

7 PROJECT SCALE ANALYSIS

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7.1 INTRODUCTION

The CEQA Guidelines, Section 15168, describe Program Environmental Impact Reports (EIR). more specifically, Section 15168(c)(4) suggests that the adopting agency “use a written checklist or similar evaluation“ to document the evaluation of the site and the activities proposed to determine whether the environmental effects of the operation are covered in the Program EIR. The Project Scale Analysis (PSA) in this PEIR functions as the environmental checklist that shall be completed by the project applicant and evaluated by the lead agency for all VTP projects. The completed checklist will indicate whether a proposed project is within the scope and analysis of the Program EIR.

A completed PSA documents whether a particular proposed project’s site-specific effects are less than significant with the use of the applicable Standard Project Requirements (SPR) in the EIR. Project Specific Requirements (PSRs) may be used to address site specific impacts in addition to the SPRs. Monitoring procedures in Appendix I may be used evaluate the performance of SPRs and PSRs. An Implementation Checklist (Appendix I) will be used to evaluate the implementation of the SPRs and PSRs for each project.

In CEQA terms, the VTP PSA also functions as an “Initial Study.” If the PSA reveals no significant adverse impacts resulting from the VTP project, then the project is in compliance with CEQA.

If the project could create environmental impacts that have not been addressed or that cannot be avoided using measures from the PSA/environmental checklist, the project

falls outside the scope of this Program EIR and CEQA requires the Department to do a supplemental environmental analysis and public review through the State Clearinghouse or make a finding of overriding considerations.

The following analysis requests basic information about the size, location, and type of project being proposed. The PSA addresses the various resource areas that include SPRs in Chapters 4 & 5, and requires project submitters to describe how their project will conform to the conditions and procedures stipulated in the Program EIR.

When prescribed burning is proposed, a burn plan, smoke management plan, and Go-No Go checklist are also required in order to verify that the proposed burn is within the scope of the VTP. The Go-No Go Checklist will be required prior to the actual burning operation. Examples of a VTP Prescribed Fire Burn Plan, Smoke Management Plan and VTP Prescribed Fire Go-No Go Checklist are included in Appendix J. Additional permits required for prescribed burning include an Air Quality Burn Permit (which is incorporated into the smoke management plan) and a CAL FIRE Burn permit as specified in PRC 4423 and applied as directed under PRC 4423.1, 4492, and 14 CCR § 1253.

Upon project completion, the Implementation Checklist will be used to validate that all the SPRs and PSRs were incorporated. This completion inspection will be conducted by CAL FIRE personnel.

7.2 PROJECT SCALE ANALYSIS

The following pages include the Project Scale Analysis for the CAL FIRE Vegetation Treatment Program.

**PROJECT SCALE ANALYSIS
CAL FIRE Vegetation Treatment Program**

| SUMMARY OF PROJECT | |
|---|--|
| Project Name: | |
| CAL FIRE Unit & Contact: | Location (legal description & nearest landmark or community): |
| Project Coordinator and Contact Information: | |
| Treatment Type: <input type="checkbox"/> <i>WUI</i> <input type="checkbox"/> <i>Fuel Break</i> <input type="checkbox"/> <i>Ecological Restoration</i> | |
| Project Objectives and Rationale: <i>(Provide a set of objectives that are consistent with the Program EIR, including the proposed treatment effects on fire behavior. See PSA Attachment C.)</i> | |
| Project Description: <i>(Provide a summary of the project and its intended objective(s). Briefly describe the environmental setting, including the types of habitat to be treated and unique features within the habitat. Indicate if work will be conducted in conjunction with other related or similar projects in the Operational Unit. The description should also describe any coordination with private, local, federal or other State agencies.)</i> | |
| Size of project (acres): | |
| Duration/Timing of project activities: | |
| Types of treatment activities proposed (include acres for each): | |
| Manual: | Mechanical: |
| Prescribed Fire: | Herbicide: |
| Prescribed Herbivory: | |
| Project Priority Ranking: <i>(Follow the flow chart in PSA Attachment B to find the priority ranking. Describe any additional considerations or arguments for increasing the priority.)</i> | |
| Mapped in a geospatial database supported by CAL FIRE? <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| Types and numbers of equipment proposed to be used: | |

Are there any proposed project requirements, in addition to the items listed in the PSA Attachment A, that will require the project to undergo supplemental environmental review such as a negative declaration or mitigated negative declaration?

Are there local or county ordinances that need to be considered when implementing the proposed project?

Was a public forum/workshop conducted? (Public forum is required for projects outside the WUI and as specified in BIO-5. Please ID type and date of the meeting advertisement(s), attendance, concerns raised, and any resolutions or changes incorporated into the project.)

Review of the project's consistency with VTP EIR

ADMINISTRATIVE PROCEDURES:

1. Will the project implement SPRs ADM 1-8 (PSA Attachment A)?

Yes No Other

If NO or OTHER, explanation required:

REGULATORY REQUIREMENTS:

2. Are any of the following applications, permits, or consultations required?

Yes No Other

DFW Stream Alteration Permit: _____

State & Federal Endangered Species Consultation: _____

Corps of Engineers 404 Permit: _____

RWQCB or NPDES Permit: _____

DPR Right to Enter or Temporary Use Permit: _____

PRC 5024 Review: _____

Stormwater Management Plan: _____

Encroachment Permit (Specify Agency): _____

Other (Specify): _____

COMMENTS:

PRESCRIBED FIRE REQUIREMENTS:

3. Does the project include prescribed fire? (If NO, please proceed to Aesthetics)

Yes No

4. Explain how the prescribed fire has been designed to initiate a surface fire of sufficient intensity that will only consume surface and ladder fuels consistent with the requirements of SPR FBE-1:

5. Has a burn plan been prepared consistent with the requirements of SPR FBE-2?

Yes No If NO, explanation required:

6. Has a *First Order Fire Effects Model* (FOFEM) or similarly accepted model been run consistent with SPR FBE-3?

Yes No If NO, explanation required:

7. Are there any additional Fire Behavior-Related PSR measures incorporated into the project or are there any requested exemptions from the notification requirements in FBE-4?

