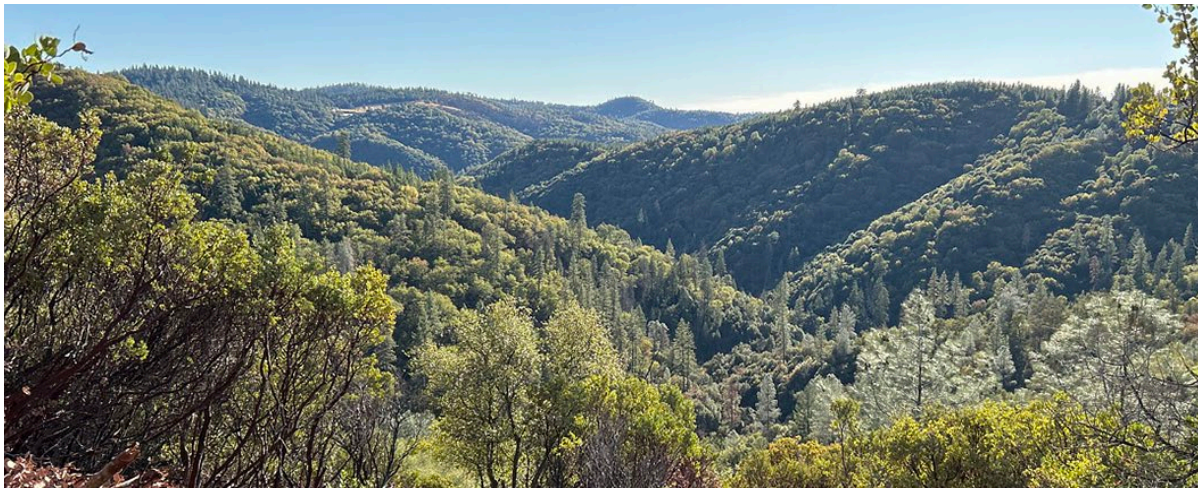
PROJECT-SPECIFIC ANALYSIS AND ADDENDUM TO THE CalVTP PROGRAM EIR

South Yuba Rim Hazardous Fuels Reduction Project



Prepared for:

Nevada County Office of Emergency Services

Yuba Watershed Institute

May 2025

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South Yuba Rim Hazardous Fuels Reduction Project

Prepared for:

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LIST OF ABBREVIATIONS

ATV	all-terrain vehicle
BLM	Bureau of Land Management
Board	California Board of Forestry and Fire Protection
CAAQS	California Ambient Air Quality Standard
Cal-IPC	California Invasive Plant Council
CalVTP	California Vegetation Treatment Program
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	California Natural Diversity Database
CRHR	California Register of Historical Resources
CUP	conditional use permit
CWHR	California Wildlife Habitat Relationships
DBH	diameter at breast height
DPS	Distinct Population Segment
EPA	US Environmental Protection Agency
ESA	federal Endangered Species Act
FEMA	Federal Emergency Management Agency
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	community conservation plan
NCIC	North Central Information Center
NO_X	nitrous oxide
NSAQMD	Northern Sierra Air Quality Management District
NWI	National Wetland Inventory

PM	particulate matter
Program EIR	program environmental impact report
proposed project	South Yuba Rim Hazardous Fuels Reduction Project
PSA	project-specific analysis
PSA/Addendum	ad to the program EIR
ROG	reactive organic gas
SENL	single event noise level
SPR	standard project requirements
SR	State Route
SRA	State Responsibility Area
TAC	toxic air contaminants
UAS	unmanned aerial systems
USFWS	US Fish and Wildlife Service
USGS	US Geological Survey
UTV	utility task vehicle
VMT	vehicle miles traveled
WLPZ	Within Watercourse and Lake Protection Zone
WUI	wildland-urban interface
YWI	Yuba Watershed Institute

1 INTRODUCTION

1.1 PROJECT OVERVIEW AND DOCUMENT PURPOSE

The California Board of Forestry and Fire Protection (Board) certified the Program Environmental Impact Report (Program EIR) for the California Vegetation Treatment Program (CalVTP) in December 2019. The Program EIR evaluates the potential environmental effects of implementing vegetation treatments throughout the State Responsibility Area (SRA) and portions of the adjacent Local Responsibility Area (LRA) in California. This document is a Project-Specific Analysis (PSA) and Addendum to the Program EIR (PSA/Addendum). The PSA process was designed during Program EIR preparation for use by state agencies, special districts, and local agencies to help increase the pace and scale of vegetation treatment by employing California Environmental Quality Act (CEQA) efficiency tools (i.e., a within-the-scope finding based on the PSA). An Addendum to the Program EIR is another CEQA efficiency tool designed to address those project components that are not within the scope of the Program EIR but have similar environmental effects. This PSA/Addendum comprises the joint implementation of these CEQA tools in a single document.

1.1.1 Proposed Project

The proposed South Yuba Rim Hazardous Fuels Reduction Project (proposed project) entails implementation of vegetation treatments on up to 7,320 acres of land in Nevada County (Figure 1-1). The proposed treatment types (i.e., fuel breaks, wildland-urban interface [WUI] fuel reduction, ecological restoration) and the treatment activities (i.e., manual vegetation treatment, mechanical vegetation treatment, prescribed burning, herbicide application, prescribed herbivory) are consistent with those evaluated in the CalVTP Program EIR. Maintenance treatments would involve the same vegetation treatment types and activities used in the initial treatments.

1.1.2 Agency Roles

This document is being prepared to comply with CEQA for the implementation of vegetation treatments that require a discretionary action by a state or local agency. Nevada County is the CEQA lead agency.

