provide partial screening of treatment areas. However, equipment, crews and smoke from prescribed burning could be visible from public viewpoints and one eligible state scenic highway (SR 88) in the short term.

The potential for the project to result in short-term substantial degradation of the visual character of the project area is within the scope of the PEIR because the proposed treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing scenic resources are essentially the same within and outside of the treatable landscape; therefore, the short-term aesthetic impact is also the same, as described above. SPRs applicable to the proposed treatments are AD-4, AES-2, AQ-2, and AQ-3. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT AES-2

Initial and maintenance treatments would include ecological restoration, which is the only treatment type proposed for the project. The potential for this treatment type to result in long-term degradation of the visual character of an area was examined in the PEIR. Public viewpoints of the project area include public trails, recreation areas (e.g., Lake Tabeaud, Mt. Zion Demonstration State Forest), as well as SR 88 and other public roadways (e.g., Clinton Road, West Clinton Road, Bosse Road). Treatments would remove shrubs and trees smaller than 12 inches dbh, leaving overstory vegetation. Therefore, mature vegetation would remain to provide partial screening of treatment areas. The long-term visual character of the treatment areas after implementation of the proposed ecological restoration treatments would remain consistent with the current natural, vegetated landscape.

The potential for the project to result in long-term substantial degradation of the visual character of the project area is within the scope of the PEIR because the proposed treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing visual character is essentially the same within and outside of the treatable landscape; therefore, the long-term aesthetic impact is also the same, as described above. SPRs applicable to the proposed treatments are AES-1 and AES-3. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT AES-3

This impact does not apply to the proposed project because no nonshaded fuel breaks are proposed.

NEW AESTHETIC AND VISUAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental conditions pertinent to aesthetics and visual resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to aesthetics and visual resources would occur.

4.2 AGRICULTURE AND FORESTRY RESOURCES

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

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

New Agriculture and Forestry Resource Impacts: Would the treatment result in other impacts to agriculture and forestry resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT AG-1

Vegetation treatment activities implemented within the project area would include manual, mechanical, prescribed burning, prescribed herbivory, and herbicide treatments to conduct ecological restoration. The project area includes conifer and hardwood forest. Treatments would include the removal of some trees in the overstory and mid-level canopy to improve forest health and reduce wildfire risk. Live trees less than 12 inches dbh would be thinned within a distance of 1.5 times the dripline of overstory trees. In areas with a single canopy layer, trees would be thinned to 20-foot spacing or two-thirds pre-treatment density, favoring trees with a dominant crown position and of good health. Remaining conifers would be pruned to 10 feet above ground level.

The potential for these treatment types and treatment activities to result in the loss of forest land or conversion of forest land to non-forest use is within the scope of the PEIR because the proposed treatment activities are consistent with those analyzed in the PEIR, and the treatment activities described above would occur in forested lands. Consistent with the PEIR, the vegetation remaining after treatments would meet the definition of forest land as defined in PRC Section 12220(g), which defines "forest land" as land that can support 10-percent native tree cover of any species under natural conditions. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the composition of forested land as defined in PRC Section 12220(g) is essentially the same within and outside the treatable landscape; therefore, the impact on forest land is also the same, as described

above. No SPRs are applicable to this impact. Therefore, the potential for the project to result in the loss or conversion of forest land is within the scope of the PEIR. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW AGRICULTURE AND FORESTRY RESOURCE IMPACTS

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

4.3 AIR QUALITY

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

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

New Air Quality Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

Pursuant to SPR AQ-2, the project proponent would prepare a smoke management plan and submit it to the Amador County Air Pollution Control District (ACAPCD), following requirements from ACAPCD, before implementing any prescribed burning treatment. In addition, the project proponent would prepare a burn plan as required by SPR AQ-3, which would include fire behavior modeling and would be implemented by a state-certified burn boss. An Incident Action Plan, which identifies burn dates, burn hours, weather limitations, specific burn prescription, communication plan, medical plan, traffic plan, and other special instructions required by ACAPCD, would also be prepared by the project proponent for all proposed prescribed burning treatments. The Incident Action Plans would also identify the contact personnel with ACAPCD to coordinate on-site briefings, posting notifications, and weather monitoring during burning.

IMPACT AQ-1

Use of vehicles, mechanical equipment, and prescribed burning during initial and maintenance treatments would result in emissions of criteria pollutants that could exceed California ambient air quality standard (CAAQS) or national ambient air quality standard (NAAQS) thresholds. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was examined in the PEIR. Emissions of criteria air pollutants related to the proposed treatment are within the scope of the PEIR because the associated equipment, duration of use, and duration of prescribed burning are consistent with those analyzed in the PEIR. The SPRs applicable to this treatment project are AD-4, AQ-1 through AQ-4, and AQ-6. The RCD would implement the emission reduction techniques included in Mitigation Measure AQ-1 to the extent feasible. However, because the treatments would be implemented by an RCD with limited funding, procuring or paying additional for contractors that use equipment meeting the latest efficiency standards, including meeting the U.S. EPA's Tier 4 emission standards, using renewable diesel fuel, using electric- and gasoline-powered equipment, and using equipment with Best Available Control Technology may be cost prohibitive. Carpooling would be encouraged by the RCD, but because crews may not all be employed with the same company and due to the project's location in a rural area it may not be feasible for all workers. For these reasons, and as explained in the PEIR, this impact would remain significant and unavoidable.

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

IMPACT AQ-2

Use of mechanical equipment during initial and maintenance treatments could expose people, such as hikers and recreationists around Lake Tabeaud, to diesel particulate matter emissions. However, treatment activities would not take place near the same people for an extended period such that prolonged exposure would occur. The potential to expose people to diesel particulate matter emissions was examined in the PEIR. Diesel particulate matter emissions from the proposed treatments are within the scope of the PEIR because the exposure potential is the same as analyzed in the PEIR, and the types and amount of equipment that would be used, as well as the duration of use during proposed treatments are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions and sensitive receptors (i.e., exposure potential) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. SPRs applicable to this treatment are HAZ-1, NOI-4, and NOI-5. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT AQ-3

This impact does not apply to the project because no naturally occurring asbestos is mapped in the project area. (CalOSHA 2022, DOC 2000).

IMPACT AQ-4

Prescribed burning during initial and maintenance treatments could expose people to toxic air contaminants, which was examined in the PEIR. The duration and parameters of the prescribed burns are within the scope of the activities addressed in the PEIR, and within the ACAPCD, air quality conditions are consistent with those analyzed in the PEIR for Amador County. Therefore, the potential for exposure to toxic air contaminants is also within the scope the PEIR. SPRs applicable to these treatment activities are AD-4, AQ-2, AQ-3, and AQ-6. All feasible measures to prevent and minimize smoke emissions, as well as exposure to smoke, are included in SPRs. No additional mitigation measures are feasible, and this impact would remain significant and unavoidable, as explained in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions present and air basins in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT AQ-5

Use of diesel-powered equipment during vegetation treatments could expose people to objectionable odors from diesel exhaust. The potential to expose people to objectionable odors from diesel exhaust was examined in the PEIR. Consistent with the PEIR, diesel exhaust emissions would be temporary, would not be generated at any one location for an extended period of time, and would dissipate rapidly from the source with an increase in distance. This impact is within the scope of the PEIR because the equipment that would be used and the duration of use under the proposed project are consistent with what was analyzed in the PEIR. SPRs applicable to the proposed project are AQ-1, HAZ-1, NOI-4, and NOI-5. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions and sensitive receptors present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT AQ-6

Prescribed burning during initial and maintenance treatments could expose people to objectionable odors. The potential to expose people to objectionable odors from prescribed burning was examined in the PEIR. The duration and parameters of the prescribed burn and the exposure potential are consistent with the activities addressed in the PEIR. Therefore, the resultant potential for exposure to objectionable odors from smoke is also within the scope of impacts covered in the PEIR. SPRs that are applicable to this treatment project are AD-4, AQ-2, AQ-3, and AQ-6. All feasible measures to prevent and minimize smoke odors, as well as exposure to smoke odors, are included in SPRs. No additional mitigation measures are feasible, and this impact would remain significant and unavoidable, as explained in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions present and sensitive receptors in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW AIR QUALITY IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.4.1, "Regulatory Setting," and Section 3.4.2, "Environmental Setting," in Volume II of the Final PEIR). Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to air quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to air quality would occur.

4.4 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

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

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

New Archaeological, Historical, and Tribal Cultural Resource Impacts: Would the treatment result in other impacts to archaeological, historical, and tribal cultural resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

Consistent with SPR CUL-1, a records search of the approximately 3,440-acre project area, including areas within and outside of the CalVTP treatable landscape, was performed by the North Central Information Center (NCIC) on April 21, 2022 (NCIC File No. AMA-22-8). The search identified seven previously recorded archaeological sites and historic features within the project area. Only one is a built-environment historic feature, a bridge constructed in 1942. This feature has been evaluated for inclusion on the National Register of Historic Places (NRHP) and was recommended ineligible; however, it has not been evaluated for inclusion on the California Register of Historical Resources (CRHR).

Therefore, it is not known whether the bridge is a resource under CEQA. The remaining six sites are archaeological: one site is Native American in nature (bedrock milling feature) and five sites are historic-era archaeological sites (abandoned water conveyance systems, mine features, roadbeds, and rock wall remains). None of the archaeological sites have been evaluated for CRHR eligibility.

Consistent with SPR CUL-2, an updated Native American contact list was obtained from the Native American Heritage Commission (NAHC). On July 8, 2022, letters inviting the tribes to consult were emailed to the 14 tribal representatives indicated by NAHC. A response was received from Wilton Rancheria on July 28, 2022. Amador RCD met with Lou Griffin and Venesa Kremer of the Wilton Rancheria on October 13, 2022 and no additional project changes were proposed. No other tribe responded. An April 26, 2022, search of NAHC's sacred lands database returned negative results.

IMPACT CUL-1

Proposed treatment activities include mechanical treatments and prescribed burning, which could damage historical resources. Although the NCIC records search revealed one historic feature, it has not been evaluated for CRHR-eligibility; therefore, it is not known if it is considered a resource under CEQA. Structures (i.e., buildings, bridges, roadways) over 50 years old that have not been recorded or evaluated for historical significance may be present in the project area, and these structures would be identified and avoided pursuant to SPR CUL-7. The potential for these treatment activities to result in disturbance, damage, or destruction of built-environment structures that have not yet been evaluated for historical significance was examined in the PEIR. This impact is within the scope of the PEIR, because treatment activities and the intensity of ground disturbance of the treatment project are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the potential to encounter built-environment structures that have not yet been evaluated for historical significance in areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on historical resources is also the same, as described above. SPRs applicable to this impact are CUL-1, CUL-7, and CUL-8. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT CUL-2

Vegetation treatment would include mechanical treatments using heavy equipment that could churn up the surface of the ground during treatment as vegetation is removed and prescribed burning; this may result in damage to known or previously unknown archaeological resources. The NCIC records search revealed 6 archaeological sites; however, none of these have been evaluated for eligibility for listing in the CRHR. Therefore, it is not known whether these sites are considered resources under CEQA. A survey would be conducted before treatment pursuant to SPR CUL-4 to identify any previously unrecorded archeological resources and identified resources would be avoided according to the provisions of SPR CUL-5.

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

significance conclusion in the PEIR; therefore, for purposes of CEQA compliance, this PSA/Addendum notes the impact as potentially significant and unavoidable.

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

IMPACT CUL-3

Native American contacts in Amador County were contacted on July 8, 2022, and included Rhonda Morningstar Pope, Chairperson, Buena Vista Rancheria of Me-Wuk Indians; Rolland Fillmore, Cultural Preservation Representative, Jackson Rancheria; Adam Dalton, Chairperson, Jackson Rancheria Band of Miwuk Indians; Gloria Grimes, Chairperson, Calaveras Band of Mi-Wuk Indians; Debra Grimes, Cultural Resources Specialist, Calaveras Band of Mi-Wuk Indians – Grimes; Calaveras Band of Mi-Wuk Indians; Lloyd Mathiesen, Chairperson, Chicken Ranch Rancheria of Me-Wuk Indians; Sara Dutschke, Chairperson, Ione Band of Miwok Indians; Cosme Valdez, Chairperson, Nashville Enterprise Miwok-Maidu-Nishinam Tribe; Gene Whitehouse, Chairperson, United Auburn Indian Community of the Auburn Rancheria; Darrel Cruz, Cultural Resources Department, Washoe Tribe of Nevada and California; Dahlton Brown, Director of Administration, Wilton Rancheria; Jesus Tarango, Chairperson, Wilton Rancheria; and Steven Hutchason, THPO, Wilton Rancheria. A response was received from Wilton Rancheria on July 28, 2022. Amador RCD met with Lou Griffin and Venesa Kremer of the Wilton Rancheria on October 13, 2022 and no additional project changes were proposed.

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

IMPACT CUL-4

Vegetation treatment activities would include mechanical treatments using heavy equipment; these treatments may use tractors, skidders, dozers, and masticators, which could uncover human remains. The NCIC records search did not reveal any burials or sites containing human remains. The potential for treatment activities to uncover human remains was examined in the PEIR. This impact is within the scope of the PEIR, because the treatment activities and intensity of ground disturbance are consistent with those analyzed in the PEIR. Additionally, consistent with the PEIR, the project would comply with California Health and Safety Code Section 7050.5 and PRC Section 5097 in the event of a discovery. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the potential for uncovering human remains during implementation of the treatment project is essentially the same within and outside the treatable landscape and treatment activities; therefore, the impact related to disturbance

of human remains is also the same, as described above. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCE IMPACTS

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

4.5 BIOLOGICAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact within the Scope of the PEIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTSM	Impact BIO-1, pp 3.6-131 – 3.6-138	Yes	BIO-1 BIO-2 BIO-7 BIO-9 GEO-1 GEO-3 GEO-4 GEO-5 GEO-7 HYD-3 HYD-4 HYD-5	BIO-1a BIO-1b	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTSM (all wildlife species except bumble bees) SU (bumble bees)	Impact BIO-2, pp 3.6-138 – 3.6-184	Yes	BIO-1 BIO-2 BIO-5 BIO-9 BIO-10 BIO-12 GEO-1 HYD-3 HYD-4	BIO-2a BIO-2b BIO-2c	LTSM	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation That Leads to Loss of Habitat Function	LTSM	Impact BIO-3, pp 3.6-186 – 3.6-191	Yes	BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-6 BIO-9 GEO-1 GEO-3 GEO-4 GEO-5 GEO-7 HAZ-5 HAZ-6 HYD-3 HYD-4 HYD-5	BIO-3a BIO-3b BIO-3c	LTSM	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTSM	Impact BIO-4, pp 3.6-191 – 3.6-192	Yes	BIO-1 BIO-2 BIO-3 BIO-9 GEO-1	BIO-4	LTSM	No	Yes

Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact within the Scope of the PEIR?
				GEO-3 GEO-4 GEO-5 GEO-6 GEO-7 HAZ-5 HAZ-6 HYD-1 HYD-3 HYD-4 HYD-5				
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTSM	Impact BIO-5, pp 3.6-192 – 3.6-196	Yes	BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-11 HYD-4	BIO-5	LTSM	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197 – 3.6-198	Yes	BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-12	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	NI	Impact BIO-7, pp 3.6-198 – 3.6-199	Yes	AD-3	NA	NI	No	Yes
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	NI	Impact BIO-8, pp 3.6-199 – 3.6-200	No	--	--	--	--	--

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

New Biological Resources Impacts: Would the treatment result in other impacts to biological resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

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

The project area spans two different ecoregions (from west to east): the Sierra Nevada Foothills ecoregion and the Sierra Nevada ecoregion. The project area ranges in elevation from approximately 1,300 feet to 2,540 feet. Habitat types within the project area and total acreage of each type are presented in Table 4.5-1.