Yes No If YES, explanation required:

AESTHETICS:

8. Would the project result in any unique aesthetic impacts that were not addressed in the VTP Program EIR?

Yes No

If YES, explanation required (How is this project within the scope of this PEIR?):

9. For a project with prescribed burning: if any part of the proposed project would be located upon highly visible slopes, is this project of such a size and design as to cause significant visual distraction and/or loss of aesthetic value? Include visual impact of pre-treatment effects, such as creation of mechanical or hand-constructed fire lines.

Yes

No

If YES, will any of the following measures be incorporated to minimize impacts?

- Straight line boundaries and other strong linear configurations will be avoided as much as possible.
- Area will not be 100% cleared through burning operations; unburned areas will be left to add textural variety.
- Natural or existing features will be followed, such as stream courses, vegetation type lines, ridge tops, etc.
- Fire line edges on the outside-of-the-burn side will be feathered into the natural landscape, with brush cuttings used to disguise the lines and provide soil cover after the burn.
- Project will not be burned upon highly visible slopes and/or visual impact expected to be minimal.

Provide additional explanation if necessary:

10. Are there additional PSR measures to protect aesthetic resources incorporated into the project?

Yes No If YES, explanation required:

AGRICULTURE:

11. Would the project result in the permanent conversion of agricultural land to non-agricultural uses or conflict with existing zoning or Williamson Act contracts for agricultural uses?

Yes No If YES, **STOP.** Proposed project is incompatible with this PEIR.

FOREST RESOURCES:

12. Would the project result in the permanent loss or conversion of forest land to non-forest uses or result in conflicts with areas designated for forest lands (as defined by PRC 12220(g)), timberlands (as defined by PRC 4526), or timberland zoned as Timberland Production (as defined by GC 51104(g))?

Yes No If YES, explanation required (How is this project within the scope of this PEIR?):

AIR QUALITY:

13. Would the project create emissions that are not discussed in the VTP Program EIR?

Yes No If YES, **STOP.** Proposed project is incompatible with this PEIR.

14. Have all air quality SPRs been incorporated into the project (AIR-1 through AIR-12)?

Yes No If NO, explanation required:

15. List any PSRs that would be required for the project:

BIOLOGICAL RESOURCES:

16. Have all biological resources SPRs been incorporated into the project (BIO-1 through BIO-13)?

Yes No If NO, explanation required:

17. List any PSRs that would be required for the project, including any CDFW recommendations:

18. If burning large areas of mature chaparral vegetation would occur during winter or spring, would this project cause low regeneration and/or depletion of available wildlife forage?

Yes No If YES, discuss project conditions or mitigation measures that would be implemented:

19. If burning dense stands of chaparral would occur in winter or spring, would this project cause significant adverse effects on plant regeneration and/or loss of wildlife habitat and oak woodlands?

Yes No If YES, list project conditions or mitigation measures that would be implemented:

20. If burning dense stands of chaparral would occur in summer or fall, would this project cause a significant loss of wildlife habitat and/or damage to oak woodlands?

Yes No If YES, list project conditions or mitigation measures that would be implemented:

21. If burning in areas with oak or conifer overstory would occur, would this project result in undesired adverse effects on conifer and/or oak tree survival?

Yes No If YES, list project conditions or mitigation measures that would be implemented:

22. Would the project result in a reduction in oak trees that could adversely affect wildlife habitat, species diversity, or a cumulative lack of oak regeneration in the area?

Yes No If YES, list project conditions or mitigation measures that would be implemented:

23. Would this project result in significant detrimental effects on wildlife habitat by creating a large homogeneous ecotone with no mosaic or strips of unburned vegetation?

Yes No If YES, list project conditions or mitigation measures that would be implemented:

24. Would any special status species be adversely affected by this project? Include the results from 9-quad CNDDDB run.

Yes No If YES, list project conditions or mitigation measures that would be implemented:

25. If burning, would this project cause significant negative impacts to known and occupied habitats of special status species?

Yes No If YES, list project conditions or mitigation measures that would be implemented:

26. Will the proposed project disrupt critical deer migration corridors or critical habitats of any game species?

Yes No If YES, list project conditions or mitigation measures that would be implemented:

27. If burning in or adjacent to areas classified as wetlands or riparian zones, would this project result in undesired changes in vegetation character or other adverse impacts to riparian plants, fish, or wildlife habitat?

Yes No If YES, list project conditions or mitigation measures that would be implemented:

28. Will the proposed project result in a detrimental impact to a biological resource in order to provide protection of human life and property?

Yes No If YES, list project conditions, discussion of the lost value and the reasoning. Including any mitigation measures that would be implemented:

CULTURAL RESOURCES: (Answers to 30 - 33 shall be included in a Confidential Addendum).

29. Have all cultural resources SPR been incorporated into the project (CUL-1 through CUL-5)?

Yes No If NO, explanation required:

30. Has a Confidential Archaeological Addendum been prepared and signed by a CAL FIRE archaeologist and is the signature page confirming such review attached?

Yes No If NO, please explain why one is not required:

31. Would archaeological, cultural, or historical resources be adversely affected by this project? Include Archaeological reviews and/or surveys in confidential addendum.