Nevada County has entered into a partnership with Yuba Watershed Institute (YWI) to implement a portion of the proposed treatments. The partnership entails the provision of resources to YWI, namely administration of funding for treatments on 800 acres in the project area through a Federal Emergency Management Agency (FEMA) grant and technical input. In this PSA/Addendum, YWI is referred to as an "implementing entity," reflecting its role as a known implementer of treatments on 800 acres. As the CEQA lead agency, Nevada County has delegated responsibility to YWI to implement CalVTP standard project requirements (SPRs) and mitigation measures on the 800 acres, and to confirm that implementation occurs in accordance with the mitigation monitoring and reporting program (MMRP) on the 800 acres, pursuant to Section 15097(a) of the State CEQA Guidelines.

USE OF THE PSA/ADDENDUM BY OTHER AGENCIES

This PSA/Addendum, in conjunction with the CalVTP Program EIR, may be used for CEQA compliance by other public agencies acting in a responsible agency role, when a discretionary approval is needed pertaining to covered activities in the project area, including for public funding through other sources. CAL FIRE is considering implementing vegetation treatments in the project area (outside of the 800 acres where YWI would implement treatments), and CAL FIRE would therefore be a responsible agency that could use this PSA/Addendum for CEQA compliance for treatments carried out by the agency and would also be the "implementing entity" for implementation of these treatments. In the future, agencies other than CAL FIRE could use this PSA/Addendum for CEQA compliance in similar circumstances.

A responsible agency would consider its action in light of the PSA/Addendum, and confirm its environmental effects are covered. If so, and in conformance with State CEQA Guidelines Section 15096, the responsible agency would adopt its findings, using the County of Nevada findings as a guide if desired, adopt the MMRP as it pertains to their project-related approval, and file a Notice of Determination regarding their project-related approval.

In the circumstance where another public agency seeks to use the PSA/Addendum for CEQA compliance and there is no related discretionary approval required of Nevada County, Nevada County would have no involvement, oversight, or other obligation in the approval, implementation, or documentation of that agency's actions.

1.1.3 Purpose of This PSA/Addendum

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

The PSA checklist (refer to Chapter 4, "Project-Specific Analysis/Addendum") includes the criteria to support an Addendum to the CalVTP Program EIR. The checklist evaluates each resource in terms of whether the later treatment project, including the "changed condition," would result in significant impacts that would be substantially more severe than those covered in the Program EIR or would result in any new impacts that were not covered in the Program EIR. If a new impact arises, the checklist analysis would provide substantial evidence about whether it would be a significant or potentially significant impact. If the new impact would not be significant, it could be addressed in the Addendum to the Program EIR.

An Addendum to an EIR is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts, consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In this case, there are no changed circumstances, but the proposed revision or change in the project, compared to the Program EIR, is the inclusion of areas outside of and adjacent to the CalVTP treatable landscape and revisions to standard project requirements (SPRs), which are integrated into the Program itself.

This document serves as both a PSA and an Addendum to the CalVTP Program EIR for Nevada County review and analysis under CEQA regarding the proposed South Yuba Rim Hazardous Fuels Reduction Project within and outside the treatable landscape covered by the Program EIR, including the proposed SPR revisions. It provides environmental information supported by substantial evidence to Nevada County in its consideration of approving grant funding allocations and implementation of the work. The project-specific MMRP, which identifies the CalVTP 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.

Given the limited spatial resolution of publicly accessible land ownership boundaries, the potential exists that during pre-treatment field layout, a registered professional forester (RPF) or qualified professional may determine that treatment area boundaries need to shift slightly from the project area identified in this PSA/Addendum to meet treatment objectives and reflect on-the-ground conditions. The RPF or qualified professional will determine if all resources in the area outside the PSA/Addendum project boundary were considered in the PSA/Addendum or are substantially the same as those considered in the PSA/Addendum, including that the cultural records search encompassed any expanded area. If resources are present that were not considered in the PSA/Addendum, additional CEQA documentation (e.g., revised PSA/Addendum) must be prepared to document whether a new significant impact or substantial increase in the severity of an identified significant impact would occur from

treatments in the area outside the PSA/Addendum project boundary. All relevant SPRs and mitigation measures will be applied throughout the entire treatment area.

PROPOSED PROJECT REVISIONS

Project Area Outside the CalVTP Treatable Landscape

Among the criteria for determining if a treatment project is within the scope of the CalVTP Program EIR is whether it is located in the CalVTP treatable landscape (i.e., the geographic extent of analysis covered in the Program EIR). While most of the project area would be inside, portions of the project area would extend outside of the treatable landscape described in the CalVTP Program EIR. In total, the areas outside the treatable landscape encompass approximately 651 acres of the 7,320-acre project area; they comprise small sections dispersed throughout the project area. The scattered array of project area acreage includes some non-treatable landscape acres that are isolated pixels surrounded by treatable landscape. 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 Program EIR would be applicable.

Use of Flaming

The project proposes to use flaming as a targeted method for controlling invasive plant and noxious weed species, in particular Scotch broom (*Cytisus scoparius*), in the treatment areas. Flaming involves using handheld propane torches to apply heat directly to the lower stems or green seedlings of target plants. This method "blanches" the plant tissue, causing cell walls to burst and the plant to collapse, without igniting it or burning the surrounding area. Flaming is particularly effective on newly germinated Scotch broom seedlings at the stage where three or four leaves have emerged and would primarily be used as a maintenance treatment to address regrowth. Operations are conducted under controlled conditions, such as light rains or wet days, to minimize fire risk, with additional safety measures, including on-site water tanks and personnel.

Although flaming is not explicitly covered as a treatment activity under the CalVTP, it aligns with the objectives and has similar or more minor impacts to manual treatment activities analyzed in the CalVTP Program EIR. Flaming uses heat to control vegetation, by “steaming” or “wilting” vegetation. Its handheld precision, minimal/no soil disturbance, and absence of combustion make it most comparable to manual treatment, as it allows for selective application with limited environmental impact. The use of handheld torches ensures that impacts remain highly localized.