Table 4.5-1 Habitat Types in the Project Area

Habitat Type	Total Acreage (Ecological Restoration)
Forest/Woodland	
Sierran Mixed Conifer	55.0
Montane Hardwood-Conifer	194.7
Montane Hardwood	1,852.4
Ponderosa Pine	74.7
Blue Oak-Foothill Pine	593.8
Valley Oak Woodland	84.1
Douglas Fir	4.8
Forest/Woodland Total	***2,859.5***
Shrub/Scrub	
Mixed Chaparral	145.7
Shrub/Scrub Total	***145.7***
Herbaceous	
Annual Grassland	270.8
Herbaceous Total	***270.8***
Wetland/Riparian	
Fresh Emergent Wetland	1.9
Lacustrine	0.9
Valley Foothill Riparian	16.5
Wetland/Riparian Total	***19.3***
Agricultural	
Evergreen Orchard	1.1
Vineyard	2.9
Agricultural Total	***4.0***
Developed/Disturbed/Barren[1]	
Urban	138.5
Developed/Disturbed/Barren Total	***138.5***
All Habitat Types Total	**3,437.8**

[1] Most urban and barren habitats would not be targeted for treatment; however, due to the scale of the habitat mapping, some areas mapped as urban or barren may contain habitats that would be treated (e.g., forested areas close to urban development).

Source: CAL FIRE FRAP vegetation data, compiled by Ascent Environmental in 2022.

A list of special-status plant and wildlife species with potential to occur in the project area was compiled by completing a review of the California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California database records for the U.S. Geological Survey (USGS) quadrangles containing and surrounding the project area (nine quadrangles total; CNDDB 2022; CNPS 2022); the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool (USFWS 2022); and Appendix BIO-3 (Table 13a, Table 13b, Table 14a, Table 14b, and Table 19) in the PEIR (Volume II) for special-status plants and wildlife that could occur in the Sierra Nevada Foothills and Sierra Nevada ecoregions. A list of sensitive natural communities with potential to occur in the project area was compiled by completing a CNDDB search of the USGS quadrangles containing and surrounding the project area (CNDDB 2022), and reviewing Table 3.6-24 (pages 3.6-88 through 3.6-90) and Table 3.6-22 (pages 3.6-83 through 3.6-85) in the PEIR (Volume II) for sensitive natural communities that could occur in the Sierra Nevada Foothills and Sierra Nevada ecoregions in the habitat types mapped in the project area.

Ascent conducted reconnaissance surveys on May 2, 2022, May 3, 2022, and May 4, 2022 to identify and document sensitive resources (e.g., aquatic habitat, riparian habitat, sensitive natural communities) and to assess the suitability of habitat in the project area for special-status plant and wildlife species. Mapped habitat types were verified where possible, and incidental wildlife observations were recorded.

Based on implementation of SPR BIO-1, including review of occurrence data, species ranges, habitat requirements for each species, results of reconnaissance-level surveys, and habitat present within the project area as assessed during reconnaissance surveys, a list of all species with potential to occur in the vicinity of the proposed project was assembled (Attachment B). Nine of the special-status plants and 14 of the special-status wildlife from this list are known or have potential to occur in the project area (Table 4.5-2). These species are discussed in detail under Impact BIO-1 (special-status plants) and Impact BIO-2 (special-status wildlife).

Table 4.5-2 Special-Status Plant and Wildlife Species with Potential to Occur in the Project Area

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Plants					
Ione manzanita *Arctostaphylos myrtifolia*	FT	—	1B.2	Chaparral or cismontane woodland. Acidic sandy or clay soils with chaparral associates. Often comprises 50–80 percent cover. 295–1,840 feet in elevation. Blooms November–March. Perennial.	*May occur*. Chaparral and woodland habitat with acidic sandy soil potentially suitable for this species is present in the project area. Although the project area is outside the extent of the Ione formation, which is where USFWS determined the extent of the species to be in 2010, a documented occurrence was recorded in 2015 7.7 miles south of the project area and 9.5 miles east-northeast of the Ione formation (USFWS 2010; CNDDB 2022).
Big-scale balsamroot *Balsamorhiza macrolepis*	—	—	1B.2	Chaparral, valley and foothill grassland, cismontane woodland. Usually (65 to 74 percent of occurrences) on serpentine. 115–4,810 feet in elevation. Blooms March–June. Perennial.	*May occur*. Chaparral, grassland, and woodland habitat potentially suitable for this species is present in the treatment area.
Watershield *Brasenia schreberi*	—	—	2B.3	Freshwater marshes and swamps, ponds, and slow streams. Aquatic from water bodies both natural and artificial in California. 95–7,220 feet in elevation. Blooms June–September. Perennial (aquatic).	*May occur*. Aquatic habitat, including ponds, potentially suitable for this species is present in the project area.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Red Hills soaproot *Chlorogalum grandiflorum*	—	—	1B.2	Cismontane woodland, chaparral, lower montane coniferous forest. Occurs frequently on serpentine or gabbro, but also on non-ultramafic substrates; often on "historically disturbed" sites. 805–4,070 feet in elevation. Blooms May–June. Geophyte.	*May occur*. Historically disturbed sites in chaparral, woodland, and conifer habitat potentially suitable for this species is present in the project area.
Yellow-lip pansy monkeyflower *Diplacus pulchellus*	—	—	1B.2	Lower montane coniferous forest, meadows, and seeps. Vernally wet depressions or seepage areas. Soils can be clay, volcanic, or granitic. 2,200–6,400 feet in elevation. Blooms April–July. Annual herb.	*May occur*. Wetland habitat potentially suitable for this species is present in the project area.
Tuolumne button-celery *Eryngium pinnatisectum*	—	—	1B.2	Volcanic soils; vernal pools, swales, intermittent streams. 230–3,005 feet in elevation. Blooms May–August. Annual or perennial.	*May occur*. Intermittent stream with volcanic soil habitat potentially suitable for this species is present in the project area. This species has a historical documented occurrence from 1892 approximately 2 miles north of the project area (CNNDB 2022).
Stanislaus monkeyflower *Erythranthe marmorata*	—	—	1B.1	Cismontane woodland, lower montane coniferous forest. Seeps, streambanks 330–2,955 feet in elevation. Blooms March–May. Annual.	*May occur*. Wetland and streambank habitat potentially suitable for this species is present in the project area. This species has a historical documented occurrence from 1892 approximately 1.4 miles east of the project area (CNDDB 2022).
Parry's horkelia *Horkelia parryi*	—	—	1B.2	Ione formation. Chaparral, cismontane woodland. Openings in chaparral or woodland; especially known from the Ione formation in Amador County. 280–3,660 feet in elevation. Blooms April–September. Perennial.	*May occur*. Openings in chaparral and woodland habitat potentially suitable for this species is present in the project area.
Prairie wedge grass *Sphenopholis obtusata*	—	—	2B.2	Wet meadows, streambanks, ponds. 985–6,565 feet in elevation. Blooms April–July. Perennial.	*May occur*. Streambank and pond habitat potentially suitable for this species is present in the project area.
Wildlife					
California red-legged frog *Rana draytonii*	FT	SSC	—	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	*May occur*. The nearest documented occurrence of California red-legged frog is approximately 10 miles south of the project area (CNDDB 2022). Aquatic habitat, including segments of Jackson Creek and South Jackson Creek that contain deep pools and stock ponds in the project area may provide habitat suitable for this species.
Coast horned lizard *Phrynosoma blainvillii*	—	SSC	—	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	*May occur*. The project area is within the documented range of coast horned lizard. Shrub habitat in the project area may provide habitat suitable for this species.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Foothill yellow-legged frog *Rana boylii*	—	SE; SSC	—	Partly shaded, shallow streams and riffles with a rocky substrate in a variety of habitats. Need at least some cobble-sized substrate for egg-laying. Need at least 15 weeks to attain metamorphosis.	*May occur*. The nearest documented occurrence of foothill yellow-legged frog is 2.9 miles southwest of the project area (CNDDB 2022). Perennial streams (i.e., Class I streams, Class II streams) in the project area (e.g., segments of South Fork Jackson Creek and Jackson Creek) may provide habitat suitable for this species.
Western pond turtle *Emys marmorata*	—	SSC	—	Aquatic turtle of ponds, marshes, rivers, streams, and irrigation ditches, usually with aquatic vegetation, below 6,000 ft elevation. Needs basking sites and suitable (sandy banks or grassy open fields) upland habitat up to approximately 0.3 mile (0.5 km) from water for egg-laying.	*May occur*. The nearest documented occurrence of western pond turtle is approximately 1.5 miles north of the project area within Grass Valley Creek, a tributary to Sutter Creek (CNDDB 2022). There are also several documented occurrences of the species in Jackson Creek and South Fork Jackson Creek approximately 1.5 to 2 miles west of the project area near Jackson (CNDDB 2022). Aquatic habitat throughout the project area, including Jackson Creek, South Jackson Creek, the Amador Canal, ponds, and irrigation ditches, may provide habitat suitable for this species.
Bald eagle *Haliaeetus leucocephalus*	FD	SE; FP	—	Ocean shore, lake margins, and rivers for both nesting and wintering. Most nest within 1 mile of water. Nests in large, old-growth, or dominant live tree with open branches, especially ponderosa pine. Roosts communally in winter.	*May occur*. The nearest documented occurrence of nesting bald eagles is approximately 14 miles southwest of the project area near New Hogan Lake (CNDDB 2022). Most of the project area does not contain nesting habitat suitable for bald eagles. However, the southeastern portion of the project area within approximately 1 mile of Lake Tabeaud may provide habitat suitable for the species.
Great gray owl *Strix nebulosa*	—	SE	—	Resident of mixed conifer or red fir forest habitat, in or on edge of meadows. Requires large diameter snags in a forest with high canopy closure, which provide a cool sub-canopy microclimate.	*May occur*. There are several documented occurrences of nesting great gray owls approximately 8 to 10 miles north of the project area in El Dorado County (CNDDB 2022). While most of the project area does not contain habitat suitable for great gray owl, the eastern portion of the project area (i.e., areas greater than 2,000 feet in elevation) contains some Sierran mixed conifer habitat that may provide nesting habitat suitable for the species where this habitat is adjacent to open areas.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Olive-sided flycatcher *Contopus cooperi*	—	SSC	—	Nesting habitats are mixed conifer, montane hardwood-conifer, Douglas-fir, redwood, red fir, and lodgepole pine. Most numerous in montane conifer forests where tall trees overlook canyons, meadows, lakes, or other open terrain.	*May occur*. The project area contains forest habitat that may provide nesting habitat suitable for olive-sided flycatchers.
Tricolored blackbird *Agelaius tricolor*	—	ST; SSC	—	Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few kilometers of the colony.	*May occur*. The nearest documented occurrence of a nesting tricolored blackbird colony is approximately 8 miles northwest of the project area (CNDDB 2022). Habitat potentially suitable for nesting tricolored blackbirds is present in the western half of the project area (i.e., below approximately 2,000 feet in elevation) within riparian vegetation adjacent to creeks and ponds as well as thickets of Himalayan blackberry.
Monarch - California overwintering population *Danaus plexippus* pop. 1	FC	—	—	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (*Eucalyptus* spp., Monterey pine [*Pinus radiata*], cypress [*Cupressus* spp.]), with nectar and water sources nearby. Along migration routes and within summer ranges, monarch butterflies require two suites of plants: (1) host plants for monarch caterpillars, which are primarily milkweeds (*Asclepias* spp.) within the family Apocynaceae upon which adult monarchs lay eggs; and (2) nectar-producing flowering plants of many other species that provide food for adult butterflies. Having both host and nectar plants available from early spring to late fall and along migration corridors is critical to the survival of migrating pollinators.	*May occur*. The project area is outside of the overwintering range of monarch butterfly. However, the project area contains grassland and open woodland habitats with floral resources and likely contains milkweed plants; thus, monarch may forage or breed on the project area.
American badger *Taxidea taxus*	—	SSC	—	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	*May occur*. While there are no documented occurrences of American badger in the vicinity of the project area, the project area is located within the range of American badger (CNDDB 2022). Grassland habitat and open woodlands within the project area may provide habitat suitable for this species.
Pallid bat *Antrozous pallidus*	—	SSC	—	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	*May occur*. The nearest documented occurrence of pallid bat is approximately 14 miles northwest of the project area (CNDDB 2022). The documented range of pallid bat includes the project area. Large trees in woodlands, forests, or rural residential areas or rocky areas within the project area may provide roosting habitat suitable for pallid bats.

Species	Listing Status[1] Federal	Listing Status[1] State	CRPR	Habitat	Potential for Occurrence[2]
Ringtail *Bassariscus astutus*	—	FP	—	Riparian habitats, forest habitats, and shrub habitats in lower to middle elevations.	*May occur*. The documented range of ringtail includes the project area. Riparian, forest, woodland, and shrub habitats in the project area may provide habitat suitable for ringtail.
Townsend's big-eared bat *Corynorhinus townsendii*	—	SSC	—	Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	*May occur*. The nearest documented occurrence of Townsend's big-eared bat is approximately 2.4 miles north of the project area (CNDDB 2022). The documented range of Townsend's big-eared bat includes the project area. Large trees in woodlands, forests, or rural residential areas or human-made structures (e.g., bridges, barns) within the County may provide roosting habitat suitable for Townsend's big-eared bats.
Western red bat *Lasiurus blossevillii*	—	SSC	—	Roosts primarily in trees, 2–40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	*May occur*. The nearest documented occurrence of western red bat is approximately 26 miles south of the project area (CNDDB 2022). The documented range of western red bat includes the project area. Trees in woodlands, forests, riparian corridors, or orchards within the County may provide roosting habitat suitable for western red bat.

[1] Legal Status Definitions: CESA = California Endangered Species Act; CEQA = California Environmental Quality Act; CRPR = California Rare Plant Rank; ESA = Endangered Species Act

California Rare Plant Ranks (CRPR):

1B Plant species considered rare or endangered in California and elsewhere (protected under CEQA, but not legally protected under ESA or CESA).
2B Plant species considered rare or endangered in California but more common elsewhere (protected under CEQA, but not legally protected under ESA or CESA).

CRPR Threat Ranks:

0.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)
0.2 Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)
0.3 Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

State: FP = Fully Protected (legally protected)
SSC = Species of Special Concern (no formal protection other than CEQA consideration)
SE = State Listed as Endangered (legally protected)
ST = State Listed as Threatened (legally protected)

Federal: FT = Federally Listed as Threatened (legally protected)
FD = Federally Delisted
FC = Federal Candidate for Listing

Sources: CNDDB 2022; CNPS 2022; USFWS 2022.

IMPACT BIO-1

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on the nine special-status plant species as habitat potentially suitable for these species is present in the project area. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments, because the same treatment activities would occur. However, treatment frequency and intensity can determine whether effects on certain plant species are beneficial or adverse. Initial treatment that reduces overgrowth, opens the tree canopy to allow more light penetration, or removes invasive competitors can be beneficial for some special-status plant populations; however, repeated treatments at too frequent intervals can have adverse effects on those same special-status plants.