Yes No If YES, list project conditions or mitigation measures that would be implemented:

32. Will the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Yes No If YES, list project conditions or mitigation measures that would be implemented:

33. Will the project disturb any human remains, including those interred outside of formal cemeteries?

Yes No If YES, list project conditions or mitigation measures that would be implemented:

GEOLOGY AND SOILS:

34. Have all geology and soils SPR been incorporated into the project (GEO-1 through GEO-2)?

Yes No If NO, explanation required:

35. List any Project Specific Requirements (PSRs) that would be required for the project:

36. If using *heavy equipment* on unstable areas/soils, will this project cause landslides or significant erosion?

Yes No If YES, list project conditions or mitigation measures that would be implemented:

37. Would the project disturb any geologically unstable areas/soils within or adjacent to the project?

Yes No If YES, list project conditions or mitigation measures that would be implemented:

GREENHOUSE GAS EMISSIONS:

38. Have all GHG SPRs been incorporated into the project (CC-1 through CC-4)?

Yes No If NO, explanation required:

39. List any PSR GHG mitigation measures that would be required for the project.

HAZARDS AND HAZARDOUS MATERIALS:

40. Have all hazard and hazardous materials SPRs been incorporated into the project (HAZ-1 through HAZ-14)?

Yes No If NO, explanation required:

41. List any Project Specific Requirements (PSRs) that would be required for the project:

42. Would the project use any chemicals/herbicides that were not evaluated in the VTP Program EIR?

Yes No If YES, explanation required (how is this project within the scope of this PEIR?):

HYDROLOGY AND WATER QUALITY:

43a. Have all hydrology and water quality SPRs been incorporated into the project (HYD-1 through HYD-17)?

Yes No If NO, explanation required:

43b. Is the Project area with a waterbody listed on the 303(d) list?

Yes No If YES, please identify the waterbody, reason for listing, and project impact:

44. List any Project Specific Requirements (PSR) that would be required for the project:

45. Will the removal of vegetative cover result in increased water runoff on slopes and subsequent adverse effects on water quality or other resources?

Yes No If YES, list any Project Specific Requirements (PSRs) that would be implemented:

46. If burning in a watercourse, lake, or reservoir, will the removal of vegetative cover or other phases of the proposed project significantly increase turbidity or deposition of sediment?

Yes No If YES, list any Project Specific Requirements (PSRs) that would be implemented:

47. If burning is planned within a WLPZ/ELZ, will this project cause a significant increase in water temperature that is detrimental to beneficial uses?

Yes No If YES, list any Project Specific Requirements (PSRs) that would be implemented:

48. Will this project cause slash or woody debris to be deposited in a watercourse, lake or reservoir?

Yes No If YES, list any Project Specific Requirements (PSRs) that would be implemented:

49. Are there any other circumstances or site conditions present in this project as designed that have not been mitigated to avoid adverse impacts on water quality?

Yes No If YES, list any Project Specific Requirements (PSRs) that would be implemented.

NOISE:

50. Have all noise SPRs been incorporated into the project (NSE-1 through NSE-5)?

Yes No If NO, explanation required:

51. List any Project Specific Requirements (PSRs) that would be required for the project:

RECREATION:

52. Will the proposed project result in a significant portion of the recreational area being closed during peak visitor season over a calendar year, or more than 10 percent of the recreational area in a condition of decreased visual quality during peak visitor season?

Yes No If YES, explanation required:

53. List any Project Specific Requirements (PSRs) that would be required for the project:

TRANSPORTATION:

54. Have all transportation SPRs been incorporated into the project (TRA-1 through TRA-2)?

Yes No If NO, explanation required:

55. List any Project Specific Requirements (PSRs) that would be required for the project:

UTILITIES AND ENERGY:

56. Are there any transmission lines or other electrical, telecommunications, or water supply facilities in or near the project area? If so, protective measures will need to be taken and may include installation of firebreaks using hand treatments around sensitive equipment.

Yes No If YES, explanation required:

57. Will treatment activity include digging below the surface of the ground to a depth of greater than 2 feet? If so, the project manager shall contact local utilities to determine location of buried underground utilities.

Yes No If YES, explanation required:

58. List any Project Specific Requirements (PSRs) that would be required for the project:

CUMULATIVE IMPACTS:

| Yes | Maybe | No | |
|--------------------------|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 1. Will the project be conducted in conjunction with or at the same time as other projects in the CAL FIRE Unit? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 2. Will the project be part of a series of inter-related projects? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 3. Are there any other projects that must be completed for any part of this project to be implemented? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 4. Will the combined acreage of this project and any past, current, and reasonably foreseeable future projects exceed 20% of a CalWater Planning Watershed over a 10-year timespan? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 5. Will the combined acreage of this project and any other proposed or completed VTP project exceed 110% of any bioregion as identified in Table 2.5-6 over an annual or 10 year period? |

If YES or MAYBE, please explain:

Attachments:

PSA Attachment A – VTP Standard Project Requirements

- Project Mitigation Monitoring and Reporting Program
- Archaeological reviews/surveys (Confidential addendum)
- Air Quality and GHG Emissions Estimates
- Wildlife reviews/CNDDDB Records Search/Biologist Recommendation
- Prescribed Fire Burn Plan
- Smoke Management Plan
- Air photo of project area
- Vicinity map on a USGS quad map
- Parcel map with APN's covering all ownerships within project area
- Soil survey map of project area
- Model run of FOFEM, BEHAVE, or other appropriate fire behavior modeling simulation
- Other _____

RECOMMENDATION:

- Project is consistent with activities evaluated under the VTP Program EIR and all appropriate SPRs and mitigation measures have been incorporated into the project.
- Certain proposed activities may not be consistent with activities evaluated in the VTP EIR and additional environmental review is required.
- Project is consistent with activities evaluated under the VTP Program EIR; however, some SPRs and mitigation measures applicable to the project have not been incorporated and as a result additional environmental review may be warranted.

**Applicant's
Signature:**

RPF#

Date:

**Unit
Forester's
Signature:**

RPF#

Date:

**Unit Chief's
Signature:**

Date:

PSA ATTACHMENT A- VTP STANDARD PROJECT REQUIREMENTS

7.2.1.1 Administrative Standard Project Requirements

ADM-1: Prior to the start of operations, the project coordinator shall meet with the contractor to discuss all resources that must be protected using standard project requirements (SPRs). If burning operations are done with CAL FIRE personnel, the Battalion Chief and/or their Company Officer designee shall meet with the project coordinator onsite prior to operations to discuss resource protection measures. Additionally, the project coordinator shall specify the resource protection measures and details of the burn plan in the incident action plan (IAP) and shall attend the pre-operation briefing to provide further information.