The potential impacts of flaming are similar in character and similar or reduced in intensity to those described for manual vegetation treatment, which is a covered activity under the CalVTP. Flaming of invasive plants and noxious weeds does not introduce any new or substantially more severe significant environmental impacts than were analyzed in the Program EIR. Its inclusion as a treatment option is consistent with the analysis established for activities already evaluated in the CalVTP Program EIR and all SPRs and mitigation measures applicable to manual treatments would be applied.

Proposed Revisions to CalVTP SPRs

While the proposed treatment types and treatment activities are consistent with the CalVTP, Nevada County has determined that certain requirements of CalVTP SPRs are infeasible, are not warranted for this project to maintain the impact significance conclusions in the Program EIR, and, if implemented as presented in the Program EIR, would prevent achievement of treatment objectives. Because SPRs are part of the CalVTP Program Description and are incorporated into later activities as a standard part of treatment design and implementation, revisions (beyond clarifying edits) would constitute a change to the CalVTP.

The proposed revisions to SPRs are described below. These proposed changes would not result in any new or substantially more severe significant impacts on any of the resources evaluated in the Program EIR and described in this PSA/Addendum. Evidence to explain this conclusion is presented under each applicable resource, as summarized below and presented throughout Chapter 4, “Project-Specific Analysis/Addendum.”

SPR CUL-4: Archaeological Surveys

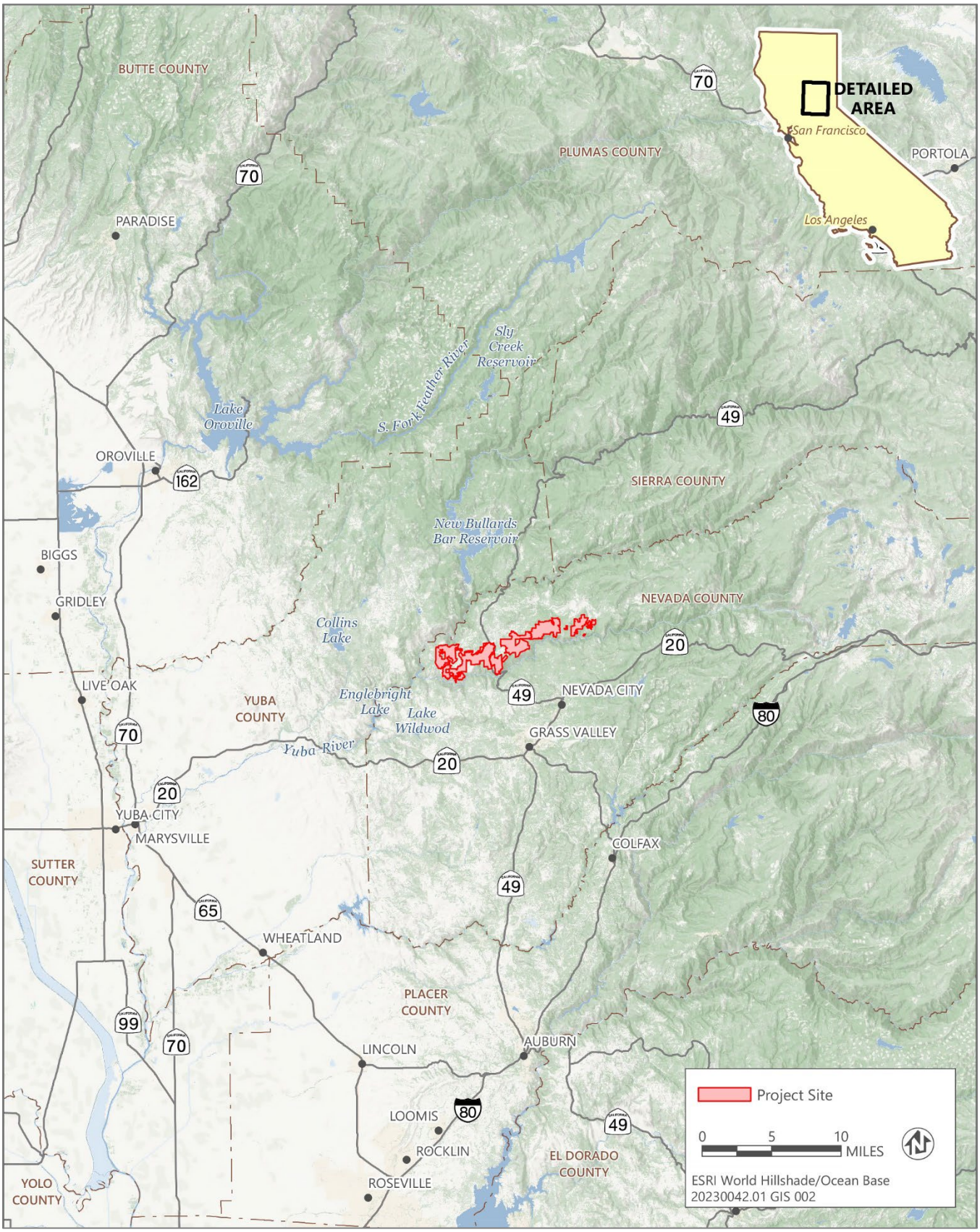
SPR CUL-4, as presented in the Program EIR, requires an archaeological and historical survey to be conducted prior to implementation of any treatment activity, including treatments that do not result in ground disturbance or other risk of impact to archaeological or historical resources (e.g., manual treatments, prescribed herbivory, and herbicide application). The application of SPR CUL-4 to all treatment activities, particularly those that do not result in any ground disturbance, is unnecessary to avoid impacts. The treatment of vegetation around communities using hand tools and non-ground disturbing equipment could not impact cultural resources, provided that woody material is chipped and removed, chipped and scattered, or lopped and scattered. Therefore, the project proposes site-specific surveys of treatment areas for mechanical treatments, prescribed burning treatments, and manual treatments when woody material would be disposed of in a manner other than being chipped and removed, chipped and scattered, or lopped and scattered. The proposed revisions to SPR CUL-4 would not result in any additional adverse effects to cultural resources beyond what was analyzed in the CalVTP Program EIR, because the revisions would only allow treatment activities that could not result in damage to cultural resources to occur without a survey for archaeological or historical resources. Those activities that may result in damage to cultural resources (e.g., mechanical treatments and prescribed burning) would require pre-treatment surveys. Potential impacts resulting from revisions to SPR CUL-4 are discussed below under Section 4.4, "Archaeological, Historical, and Tribal Cultural Resources." As explained in that section, the proposed revisions to SPR CUL-4 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. Impacts on other resources would not occur as a result of these revisions, because SPR CUL-4 is not required to reduce environmental effects on any other resources from implementation of the project. The proposed revisions to SPR CUL-4 are shown in the MMRP (Attachment A).