Of the nine special-status plant species that may be present in the project area, three species – watershield, yellow-lip pansy monkeyflower, and Tuolumne button-celery – are typically associated with wetlands (e.g., freshwater emergent wetlands, freshwater forested/shrub wetlands, springs, seeps) (Table 4.5-2). Four special-status plant species – Ione manzanita, big-scale balsamroot, Red Hills soaproot, and Parry's horkelia – are associated with upland habitats that are present in the project area. The remaining two special-status plant species – Stanislaus monkeyflower and prairie wedge grass – may be associated with both wet and upland areas, as both species can be found along streambanks, among other habitats (Table 4.5-2). Pursuant to SPR HYD-4, WLPZs ranging from 50 to 150 feet adjacent to all Class I and Class II streams and lakes (defined under Forest Practice Rules as a permanent natural body of water of any size, or an artificially impounded body of water having a surface area of at least 1 acre; CAL FIRE 2020) within the project area would be implemented and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV (e.g., drainage canals, irrigation ditches) streams for prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and herbicide application, which would minimize some adverse effects on wetland and streambank associated species. Requirements under SPR HYD-4 requires the retention of at least 75 percent of surface cover and undisturbed area within WLPZs. However, not all impacts would be avoided as manual treatments within WLPZs are allowed and up to 25 percent of vegetative cover may be removed, per SPR HYD-4, which could potentially result in loss of special-status plants in pond, streambank, wetland, spring, and seep. Therefore, implementation of WLPZ restrictions under SPR HYD-4 would not be sufficient in protecting special-status plants within the WLPZ. Furthermore, there may be additional on-site wetland, spring, seep, and mesic habitat suitable for special-status plants outside of a WLPZ as well as ponds smaller than one acre (i.e., not considered a lake under Forest Practice Rules) that were not identified during desktop research or reconnaissance surveys. Wetland delineations would be conducted to determine if other wetland habitats are located within treatment areas; where wetland habitats are delineated, no-disturbance buffers of at least 25 feet around them would be established (per Mitigation Measure BIO-4, refer to Impact BIO-4 below).

Although SPR HYD-4 and Mitigation Measure BIO-4 would avoid and minimize some adverse effects on special-status plants typically associated with wetlands, habitat potentially suitable for the two facultative special-status plant species (i.e., associated with both wetland and upland areas) and the four upland-associated special-status plant species would not be avoided under SPR HYD-4 and Mitigation Measure BIO-4. As a result, SPR BIO-7 would be required, which would require a survey for special-status plants before implementing treatments in any habitat potentially suitable for special-status plants. If special-status plant species are observed during implementation of SPR BIO-7, Mitigation Measure BIO-1a and/or Mitigation Measure BIO-1b would be required, and no disturbance buffers would be established around plants listed under the California Endangered Species Act (CESA), federal Endangered Species Act (ESA) (i.e., Ione manzanita if present), and other non-listed special-status plants, which would include special-status plants in both wetland and upland habitat. For wetland habitats containing special-status plants, a no-disturbance buffer of 50-feet around the wetland would be required.

Pursuant to SPR BIO-7, surveys would not be required for those special-status plants not listed under the CESA or ESA, if the target special-status plant species is an herbaceous annual species, stump-sprouting species, or geophyte species, and the specific treatments may be carried out during the dormant season for that species or when the species has completed its annual life cycle, provided the treatment would not alter habitat in a way that would make it unsuitable for the special-status plants to reestablish following treatment, or destroy seedbanks, stumps, or roots, rhizomes, bulbs and other underground parts of special-status plants. However, this would require that treatments in

potentially suitable habitat for these special-status plants be restricted to the dormant season for these species and to treatments that do not disturb below the soil surface (i.e., manual treatments, herbicide application, prescribed herbivory, and prescribed burning) without prior knowledge of their presence, which may unnecessarily or infeasibly constrain treatment implementation.

Three of the nine special-status plant species that may occur within the project area are herbaceous annual species or geophytes, as indicated in Table 4.5-2. Impacts on these species would be avoided by implementing treatment activities that do not kill or remove vegetation or disturb the soil (i.e., manual treatment, herbicide application, prescribed herbivory, and prescribed burning) during the dormant season (i.e., when the plant has no aboveground parts), which would typically occur after seed set and before germination. Typically, germination will occur after the first significant rainfall (approximately 0.5 inches), and cold snap, which generally occurs between October – December (Levine et. al 2008). Treatment activities that could potentially kill or remove seeds, stumps, and underground root structures (i.e., mechanical treatments) may result in impacts on these plant species even when dormant and would not be conducted without prior implementation of SPR BIO-7. If treatments that do not kill or remove vegetation or disturb the soil (i.e., manual treatments, herbicide application, prescribed herbivory, and prescribed burning) cannot be completed in the dormant season and would be implemented during the growing period of these annual and geophyte species, protocol surveys (per SPR BIO-7) and avoidance of any identified plants (per Mitigation Measures BIO-1a and BIO-1b) must be implemented, as described below. Five of the nine special-status plant species that have potential to occur within the project area are perennial species, which could not be avoided seasonally in the same manner as herbaceous annual species, stump sprouters, or geophytes; therefore, protocol-level surveys under SPR BIO-7 would be necessary to identify them prior to implementing treatment activities regardless of the timing of treatments. The remaining special-status plant species – Tuolumne button-celery – that may occur within the project area is an herbaceous annual or perennial. Lifeform of this special-status plant must be determined if found in the project area during surveys required under SPR BIO-7, which would determine which of the lifeform-based measures described above are required to protect this species.

Where protocol-level surveys are required (pursuant to SPR BIO-7) and special-status plants are identified during these surveys, Mitigation Measures BIO-1a or BIO-1b, depending on species status, would be implemented to avoid loss of identified special-status plants. Pursuant to Mitigation Measures BIO-1a and BIO-1b, if special-status plants are identified during protocol-level surveys, a no-disturbance buffer of at least 50 feet would be established around the area occupied by the species within which prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and herbicide application would not occur unless a qualified RPF or biologist determines, based on substantial evidence, that the species would benefit from the proposed treatment in the occupied habitat area. In the case of plants listed pursuant to CESA or ESA, the determination of beneficial effects would need to be made in consultation with the California Department of Fish and Wildlife (CDFW) and/or USFWS, depending on species status. If treatments are determined to be beneficial and would be implemented in areas occupied by special-status plants, under the specific conditions described under Mitigation Measures BIO-1a and BIO-1b, additional impact minimization and avoidance measures or design alternatives to reduce impacts would be identified. An evaluation of the appropriate treatment design and frequency to maintain habitat function for special-status plants would be carried out by a qualified RPF 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 potential for treatment activities to result in adverse effects on special-status plants was examined in the PEIR. This impact on special-status plants is within the scope of the PEIR, because, within the boundary of the project area, habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on special-status plants is also the same, as described above.

Biological resource SPRs that apply to project impacts under Impact BIO-1 are SPRs BIO-1, BIO-2, BIO-6, BIO-7, BIO-9, GEO-1, GEO-3, GEO-4, GEO-5, GEO-7, HYD-4, and HYD-5. Biological resource mitigation measures that apply to project impacts under Impact BIO-1 are Mitigation Measures BIO-1a BIO-1b. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-2

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

California Red-Legged Frog

California red-legged frog historically occupied portions of the western slope of the Sierra Nevada from Shasta County south to Tulare County; however, these populations have been fragmented and nearly eliminated (USFWS 2002). The nearest documented occurrence of California red-legged frog is approximately 10 miles south of the project area (CNDDB 2022). There is no critical habitat for California red-legged frog in the project area, or in Amador County. Glyphosate, triclopyr, and imazapyr are subject to the California Red-Legged Frog Injunction (Center for Biological Diversity v. U.S. EPA [2006] Case No. 02-1580-JSW); therefore, specific application requirements apply in areas subject to the injunction. Pursuant to the Injunction, the application of these herbicides is prohibited within 60 feet of California red-legged frog aquatic breeding habitat or non-breeding aquatic habitat within critical habitat areas. Because there is no critical habitat for California red-legged frog in the project area, the Injunction does not apply to this project.

Because there are no documented occurrences of California red-legged frogs in the project area and because the population of this species in the Sierra Nevada Foothill region is known to be small and fragmented, it is unlikely that the project area supports a large population of California red-legged frogs, and the species may not be present in the project area at all. However, while California red-legged frogs have not been documented in the project area, surveys have not been conducted throughout much of the area (e.g., within privately-owned land), and aquatic habitat, including perennial streams with deep pools (i.e., in South Fork Jackson Creek and Jackson Creek), stock ponds, seeps, and wetlands throughout the project area may provide habitat suitable for this species. The potential for initial treatment activities and maintenance treatments to result in adverse effects on California red-legged frogs was examined in the PEIR.

Aquatic and Upland Habitat

Studies have demonstrated that California red-legged frogs remain very close to breeding ponds during the nonbreeding season and typically do not move more than a few hundred feet into upland habitats (Bulger et al. 2003; Fellers and Kleeman 2007). Pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV streams (e.g., drainage canals, irrigation ditches). Also pursuant to SPR HYD-4, pile burning would be conducted outside of the WLPZs. Wetland delineations would be conducted to determine if other wetland, spring, and seep habitats are present within a treatment area, and where aquatic habitats are delineated, no-disturbance buffers of at least 25 feet would be implemented (refer to Impact BIO-4 below). Additionally, pursuant to SPR HYD-3, livestock would be excluded within 50 feet of environmentally sensitive areas such as Class I and II streams, ponds (including stock ponds suitable for California red-legged frog as determined by a qualified RPF or biologist), wetlands, or riparian areas during prescribed herbivory treatments using temporary fencing or active herding. However, these measures may not avoid impacts on California red-legged frogs if frogs are present outside of established WLPZs or buffers (e.g., greater than 150 feet from aquatic habitat), are present within ponds smaller than one acre (i.e., not considered a lake under Forest Practice Rules), or if non-mechanical treatment activities implemented within the WLPZ resulted in injury or mortality of frogs.

As noted above, aquatic breeding habitat potentially suitable for California red-legged frog is present in perennial streams (e.g., South Fork Jackson Creek, Jackson Creek) with deep pools and in stock ponds throughout the project area. Aquatic nonbreeding habitat potentially suitable for California red-legged frog is also potentially present (e.g., streams without deep pools, other wetlands). California red-legged frogs could also periodically use the Amador Canal to move between suitable habitat areas; however, the canal lacks vegetative cover and is overall low-quality habitat for this species.

California red-legged frogs have not been documented in ponds or streams in the project area and populations have been fragmented and nearly eliminated from the region (USFWS 2002); as a result, injury or mortality of California red-legged frogs is unlikely to occur as a result of treatments near these potentially suitable habitats. Nonetheless, per SPR BIO-1, protective buffers would be implemented surrounding these habitats prior to commencement of treatment activities to further reduce the likelihood of impacts. To avoid injury or mortality of California red-legged frogs in aquatic habitat during the wet season (i.e., starting with the first frontal rain system depositing a minimum of 0.25 inch of rain after October 15 and ending on April 15), the following measures would be implemented: 1) a 300-foot no-disturbance buffer would be applied to Class I streams, Class II streams with water, permanent ponds (including stock ponds), and wetlands which meet the definition of aquatic breeding habitat suitable for the species as determined by a qualified RPF or biologist; 2) a 30-foot no-disturbance buffer would be applied to Class I streams that do not meet the definition of aquatic breeding habitat suitable for the species as determined by a qualified RPF or biologist and dry Class II streams; and 3) no mechanical treatments would occur within 75 feet of Class I streams that do not meet the definition of aquatic breeding habitat suitable for the species as determined by a qualified RPF or biologist, and dry Class II streams. During the dry season (i.e., starting April 15 and ending with the first frontal rain system depositing a minimum of 0.25 inch of rain after October 15), a 30-foot no-disturbance buffer would be applied to all Class I and Class II streams, permanent ponds (including stock ponds), and wetlands, which meet the definition of aquatic habitat suitable for California red-legged frog as determined by a qualified RPF or biologist. Further, year-round measures would require all trees to be felled away from aquatic habitat suitable for California red-legged frogs, and no pile burning within 300 feet of these aquatic habitats year-round.

Concrete and earthen stock ponds may provide breeding and movement habitat for California red-legged frog, and the Amador Canal may provide marginal habitat for movement of California red-legged frog. However, as described above, aquatic habitat in the canal is low quality, and given the rarity of California red-legged frog in the Sierra Foothills, the likelihood of presence of California red-legged frog in the canal is extremely low. Water drafting from concrete and earthen stock ponds would be limited to those stock ponds that do not provide habitat suitable for California red-legged frog breeding. Because nonbreeding California red-legged frogs may be present in stock ponds or the Amador Canal where water drafting may occur, Mitigation Measure BIO-2a would be required during water drafting. Pursuant to Mitigation Measure BIO-2a, protective measures would be implemented during water drafting to prevent impacts on California red-legged frogs. Specifically, buckets and hoses used for water drafting would be covered by ¼-inch to 1-inch mesh to prevent entrainment of aquatic species, as described above under Section 2.1.2, "Treatment Activities." Where a stock pond would be used as a water drafting source that is connected to a watercourse, the water level in the pond will always be maintained such that there would be negligible effect on downstream flow, thereby maintaining habitat for California red-legged frog.

Dispersal and Migration

While California red-legged frogs generally remain close to breeding ponds during the nonbreeding season, adults and juveniles are known to travel through upland habitat (e.g., riparian, woodland, grassland) to move between breeding and nonbreeding sites (e.g., other ponds, deep pools in streams, moist and cool riparian understory, burrows) for access to refugia and foraging habitat, or to disperse to new breeding locations. Movements through upland habitat are typically up to approximately 1.6 kilometers (1 mile) over the course of a wet season (Bulger et al. 2003). During migration, California red-legged frogs may travel long distances from aquatic habitat and typically travel in straight lines irrespective of vegetation types and have been documented to move over 1.7 miles between aquatic habitat sites (Bulger et al. 2003). The distance between the nearest documented California red-legged frog occurrence and the project area is approximately 10 miles, substantially greater than the typical dispersal distance of

the species (CNDDB 2022). It is unlikely that California red-legged frogs would migrate into the project area from this documented occurrence.

California red-legged frogs generally make overland movements (i.e., dispersal, migration) during the wet season (i.e., October to May) and these movement are typically made at night (Bulger et al. 2003). Treatment activities would be limited to daytime hours (i.e., 7:00 a.m. to 7:00 p.m., typically). Pursuant to SPR GEO-1, mechanical treatments and herbicide application would be suspended if it is raining, soils are saturated, or soils are wet enough to mobilize herbicides or be compacted by mechanical activities. Further, mechanical treatments may not resume until precipitation stops and soils are no longer saturated or very wet. The low likelihood of California red-legged frogs dispersing through the project area combined with implementation of these measures would avoid adverse effects on dispersing frogs.

Habitat Function

Habitat function for California red-legged frogs would be maintained because implementation of SPRs, mitigation measures, and protective measures would result in retention of habitat features important to the species. Treatment activities and maintenance treatments would not occur within aquatic habitat; WLPZs of 50-150 feet adjacent to all Class I and Class II streams and lakes would be implemented within which treatments would be limited (e.g., no mechanical treatment, retention of at least 75 percent surface cover); WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV (e.g., drainage canals, irrigation ditches) would be implemented; pile burning would be conducted outside of the WLPZs; no-disturbance buffers of at least 25 feet would be implemented surrounding other wetland, spring, and seep habitats; and livestock would be excluded within 50 feet of watercourses, ponds, and wetlands. Additionally, chipped and masticated biomass would not exceed 2–6 inches in depth, and 50 percent of understory (i.e., shrubs, herbs) in WLPZs would be retained.

If water drafting is required for prescribed herbivory treatments, Mitigation Measure BIO-2a will be implemented (as described above), and the project proponent would contact USFWS to notify them of their proposed avoidance measures and their determination that habitat function would be maintained for California red-legged frog. Mitigation Measure BIO-2a requires the project proponent to consult with USFWS on their proposed measures to avoid injury to or mortality of California red-legged frog and their determination for California red-legged frog habitat function maintenance. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Coast Horned Lizard

Coast horned lizard has potential to occur in the project area within shrub habitat (e.g., mixed chaparral). Treatment activities, including prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and herbicide application would be implemented within this habitat type, which could result in adverse effects on coast horned lizard. The potential for treatment activities and maintenance treatments to result in adverse effects on coast horned lizard was examined in the PEIR.