ADM-2: All protected resources shall be flagged, painted or otherwise marked prior to the start of operations by someone knowledgeable of the resources at risk, their location, and the applicable protection measures to be applied. This work shall be performed by a Registered Professional Forester (RPF), or his/her supervised designee, for any project in a forested landscape as defined in PRC § 754.

ADM-3: The project coordinator or designee shall monitor SPR implementation (and effectiveness in some cases) as an adaptive management tool. If a SPR does not perform adequately to protect the specified resource, the project coordinator will determine adaptation strategies, in coordination with the contractor and/or CAL FIRE personnel, and require their implementation.

ADM-4: If monitoring is necessary (e.g., effectiveness monitoring), the project coordinator or designee shall notify the party responsible for monitoring a minimum of three weeks in advance of operations. More advanced notification is encouraged from project coordinators to parties responsible for more rigorous monitoring activities.

ADM-5: All ground disturbing treatment activities, including land clearing and bull dozer line construction, shall be suspended when a red flag warning is issued by the local National Weather Service office.

ADM-6: The project coordinator or designee shall consult with the USFS, CAL FIRE, or other public agencies as appropriate to develop a list of past, current, and reasonably foreseeable probable future projects within the planning watershed of the proposed project. If the total combined acreage disturbed in the planning watershed exceeds 20% in a 10-year period, compliance with HYD-16 must be met prior to any ground disturbing operations. Projects that may combine with VTP projects to create the potential for significant effects include, but are not limited to, controlled burning, fuel reduction, and commercial timber harvesting.

ADM-7: The Sacramento Program manager shall track the annual and 10-year average annual acreage treated by the VTP, by bioregion. If the acreage treated within any bioregion exceeds 110 percent of the yearly amounts as identified in **Error! Reference source not found.**, the Program manager will notify the affected CAL FIRE Units that any additional projects submitted within that bioregion fall outside of the scope of analysis by this PEIR and additional CEQA analysis will be required. Additional CEQA analysis, such as a mitigated negative declaration, shall assess the cumulative impacts of the proposed project and identify any additional project constraints that may be necessary to mitigate these to less than significant. Additional CEQA analysis may be tiered off this PEIR when the proposed project is otherwise consistent with the VTP.

ADM-8: During the project planning phase, the project proponent will provide a public workshop for projects outside of the WUI. A public notice will be advertised in a local newspaper. The notification will be used to inform stakeholders and to solicit information on the potential for significant impacts during the project planning phase.

7.2.1.2 Aesthetics-Related Standard Project Requirements

AES-1: See **BIO-5** for shrublands in San Diego, Imperial, Riverside, Orange, Los Angeles, Ventura, Santa Barbara, and San Bernardino counties.

7.2.1.3 Air Quality-Related Standard Project Requirements

AIR-1: The project shall comply with all local, state, and federal air quality regulations and ordinances. The local Air Pollution Control District (APCD) or Air Quality Management District (AQMD) will be contacted to determine local requirements.

AIR-2: Prior to approval of an CAL FIRE Unit project under the VTP, the project coordinator shall model the project's Criteria Air Pollutant (CAP) emissions and compare the projected emissions levels to the thresholds identified by the local air district. If emissions levels exceed air district thresholds, consultation of the air district will occur.

AIR-3: In accordance with CCR Section 80160(b), all burn prescriptions shall require the submittal of a smoke management plan for all projects greater than 10 acres or are estimated to produce more than 1 ton of particulate matter. Burning shall only be done in compliance with the burn authorization program of the local air district having jurisdiction over the project area. Example of a smoke management plan is in Appendix J.

AIR-4: Fire emissions and fire behavior shall be planned, predicted, and monitored in accordance with SPRs FBE-1, FBE-2, and FBE-3 with the goal of minimizing air pollutant emissions.

AIR-5: Dust control measures shall be implemented in accordance with SPRs Hyd-9 with the goal of minimizing fugitive dust emissions.

AIR-6: The speed of activity-related trucks, vehicles, and equipment traveling on dirt areas shall be limited to 15 miles per hour (mph) to reduce fugitive dust emissions.

AIR-7: In areas where sufficient water supplies and access to water is available, all visible dust, silt, or mud tracked-out on to public paved roadways as a result of project treatment activities shall be removed at the conclusion of each work day, or at a minimum of every 24 hours for continuous fire treatment activities.

AIR-8: Ground-disturbing treatment activities, including land clearing and bull dozer lines, shall be suspended when there is a visible dust transport outside the project boundary.

AIR-9: Ground-disturbing treatment activities shall not be performed in areas identified as “moderately likely to contain naturally occurring asbestos (NOA)” according to maps and guidance published by the California Geological Survey (CGS), unless an Asbestos Dust Control Plan is prepared by the Operational Unit and approved by the air district(s) with jurisdiction over the project site. This determination would be based on a CGS publication titled *A General Location Guide for Ultramafic Rocks in California – Areas More Likely to Contain Naturally Occurring Asbestos* (Churchill and Hill 2000), or whatever more current guidance from CGS exists at the time the VTP project is evaluated. Any NOA-related guidance provided by the applicable local air district shall also be followed. If it is determined that NOA could be present at the project site, then an Asbestos Dust Control Plan shall be prepared and implemented in accordance with Title 17 of the Public Health CA Code of Regulations of Section 93105.

AIR-10: Operation of each large diesel- or gasoline-powered activity equipment (i.e., greater than 50 horsepower [hp]) shall not exceed 16 equipment-hours per day, where an equipment-hour is defined as one piece of equipment operating for one hour (daily CAPs, TACs, GHGs).

AIR-11: All diesel- and gasoline-powered equipment shall be properly maintained according to manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records shall be available for verification.

AIR-12: A CAL FIRE Unit shall not conduct more than five simultaneous VTP activities on any day within an air district when multiple units reside within the same air district boundary. When a single CAL FIRE Unit resides within an air district boundary, one day total activity emission estimates will not exceed the current air district's Threshold of Significance. No more than one of these projects shall be a prescribed burn, unless

additional prescribed burns have been approved by the local air district having authority over the project area.