SPR GEO-1: Suspend Disturbance during Heavy Precipitation

SPR GEO-1, as presented in the Program EIR, requires that mechanical, prescribed herbivory, and herbicide treatments be suspended if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated.

Nevada County proposes to suspend mechanical treatments, prescribed herbivory, and herbicide treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical activities. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated. In the region where the project is located, forecasts often include a chance of rain; however, precipitation sometimes does not materialize. Therefore, suspension of treatment activities in these cases could result in unnecessary loss of work time. This revision is consistent with the purpose of SPR GEO-1 to suspend disturbance during heavy precipitation to minimize the risk of soil compaction and disturbance.

Potential impacts resulting from revisions to SPR GEO-1 are discussed below under Section 4.5, "Biological Resources," Section 4.6, "Geology, Soils, Paleontology, and Mineral Resources," and Section 4.10, "Hydrology and Water Quality." As explained in these sections, the proposed revisions to SPR GEO-1 would not result in any new or substantially more severe significant impacts than were analyzed in the Program EIR. Impacts on other resources would not occur as a result of these revisions, because SPR GEO-1 is not required to reduce environmental effects to any other resources from implementation of the project. The proposed revisions to SPR GEO-1 are shown in the MMRP (Attachment A).



Source: Adapted by Ascent in 2024.

Figure 1-1 Regional Location

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2 PROJECT DESCRIPTION

The proposed CalVTP treatment types and activities are summarized in Table 2-1, below.

CalVTP Treatment Type	Treatment Description	CalVTP Treatment Activities	Treatment Size (acres)	Equipment Used for Treatments	Typical Duration of Treatments
Ecological Restoration	Enhancement of forest, oak woodlands, and shrub ecosystems, increased fire resilience (development of fire adapted/resistant landscape), improved plant and wildlife habitat quality, invasive plant removal	Mechanical (mastication, ripping, biomass chipping, machine piling, brush raking, tilling, drill seeding, mowing, roller chopping, chaining, skidding/removal); Manual (hand thinning, pruning, piling, pulling/grubbing, lop/scatter, seeding/planting); Prescribed burning (pile burning, broadcast/underburning, air curtain burning, and carbonization); Prescribed herbivory; Herbicide (hand application: paint-on, backpack, tank and ATV sprayer, injection, hand placement of pellets)	1,775	Masticators, chippers (tracked and wheeled), excavators, skid steers, tractors, bulldozers, mowers, hand tools, chainsaws, pole saws, weed-trimmers, drip torches, propane torches, terra torches, unmanned aerial systems with plastic sphere dispensers, water trucks, fire engines, ATVs, UTVs, portable water tanks, water pumps, fire hoses, leaf blowers, pickup trucks, backpack sprayer, porta-potty, temporary fencing	Mechanical and Manual treatments: up to 12 months per year; Prescribed burning: 1 day to 6 months per year; Prescribed herbivory: 1 week to 8 months per year; Herbicide treatment: 1 week to 6 months per year
WUI Fuel Reduction	Improvement of egress and access for fire-suppression activities and fire control, development of fire-adapted communities, increased fire resilience (development of fire adapted/resistant landscape), improved plant and wildlife habitat quality, invasive plant removal	Mechanical (mastication, biomass chipping, machine piling, brush raking, tilling, drill seeding, mowing, roller chopping, chaining, skidding/removal); Manual (hand thinning, pruning, piling, pulling/grubbing, lop/scatter, seeding/planting); Prescribed burning (pile burning, broadcast/underburning, air curtain burning, and carbonization); Prescribed herbivory; Herbicide (hand application: paint-on, backpack, tank and ATV sprayer, injection, hand placement of pellets)	4,154	Masticators, chippers (tracked and wheeled), excavators, skid steers, tractors, bulldozers, mowers, hand tools, chainsaws, pole saws, weed-trimmers, drip torches, propane torches, terra torches, unmanned aerial systems with plastic sphere dispensers, water trucks, fire engines, ATVs, UTVs, portable water tanks, water pumps, fire hoses, leaf blowers, pickup trucks, backpack sprayer, porta-potty, temporary fencing	Mechanical and Manual treatments: up to 12 months per year; Prescribed burning: 1 day to 6 months per year; Prescribed herbivory: 1 week to 8 months per year; Herbicide treatment: 1 week to 6 months per year
Fuel Breaks	Improvement of egress and access for fire-suppression activities and fire control, development of fire-adapted communities, increased fire resilience (development of fire adapted/resistant landscape), invasive plant removal	Mechanical (mastication, biomass chipping, machine piling, brush raking, tilling, drill seeding, mowing, roller chopping, chaining, skidding/removal); Manual (hand thinning, pruning, piling, pulling/grubbing, lop/scatter, seeding and planting); Prescribed burning (pile burning, broadcast/underburning, air curtain burning, and carbonization); Prescribed herbivory; Herbicide (hand application: paint-on, backpack, tank and ATV sprayer, injection, hand placement of pellets)	1,391	Masticators, chippers (tracked and wheeled), excavators, skid steers, tractors, bulldozers, mowers, hand tools, chainsaws, pole saws, weed-trimmers, drip torches, propane torches, terra torches, unmanned aerial systems with plastic sphere dispensers, water trucks, fire engines, ATVs, UTVs, portable water tanks, water pumps, fire hoses, leaf blowers, pickup trucks, backpack sprayer, porta-potty, temporary fencing	Mechanical and Manual treatments: up to 12 months per year; Prescribed burning: 1 day to 6 months per year; Prescribed herbivory: 1 week to 8 months per year; Herbicide treatment: 1 week to 6 months per year
Total acres					**7,320 acres**

Notes: ATV = all-terrain vehicle; UTV = utility task vehicle; WUI = wildland-urban interface.