Per SPR BIO-1, if it is determined that adverse effects on coast horned lizard can be clearly avoided by physically avoiding the habitat suitable for these species, then no mitigation would be required. However, because coast horned lizards may be present habitat that would be treated, it is unlikely that all habitat potentially suitable for the species can be avoided while achieving treatment objectives. As a result, SPR BIO-10 would apply, and focused surveys for coast horned lizard would be conducted by a qualified RPF or biologist within habitat suitable for the species prior to implementation of prescribed burning, mechanical treatment, manual treatment, and herbicide application. Prescribed herbivory is not expected to result in loss of coast horned lizards because coast horned lizards are known to occupy rangelands where cattle are present and are capable of avoiding areas where livestock are concentrated.

If coast horned lizards are not detected within the project area during focused surveys, then no mitigation for the species would be required. If the species is detected during focused surveys, then Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, the project proponent would require relocation of individual animals by a qualified RPF or biologist with a valid CDFW scientific collecting permit, and/or other measures

recommended by a qualified RPF or biologist as necessary to avoid injury to or mortality of coast horned lizards. The project proponent may consult with CDFW for technical information regarding appropriate measures.

Habitat function for coast horned lizard would be maintained because under SPR BIO-5, treatments implemented in chaparral would be designed to avoid type conversion of chaparral vegetation (the optimal habitat for this species) and to maintain chaparral habitat function. Treatments within chaparral habitat would retain at least 35 percent relative vegetation density and would retain a mix of middle to older aged shrubs to maintain heterogeneity. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Foothill Yellow-Legged Frog

Aquatic habitat potentially suitable for foothill yellow-legged frog is present within Class I and Class II streams in the project area, including South Fork Jackson Creek and Jackson Creek. Foothill yellow-legged frog is known to occur within upland habitat up to approximately 200 feet away, but typically no more than 50 to 70 feet away, from aquatic habitat (CDFW 2018a).

Pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented. Additionally, pursuant to SPR HYD-3, livestock would be excluded within 50 feet of environmentally sensitive areas such as Class I and II streams or riparian areas during prescribed herbivory treatments using temporary fencing or active herding. However, these measures may not result in full avoidance of foothill yellow-legged frogs if manual activities implemented within the WLPZ resulted in injury or mortality of frogs. The potential for treatment activities, including maintenance treatments, to result in adverse effects on foothill yellow-legged frog was examined in the PEIR.

Per SPR BIO-1, to fully avoid habitat potentially suitable for foothill yellow-legged frog, a 200-foot no-disturbance buffer would be implemented prior to commencement of treatment activities by flagging along perennial streams (Class I and Class II) determined to be suitable for foothill yellow-legged frogs by a qualified RPF or biologist within and adjacent to the project area. If the 200-foot no-disturbance buffer is determined to be infeasible for certain treatments, then SPR BIO-10 would apply, and focused visual encounter surveys for foothill yellow-legged frog would be conducted by a qualified RPF or biologist within suitable habitat areas prior to treatment activities. If foothill yellow-legged frogs are not detected within the project area during focused surveys, then no mitigation for the species would be required. If foothill yellow-legged frogs are identified during focused surveys, Mitigation Measure BIO-2a would be implemented.

Under Mitigation Measure BIO-2a, the project proponent would require flagging areas for avoidance in which no treatment activities would occur, biological monitoring, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury to or mortality of foothill yellow-legged frog. The project proponent may consult with CDFW for technical information regarding appropriate measures. If impacts would remain significant under CEQA and the project proponent determines that additional mitigation is necessary to reduce significant impacts, Mitigation Measure BIO-2c would be required, and incidental take permitting under CESA may be required pursuant to consultation with CDFW.

Habitat function for foothill yellow-legged frog would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat, treatments within stream WLPZs adjacent to the project area would be limited (e.g., no mechanical treatment, retention of at least 75 percent surface cover) (SPR HYD-4), and prescribed herbivory treatments would be excluded within 50 feet of watercourses and wetlands. Additionally, chipped and masticated biomass would not exceed 2–6 inches in depth, and 50 percent of understory (i.e., shrubs, herbs) in WLPZs would be retained.

Pursuant to Mitigation Measure BIO-2a, the project proponent must consult with CDFW for technical input on their proposed measures to avoid injury to or mortality of foothill yellow-legged frog and their determination for maintenance of habitat function for the species. Therefore, if Mitigation Measure BIO-2a is required for treatment activities, the project proponent would contact CDFW to seek technical input on the determination that habitat function would be maintained for foothill yellow-legged frog. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Western Pond Turtle

Aquatic habitat potentially suitable for western pond turtle is present within ponds, streams, and canals in and adjacent to the project area, and this species could use upland habitat within the project area in the vicinity of these features. Western pond turtles may be present within upland habitat up to approximately 1,500 feet from water. Water drafting could occur within habitat potentially suitable for the species. Concrete and earthen stock ponds and the Amador Canal may provide habitat suitable for western pond turtles. The Amador Canal may provide marginal habitat for movement of western pond turtles.

Pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented, and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III (e.g., ephemeral streams) and Class IV streams (e.g., drainage canals, irrigation ditches). Additionally, pursuant to SPR HYD-3, livestock would be excluded within 50 feet of environmentally sensitive areas such as Class I and II streams, ponds (including stock ponds that provide habitat suitable for California red-legged frog), wetlands, or riparian areas during prescribed herbivory treatments using temporary fencing or active herding. However, these measures may not avoid impacts on western pond turtles if turtles are present further than 50 to 150 feet from stream or lake habitat, are present within ponds smaller than one acre (i.e., not considered a lake under Forest Practice Rules), or if manual activities implemented within the WLPZ resulted in injury or mortality of turtles. The potential for treatment activities and maintenance treatments to result in adverse effects on western pond turtle was examined in the PEIR.

Per SPR BIO-1, if it is determined that adverse effects on western pond turtles can be clearly avoided by physically avoiding the habitat suitable for these species, then no mitigation would be required. However, because western pond turtles may be present relatively large distances (i.e., up to approximately 1,500 feet) from aquatic habitat in the project area, it is unlikely that all habitat potentially suitable for the species can be avoided while achieving treatment objectives. Additionally, water drafting may occur within habitat suitable for western pond turtle. As a result, SPR BIO-10 would apply, and focused visual encounter surveys for western pond turtle would be conducted by a qualified RPF or biologist within upland habitat areas suitable for the species before implementation of treatments that could result in disturbance to underground burrows (i.e., mechanical treatments) and prescribed burning, and within areas where water drafting would occur for prescribed herbivory (e.g., stock ponds and the Amador Canal). Manual treatments, prescribed herbivory (with the exception of water drafting), and herbicide application treatments are not expected to result in adverse effects on western pond turtles. Personnel implementing manual treatments and herbicide application treatments would conduct these activities on foot, and the likelihood of a turtle or burrow being inadvertently crushed or otherwise destroyed would be very low. Additionally, the likelihood of a turtle or burrow being crushed by livestock would be low due to the size and depth of the burrows. However, water drafting for livestock watering could result in entrainment of western pond turtles. If western pond turtles are identified during focused surveys conducted per SPR BIO-10, Mitigation Measure BIO-2b for this species would be implemented for mechanical treatment, prescribed burning, and water drafting.

Under Mitigation Measure BIO-2b, the project proponent would require flagging areas for avoidance, relocation of individual animals by a qualified RPF or biologist with a valid CDFW scientific collecting permit, and/or other measures recommended by a qualified RPF or biologist as necessary to avoid injury to or mortality of western pond turtles. The project proponent may consult with CDFW for technical information regarding appropriate measures.

Additionally, pursuant to Mitigation Measure BIO-2b, protective measures would be implemented during water drafting to prevent impacts on western pond turtle. Specifically, buckets and hoses used for water drafting would be covered by ¼-inch to 1-inch mesh to prevent entrainment of aquatic species, as described above under Section 2.1.2, "Treatment Activities." Where a stock pond would be used as a water drafting source that is connected to a watercourse, the water level in the pond will always be maintained such that there would be negligible effect on downstream flow, thereby maintaining habitat for western pond turtle.

Habitat function for western pond turtle would be maintained because treatment activities and maintenance treatments would not occur within aquatic habitat, and pursuant to SPR HYD-4, treatments within stream WLPZs adjacent to the project area would be limited (e.g., no mechanical treatment, retention of at least 75 percent surface

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

Special-Status Birds

Four special-status bird species have potential to occur in the project area: bald eagle, great gray owl, olive-sided flycatcher, and tricolored blackbird (Table 4.5-2).

Mechanical treatments, manual treatments, prescribed burning, and prescribed herbivory conducted during the nesting bird season (February 1–August 31) could result in direct loss of active nests if trees or shrubs containing nests or ground nests are removed, burned, or consumed by livestock. For nests within vegetation that would not be removed, treatment activities including prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and herbicide application, could result in disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chainsaws, vehicles, personnel, livestock) potentially resulting in abandonment and loss of eggs or chicks. The potential for treatment activities to result in adverse effects on special-status birds was examined in the PEIR.

Per SPR BIO-1, if it is determined that adverse effects on habitat suitable for nesting special-status birds can be clearly avoided by physically avoiding habitat suitable for the species or conducting treatments outside of the season of sensitivity (i.e., nesting bird season), then no mitigation would be required. Adverse effects on nesting special-status birds would be clearly avoided for treatments that would occur outside of the nesting bird season (February 1–August 31). Per SPR BIO-12, trees with visible raptor nests, whether occupied or not, would be retained.

If conducting some treatments outside of the nesting bird season is determined to be infeasible, then SPR BIO-10 would apply, and focused nesting bird surveys for bald eagle, great gray owl, olive-sided flycatcher, and tricolored blackbird would be conducted by a qualified RPF or biologist before implementation of treatment activities within habitats suitable for these species.

If no active bird nests or colonies (i.e., tricolored blackbird) are observed during focused surveys, then additional avoidance measures for these species would not be required. If active special-status bird nests are observed during focused surveys, then Mitigation Measures BIO-2a (for bald eagle, great gray owl, and tricolored blackbird) and BIO-2b (for olive-sided flycatcher) would be implemented.

Under Mitigation Measures BIO-2a or BIO-2b, a no-disturbance buffer of at least 0.5 mile would be established around active bald eagle nests; 0.25 mile around great gray owl nests; and at least 100 feet around the nests or colonies of other special-status birds, and no treatment activities would occur within this buffer until the chicks have fledged as determined by a qualified RPF or biologist. Additionally, trees containing bald eagle nests would not be removed pursuant to the Bald and Golden Eagle Protection Act.

Habitat function for special-status birds would be maintained because treatment activities would not result in removal of trees greater than 12 inches dbh (i.e., except for hazard trees), which would be the most likely features to be used by bald eagle, great gray owl, and olive-sided flycatcher due to the cover provided by larger trees. Additionally, three to five large snags would be retained per acre, where present, to provide wildlife habitat. Further, treatments within riparian habitat (which may provide nesting habitat for tricolored blackbird) that is included within a WLPZ would be limited pursuant to SPR HYD-4 (e.g., no mechanical treatment, retention of at least 75 percent surface cover). Additionally, pursuant to SPR HYD-3, livestock would be excluded within 50 feet of environmentally sensitive areas such as Class I and II streams, ponds, wetlands, or riparian areas during prescribed herbivory treatments using temporary fencing or active herding. Pursuant to Mitigation Measure BIO-2a, the final determination for habitat function maintenance for bald eagle, great gray owl, and tricolored blackbird must be made by the project proponent in consultation with CDFW. Therefore, if Mitigation Measure BIO-2a is required for treatment activities, the project proponent would contact CDFW to seek technical input on the determination that habitat function would be maintained for bald eagle, great gray owl, and tricolored blackbird. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Monarch

Monarch is a candidate for listing under ESA, and as such, currently does not have protection under ESA and is considered an "other special-status species" in the CalVTP PEIR. There are several documented observations of milkweed (*Asclepias* spp.) and one observation of an adult monarch within and adjacent to the project area (Xerces Society et al. 2022). It is likely that there are additional undocumented occurrences of both milkweed and monarchs in the project area. The project area is outside of the monarch overwintering range; however, it is within the breeding and foraging range and contains various natural habitats and floral resources that likely provide foraging or breeding habitat suitable for the species. Treatment activities, including prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and herbicide application could result in temporary removal of floral resources, including monarch host plants (i.e., milkweed), or direct mortality of monarch butterflies. The potential for treatment activities to result in adverse effects on monarch butterflies was examined in the PEIR.

Implementation of treatments would not result in removal of overwintering habitat, because the project is outside of the overwintering range of monarch. Treatments would occur in habitat that may provide foraging or breeding habitat (i.e., milkweed) for monarchs. During the foraging and breeding season, monarchs are typically found in prairies, meadows, grasslands, and along roadsides (NPS 2017). In the project area, the most suitable foraging and breeding habitat for monarchs would be grasslands, which comprise approximately 8 percent of the total project area (Table 4.5-1). Common California milkweed species are not limited to grasslands, and can also occur in riparian areas, wetlands, open woodlands, and openings in forests. Treatments within riparian areas and wetlands would be avoided or limited pursuant to SPR HYD-4, SPR BIO-4, and Mitigation Measure BIO-4, and milkweed would not be targeted for treatments in these habitats. Further, most woodland and forest habitat in the project area does not contain openings or significant light infiltration due to the dense, overstocked nature of these habitats; thus, high quality habitat for milkweed is not likely present in woodlands or forests in the project area.

Treatment activities implemented within grassland habitat would be prescribed burning and prescribed herbivory (Table 2-1). After prescribed burning in meadows located in the foothills of Butte County where purple milkweed (*Asclepias cordifolia*), showy milkweed (*Asclepias speciosa*), and narrow-leaved milkweed (*Asclepias fascicularis*) were present, populations of milkweed species have either increased or been maintained (Hankins, pers. comm., 2022). In Spring of 2022 a monarch larva was observed on purple milkweed in an area that was burned in Fall of 2021 (Hankins, pers. comm., 2022). Purple milkweed, showy milkweed, and narrow-leaved milkweed are all present in Amador County. Further, because milkweed has light, wind-blown seeds, deep rhizomes, and early successional status, showy milkweed has adaptations that typically promote fire survivorship and establishment in early postfire communities where milkweed populations are present near burned areas (Ulev 2005). The Xerces Society for Invertebrate Conservation has identified regionally appropriate monarch breeding habitat management windows to avoid impacts on monarch eggs and larvae (Xerces Society 2019). The window identified for the Sierra Nevada foothill region during which management activities (e.g., mechanical treatments, prescribed burning) are recommended is September 30–June 1 (Xerces Society 2019). Prescribed burning activities under the proposed project would occur from late fall through May, which is entirely within this recommended window,

Removal of milkweed would not be targeted during prescribed herbivory treatments and livestock may avoid eating milkweed because the plants are unpalatable and contain glycosides that are toxic to cattle, goats, and sheep (Hall et al. 2020). Therefore, direct loss of monarch eggs or larvae during prescribed herbivory treatments would be limited. Because treatments would not target and are not expected to remove significant amounts of milkweed plants; prescribed burning would occur within the recommended window to avoid impacts on monarch eggs and larvae; and treatments may maintain grassland habitats or improve habitat for milkweed species in grasslands, woodlands, and forests; project implementation would not substantially reduce the number or restrict the range of monarch butterflies and impacts on this species would be less than significant.

Habitat function for monarch would be maintained because treatment activities and maintenance treatments would not target monarch host plants and because all habitat suitable for monarch in the project area would not be treated at once (i.e., treatments in the project area would occur over the course of several years). Prescribed fire and prescribed herbivory would also reduce encroachment of woody species and maintain grassland areas where this encroachment is occurring, potentially maintaining grassland foraging and breeding habitat for monarchs. This

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

American Badger

Habitat potentially suitable for American badger is present within grassland and open woodland in the project area. Mechanical treatments and prescribed burning could result in direct loss of active dens and potential loss of young, if present in project area. Manual treatments, prescribed herbivory, and herbicide application treatments are not expected to result in adverse effects on American badger dens. Personnel implementing manual treatments and herbicide application treatments would conduct these activities on foot, and the likelihood of a den being inadvertently crushed or otherwise destroyed would be very low. Additionally, the likelihood of a badger den being crushed by livestock would be low due to the size and depth of the burrows and American badgers frequently burrow within rangelands where cattle are present. The potential for treatment activities to result in adverse effects on American badger was examined in the PEIR.