Mitigation Measure AIR-1

To achieve compliance with local air district emission thresholds in the San Joaquin Valley Unified Air Quality Management District, simultaneous projects within that air district will be constrained to an appropriate number as not to exceed air quality standards. As a result, the Program shall implement the following:

- CAL FIRE shall not allow more than seven simultaneous treatment activities to occur in the San Joaquin Valley Unified Air Quality Management District, regardless of the number of CAL FIRE units in the district.

7.2.1.4 Biological Standard Project Requirements

BIO-1: Projects shall be designed to avoid significant effects and avoid take of special status species as defined in the glossary as a plant or animal species that is listed as rare, threatened, or endangered under Federal law; or rare, threatened, endangered, candidate, or fully protected under State law; or as a sensitive species by the California Board of Forestry and Fire Protection.

BIO-2: The project coordinator shall run a nine-quad search or larger search area (may be required if a project is on the boundary of two USGS quad maps) of the area surrounding the proposed project for special status species, using at a minimum, the California Natural Diversity Database (CNDDDB) or its successor (e.g., DFW's Vegetation Classification and Mapping Program, VegCAMP).

BIO-3: The project coordinator shall write a summary of all special status species identified in the biological scoping including the CNDDDB search with a preliminary analysis, identifying which species would be affected by the proposed project. A field review will then be conducted by the project coordinator to identify the presence or absence of any special status species, or appropriate habitat for special status species, within the project area.

BIO-4: The project coordinator shall ensure that a CAL FIRE Environmental Coordinator analyze impacts to any species identified in a CNDDDB or BIOS search and shall submit the summary and preliminary analysis to the CDFW, USFWS, and [if applicable] NOAA Fisheries for consultation. The preliminary analysis shall be accompanied with a standard letter containing the following:

- A written description of the project location and boundaries.
- Brief narrative of the project objectives.

- A description of the types of activities used in the project (e.g., prescribed burning; mastication) and associated acreages.
- A project and general location map. Project map shall be of sufficient scale to indicate the spatial extent of activities within the project area.
- The output from the CNDDDB run, including a map of any special status species located during the field review, and the SPRs that will be implemented to minimize impacts on the identified special status species.
- A request for information regarding the presence and absence of special status species, including any applicable HCPs, in the project vicinity, and potential take avoidance measures to be implemented as PSRs.
- An offer to schedule a day to visit the project area with the project coordinator.

BIO-5: Vegetation treatment projects that are not deemed necessary to protect critical infrastructure or forest health in San Diego, Imperial, Riverside, Orange, Los Angeles, Ventura, Santa Barbara, Kern, and San Bernardino counties shall:

- Be designed to prevent vegetation type conversion.
- Not take place in vegetation that has not reached the age of median fire return intervals.
- Not re-enter treatment areas for maintenance in an interval shorter than the median fire return interval outside of the wildland urban interface and excluding fuel break maintenance.
- Not take place in old-growth chaparral without consultation regarding the potential for significant impacts with the CDFW and the CNPS.
- Take into account the local aesthetics, wildlife, and recreation of the shrub-dominated subtype during the planning and implementation of the project.
- During the project planning phase provide a public workshop or public notice in a newspaper that is circulated locally describing the proposed project during the project planning phase for projects outside of the WUI. The notification will be used to inform stakeholders and to solicit information on the potential for significant impacts during the project planning phase.

BIO-6: In shrublands containing native oaks, treatments may incorporate retention of older, acorn producing oaks to create deer forage. CAL FIRE or applicants may plant other vegetation to promote species diversity and improve wildlife habitat when such practices are not in conflict with program goals.

BIO-7: Unless otherwise directed by CDFW, a minimum 50 foot avoidance buffer shall be established around any special status animal, nest site, or den location and a minimum 15 foot avoidance buffer shall be established around any special status plant

within the project area. Additional buffer distances may be required through consultation with the appropriate State or Federal agencies, or a qualified biologist to avoid significant effects to special status species (see BIO-4).

BIO-8: In order to reduce the spread of new invasive plants, only certified weed-free straw and mulch shall be used.

BIO-9: During the planning phase, if the project coordinator determines that there is a significant risk of introducing invasive plants, then project specific mitigation measures shall be developed using principles outlined in the document “Preventing the Spread of Invasive Plants: Best Management Practices for Land Managers (3rd edition)” or other relevant documents. Coordination of mitigation measures will also include consultation with CDFW.

BIO-10: If water drafting becomes a necessary component of the proposed project, drafting sites shall be planned to avoid adverse effects to special status aquatic species and associated habitat, in-stream flows, and depletion of pool habitat. Screening devices shall be used for water drafting pumps, and pumps with low entry velocity shall be used to minimize removal of aquatic species, including juvenile fish, amphibian egg masses, and tadpoles, from aquatic habitats.

BIO-11: Aquatic habitats and species shall be protected through the use of watercourse and lake protection zones (WLPZ), as described in California Forest Practice Rules (14 CCR Chapters 4, 4.5, and 10). Other operational restrictions may be identified through consultation with CDFW and RWQCB (see BIO-4). See HYD-3 for these standard protection measures.

BIO-12: For projects that require a non-construction-related CDFW Streambed Alteration Agreement, any BMPs identified in the agreement shall be developed and implemented.

BIO-13: If any special status species are identified within the project area, an onsite meeting shall occur between the project coordinator and operating contractor. At this meeting the project manager shall conduct a brief review of life history, field identification, and habitat requirements for each special status species, their known or probable locations in the vicinity of the treatment site, project specific requirements or avoidance measures, and necessary actions if special status species or sensitive natural communities are encountered.

7.2.1.5 Climate Change-Related Standard Project Requirements

CC-1: Prior to approval of a Unit project under the VTP, the project coordinator shall run the FOFEM, and/or other GHG-emissions models, as appropriate to the treatment

activity, to confirm that GHG emissions will be the minimum necessary to achieve risk reduction objectives.

CC-2: Carbon sequestration measures shall be implemented per SPRs BIO-5 and BIO-6 to reduce total carbon emissions resulting from the treatment activity.