Source: Data provided by Yuba Watershed Institute in 2024.

2.1 PROPOSED TREATMENTS

The treatment types and treatment activities are described below.

2.1.1 Treatment Types

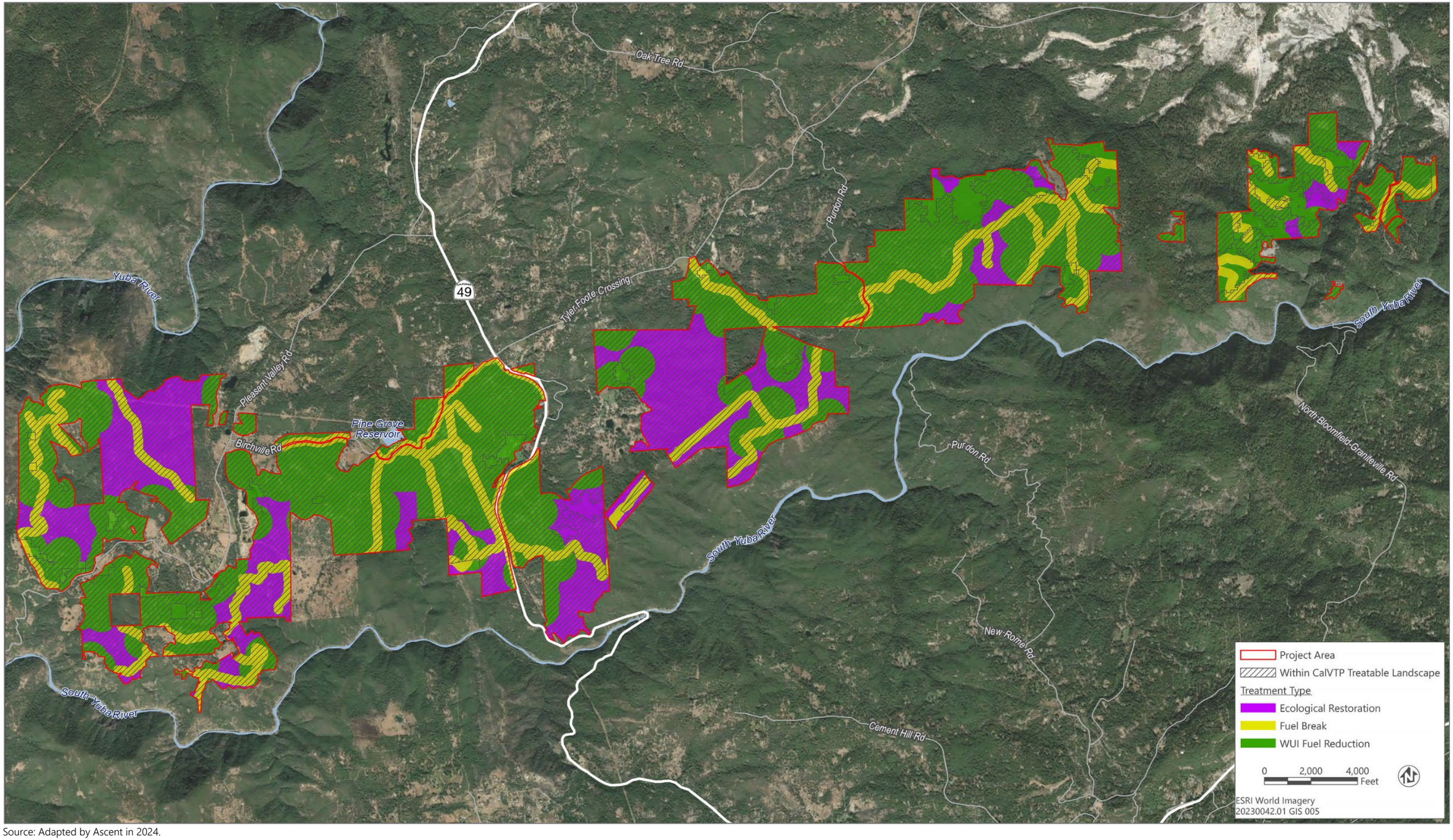
Proposed treatment types consist of ecological restoration, wildland-urban interface (WUI) fuel reduction, and fuel breaks. Each treatment type is described in more detail below and consistent with the treatment types described in the CalVTP Program EIR. Refer to Figure 2-1 for the location of each treatment type. Table 2-1 provides a summary of treatments.

ECOLOGICAL RESTORATION

The vast majority of the project area is well outside the historical range of ecological variation for measures such as tree and shrub density and fuel loading, canopy closure, and species composition and age classes. Due to fire suppression and other human disturbances, there is a greater likelihood of large, high-severity fires with effects such as loss of mature tree cover and essential wildlife habitat and increased soil destabilization. Increased tree mortality from drought stress and bark beetle infestation is present. Dense understory fuel loading of even-aged young conifers and decadent shrublands have increased competition for water, light, and nutrients, resulting in reducing ecosystem health, vigor, and resiliency.

Ecological restoration treatments are intended to safeguard and reestablish natural ecological functions, particularly enhancing landscape resilience to stressors such as drought, bark beetle infestations, wildfire, and climate change. Resilience would be augmented by restoring the historical range of variability for forest characteristics such as stand density, age structure, species composition, and fuel loads. In general, stand densities would be lowered, a multi-age structure would be promoted, drought-tolerant and shade-intolerant tree species would be retained, and fuel loads would be reduced. This would be accomplished through a mix of different treatment activities, all designed to emulate natural, periodic disturbances such as frequent, low- and mixed-severity wildfire. This treatment type would be applied across mixed conifer and ponderosa pine forests, oak woodlands, shrublands, and riparian habitats.