Per SPR BIO-1, if it is determined that adverse effects on American badger can be clearly avoided by conducting treatments outside of the season of sensitivity or physically avoiding habitat for these species, then mitigation would not be required. However, because American badgers may use a den year-round, and because focused surveys for American badgers have not been conducted, implementation of SPR BIO-10 would be required before mechanical treatments and prescribed burning. Under SPR BIO-10, focused surveys would be conducted for American badger dens within habitat suitable for the species (i.e., grasslands, open woodland) by a qualified RPF or biologist. If American badger dens are not detected during focused surveys, then further mitigation for the species would not be required. If American badger dens are detected during focused surveys, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, a no-disturbance buffer would be established around the den, the size of which would be determined by the qualified RPF or biologist, and no treatment activities would occur within this buffer.

Habitat function for American badger would be maintained because habitat suitable for the species (i.e., grasslands, open woodlands) would be maintained and additional open woodland habitat would likely be restored through thinning and removal of ladder fuels. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Ringtail

Ringtail is primarily nocturnal and typically occurs in riparian areas, forests (including stands of various ages), and shrub habitats. Potential denning habitat includes rock outcrops, crevices, snags, large hardwoods, large conifers, and shrubs. Most of these habitats would be avoided, as live trees (i.e., conifers, hardwoods) larger than 12 inches dbh would not be removed during treatment or maintenance activities, and because rocky areas would not be targeted for vegetation treatment; however, shrubs would be targeted for treatment and would not be avoided through implementation of other measures. The potential for treatment activities, including maintenance treatments, to result in adverse effects on ringtail was examined in the PEIR.

Per SPR BIO-1, if it is determined that adverse effects on ringtail can be clearly avoided by conducting treatments outside of the season of sensitivity (i.e., maternity season), then mitigation would not be required. Outside of the breeding season, resting ringtails would likely flee due to the presence of equipment, vehicles, or personnel, and injury or mortality would not be expected. Manual treatments, prescribed herbivory, and herbicide application treatments are not expected to result in adverse effects on ringtail dens because personnel would conduct these activities on foot, prescribed herbivory would be implemented in areas not likely to be occupied by ringtails (e.g., outside of riparian habitat and forest habitat) and the likelihood of a den being inadvertently crushed or otherwise destroyed would be very low. However, mechanical treatments and prescribed burning conducted during the ringtail maternity season (i.e., the period during which young would be present in a den, approximately April 15–June 30) could result in destruction of active dens within dense shrub habitat or disturbance to active dens potentially resulting in abandonment and loss of young, which may not yet be capable of fleeing. Adverse effects on ringtail would be clearly avoided for mechanical treatments and prescribed burning that would occur outside of the ringtail maternity season (April 15–June 30) under SPR BIO-1.

If conducting some mechanical treatments and prescribed burning outside of the ringtail maternity season is determined to be infeasible for certain treatments, then SPR BIO-10 would apply, and presence of ringtail would be assumed, or focused surveys for ringtail would be conducted within the treatment area before implementation of treatment activities. Surveys for ringtail would include the use of trail cameras, track plates, and other non-invasive survey methods to determine whether ringtails are present within the treatment area and would be conducted by a qualified RPF or biologist. If baited trail cameras are used, the qualified professionals should obtain a valid CDFW Scientific Collecting Permit before using bait. If focused surveys are conducted, and ringtails are not detected, then further mitigation for the species would not be required. If ringtails are detected during focused surveys, then additional surveys would be required to determine whether an active ringtail den is present within the treatment area. If an active den is identified by a qualified RPF or biologist, Mitigation Measure BIO-2a would be implemented. Under Mitigation Measure BIO-2a, a no-disturbance buffer would be established around the den, the size of which would be determined through consultation with CDFW. No treatment activities would occur within this buffer.

If the presence of ringtail within the treatment area is assumed, then implementation of avoidance and minimization measures would be required pursuant to Mitigation Measure BIO-2a before and during implementation of mechanical treatments and prescribed burning between April 15 and June 30. Avoidance and minimization measures would include but not be limited to pre-treatment den surveys, daily sweeps of the treatment area, and biological monitoring.

Habitat function for ringtail would be maintained because treatment activities and maintenance treatments would not result in removal of trees (i.e., conifers, hardwoods) greater than 12 inches dbh, and would retain three to five large snags per acre, where present, which would be the most likely features to be used by this species due to the cover provided by larger trees. Additionally, rocky areas would not be targeted for vegetation treatment. Pursuant to Mitigation Measure BIO-2a, the final determination for habitat function maintenance must be made by the project proponent in consultation with CDFW. Therefore, if Mitigation Measure BIO-2a is required for treatment activities, the project proponent would contact CDFW to seek technical input on the determination that habitat function would be maintained for ringtail and input on their proposed measures to avoid injury to or mortality of this species. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Special-Status Bats

Habitat potentially suitable for three special-status bat species—pallid bat, Townsend's big-eared bat, and western red bat—is present within forest habitat, rocky areas, and human-made structures (e.g., barns, bridges) in the project area. Per SPR BIO-1, if it is determined that adverse effects on special-status bats would be clearly avoided by conducting treatments outside of the season of sensitivity (i.e., maternity season), then mitigation would not be required. Adverse effects on special-status bat maternity roosts would be clearly avoided if initial and maintenance treatments were implemented outside of the bat maternity season (April 1–August 31; Caltrans 2004).

Treatment activities, including mechanical treatments, manual treatments, and prescribed burning conducted within habitat suitable for bats during the bat maternity season (April 1–August 31) could disturb active bat roosts from auditory and visual stimuli (e.g., heavy equipment, chainsaws, vehicles, personnel) or smoke (e.g., prescribed burning) potentially resulting in abandonment of the roost and loss of young. Herbicide application that would occur away from established roads would be limited to ground-based methods, such as using a backpack sprayer or painting herbicide onto cut stems and would be conducted by crews of 1-5 people; thus, these treatments would not be expected to result in substantial disturbance to special-status bat roosts. Prescribed herbivory would be a relatively low-impact treatment activity that would not result in loud noise or smoke; thus, these treatments would not be expected to result in substantial disturbance to special-status bats. The potential for treatment activities to result in adverse effects on special-status bats was examined in the PEIR.

If implementation of some mechanical or manual treatments, or prescribed burning would occur during the bat maternity season, then SPR BIO-10 would apply, and focused surveys for these species would be conducted by a qualified RPF or biologist within suitable habitat areas before initiation of manual, mechanical, and prescribed burning treatments. If special-status bat roosts are identified during focused surveys, Mitigation Measure BIO-2b for

special-status bats would be implemented. Under Mitigation Measure BIO-2b, a no-disturbance buffer of 250 feet would be established around active pallid bat, Townsend's big-eared bat, and western red bat roosts and mechanical treatments, manual treatments, and prescribed burning would not occur within this buffer. A no-disturbance buffer of 250 feet is necessary to protect sensitive roosts to provide adequate protection such that impacts would be less than significant under CEQA.

Habitat function for special-status bats would be maintained because treatment activities and maintenance treatments would not result in removal of trees (i.e., conifers, hardwoods) greater than 12 inches dbh, and would retain three to five large snags per acre, where present, which would be the most likely features to be used by this species. Further, bat foraging habitat, including meadows and open water, would not be modified during treatments and thus would be retained in the project area. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Conclusion

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

As described above under Section 1.1.3, "Purpose of the PSA/Addendum," Amador RCD proposes to include water drafting, which was not covered as an activity in the CalVTP Program EIR, and revise Mitigation Measure BIO-4 to allow water drafting for livestock watering. This constitutes a change to the program description as analyzed in the PEIR.

Sources from which water could be drafted would be limited to those that do not provide habitat suitable for California red-legged frog breeding as determined by a qualified RPF or biologist. The project proponent would implement SPRs and mitigation measures to reduce impacts on special-status wildlife potentially present in stock ponds and the Amador Canal (i.e., California red-legged frog and western pond turtle [Table 4.5-2]).

As described above for California red-legged frog and western pond turtle, water drafting (and proposed revisions to Mitigation Measure BIO-4 to allow for this activity to occur), specifically from existing concrete stock ponds, earthen stock ponds, and the Amador Canal may occur. Sources from which water could be drafted would be limited to those that do not provide habitat suitable for California red-legged frog breeding as determined by a qualified RPF or biologist. Water drafting would not result in a substantially more severe significant effect on special-status wildlife than what was covered in the PEIR and the impact would be maintained at less than significant with mitigation, consistent with the impact significance determination in the PEIR.

Biological resource SPRs that apply to project impacts under Impact BIO-2 are SPR BIO-1, SPR BIO-2, SPR BIO-5, SPR BIO-9, SPR BIO-10, SPR GEO-1, SPR HYD-3, and SPR HYD-4. Biological resource mitigation measures that apply to project impacts under Impact BIO-2 are Mitigation Measure BIO-2a, Mitigation Measure BIO-2b, and Mitigation Measure BIO-2c. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-3

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on sensitive habitats, including designated sensitive natural communities. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities are

proposed; however, retreatment at too great a frequency could result in additional adverse effects. The potential for treatment activities, including maintenance treatments, to adversely affect sensitive habitats was examined in the PEIR.

Based on species ranges, occurrence data, vegetation mapping, aerial photos, and the reconnaissance-level survey conducted pursuant to SPR BIO-1, the following sensitive habitats (as identified in Manual of California Vegetation, and CalVTP PEIR) are not anticipated to occur within the treatment area: bigcone Douglas fir forest, Washoe pine woodland, red osier thicket, shining willow groves, wild grape shrubland, cup leaf ceanothus chaparral, monolopia – leafy-stemmed tickseed field, Fremont's goldfields – salt grass alkaline vernal pool, tar plant field, goldenaster patch, monolopia – leafy-stemmed tickseed field.

Twenty-six sensitive natural communities (i.e., natural communities with a rarity rank of S1, S2, or S3) may be present in the project area. The sensitive natural communities, the associated rarity rank, and the habitat type within which the communities may occur are presented in Table 4.5-3. In addition, several oak woodland and forest types (i.e., blue oak, interior live oak, canyon live oak, and valley oak), which are sensitive habitats pursuant to the Oak Woodlands Conservation Act and PRC Section 21083.4, may occur in the project area.

Table 4.5-3 Sensitive Natural Communities Documented or with Potential to Occur in the Project Area

Sensitive Natural Community[1]	Rarity Rank[2]	CWHR Habitat Type
Bigleaf maple forest	S3	Douglas Fir
Douglas fir - tanoak forest	S3	Douglas Fir
Incense cedar forest	S3	Sierran Mixed Conifer
Giant sequoia forest	S3.2	Sierran Mixed Conifer
California buckeye grove	S3	Montane Hardwood
Tanoak forest	S3.2	Montane Hardwood
Bigleaf maple forest	S3	Montane Hardwood
Bigleaf maple forest	S3	Montane Hardwood-Conifer
Torrent sedge patch	S3	Valley Foothill Riparian
Button willow thicket	S2	Valley Foothill Riparian
California sycamore woodland	S3	Valley Foothill Riparian
Fremont cottonwood forest	S3.2	Valley Foothill Riparian
Black cottonwood forest	S3	Valley Foothill Riparian
Red willow thicket	S3	Valley Foothill Riparian
California rose briar patch	S3	Valley Foothill Riparian
Valley oak woodland	S3	Valley Oak Woodland
Valley oak riparian woodland	S3	Valley Oak Woodland
Ione chaparral	S1	Mixed Chaparral
Oak gooseberry thicket	S2?	Mixed Chaparral
Hoary, common, and Stanford manzanita chaparral	S3	Mixed Chaparral
Needle spike rush stand	S2	Annual Grassland
Fremont's goldfields - Downingia vernal pools	S2	Annual Grassland
Smooth goldfields vernal pool bottom	S2	Annual Grassland
Fremont's tidy-tips - blow wives vernal pool	S3?	Annual Grassland
Water blinks - annual checkerbloom vernal pool	S2	Annual Grassland
White-tip clover swales	S3?	Annual Grassland

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

[2] Older ranks, which need to be updated by CDFW, may still contain a decimal "threat" rank of .1, .2, or .3, where .1 indicates very threatened status, .2 indicates moderate threat, and .3 indicates few or no current known threats. A question mark (?) denotes an inexact numeric rank because there are insufficient samples over the full expected range of the type, but existing information points to this rank.

Source: Sawyer et al. 2009; Compiled by Ascent Environmental in 2022.

During the reconnaissance-level survey conducted pursuant to SPR BIO-1, several species associated with these sensitive natural communities were observed, including bigleaf maple (*Acer macrophyllum*), incense cedar (*Calocedrus decurrens*), California buckeye (*Aesculus californica*), Fremont cottonwood (*Populus fremontii*), manzanita (*Arctostaphylos* spp.), and valley oak (*Quercus lobata*). While not all the dominant species associated with sensitive natural communities included in Table 4.5-3 were observed during the reconnaissance-level survey, these communities may be present because the entire project area was not surveyed during the reconnaissance-level surveys, and habitat potentially suitable for additional sensitive natural communities is present in the project area. As a result, prior to implementation of treatment activities, SPR BIO-3 would be implemented and a qualified RPF or biologist would identify sensitive natural communities in the treatment area to the alliance level pursuant to *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018b).

Riparian habitat is present within the project area adjacent to streams and ponds. Under SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented for prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and herbicide application, which would limit the extent of treatment activities within riparian habitat. While these SPRs would reduce potential impacts on riparian habitat, the extent of riparian habitat within the project area has not been mapped and riparian habitat may be present outside of the areas encompassed within WLPZs. As a result, prior to implementation of treatment activities, SPR BIO-3 would be implemented to identify and map the extent of riparian habitat within a treatment area. As required under SPR BIO-4, treatments in riparian habitats would retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation; any treatment in riparian habitat would be limited to removal of uncharacteristic or undesired fuel loads (e.g., dead or dying vegetation, invasive plants). Additionally, prior to any treatments in riparian habitat or before drafting water from the Amador Canal, the project proponent would notify CDFW pursuant to California Fish and Game Code Section 1602, when required.

As described above, mixed chaparral habitat is present within the project area. As required by SPR BIO-5, treatments implemented in chaparral would be designed to avoid type conversion of chaparral vegetation and to maintain chaparral habitat function. This would include identifying the chaparral vegetation types to the alliance level, determining appropriate treatment prescriptions based on current fire return interval departure and condition class of the chaparral vegetation alliance on-site, retaining at least 35 percent relative final density of mature chaparral vegetation, and retaining a mix of middle to older aged shrubs to maintain heterogeneity. The project proponent would demonstrate with substantial evidence that the habitat function of the specific chaparral vegetation types (i.e., alliances) present would be maintained or enhanced by the treatments applied. Ecological restoration treatments would not be implemented in stands of chaparral vegetation that are within their natural fire return interval unless the project proponent demonstrates with substantial evidence that the habitat function of the chaparral vegetation alliances would be improved. Some maintenance activities such as hazardous tree removal and invasive species removal may occur more frequently than the fire return interval. Ione manzanita chaparral is also a S1 ranked sensitive natural community dominated by the federally threatened Ione manzanita (*Arctostaphylos myrtifolia*). Although the project area is outside the extent of the Ione formation, which is where USFWS determined the extent of the species to be in 2010, a documented occurrence was recorded in 2015 south of the project area and east-northeast of the Ione formation (USFWS 2010; CNDDB 2022). Therefore, this sensitive natural community is included in this analysis.