CC-3: Treatment activity-related air pollutant emission control measures for prescribed burns shall be implemented in accordance with SPRs AIR-3 and AIR-4.

CC-4: Treatment activity-related air pollutant emission control measures for equipment operation hours, practices, and maintenance shall be implemented in accordance with SPRs AIR-11 and AIR-12.

7.2.1.6 Archaeology and Cultural Resources-Related Standard Project Requirements

CUL-1: The project coordinator or designee shall order a current records check as per the most current edition of “Archaeological Review Procedures for CAL FIRE Projects” (CAL FIRE, 2010, see Appendix H). The project coordinator may contact landowners within the project area who might have already conducted a records check for a Timber Harvest Plan or other project on their land to limit costly redundant records searches. Records checks must be less than five years old at the time of project submission.

CUL-2: Using the latest Native Americans Contact List from the CAL FIRE website, the project coordinator or designee shall send all Native American groups in the counties where the project is located a standard letter notifying them of the project. The letter shall contain the following:

- A written description of the project location and boundaries.
- Brief narrative of the project objectives.
- A description of the types of activities used in the project (e.g., prescribed burning, mastication) and associated acreages.
- A project and general location map. Project map shall be of sufficient scale to indicate the spatial extent of activities within the project area.
- A request for information regarding potential cultural impacts from the proposed project.

CUL-3: The project coordinator or designee shall contact a CAL FIRE Archaeologist or CAL FIRE Certified Archaeological Surveyor to arrange for a survey of the project area if necessary. The specific requirements need to comply with the most current edition of “Archaeological Review Procedures for CAL FIRE Projects” (CAL FIRE, 2010).

CUL-4: Protection measures for archaeological and cultural resources shall be developed through consultation with a CAL FIRE archeologist. If new archaeological

sites are discovered, the project coordinator or designee shall notify Native American groups of the resource and the protection measure with the standard second letter (see Appendix H). Locations of archaeological resources should not be disclosed on a map to the members of the public, including Native American groups.

CUL-5: If an unknown site is discovered during project operations, operations within 100 feet of the identified boundaries of the new site shall immediately halt, and the project will avoid any more disturbances. A CAL FIRE Archaeologist shall be contacted for an evaluation of the significance of the site. In accordance with the California Health and Safety Code, if human remains are discovered during ground disturbing activities, CAL FIRE and/or the project contractor(s) shall immediately halt potentially damaging activities in the area of the burial and notify the County Coroner and a qualified professional archaeologist to determine the nature and significance of the remains.

7.2.1.7 Fire Behavior-Related Standard Project Requirements

FBE-1: The prescribed fire burn prescription shall be designed to initiate a surface fire of sufficient intensity that will only consume surface and ladder fuels. The prescribed fire burn prescription shall be designed and implemented to protect soil resources from direct soil heating impacts. Soil damage will not occur as a result of this project.

FBE-2: A burn plan shall be created using the burn plan template. The burn plan shall include a fire behavior model output of BEHAVE or other fire behavior modeling simulation and performed by a fire behavior technical specialist (S-490 qualified). The burn plan shall be created with input from the vegetation project's Battalion Chief and a fire behavior technical specialist (S-490 qualified).

FBE-3: The project coordinator shall run a First Order Fire Effects Model (FOFEM) to analyze fire effects. The results of the analysis shall be included with the Burn Plan. FOFEM calculates consumption of fuels, tree mortality, predicted emissions, GHG emissions, and soil heating.

FBE-4: Approximately two weeks prior to commencement of prescribed burning operations the project coordinator shall 1) post signs along the closest major road way to the project area describing the project, timing, and requesting for smoke sensitive persons in the area to contact the project coordinator; 2) publish a public interest notification in a local newspapers describing the project, timing, and requesting for smoke sensitive persons in the area to contact the CAL FIRE project coordinator; 3) send the local county supervisor a notification letter describing the project, its necessity, timing, and summarize the measures being taken to protect the environment and prevent escape; and 4) develop a list of smoke sensitive persons in the area and contact them prior to burning.

7.2.1.8 Geologic Standard Project Requirements

GEO-1: An RPF or licensed geologist shall assess the project area for unstable areas and unstable soils as per 14 CCR 895.1 of the California Forest Practice Rules. Guidance on identifying unstable areas is contained in the California Licensed Foresters Association *Guide to Determining the Need for Input From a Licensed Geologist During THP Preparation* and California Geological Survey (CGS) Note 50 (see Appendix C). Priority will be placed on assessing watercourse-adjacent slopes greater than 50%. If unstable areas or soils are identified within the project area, are unavoidable, and are potentially directly or indirectly affected by the project operations, a licensed geologist (P.G. or C.E.G.) shall conduct a geologic assessment to determine the potential for project-induced impacts and mitigation strategies. Project shall incorporate all of the recommended mitigations. Geologic reports should cover the topics outlined in CGS Note 45 (see Appendix C).

GEO-2: The potential impacts of prescribed fire on geologic processes shall be reduced by following the Fire Behavior-related SPRs FBE-1, FBE-2, and FBE-3.

7.2.1.9 Hazards and Hazardous Material-Related Standard Project Requirements

HAZ-1: Prior to the start of vegetation treatment activities, the project coordinator shall conduct an Envirofacts web search to identify any known contamination sites within the project area. If a proposed vegetation treatment project occurs in areas located on the DTSC Cortese List, no activities shall occur within 100 feet of the site boundaries.

HAZ-2: Prior to the start of vegetation treatment activities, the project coordinator or contractor shall inspect all equipment for leaks and regularly inspect thereafter until equipment is removed from the site.

HAZ-3: Prior to the selection of treatment activities, CAL FIRE shall determine if there are viable, cost-effective, non-herbicide treatment activities that could be implemented prior to the selection of herbicide treatments.