While residual trees are desired to have ample spacing to reduce continuity of fuels, even spacing is not desired. Trees are intended to be well-spaced but irregularly distributed throughout the stand to promote a heterogeneous structure or mosaic of "clumps and gaps." The primary targets for vegetation removal include overstocked shade-tolerant conifers and common upland broadleaf tree species less than 12 inches in diameter at breast height (DBH) found in the mid- to low-canopy where vigor, growing space, and access to sunlight is suboptimal (intermediate and suppressed crown classes, as well as most shrub species that form dense stands and constitute ladder fuels to trees in the intermediate, co-dominant, and dominant crown classes). Targets for surface fuel treatment include all cut material and slash, as well as downed woody material less than 12 inches DBH. Additional details about the proposed treatments are provided below.



Source: Adapted by Ascent in 2024.

Figure 2-1 Project Area

When treating shrub species and other understory fuels, the goal is to reduce the density and continuity of shrubs and decrease surface fuel loading. Individual plants or clusters of plants would be retained if feasible while still meeting treatment goals, and if horizontal separation between plants is at least three to five times the height of the residual plants and the residual plants are not within the drip line of an overstory tree. For the ecological restoration treatment type, at least 35 percent relative cover of chaparral vegetation would be retained. The preferred native shrub species to be retained, in order of priority, are

- Lemmon's ceanothus (*Ceanothus lemmonii*),
- coffeeberry (*Frangula* spp.),
- deer brush (*Ceanothus integerrimus*),
- toyon (*Heteromeles arbutifolia*),
- buck brush (*Ceanothus cuneatus*), and
- whiteleaf manzanita (*Arctostaphylos viscida*).

Uncommon shrub species, such as Indian manzanita (*Arctostaphylos mewukka*) and Oregon white oak (*Quercus garryana* var. *semota*) would be retained wherever feasible. The following shrub species would also be retained:

- elderberry (*Sambucus spp.*),
- western azalea (*Rhododendron occidentale*),
- dogwood (*Cornus spp.*),
- hazelnut (*Corylus cornuta*), and
- redbud (*Cercis occidentalis*).

When treating mid-story fuels, the goal is to reduce ladder fuels to the intermediate, co-dominant, and dominant crown classes by reducing the density and continuity of mid- and low-canopy (intermediate and suppressed) trees where vigor, growing space, and access to sunlight are suboptimal. An additional goal is to increase diversity in species composition of the understory by targeting overly abundant species for removal and retaining less abundant or more sensitive species. Conifer trees such as ponderosa pine (*Pinus ponderosa*), Douglas fir (*Pseudotsuga menziesii*), white fir (*Abies concolor*), and incense cedar (*Calocedrus decurrens*) under 12 inches DBH would be removed to create horizontal and vertical separation of residual trees. Hardwood and broadleaf trees such as madrone (*Arbutus menziesii*), tanoak (*Notholithocarpus densiflorus*), black oak (*Quercus kelloggii*), canyon live oak (*Quercus chrysolepis*), interior live oak (*Quercus wislizeni*), blue oak (*Quercus douglasii*), and sugar pine (*Pinus lambertiana*), under 12 inches DBH would be removed only if they constitute potential ladder fuels (i.e., are located within the drip line of residual trees), except in areas with dense stands of young oaks or madrones, which would be thinned to a desirable density to release individuals. The following tree species would be retained regardless of density or crown position, unless they are dead, dying, diseased, or a safety hazard:

- elderberry,
- willow (*Salix* spp.),
- maples and box elders (*Acer* spp.),
- alder (*Alnus* spp.),
- MacNab cypress (*Hesperocyparis macnabiana*),
- Pacific yew (*Taxus brevifolia*),
- ash (*Fraxinus* spp.),
- California sycamore (*Platanus racemosa*),
- cottonwoods (*Populus* ssp.), and

- valley oak (*Quercus lobata*) in riparian hábitats.

The order of conifer species to be retained, in descending priority, is as follows:

- sugar pine,
- Ponderosa pine,
- Douglas fir,
- white fir, and
- incense cedar.

The order of hardwood species to be retained, in descending priority, is as follows:

- blue oak,
- madrone,
- black oak,
- tanoak,
- canyon live oak, and
- interior live oak.

Snags (dead standing trees) and downed logs greater than 10 inches DBH would be retained to provide wildlife habitat, except those within 100 feet of all roads and habitable structures or those which constitute dense fuels, which would be treated if they pose a hazard.

Additional requirements regarding special-status species consist of the following:

- in forest habitats determined by a qualified RPF or biologist to be occupied (i.e., through implementation of protocol-level surveys under SPR BIO-10) or assumed to be occupied by California spotted owl (*Strix occidentalis occidentalis*) (e.g., forests with canopy cover greater than 60 percent, late seral forest characteristics, complex forest structure), treatments would be designed to reduce canopy cover by no more than 30 percent from existing conditions, and a minimum of 60 percent canopy cover would be retained. Treatments would be designed by a qualified RPF or silviculturist to maintain tree age class diversity and sufficient young understory trees to facilitate forest regeneration and long-term maintenance of habitat function;
- large diameter trees that exhibit fire resilient characteristics such as thickened, furrowed bark and well-developed crowns would be retained, unless the tree poses a hazard to public safety;
- the understory of mid- to late-seral areas would be managed for a patchy distribution of shrubs, forbs, tree regeneration patches, and bare ground; and
- within Watercourse and Lake Protection Zones (WLPZs), understory vegetation would be removed in a mosaic pattern, where some herbaceous understory would remain such that cover is still available for special-status amphibians, with a minimum retention of 10 percent relative cover per acre.