The project proponent would avoid impacts on sensitive natural communities and oak woodlands by avoiding treatments in these communities. However, if avoiding treatment activities within identified sensitive natural communities or oak woodlands would preclude achieving treatment objectives, then Mitigation Measure BIO-3a would apply in these areas to ensure that the characteristics which qualify the communities as sensitive (e.g., dominant canopy species, canopy relative percentage of dominant species, species composition) are retained post-

treatment to the extent feasible. Under Mitigation Measure BIO-3a, a qualified RPF or biologist would determine the natural fire regime, condition class, and fire return interval for each sensitive natural community and oak woodland type. Initial and maintenance treatment activities in sensitive natural communities and oak woodlands would be designed to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function. If habitat function of sensitive natural communities or oak woodlands would not be maintained through implementation of Mitigation Measure BIO-3a, then Mitigation Measure BIO-3b and Mitigation Measure BIO-3c would apply, and unavoidable losses of these resources would be compensated through restoration or preservation of these vegetation types within or outside of the project area.

Treatment within Ione manzanita chaparral would require a treatment design that includes prescribed burning at appropriate intervals as required under Mitigation Measure BIO-3a. Ione manzanita requires periodic fire to induce regeneration from seeds and maintain species composition (Sawyer et al. 2009). If the interval between fire events is too long, it can lead to declining shrub health, tree encroachment, and reduced seed banks that can eventually convert these shrublands to tree-dominated communities (Sawyer et al. 2009). Fires, or other disturbances or treatments, at too frequent intervals (generally more frequently than every 30 years) can convert this community to grassland. Because this community is dominated by a species that is listed as threatened under ESA, consultation with USFWS would be required before any treatment is implemented in Ione manzanita chaparral and a treatment plan for this community type that demonstrates how ecological function would be maintained or improved for Ione manzanita likely would be required as part of ESA consultation.

The potential for treatment activities to result in adverse effects on sensitive habitats, as described above, was examined in the PEIR. This impact on sensitive habitats is within the scope of the PEIR, because, within the project area boundary, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and intensity of disturbance as a result of implementing treatment activities would be consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental conditions outside the treatable landscape in the project area are essentially the same as those within the treatable landscape; therefore, the potential impact on sensitive habitats is also the same. Biological resource SPRs that apply to project impacts under Impact BIO-3 are SPRs BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-9, GEO-1, GEO-3, GEO-4, GEO-5, GEO-7, HAZ-5, HAZ-6, HYD-3, HYD-4, and HYD-5. Biological resource mitigation measures that apply to project impacts under Impact BIO-3 are Mitigation Measure BIO-3a, Mitigation Measure BIO-3b, and Mitigation Measure BIO-3c. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-4

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on state or federally protected wetlands. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities are proposed. The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the PEIR.

During the reconnaissance-level survey conducted pursuant to SPR BIO-1, many different types of aquatic habitat were observed, including Jackson Creek, Amador Canal, and a freshwater pond. Seasonal wetlands and meadows were also observed during the survey. CAL FIRE's FRAP vegetation data for the project area includes 0.9 acres of lacustrine habitat (i.e., reservoirs, lakes, ponds), 20.9 acres of valley foothill riparian habitat, and 1.9 acres of fresh emergent wetland habitat (Table 4.5-1). The National Wetlands Inventory classifies the project area as having approximately 45.8 acres riverine habitat, 3.0 acres freshwater pond, 6.1 acres freshwater forested/shrub wetland, and 7.2 acres freshwater emergent wetland (USFWS 2021). California Aquatic Resources Inventory classifies the project area as having approximately 7.5 miles of canal/ditch (e.g., Amador Canal), 6.4 miles of intermittent stream/river (e.g., South Fork Jackson Creek), and 3.7 miles perennial stream/river (e.g., Jackson Creek) (SFEI Aquatic Science Center 2017).

Pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams would be implemented, and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV streams within the project area for prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and herbicide application. Establishment of WLPZs would result in avoidance of stream and pond habitat for prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and herbicide application.

Additional wetlands may be present throughout the project area that have not been identified or mapped as well as ponds smaller than 1 acre (i.e., not considered a lake under Forest Practice Rules), seasonal wetlands, springs, and seeps. Mitigation Measure BIO-4 would apply to all treatment activities, and a qualified RPF or biologist would delineate the boundaries of these features; establish an appropriate buffer (with a minimum of 25 feet) around seasonal wetlands, springs, and seeps; and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). A larger buffer may be required if wetlands or other aquatic habitats contain habitat potentially suitable for special-status plants or special-status wildlife (e.g., California red-legged frog, foothill yellow-legged frog, western pond turtle; see Impact BIO-2).

The potential for treatment activities to adversely affect state or federally protected wetlands was examined in the PEIR. This impact on wetlands is within the scope of the PEIR, because, within the project area boundary, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and intensity of disturbance as a result of implementing treatment activities would be consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, because the existing environmental conditions outside the treatable landscape in the project area are essentially the same as those within the treatable landscape, the potential impact on wetlands is also the same.

As described above under Section 1.1.3, "Purpose of the PSA/Addendum," Amador RCD proposes to include water drafting, which was not covered as an activity in the CalVTP Program EIR, and revise Mitigation Measure BIO-4 to allow water drafting from existing concrete stock ponds, earthen stock ponds and the Amador Canal for livestock watering. Sources from which water could be drafted would be limited to those that do not provide habitat suitable for California red-legged frog breeding as determined by a qualified RPF or biologist. This constitutes a change to the program description as analyzed in the PEIR.

which would require revising As presented in the PEIR, Mitigation Measure BIO-4 prohibits prescribed herbivory or equipment and vehicle access or staging within buffers surrounding state or federally protected wetlands. As described under Section 1.1.3, Amador RCD proposes to revise requirements under Mitigation Measure BIO-4 to allow the use of non-ground-disturbing equipment within these buffers to support water drafting for prescribed herbivory activities Without this revision to Mitigation Measure BIO-4, the use of on-site water sources for prescribed herbivory would not be allowed, which would make the implementation of this activity infeasible at the proposed scale of treatment, and project objectives could not be achieved. See Section 2.1.2, "Treatment Activities," for more information regarding proposed water drafting activities.

the project proponent would implement SPRs and mitigation measures to reduce impacts to state and federally protected wetlands, which may include stock ponds in the project area and the Amador Canal. Wetland buffers required under Mitigation Measure BIO-4 as presented in the Program EIR are intended to prevent direct and indirect impacts on wetlands including fill, disruption of hydrology, adverse effects on water quality, and removal of wetland vegetation. As described under "Water Drafting for Prescribed Herbivory," in Section 1.1.3, proposed water drafting and associated revisions to Mitigation Measure BIO-4 would not result in effects on downstream flow or removal of riparian vegetation. Further, equipment use associated with water drafting within wetland buffers would be limited to non-ground-disturbing. Therefore, these proposed revisions would not result in fill, disruption of hydrology, adverse effects on water quality, or removal of wetland vegetation; this impact would be maintained at less than significant with mitigation, consistent with the impact significance determination in the PEIR.

Biological resource SPRs that apply to project impacts under Impact BIO-4 are SPRs BIO-1, BIO-2, BIO-3, BIO-9, GEO-1, GEO-3, GEO-4, GEO-5, GEO-6, GEO-7, HAZ-5, HAZ-6, HYD-1, HYD-3, HYD-4, and HYD-5. The biological resource mitigation measure that applies to project impacts under Impact BIO-4 is Mitigation Measure BIO-4. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-5

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on wildlife movement corridors and nurseries. Potential impacts resulting from maintenance activities would be similar to those resulting from initial vegetation treatments because the same treatment activities are proposed. The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the PEIR.

Based on review and survey of project-specific biological resources (SPR BIO-1), mapped essential connectivity areas are present throughout the project area connecting natural habitats north, south, east, and west of the project area (CDFW 2022). Mapped natural landscape blocks are present north, south, and west of the project area (CDFW 2022).

Many treatments would occur near existing roads and residences. The size and traffic level of the roads and level of development within residential areas varies; however, these areas generally are subject to ongoing disturbances (e.g., vehicle traffic, human activity) and some level of wildlife habitat fragmentation due to previous urban, residential, and agricultural development of the region. While habitat directly adjacent to development would not be considered optimal habitat, wildlife may move through these areas, or use some habitats for cover or as nursery sites, especially in relatively undeveloped areas.

Pursuant to SPR HYD-4, a WLPZ of 50 to 150 feet adjacent to all Class I and Class II streams and lakes would be implemented, which would limit the extent of treatment activities within riparian habitat (e.g., no mechanical treatment, retention of at least 75 percent surface cover) that would likely function as a wildlife movement corridor. SPR BIO-12 would be implemented for treatments that would occur during the nesting bird season and would result in identification and avoidance of any common bird nursery sites (e.g., heron rookeries, egret rookeries). Trees (e.g., conifers, hardwoods) larger than 12 inches would be retained and pursuant to SPRs BIO-3, BIO-4, and BIO-5, treatments in sensitive natural communities, riparian habitat, and chaparral habitat, respectively, would be designed to maintain habitat function of these communities. SPR BIO-11 would require all temporary fencing associated with prescribed herbivory treatments to be wildlife-friendly, such that the chance of wildlife entanglement would be minimized. Additionally, implementation of proposed treatments would not result in any conversion of land cover or create permanent new barriers to wildlife movements within (locally) or across (regionally) the project area. With implementation of SPRs, habitat function within the project area would be maintained and there would not be a substantial change in the existing conditions that facilitate wildlife movement in the project area.

If during surveys conducted pursuant to SPR BIO-10 wildlife nursery sites (e.g., heron rookeries, deer fawning areas, common bat roosts) are detected, Mitigation Measure BIO-5 would apply to all treatment activities and a no-disturbance buffer would be established around these features, the size of which would be determined by a qualified biologist or RPF.

The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the PEIR. This impact is within the scope of the PEIR, because, within the project area boundary, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, because the existing environmental conditions outside the treatable landscape in the project area are essentially the same as those within the treatable landscape, as described above, the potential impact on wildlife movement corridors is also the same. Biological resource SPRs that apply to project impacts under Impact BIO-5 are SPR BIO-1, SPR BIO-2, SPR BIO-3, SPR BIO-4, SPR BIO-5, SPR BIO-11, and SPR HYD-4. The biological resource

mitigation measure that applies to project impacts under Impact BIO-5 is Mitigation Measure BIO-5. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-6

Initial treatment and maintenance treatments could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds, because nesting habitat suitable for birds is present throughout the project area. Treatment activities, including prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and herbicide application, conducted during the nesting bird season (February 1–August 31), could result in direct loss of active nests or disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chainsaws, vehicles, personnel, livestock) potentially resulting in abandonment and loss of eggs or chicks.

SPR BIO-12 would apply, and for treatments implemented during the nesting bird season, a survey for common nesting birds would be conducted within the project area by a qualified RPF or biologist before treatment activities. If no active bird nests are observed during focused surveys, then additional mitigation would not be required. If active nests of common birds or raptors are observed during focused surveys, disturbance to the nests would be avoided by establishing an appropriate buffer around the nests, modifying treatments to avoid disturbance to the nests, or deferring treatment until the nests are no longer active as determined by a qualified RPF or biologist.

The potential for treatment activities to result in adverse effects on these resources was examined in the PEIR. The potential for adverse effects on common wildlife, including nesting birds, is within the scope of the PEIR, because, within the project area boundary, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and extent of expected disturbance as a result of implementing treatment activities would be consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, because the existing environmental conditions outside the treatable landscape in the project area are essentially the same as those within the treatable landscape, as described above, the potential impact on common wildlife, including nesting birds is also the same. Biological resource SPRs that apply to project impacts under Impact BIO-6 are SPR BIO-1, SPR BIO-2, SPR BIO-3, SPR BIO-4, SPR BIO-5, and SPR BIO-12. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-7

The only applicable local ordinance relevant to biological resources is the Amador County Tree and Shrubbery Ordinance (Chapter 12.36, "Trees and Shrubbery"). The Amador County Tree and Shrubbery Ordinance states that when more than five trees or one hundred pounds of shrubbery is planned for removal, a notice of intention must be filed with the Amador County sheriff. The notice of intention would include the approximate number and quantity of trees/shrubbery to be cut, general description of land where work is to be completed, approximate dates of work, signature of person proposing to cut trees, and written consent by the landowner or authorized agent. The Amador RCD would acquire written permission from landowners participating in the project and submit a notice of intention with the sheriff of Amador County. Thus, implementation of treatment activities would not conflict with local ordinances.

The potential for treatment activities to conflict with local policies or ordinances was examined in the PEIR. The potential for the treatment project to conflict is within the scope of the PEIR because vegetation treatment projects implemented under the CalVTP that are subject to local policies or ordinances would be required to comply with any applicable county, city, or other local policies, ordinances, and permitting procedures related to protection of biological resources, per SPR AD-3. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the project area boundary, the existing regulatory conditions present in the areas outside the treatable landscape are essentially

the same as those within the treatable landscape; therefore, the potential for conflicts with local policies or ordinances is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT BIO-8

Implementation of the proposed vegetation treatment and maintenance treatments would not result in a conflict with adopted habitat conservation plans (HCP) or natural community conservation plans (NCCP), because the project area is not within the plan area of any adopted HCP or NCCP. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the project area boundary, the existing regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential for conflicts with an adopted HCP or NCCP is also the same. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW BIOLOGICAL RESOURCE IMPACTS

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to biological resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those considered in the PEIR. Amador RCD proposes to revise requirements of the CalVTP by drafting water from existing concrete stock ponds, earthen stock ponds, and the Amador Canal for livestock watering. Sources from which water could be drafted would be limited to those that do not provide habitat suitable for California red-legged frog breeding as determined by a qualified RPF or biologist. This constitutes a revision to the program analyzed in the PEIR. This would not result in a new impact related to biological resources because impacts to special-status species and jurisdictional wetlands and waters were analyzed in the PEIR.

No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and proposed revisions to the program at allow water drafting would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to biological resources would occur that is not covered in the PEIR.

4.6 GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

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

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

New Geology, Soils, Paleontology, and Mineral Resource Impacts: Would the treatment result in other impacts to geology, soils, paleontology, and mineral resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

The project area is located in the Sierra Nevada geomorphic province (CGS 2002). The Sierra Nevada province is characterized by high, rugged multiple scarps on the eastern side, where the high peaks are located, and gentle slopes that disappears under sediment that make up the Great Valley on the western side. The Sierra Nevada province formation occurred from an upfaulted, tilted block of the Earth's crust. This eastern side of the block tilted up and westward, making the high rugged peaks of the eastern Sierra Nevada. The western part of the Sierra Nevada range has a much gentler slope, allowing streams to flow slower which created massive alluvial fans that reach into the Central Valley.

The project area is located on the western slope in the Sierra Nevada Foothills and contains metasedimentary and granitic rocks. Soils throughout the project footprint are variable, and most are formed from metamorphic rock, schist, or slate. There are also some soils formed from alluvium as well as granite and metasedimentary rock. Ultramafic soils, including serpentine soils, are not mapped in the project area. Slopes are variable throughout the project area.