HAZ-4: Prior to the start of herbicide treatment activities, the project coordinator shall prepare a Spill Prevention and Response Plan (SPRP) to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. This plan shall include (but not be limited to):

- A map that delineates VTP staging areas, where storage, loading, and mixing of herbicides will occur
- A list of items required in a spill kit onsite that will be maintained throughout the life of the project

- Procedures for the proper storage, use, and disposal of any herbicides, adjuvants, or other chemicals used in vegetation treatment

HAZ-5: If remediation of hazardous contamination is needed, the project coordinator shall hire a licensed contractor with expertise in performing such work. The contractor shall comply with all laws and regulations governing worker safety and the removal and disposal of any contaminated material.

HAZ-6: All pesticide use shall be implemented consistent with Pest Control recommendations prepared annually by a licensed Pest Control Advisor.

HAZ-7: All appropriate laws and regulations pertaining to the use of pesticides and safety standards for employees and the public, as governed by the U.S. Environmental Protection Agency, the California Department of Pesticide Regulation, and local jurisdictions shall be followed. All applications shall adhere to label directions for application rates and methods, storage, transportation, mixing, and container disposal. All contracted applicators shall be appropriately licensed by the state. The project coordinator shall coordinate with the County Agricultural Commissioners, and all required licenses and permits shall be obtained prior to pesticide application.

HAZ-8: Projects shall avoid herbicide treatment in areas adjacent to water bodies and riparian areas. Application of herbicides shall be outside the WLPZ and ELZ as specified in HYD-3, or at the distances set forth in the herbicide label requirements, whichever is greater. No aerial spraying of herbicides shall occur under this Program EIR.

HAZ-9: The following general application parameters shall be employed during herbicide application:

- Application shall cease when weather parameters exceed label specifications, when sustained winds at the site of application exceeds seven miles per hour (MPH), or when precipitation (rain) occurs or is forecasted with greater than a 40 percent probability in the next 24-hour period to prevent sediment and herbicides from entering the water via surface runoff
- Spray nozzles shall be configured to produce a relatively large droplet size
- Low nozzle pressures (30-70 pounds per square inch [PSI]) shall be observed
- Spray nozzles shall be kept within 24 inches of vegetation during spraying

Drift avoidance measures shall be used to prevent drift in locations where target weeds and pests are in proximity to special status species or their habitat. Such measures can consist of, but would not be limited to, the use of plastic shields around target weeds and pests and adjusting the spray nozzles of application equipment to limit the spray area.

HAZ-10: All herbicide and adjuvant containers shall be triple rinsed with clean water at an approved site, and the rinsate shall be disposed of by placing it in the batch tank for application per 3 CCR § 6684. Used containers shall be punctured on the top and bottom to render them unusable, unless said containers are part of a manufacturer's container recycling program, in which case the manufacturer's instructions shall be followed. Disposal of non-recyclable containers will be at legal dumpsites. Equipment would not be cleaned and personnel would not bathe in a manner that allows contaminated water to directly enter any body of water within the treatment areas or adjacent watersheds. Disposal of all pesticides shall follow label requirements and local waste disposal regulations.

HAZ-11: Storage, loading and mixing of herbicides shall be set back at least 150 feet from any aquatic feature or special status species or their habitat or sensitive natural communities.

HAZ-12: Appropriate non-toxic colorants or dyes shall be added to the herbicide mixture where needed to determine treated areas and prevent over-spraying.

HAZ-13: For treatment activities located within or adjacent to public recreation areas, signs shall be posted at each end of herbicide treatment areas and any intersecting trails notifying the public of the use of herbicides. The signs shall consist of the following information: signal word, product name, and manufacturer; active ingredient; EPA registration number; target pest; treatment location; date and time of application; date which notification sign may be removed; and contact person with telephone number. Signs shall be posted at the start of treatment and notification will remain in place for 72 hours after treatment ceases.

HAZ-14: All heavy equipment shall be required to include spark arrestors or turbochargers that eliminate sparks in exhaust and have fire extinguishers onsite.

7.2.1.10 Hydrologic and Water Quality-Related Standard Project Requirements

HYD-1: The project shall comply with all applicable water quality requirements adopted by the appropriate Regional Water Quality Control Board and approved by the State Water Board (i.e., Basin Plan).

HYD-2: During the planning phase the project coordinator shall submit a standard letter to the appropriate RWQCB containing the following:

- A written description of the project location and boundaries.
- Brief narrative of the project objectives.
- A description of the types of activities used in the project (e.g., prescribed burning, mastication) and associated acreages.

- A project and general location map. Project map shall be of sufficient scale to indicate the spatial extent of activities within the project area.
- Notification of whether the project drains directly into an impaired water body, and the type of water quality constituent(s) that is impairing the water body.
- A request for information and recommendations regarding the potential for significant water quality impacts from the proposed project and an offer to schedule a day to visit the project area with the project coordinator. The project shall incorporate the recommendations that prevent significant impacts to water quality as PSRs.

HYD-3: A WLPZ shall be established on each side of all Class I and II watercourses that is equal to the standard widths specified in the current California Forest Practice Rules (**Error! Reference source not found.**). Fifty foot equipment limitation zones (ELZs) shall be established for Class III watercourses. Vegetation within the WLPZ or ELZ will not be disturbed by project activities, with the exception of backing prescribed fire. Class IV watercourse protections shall be PSRs specified in the PSA, and designed in conjunction with any recommendations from RWQCB staff.

Watercourse and lake protection zone buffer widths by watercourse classification and hill slope gradient (See HYD -3)

Note: ELZ-Equipment Limitation Zone, PSR-Project Specific Requirement

| Water Class Characteristics or Key Indicator / Beneficial Use | 1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the project area and/or | 1) Fish always or seasonally present offsite within 1000 feet downstream and/or | No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II water under normal high water flow conditions of timber operations | Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use |
|---|---|---|---|---|
| Water Class | Class I | Class II | Class III | Class IV |
| Slope Class (%) | Width (ft.) | Width (ft.) | Width (ft.) | Width |
| <30 | 75 | 50 | 50 (ELZ) | PSR |
| 30-50 | 100 | 75 | 50 (ELZ) | PSR |
| >50 | 150 | 100 | 50 (ELZ) | PSR |

HYD-4: No direct ignition shall be allowed within the WLPZ or ELZs. However, it is acceptable for a fire to enter or back into a WLPZ's or ELZ's.