WILDLAND URBAN INTERFACE FUEL REDUCTION

WUI fuel reduction treatments focus on strategically removing vegetation and fuels to protect communities and assets from wildfires originating in adjacent wildlands, as well as to protect wildlands from fires starting near developed areas. These treatments also facilitate emergency access and staging for firefighters while reducing flammable vegetation along evacuation routes.

WUI treatments are designed to improve habitat quality and increase forest health. They also encourage sustainable species diversity and age-classes, and enhance existing degraded habitat, including treatment of invasive plant and noxious weed infestations.

WUI treatments would retain species following the prioritization described under the "Ecological Restoration" treatment type, above. In addition, these treatments could:

- remove trees up to 18 inches DBH to thin canopy and break up canopy continuity. Branches and leaves/needles would be chipped, masticated, or piled and burned. Larger diameter (>10 inches DBH) boles and branches may be cut, scattered, and laid flush with the ground, as long as they are not near structures or pose a fuels hazard;
- remove all downed logs and dead and downed material within 300 feet of homes;
- retain largest downed logs, up to three logs per acre, and large snags, up to two per acre, beyond 300 feet from homes (with a preference for the largest snags that exhibit the form and decay characteristics favored by wildlife) unless the snags pose a hazard to implementation or personnel;
- remove most shrubs within 300 feet of homes, unless they are adequately spaced and not ladder fuels that pose a fire hazard;
- reduce ground fuels to less than 5 tons per acre by prescribed burning, chipping, or mastication;
- prune lower branches of residual trees up to 10 feet above the ground;
- apply herbicides to trees and shrubs to prevent resprouting where sprouting species are present and pose a fire hazard (e.g., toyon, buck brush, interior live oak); and
- pull up root balls of sprouting trees and shrubs where herbicides are not viable, and slopes are less than 30 percent, in order to maintain efficacy of the WUI treatments.
- In forest habitats determined by a qualified RPF or biologist to be occupied (i.e., through implementation of protocol-level surveys under SPR BIO-10) or assumed to be occupied by California spotted owl (e.g., forests with canopy cover greater than 60 percent, late seral forest characteristics, complex forest structure), treatments would be designed to reduce canopy cover by no more than 30 percent from existing conditions, and a minimum of 60 percent canopy cover would be retained. Treatments would be designed by a qualified RPF or silviculturist to maintain tree age class diversity and sufficient young understory trees to facilitate forest regeneration and long-term maintenance of habitat function.
- Within WLPZs, understory vegetation would be removed in a mosaic pattern, where some herbaceous understory would remain such that cover is still available for special-status amphibians, with a minimum retention of 10 percent relative cover per acre.

FUEL BREAKS

In strategic locations, fuel breaks create zones of vegetation removal, often in a linear layout, that reduce wildfire risk and support fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. They can also provide safe emergency egress during wildfires. Both shaded and nonshaded fuel breaks would be implemented. Fuel breaks would be shaded in forested areas and nonshaded fuel breaks would be implemented in areas that contain only shrubs (i.e., no tree canopy). Fuel breaks would be established along strategic topographic locations (e.g., on ridge tops), adjacent to roads, and near high-use areas (e.g., homes, infrastructure). Fuel breaks would be up to 400 feet wide.

Treatments within fuel breaks would retain species following the prioritization described under the "Ecological Restoration" treatment type, above. In addition, these treatments could:

- remove trees up to 18 inches DBH to thin canopy and break up canopy continuity. Branches and leaves/needles would be chipped, masticated, or piled and burned. Larger diameter (>10 inches DBH) boles and branches may be chipped or cut, scattered, and laid flush with the ground, as long as they are not near structures or pose a fuels hazard;
- trees greater than 18 inches DBH may be removed if they are dead, dying, diseased, or a safety hazard;

- remove trees to create horizontal distances between residual trees of 20 to 35 feet between trunks such that there is 8 to 15 feet between tree crown drip lines, where feasible;
- where trees are present, leave a canopy cover of about 60 percent, where feasible;
- remove all downed logs (greater than 10-inch DBH) and dead and downed material (limbs, branches, and leaves) within 300 feet of homes and 200 feet from centerline of fuel break. Twenty percent of downed logs may be retained when they do not pose a fire hazard;
- retain large snags up to two per acre beyond 300 feet from homes and 200 feet from the centerline of the fuel break (with a preference for the largest snags that exhibit the form and decay characteristics favored by wildlife) unless the snags pose a hazard to implementation or personnel;
- remove most shrubs within 300 feet of homes and within 200 feet of the center line of the fuel break, while retaining only shrubs that are adequately spaced and are not ladder fuels in other areas;
- reduce ground fuels to less than 5 tons per acre by prescribed burning, chipping, or mastication;
- prune lower branches of residual trees up to 10 feet above the ground;
- apply herbicides to trees and shrubs to prevent resprouting where sprouting species are present (e.g., toyon, buck brush, interior live oak); and
- pull up root balls of sprouting shrubs where herbicides are not viable, and slopes are less than 30 percent, in order to maintain efficacy of the fuel break.
- In forest habitats determined by a qualified RPF or biologist to be occupied (i.e., through implementation of protocol-level surveys under SPR BIO-10) or assumed to be occupied by California spotted owl (e.g., forests with canopy cover greater than 60 percent, late seral forest characteristics, complex forest structure), treatments would be designed to reduce canopy cover by no more than 30 percent from existing conditions, and a minimum of 60 percent canopy cover would be retained. Treatments would be designed by a qualified RPF or silviculturist to maintain tree age class diversity and sufficient young understory trees to facilitate forest regeneration and long-term maintenance of habitat function.
- Within WLPZs, understory vegetation would be removed in a mosaic pattern, where some herbaceous understory would remain such that cover is still available for special-status amphibians, with a minimum retention of 10 percent relative cover per acre.