IMPACT GEO-1

Vegetation treatment would be ecological restoration through use of prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and herbicide application. These activities could result in varying levels of soil disturbance and have the potential to increase the rates of erosion and loss of topsoil. Mechanical treatments using heavy machinery are the most likely to cause soil disturbance that could lead to substantial erosion or loss of topsoil, especially in areas that contain steep slopes, or in areas that previously experienced fire. The potential for these treatment activities to cause substantial erosion or loss of topsoil was examined in the PEIR. These impacts are within the scope of the PEIR because the use and type of equipment, extent of vegetation removal, and intensity of proposed treatment activities (e.g., mechanical treatments, prescribed burning, prescribed herbivory) are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental conditions, such as soil characteristics, present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact related to soil erosion is also the same, as described above. SPRs applicable to this treatment project are GEO-1 through GEO-8, AQ-3, and AQ-4. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT GEO-2

Treatment activities would include prescribed burning, mechanical treatment, manual treatment, prescribed herbivory, and herbicide application. No areas with known landslide activity are identified within the project area (USGS 2022). However, given the variable topography in some portions of the project area, some steep terrain, and wet winter conditions, there is the potential for landslides in the project area. The potential for treatment activities to increase landslide risk was examined in the PEIR. This impact is within the scope of the PEIR because the extent of vegetation removal, intensity of treatment areas, and characteristics of the geographical terrain are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the range of slopes and landslide conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the potential impact related to landslide risk is also the same, as described above. SPRs applicable to the proposed project are GEO-1, GEO-3, GEO-4, GEO-7, GEO-8, and AQ-3. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.7.1, "Environmental Setting," and Section 3.7.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to geology and soils that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to geology, soils, paleontology, or mineral resources would occur that is not covered in the PEIR.

4.7 GREENHOUSE GAS EMISSIONS

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact within the Scope of the PEIR?
Would the project:								
Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs	LTS	Impact GHG-1, pp. 3.8-10 – 3.8-11	Yes	None	NA	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	SU	Impact GHG-2, pp. 3.8-11 – 3.8-17	Yes	AQ-3	GHG-2	SU	No	Yes

Notes: LTS = less than significant; SU = significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the PEIR for this impact; None = there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New GHG Emissions Impacts: Would the treatment result in other impacts to GHG emissions that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT GHG-1

Use of vehicles and mechanical equipment and prescribed burning during initial and maintenance treatments would result in greenhouse gas (GHG) emissions. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the PEIR. This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment, duration of use, duration of prescribed burning, and resultant GHG emissions, are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the same plans, policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape, as well as areas within the treatable landscape; therefore, the GHG impact is also the same, as described above. SPR GHG-1 is not applicable to the proposed project; the Amador RCD is not subject to the requirement to provide information to inform reporting under the Board of Forestry and Fire Protection's Assembly Bill 1504 Carbon Inventory Process because this project is not a registered offset project. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT GHG-2

Use of vehicles and mechanical equipment and prescribed burning during initial and maintenance treatments would result in GHG emissions. The potential for treatments under the CalVTP to generate GHG emissions was examined in the PEIR. This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions related to wildfire are consistent with those analyzed in the PEIR. Mitigation Measure GHG-2 would be implemented and would reduce GHG emissions associated with prescribed burning. However, emissions generated by the treatment would still contribute to the annual emissions generated by the CalVTP, and this impact would remain significant and unavoidable, consistent with, and for the same reasons described in, the PEIR. SPR AQ-3 is also applicable to this treatment and would contain the description of feasible GHG reduction techniques implemented per Mitigation Measure GHG-2. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the climate conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the GHG impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW IMPACTS RELATED TO GHG EMISSIONS

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

4.8 ENERGY RESOURCES

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

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

New Energy Resource Impacts: Would the treatment result in other impacts to energy resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT ENG-1

Use of vehicles and mechanical and some manual (e.g., chainsaws) equipment during initial treatment and treatment maintenance activities would result in the consumption of energy through the use of fossil fuels. The use of fossil fuels for equipment and vehicles was examined in the PEIR. The consumption of energy during implementation of the treatment project is within the scope of the PEIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing energy consumption is essentially the same within and outside the treatable landscape; therefore, the energy impact is also the same, as described above. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

NEW ENERGY RESOURCE IMPACTS

The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.9.1, "Regulatory Setting," and Section 3.9.2, "Environmental Setting," in Volume II of the Final PEIR). Including land outside the treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those considered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to energy resources would occur.

4.9 HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

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

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

New Hazardous Materials, Public Health and Safety Impacts: Would the treatment result in other impacts related to hazardous materials, public health and safety that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT HAZ-1

Initial and maintenance treatments would include mechanical treatments, manual treatments, and prescribed burning. These treatment activities would require the use of fuels and related accelerants, which are hazardous materials. The potential for treatment activities to cause a significant health hazard from the use of hazardous materials was examined in the PEIR. This impact is within the scope of the PEIR because the types of treatments and associated equipment and types of hazardous materials that would be used are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the exposure potential and regulatory conditions are essentially the same within and outside the treatable landscape; therefore, the hazard material impact is also the

same, as described above. SPR HAZ-1 is applicable to this treatment. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT HAZ-2

Initial and maintenance treatments would include the application of herbicides using ground-based methods, such as using a backpack sprayer or painting herbicide onto cut stems. No aerial spraying of herbicides would occur. The potential for treatment activities to cause a significant health hazard from the use of herbicides was examined in the PEIR. This impact is within the scope of the PEIR because the specific herbicides (e.g., clopyralid, glyphosate, triclopyr, imazapyr) and application methods that would be used are consistent with those analyzed in the PEIR. In addition, herbicides would be applied by licensed applicators in compliance with applicable laws, regulations, and herbicide label instructions, consistent with herbicide use described in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the exposure potential is essentially the same within and outside the treatable landscape; therefore, the hazardous materials impact is also the same, as described above. SPRs HAZ-5 through HAZ-9 are applicable to this treatment. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT HAZ-3

Initial and maintenance treatments would include soil disturbance and prescribed burning, which could expose workers or the environment to hazardous materials if a contaminated site is present within the project area. The potential for workers implementing treatment activities to encounter contamination that could expose them or the environment to hazardous materials was examined in the PEIR. This impact was identified as potentially significant in the PEIR because hazardous materials sites could be present within treatment sites, and soil disturbance or burning in those areas could expose people or the environment to hazards. As directed by Mitigation Measure HAZ-3, database searches for hazardous materials sites within the project area have been conducted, and no hazardous materials sites were identified within 0.25 mile of the project area (DTSC 2022; CalEPA 2022; SWRCB 2022) (Attachment C). Therefore, this impact would be less than significant. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the potential to encounter hazardous materials and the regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the hazardous materials impact is also the same, as described above. No SPRs are applicable to this impact, and no additional mitigation is required. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.10.1, "Environmental Setting," and Section 3.10.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to hazardous materials that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to hazardous materials, public health, or safety would occur.

4.10 HYDROLOGY AND WATER QUALITY

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

Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact within the Scope of the PEIR?
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-31	Yes	HYD-2 HYD-4 HYD-6 GEO-1 GEO-2 GEO-4 GEO-5 GEO-7	NA	LTS	No	Yes

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

New Hydrology and Water Quality Impacts: Would the treatment result in other impacts to hydrology and water quality that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

The project area is within the San Joaquin River hydrologic region and within the Upper Jackson Creek watershed. Hydrologic features in the project vicinity are Sutter Creek, Grass Valley Creek, Mokelumne River, Upper and Lower Standard Canal, and Lake Tabeaud. Amador Canal, Jackson Creek, and the South Fork Jackson Creek flow through the project area. Jackson Creek flows into Lake Amador, which is southwest of Jackson. Slopes within the project area drain into Amador Canal, Jackson Creek, and South Fork Jackson Creek.

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

IMPACT HYD-1

Initial and maintenance treatments would include prescribed burning. Ash and debris from treatment areas could be washed by runoff into adjacent drainages and streams. Although most treatment areas would avoid streams and watercourses, WLPZs ranging from 50 to 150 feet would be implemented for Class I and Class II streams that are within treatment areas pursuant to SPR HYD-4. The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR because the parameters of broadcast burns (i.e., low intensity) and pile burning are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the

project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from prescribed burning is also the same, as described above. SPRs applicable to this treatment are HYD-1, HYD-4, HYD-6, BIO-4, GEO-4, GEO-6, and AQ-3. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT HYD-2

Initial treatment would include mechanical and manual treatments. Although most treatment areas would avoid streams and watercourses, WLPZs ranging from 50 to 150 feet would be implemented for any Class I or Class II watercourses and WLPZs of sufficient size to avoid degradation of downstream beneficial uses of water would be established adjacent to all Class III and Class IV (e.g., drainage canals, irrigation ditches) streams that are within treatment areas pursuant to SPR HYD-4. The potential for mechanical and manual treatment activities to violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR because the use and type of equipment used during manual and mechanical treatments (e.g., tractors/skidders, masticators, chainsaws, hand saws, brush cutters), extent of vegetation removal, and intensity of proposed mechanical treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from manual and mechanical treatments is also the same, as described above. SPRs applicable to this treatment are HYD-1, HYD-2, HYD-4, HYD-6, GEO-1 through GEO-5, GEO-7, GEO-8, BIO-1, BIO-4, BIO-5, HAZ-1, and HAZ-5. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT HYD-3

Initial treatment would include prescribed herbivory. Environmentally sensitive areas such as Class I and II streams, ponds, wetlands, or riparian areas would be identified and livestock would be excluded from these areas during prescribed herbivory using temporary fencing or active herding; a buffer of approximately 50 feet would be maintained between sensitive and actively grazed areas as described in Section 2.1.2, "Treatment Activities," and required by SPR HYD-3. Additionally, WLPZs ranging from 50 to 150 feet would be implemented for any watercourses that are within treatment areas pursuant to SPR HYD-4. The potential for prescribed herbivory to violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR because the use of grazing animals (e.g., cattle, sheep, or goats) and the grazing intensity to manage and remove vegetation are consistent with those analyzed in the PEIR.

As described above under Section 1.1.3, "Purpose of the PSA/Addendum," Amador RCD proposes to revise requirements of the CalVTP by drafting water from existing concrete stock ponds, earthen stock ponds, and the Amador Canal for livestock watering for prescribed herbivory activities. Sources from which water could be drafted would be limited to those that do not provide habitat suitable for California red-legged frog breeding as determined by a qualified RPF or biologist. This constitutes a revision to the program description as analyzed in the PEIR.

The project proponent would implement SPRs and mitigation measures to prevent adverse effects on water quality. The amount of water needed for goats or sheep used for prescribed herbivory would be less than 5,000 gallons per day (i.e., 5 gallons per head and an estimated 1,000 head of livestock). The estimated 5,000 gallons per day, or 0.0077 cfs, would represent 0.3 to 0.5 percent of water flows in the Amador Canal throughout the year. This change to flows attributable to water drafting for prescribed herbivory would be negligible. Additionally, operational activities for water drafting would be comprised of personnel using a hose with a bucket that would not result in ground disturbance and the use of any other ground-disturbing equipment would be prohibited by Mitigation Measure BIO-4. For these reasons, proposed water drafting would not result in adverse effects on water quality. Therefore, water drafting, would not result in violation of water quality standards or waste discharge requirements, substantial degradation of surface or ground water quality, or conflict with or obstruction of the implementation of a water

quality control plan, and the impact would be maintained at less than significant, consistent with the impact significance determination in the PEIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from prescribed herbivory treatments is also the same, as described above. SPRs applicable to this treatment are HYD-3, GEO-1, GEO-3, GEO-4, and GEO-7. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT HYD-4

Initial and maintenance treatments would include the use of herbicides to help prevent resprouting tree species, invasive plants and noxious weeds, and regrowth of native shrub species (e.g., shrubs, hardwoods) within certain areas of the project. Herbicide application would be limited to ground-based methods, such as a using targeted spray from a backpack or reservoir carried by a UTV, or painting herbicide onto cut stems. All herbicide application would comply with U.S. EPA and California Department of Pesticide Regulation label standards. The potential for the use of herbicides to violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR because the use and types of herbicides (e.g., clopyralid [monoethanolamine salt]; glyphosate [isopropylamine salt, potassium salt, dimethylamine salt and diammonium salt]; hexazinone; imazapyr [isopropylamine salt]; sulfometuron methyl; triclopyr [butoxyethyl ester and triethylamine salt]; and Velpar [hexazinone]) to remove vegetation are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, surface water conditions are essentially the same within and outside the treatable landscape; therefore, the water quality impact from use of herbicides is also the same, as described above. SPRs applicable to this treatment are HYD-1, HYD-5, BIO-4, HAZ-5, and HAZ-7. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT HYD-5

Initial and maintenance treatments could cause ground disturbance and erosion, which could directly or indirectly modify existing drainage patterns. The potential for treatment activities to substantially alter the existing drainage pattern of a project site was examined in the PEIR. This impact on site drainage is within the scope of the PEIR because the use and type of equipment, extent of vegetation removal, use of manual treatments and herbivory, and intensity of proposed mechanical treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, surface water conditions are essentially the same within and outside the treatable landscape; therefore, the impact related to alteration of site drainage patterns is also the same, as described above. SPRs applicable to this treatment are HYD-2, HYD-4, HYD-6, GEO-1, GEO-2, GEO-4, GEO-5, and GEO-7. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW HYDROLOGY AND WATER QUALITY IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.11.1, "Environmental Setting," and Section 3.11.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing

environmental and regulatory conditions pertinent to hydrology and water quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR.

Amador RCD proposes to revise requirements of the CalVTP by drafting water from existing concrete stock ponds, earthen stock ponds, and the Amador Canal for livestock watering. Sources from which water could be drafted would be limited to those that do not provide habitat suitable for California red-legged frog breeding as determined by a qualified RPF or biologist. This constitutes a revision to the program description as analyzed in the PEIR.

This would not result in a new impact related to hydrology and water quality because potential disruption of hydrology and adverse effects on water quality from implementation of prescribed herbivory were analyzed in the PEIR. Therefore, no new impact related to biological resources would occur that is not covered in the PEIR.

No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and proposed revisions to the program that allow water drafting would not give rise to any new significant impacts. Therefore, no new impact related to hydrology and water quality would occur.

4.11 LAND USE AND PLANNING, POPULATION AND HOUSING

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

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

New Land Use and Planning, Population and Housing Impacts: Would the treatment result in other impacts to land use and planning, population and housing that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT LU-1

Initial treatment and treatment maintenance activities would occur on property owned predominately by private landowners. As noted in Section 4.12, "Noise," below, treatment activities would take place during daytime hours consistent with the Amador County General Plan. While there is the potential for some prescribed burning and prescribed herbivory to occur during nighttime and weekend hours, treatment activities using heavy machinery and noise-generating equipment (e.g., chainsaws) would be limited to daytime hours, 7:00 a.m. to 7:00 p.m., seven days per week, which would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours and conflict with the Amador County General Plan. The potential for vegetation treatment activities to cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation was examined in the PEIR. This impact is within the scope of the PEIR because the treatment types and activities are consistent with those analyzed in the PEIR. No conflict would occur because the project proponent would adhere to SPR AD-3. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent considered in the PEIR. However, land uses in the project area are essentially the same within and outside the treatable landscape; therefore, the land use impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT LU-2

The potential for initial treatments and maintenance treatments to result in substantial unplanned population growth as a result of increases in demand for employees was examined in the PEIR. Impacts associated with short-term increases in the demand for workers during implementation of the treatment project are within the scope of the PEIR because the number of workers required for implementation of the treatments is consistent with (or less than) the crew size analyzed in the PEIR for the types of treatments proposed (i.e., 10–50 workers for prescribed burns, one to 50 crew members, up to four crews for mechanical and manual treatments, up to 10 workers for herbicide treatments, and one to two workers for prescribed herbivory). The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the population and housing characteristics of the project area are essentially the same within and outside the treatable landscape; therefore, the population and housing impact is also the same, as described above. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

NEW LAND USE AND PLANNING, POPULATION AND HOUSING IMPACTS

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

4.12 NOISE

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

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

New Noise Impacts: Would the treatment result in other noise-related impacts that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT NOI-1

Initial and maintenance treatments would require heavy, noise-generating equipment. Manual treatment, mechanical treatment, and prescribed burning occurring adjacent to sensitive land uses could temporarily expose those receptors to noise levels that exceed local standards. Prescribed herbivory and herbicide application would not require the use of noise-intensive equipment; noise generated by these treatment types would be negligible. The potential for a substantial short-term increase in ambient noise levels from use of heavy equipment was examined in the PEIR. This impact is within the scope of the PEIR because the number and types of equipment proposed, and equipment use being temporary and sporadic, are consistent with the assumptions analyzed in the PEIR. The proposed treatments would not require the use of helicopters, which was the loudest type of equipment evaluated in the PEIR.