HYD-5: Compacted and/or bare linear treatment areas (e.g., fire breaks, roads, or trails) capable of generating storm runoff shall be drained via water breaks using the spacing guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules.

HYD-6: Compacted and/or bare treatment areas shall be drained such that they are hydrologically disconnected from watercourses or lakes. Measures to hydrologically disconnect these areas shall be guided by consulting with Technical Rule Addendum #5 of the California Forest Practice Rules – Guidance on Hydrologic Disconnection, Road Drainage, Minimization of Diversion Potential, and High Risk Crossings

HYD-7: No high ground pressure vehicles shall be driven through project areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing material during timber operations, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials.

HYD-8: For remaining hydrologically connected areas of compacted or bare linear treatment areas, disturbed areas will be mulched with onsite native vegetative material (e.g., cut material).

HYD-9: During dry, dusty conditions, unpaved roads shall be wetted using water trucks or treated with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material). Any dust suppressant product used shall be environmentally benign (i.e., non-toxic to plants and shall not negatively impact water quality) and its use shall not be prohibited by the ARB, U.S. Environmental Protection Agency (EPA), or the State Water Resources Control Board. Exposed areas shall not be over-watered such that water results in runoff. The type of dust suppression method shall be selected by the contractor based on soil, traffic, site-specific conditions, and local air quality regulations.

HYD-10: Prior to the start of onsite activities, all equipment will be inspected for leaks and regularly inspected thereafter until equipment is removed from the project area. All contaminated water, sludge, spill residue, or other hazardous compounds will be contained and disposed of outside the boundaries of the site, at a lawfully permitted or authorized destination.

HYD-11: Staging areas shall be designated and located to prevent leakage of oil, hydraulic fluids, or other chemicals into watercourses or lakes.

HYD-12: All heavy equipment parking, refueling, and service shall be conducted within designated areas outside of the WLPZ or ELZ.

HYD-13: No new roads (including temporary roads) shall be constructed or reconstructed (reconstruction is defined as cutting or filling involving less than 50 cubic yards/0.25 linear road miles). Existing roads, skid trails, fire lines, fuel breaks, etc. that require reopening or maintenance shall have drainage facilities applied at the conclusion of the project that are at least equal to those of the California Forest Practice Rules.

HYD-14: Heavy equipment is prohibited on slopes exceeding 65 percent or on slopes greater than 50 percent where the erosion hazard rating is high or extreme. Heavy equipment is prohibited on slopes greater than 50 percent that lead without flattening to watercourses.

HYD-15: Burn piles shall not exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour.

HYD-16: At the CalWater Planning Watershed scale, if the combined, appropriately-weighted acreage subjected to fuels treatments and logging exceed 20% of the watershed area within a 10-year timespan (see Appendix K for calculation procedures); an analysis will be performed to determine the potential for hydrologically-induced significant impacts of the proposed activity.

HYD-17: If herbivory is proposed to treat vegetation in a project area containing watercourses, then the following items must be addressed as PSRs:

- The project will require water on site in the form of an on-site stock pond outside the WLPZ or ELZ, or a portable water source located outside the WLPZ or ELZ.
- The project will specify animal containment measures in the PSA to prevent animals from entering the WLPZ and/or ELZs. These might include the use of fencing (i.e., fixed or portable), the use of guard or herd dogs, or the use of an on-site herder.

7.2.1.11 Noise-Related Standard Project Requirements

NSE-1: All powered equipment shall be used and maintained according to manufacturer's specifications.

NSE-2: Equipment engine shrouds shall be closed during equipment operation.

NSE-3: All heavy equipment and equipment staging areas shall be located as far as possible from nearby noise-sensitive land use (e.g., residential land uses, schools, hospitals, places of worship).

NSE-4: All motorized equipment shall be shut down when not in use. Idling of equipment or trucks shall be limited to 5 minutes.

NSE-5: Public notice of the proposed project shall be given to notify noise-sensitive receptors of potential noise-generating activities.

7.2.1.12 Traffic-Related Standard Project Requirements

TRA-1: Public road ways leading into project area shall be signed to warn traffic of the project activities that are taking place. Road signage shall be posted the morning prior to the commencement of burning operations and shall remain until all operations are completed.

TRA-2: Direct smoke and dust impacts to roadway visibility and the indirect distraction of operations shall be considered during burning operations. Traffic control operations shall be implemented if weather conditions inhibiting smoke and dust dispersion have the potential to impact roadway visibility to motorists.

7.2.2 PSA ATTACHMENT B- PROJECT PRIORITY RANKING

7.2.3 PSA ATTACHMENT C- VTP OBJECTIVES & PROJECT OBJECTIVE EXAMPLES

| Vegetation Treatment Program Objectives |
|--|
| 1. Modify wildland fire behavior to help reduce losses to life, property and natural resources. |
| 2. Increase the opportunities for altering or influencing the size, intensity, shape, and direction of wildfires within the wildland-urban interface (WUI). |
| 3. Reduce the potential size and total associated suppression costs of individual wildland fires by altering the continuity of wildland fuels. |
| 4. Reduce the potential for high severity fires by restoring and maintaining a range of native, fire-adapted plant communities through periodic low intensity treatments within the appropriate vegetation types. |
| 5. Provide a consistent, accountable, and transparent process for vegetation treatment monitoring that is responsive to the objectives, priorities, and concerns of landowners, local, state, and federal governments, and other stakeholders. |

WUI treatment sample objectives –

- Reduce the vertical and horizontal continuity of fuels adjacent to structures.
- Provide vegetation clearance along ingress and egress for public safety.

Ecological Restoration treatment sample objectives –

- Recreate pre-settlement fire regimes, stand structures and species compositions
- Increase the quality of habitat for early seral stage wildlife species.
- Increase range forage conditions for domestic livestock

Fuel Break treatment sample objectives –

- Provide a shaded fuel break between ##### and ##### to help slow the progress of wildfire impacting the ##### community and/or allow for the safe deployment of firefighting personnel.