Amador County does not have a noise ordinance or policy restricting the time of day when noise-generating activity can occur, though the Sheriff's Office can respond to a construction noise complaint just as they would for any noise nuisance. In the absence of standards for construction noise, the County's land use/noise compatibility interior standards would be applied, which limit exterior noise levels for single-family and multi-family residential to 60 and 65 decibels (dB), respectively, and interior noise to 45 dB L_{dn} for noise sensitive receptors (Amador County 2016). L_{dn} is the day-night average sound level and is used to describe the cumulative noise exposure during an average annual day. As discussed in the PEIR, noise levels generated by individual equipment range from 77 to 87.9 dB at 50 feet

from the noise source (77 to 85 dB at 50 feet from the noise source for projects without the use of helicopters). The loudest types of equipment proposed for this project are chainsaws and dozers. Though multiple pieces of equipment would be operated simultaneously to implement a treatment, they would typically be spread out (i.e., usually more than 100 feet apart) rather than operating next to each other. This is particularly true of larger, heavy-duty off-road equipment such as masticators, chippers, and dozers. Noise-generating equipment would be used intermittently between 7:00 a.m. and 7:00 p.m. during treatment. While there is the potential for some prescribed burning to occur during nighttime and weekend hours, all treatment activities using noise-generating equipment would be limited to 7:00 a.m. to 7:00 p.m. seven days per week, which would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. The Amador County General Plan considers the hours between 10:00 p.m. and 7:00 a.m. as noise sensitive (Amador County 2016). For treatment activities utilizing heavy equipment from 6:00 a.m. to 7:00 a.m., crews will remain 1,500 feet from the noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship).

Although operation of equipment would temporarily and intermittently generate elevated noise during daytime hours, the interior noise standard is an average that considers daytime and nighttime noise levels, and when averaged with the noise levels during the quiet nighttime hours, it is reasonably expected that noise generated during treatments would not exceed the local L_{dn} threshold. In addition, treatments would only occur outside of the 100-foot defensible space requirement described in PRC 4291 and therefore, would not occur within 100 feet of sensitive receptors. The equipment noise levels discussed above are at 50 feet from the noise source. Therefore, there would be additional attenuation for distance, vegetation, and building materials that would result in interior noise levels being lower than the 77 to 85 dB levels estimated for equipment. Treatments would also be dispersed throughout the 3,440-acre project area so that short-term noise increases at any one sensitive receptor would be limited.

SPRs AD-3 and NOI-1 through NOI-5 are applicable to this treatment. With implementation of SPR AD-3, noise levels associated with vegetation treatment activities under the CalVTP would not exceed local land use/noise compatibility standards and noise exposure attributed to vegetation treatment activities under the CalVTP would not generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of local standards. For any sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) that are within 1,500 feet of a treatment area, SPR NOI-6 would also apply. There are residences scattered throughout the project area that could be within 1,500 feet of proposed treatments. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the exposure potential to any sensitive receptors present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the noise impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT NOI-2

Initial and maintenance treatments would involve large trucks hauling heavy equipment to the project area. These haul truck trips would be dispersed on area roadways providing access to the project area including, but not limited to SR 88, Clinton Road, West Clinton Road, and Bosse Road. Vehicle traffic on area highways is not expected to generate a noticeable increase in traffic-related noise. Haul truck trips on the local roadways would pass by residential receptors and the event of each truck passing by could increase the single event noise levels. The potential for a substantial short-term increase in Single-Event Noise Levels was examined in the PEIR. This impact is within the scope of the PEIR because the number and types of equipment proposed are consistent with those analyzed in the PEIR. The haul trips associated with the treatment would occur during daytime hours, which would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. SPR NOI-1 is applicable to this treatment. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the exposure potential is essentially the same within and outside the treatable landscape; therefore, the noise impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW NOISE IMPACTS

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

4.13 RECREATION

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered in the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project	List MMs Applicable to the Treatment Project	Identify Impact Significance for Treatment Project	Would This Be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact within the Scope of the PEIR?
Would the project:								
Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas	LTS	Impact REC-1, pp. 3.14-6 – 3.14-7	Yes	None	NA	LTS	No	Yes

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the PEIR for this impact; None = there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Recreation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT REC-1

There are no recreational facilities present within the project area. The nearest recreational area is the Lake Tabeaud day use area, located approximately 0.3 mile east of the project area. Recreational activities at Lake Tabeaud include walking, jogging, canoeing, kayaking, fishing, picnics, and birdwatching (ACRA 2016). Other recreational areas located in the project vicinity are Mt. Zion Demonstration State Forest, located approximately 0.9 mile north of the project area and Kennedy Tailing Wheels Park, located approximately 2 miles west of the project area. Mt. Zion Demonstration State Forest is owned and operated by CAL FIRE and includes a hiking trail and picnic tables. Kennedy Tailing Wheels Park is the only fenced dog park in the county, and includes picnic tables, a drinking fountain, and restrooms.

Vegetation treatment activities have the potential to disrupt recreational activities by degrading the experience of nearby recreationists through the degradation of scenic views or increased traffic. Access and use of the aforementioned recreation areas would not be precluded by proposed treatments. The potential for vegetation treatment activities to disrupt recreation activities was examined in the PEIR. This impact is within the scope of the PEIR because the number and types of equipment proposed are consistent with those analyzed in the PEIR because the availability of recreational resources within the project vicinity is essentially the same within and outside the CalVTP treatable landscape and the treatment activities and intensity are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the availability of recreational resources within the project area is essentially the same within and outside the treatable landscape; therefore, the impact on recreation is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

NEW RECREATION IMPACTS

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

4.14 TRANSPORTATION

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

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

New Transportation Impacts: Would the treatment result in other impacts to transportation that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT TRAN-1

Initial and maintenance treatments would temporarily increase vehicular traffic along roadways throughout the project area, including SR 88, and various public and private roadways. The potential for a temporary increase in traffic to conflict with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures was examined in the PEIR. The proposed treatments would be short term, and temporary increases in traffic related to treatments are within the scope of the PEIR because the treatment duration and limited number of vehicles (i.e., heavy equipment transport, crew vehicles for crew members) associated with the proposed treatments are consistent with those analyzed in the PEIR. In addition, the proposed treatments would not all occur concurrently, and increases in vehicle trips associated with the treatments would be dispersed on multiple roadways. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing transportation conditions (e.g., roadways and road use) present in the areas outside the treatable landscape are essentially the same as those within

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

IMPACT TRAN-2

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

IMPACT TRAN-3

Treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the proposed project would require vehicle trips to transport crew members and equipment to the treatment areas. The potential for an increase in VMT on affected roadways during implementation of the treatment project was examined in the PEIR. This impact was identified as potentially significant and unavoidable in the PEIR because implementation of the CalVTP would result in a net increase in VMT. Manual and mechanical treatments and prescribed burning under the proposed project would typically require between one and 50 crew members with up to four crews for mechanical and manual treatment type, one to five workers for herbicide treatments, and one to two workers for prescribed herbivory. Up to four treatments could be implemented simultaneously. This impact is within the scope of the activities and impacts addressed in the PEIR because the size and number of crews is consistent with that analyzed in the PEIR. The increase in vehicle trips would be temporary and dispersed over multiple roadways. A temporary increase in VMT is within the scope of the activities and impacts addressed in the PEIR because the number and duration of increased vehicle trips are consistent with that analyzed in the PEIR. As discussed for Impact AQ-1 in Section 4.3, "Air Quality," the RCD would implement Mitigation Measure AQ-1 to the extent feasible, which includes encouraging carpooling. However, because crews may not all be employed with the same company and due to the project's location in a rural area, carpooling may not be feasible to implement for all of the workers. With implementation of Mitigation Measure AQ-1, and the current practice of employing local crews and equipment as available and feasible, it would not be feasible to reduce VMT generated under the proposed project beyond encouraging workers to carpool. The proposed project would contribute to the cumulative increase in VMT attributable to implementation of the CalVTP. For these reasons, and as explained in the PEIR, this impact would remain significant and unavoidable. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the transportation-related conditions in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW IMPACTS ON TRANSPORTATION

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

4.15 PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

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

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

New Public Services, Utilities and Service System Impacts: Would the treatment result in other impacts to public services, utilities and service systems that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

IMPACT UTIL-1

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

As described above under Section 1.1.3, "Purpose of the PSA/Addendum," Amador RCD proposes to revise requirements of the CalVTP by drafting water from existing concrete stock ponds, earthen stock ponds, and the Amador Canal for livestock watering for prescribed herbivory activities. Sources from which water could be drafted would be limited to those that do not provide habitat suitable for California red-legged frog breeding as determined by a qualified RPF or biologist. This constitutes a revision to the program description as analyzed in the PEIR.

Amador Water Agency (AWA) manages water supplies in the Amador Canal. The AWA has indicated that the flow rate in the Amador Canal in the area that would serve prescribed herbivory under the project ranges between 3 cubic feet per second (cfs) (summer) and 1.5 to 2 cfs (winter) (Haugland, pers. comm., 2022). These flow rates are the current and anticipated future allocation to AWA from Lake Tabeaud. As of December 6, 2022, the project area is within an extended drought, and this water supply information reflects drought conditions. The amount of water needed for goats or sheep used for prescribed herbivory would be less than 5,000 gallons per day (i.e., 5 gallons per head and an estimated 1,000 head of livestock). The estimated 5,000 gallons per day, or 0.0077 cfs, would represent 0.3 to 0.5 percent of water flows in the Amador Canal throughout the year. This change to flows attributable to water drafting for prescribed herbivory would be negligible. There would be sufficient available water supply for the project and water use for the project would not adversely affect supplies to downstream users. AWA confirmed the water is available and accessible to the RCD to serve the project. Therefore, the use of water drafting to support prescribed herbivory would not result in a substantially more severe significant impact on public services and utilities than what was covered in the PEIR.

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

IMPACT UTIL-2

Initial and maintenance treatments would generate biomass within the project area. Biomass generated by mechanical and manual treatments would be disposed of with pile burning, biomass chipping, or lopping and scattering biomass within areas on-site where material cannot safely be burned. Invasive plant and noxious weed biomass would also be treated on-site (e.g., prescribed burning), when possible, to eliminate seed and propagules; however, invasive plants and noxious weeds would not be chipped and spread, scattered, or mulched on-site. For the proposed treatment project, no biomass would be hauled off-site; therefore, there is no potential to exceed the capacity of existing infrastructure, and this impact does not apply to the proposed project.

IMPACT UTIL-3

As discussed above, initial and maintenance treatments would generate biomass. Biomass generated by mechanical and manual treatments would be disposed of with pile burning or mulching or lopping and scattering biomass in

areas where material cannot safely be burned. Invasive plant and noxious weed biomass would also be treated on-site, when possible. If invasive plant biomass cannot be treated on-site, there is the potential for a small amount of biomass to be disposed of off-site at an appropriate waste collection facility. If off-site disposal is needed, Amador RCD would comply with all federal, state, and local management and reduction goals, statutes, and regulations related to solid waste. Compliance with reduction goals, statutes, and regulations related to solid waste was examined in the PEIR. This impact is within the scope of the activities and impacts addressed in the PEIR because the type and amount of biomass that may need to be hauled off-site are consistent with those analyzed in the PEIR. The inclusion of land in the project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the biomass conditions in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, impacts related to biomass are also the same, as described above. SPR UTIL-1 would be applicable to the proposed treatments if biomass is hauled off-site. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW IMPACTS ON PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.16.1, "Environmental Setting," and Section 3.16.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to public services, utilities, and service systems that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR.

Amador RCD proposes to revise requirements of the CalVTP by drafting water from existing concrete stock ponds, earthen stock ponds, and the Amador Canal for livestock watering. Sources from which water could be drafted would be limited to those that do not provide habitat suitable for California red-legged frog breeding as determined by a qualified RPF or biologist. This constitutes a revision to the program analyzed in the PEIR. This would not result in a new impact related to water supply because the water demand for the project is a small proportion of available water supplies (0.3-0.5 percent) and AWA has confirmed water is available for the project.

No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and proposed revisions to the program at allow water drafting would not give rise to any new significant impacts. Therefore, no new impact related to public services, utilities, or service systems would occur.

4.16 WILDFIRE

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

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

New Wildfire Impacts: Would the treatment result in other impacts related to wildfire that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
	☐	☐	☐

Discussion

The project area is in moderate, high, and very high fire severity zones (CAL FIRE 2022a). In 2015, the Butte Fire burned approximately 70,868 acres directly south of the project area in mid- to late-September (CAL FIRE 2021). Large fires in the vicinity of the project area include the Caldor Fire (2021) (16 miles north of the project area), which burned approximately 221,786 acres and took over 3 months (Aug 14–November 17) to contain, and the Rim Fire (2013) (40 miles southeast of the project area), which burned approximately 255,858 acres and took over 2 months (Aug 16–October 23) to contain (CAL FIRE 2021). On July 4, 2022, the Electra Fire started approximately 3 miles southwest of the project area and burned nearly 4,000 acres (CAL FIRE 2022b). The northern edge of the Electra Fire reached Amador Lane, which is less than 700 feet south from the southern boundary of the project area (CAL FIRE 2022b). Although multiple large wildfires have occurred near the project area, no documented fires have occurred in the project area in recorded history (CAL FIRE 2021).

IMPACT WIL-1

Proposed vegetation treatment activities are mechanical, manual, herbicide application, prescribed herbivory, and prescribed burning treatments. Vegetation treatment involving motorized equipment could pose a risk of accidental ignition. Temporary increases in risk associated with uncontrolled fire from prescribed burns could also occur. As discussed in Section 3.17.1, "Environmental Setting," in Volume II of the Final PEIR, under "Prescribed Burn Planning and Implementation," implementing a prescribed burn requires extensive planning, including the preparation of

prescription burn plans, smoke management plans, site-specific weather forecasting, public notifications, safety considerations, and ultimately favorable weather conditions so a burn can occur on a given day. Prior to implementing a prescribed burn, fire containment lines would be established by clearing vegetation surrounding the designated burn area to help prevent the accidental escape of fire. Water containers and safety equipment would be staged on-site, as necessary.

The potential increase in exposure to wildfire during implementation of treatments was examined in the PEIR. Increased wildfire risk associated with the use of heavy equipment in vegetated areas and with prescribed burns is within the scope of the PEIR because the types of equipment and treatment duration and the types of prescribed burning methods proposed as part of the project are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the wildfire risk is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. SPRs applicable to this treatment are AD-3, AQ-3, HAZ-2, HAZ-3, and HAZ-4. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

IMPACT WIL-2

Vegetation treatment types would include mechanical and manual vegetation treatment, herbicide application, prescribed herbivory, and prescribed burning, which could exacerbate fire risk as described in Impact WIL-1 above. The potential for post-wildfire landslides and flooding was evaluated in the PEIR. The potential exposure of people or structures to post-wildfire landslides and flooding are within the scope of the activities and impacts covered in the PEIR because the equipment types and duration of treatments, and methods of prescribed burn implementation are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the wildfire risk of the project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. SPRs applicable to this impact are AQ-3, GEO-3 through GEO-5, and GEO-8. Although some mechanical treatments would occur from existing roads or skid trails or on flat to moderate slopes, SPR GEO-8 would apply if a treatment area contained steep slopes. Furthermore, because the treatments reduce wildfire risk, they would also decrease post-wildfire landslide and flooding risk in areas that could otherwise burn in a high-severity wildfire without treatment. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

NEW IMPACTS ON WILDFIRE

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

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