2.1.2 Treatment Activities

The proposed treatment activities are prescribed burning, mechanical vegetation treatments, manual vegetation treatments, herbicide application, and prescribed herbivory. Each of the treatment activities is described in more detail below and consistent with the treatment activities described in the CalVTP. Table 2-1 provides a summary of treatments and the maximum acreage of each treatment activity in the project area. Treatment activities could occur during any time of the year. Prescribed burning and prescribed herbivory may occur any day of the week or time of day. Mechanical treatments, manual treatments, and herbicide application could occur on any day of the week but would be limited to daytime hours. Several crews may be conducting treatments simultaneously, and crews would be dispersed throughout the project area.

PRESCRIBED BURNING

Prescribed burning consists of two general types: pile burning and broadcast burning (underburning).

Pile burning: Biomass from manual and mechanical treatment would be piled using equipment (e.g., skid steer, tractor, bulldozer, or excavator) and/or hand crews and burned appropriately.

- piles would be placed where they do not pose a threat of igniting residual overstory trees or infrastructure, and at least 5 feet away from large logs or stumps;
- no piles would be placed within WLPZs;
- piles would not be placed where slopes exceed 65 percent; and
- all piles would be constructed in a manner that would ensure a 90 percent consumption standard regardless of the time of year in which they are burned.

If feasible, biomass from mechanical and manual treatments may be disposed of using **air curtain burning**. An air curtain burner, such as the "BurnBoss," "FireBox," or "CharBoss," would be used to dispose of biomass. Air curtain burners use direct combustion to process biomass. Combustion is an exothermic (heat-producing) reaction between oxygen and the hydrocarbon in biomass. The biomass is converted into heat, water, carbon ash, and carbon dioxide. Air curtain burners are operated by depositing biomass in the firebox, an open top metal container, within which the biomass is set alight. The air curtain filter (i.e., fast-moving curtain of air) is drawn over the firebox while a blower circulates the air and smoke within the firebox, subjecting it to repeated cycles of burning in the flames. The blower creates a high temperature vortex inside the chamber to accelerate biomass combustion, more completely combust the material, and keep most pollutants from escaping the firebox into the atmosphere. The air curtain at the top of the firebox acts as a filter to reduce any particulate matter (PM) emissions from the resulting exhaust. These units range in size. For example, the BurnBoss is a small, highly mobile self-contained kiln that can be towed with a standard heavy-duty pickup truck, and the FireBox is a larger unit that can be transported using a trailer. A small US Environmental Protection Agency (EPA) Tier 4 diesel engine powers these systems, which consumes one-third of a gallon of diesel fuel per hour at full power. Air curtain burners would be set up on existing roadways or other disturbed areas that meet the qualifications for their safe use, which comprise level, previously disturbed areas that are devoid of vegetation. Multiple air curtain burners could be operated simultaneously as part of the proposed project. A burner requires a crew of two to three people per burner and operating multiple burners next to each other would not necessarily require additional people. Some of these units, such as the CharBoss, have been designed to produce biochar as a beneficial byproduct, which can be used for soil amendment and carbon sequestration.

In addition, biomass from mechanical and manual treatments may be disposed of using pyrolysis techniques, when feasible. Pyrolysis (or **carbonization**) can be performed with simple oxygen-depriving designs, such as an Oregon Kiln or Ring of Fire Kiln, which can process up to several cubic yards at a time, or modular and portable carbonization units. Pyrolysis involves the conversion of biomass into hydrocarbon liquids, gases, or solids (or all three) in the total absence of oxygen at temperatures ranging from (400–900 degrees C). Only smaller-scale, portable carbonizers would be used as part of the proposed project. An example of a carbonizer that may be used is the Tigercat 6050 Carbonator. This portable facility is approximately 40 feet in length, 12 feet in width, and 12 feet in height. Portable kilns may also be used.

Once the burning is complete, and the produced wood ash has cooled, the ash and/or biochar would be distributed throughout the treatment area where the biomass originated to approximate the mosaic of conditions that would occur after broadcast burning. At no location in the treatment area would the depth of biochar or ash exceed 4 inches. If it is not feasible to distribute biochar or ash within the treatment area in this way, biochar may also be hauled off-site for beneficial use at agricultural or other facilities in the area. Air curtain burners and carbonizers have been designed to consume biomass quickly and efficiently with a substantial reduction in smoke compared to pile burning (refer to additional information in Section 4.3, "Air Quality," and Section 4.7, "Greenhouse Gas Emissions"). Mitigation Measure GHG-2 in the CalVTP Program EIR requires implementation of feasible methods, including the use of air curtain burners and carbonizers, to reduce the greenhouse gas emissions from pile burning.

Broadcast burning: Broadcast burning would be used to promote forest health and native flora and reduce biomass and fuel loading in shrubland, woodland, and forest vegetation. Pretreatment of vegetation using mechanical activities, manual activities, or herbicide application may occur, where necessary, in areas proposed for broadcast burning.

Understory burns would be implemented in accordance with a specific prescription that defines the desired maximum flame lengths and fire spread rates based on the fuel types, weather, slopes, aspect, staffing levels, containment lines, and strategies set out in a burn plan. Interior portions of prescribed burns may exceed the prescribed flame lengths planned at the control lines, but the overall prescription is designed to safely contain the fire within the planned fire perimeter. Burns could occur during conditions that are conducive to burning targeted fuels (typically from September through June). Broadcast burning may require the construction of new control lines or enhancement of existing control lines using manual and mechanical treatments, including construction of handline, mow lines, or dozer lines. If control lines are needed, they would be constructed and would be implemented pursuant to limitations in the CalVTP Program EIR (e.g., Mitigation Measure BIO-4 requires that fire containment lines are not constructed within wetland buffers). Additionally, broadcast burning may be used for secondary treatments and maintenance after initial treatments of dense vegetation have been completed, including control of invasive plants and noxious weeds establishment.

Prescribed burning would require between 10 and 50 crew members, depending on the size and site characteristics of the burn unit. Typically, each burn would last 1 day to 1 week. Equipment used would include water trucks, fire engines, chainsaws, drip torches, propane torches, all-terrain vehicles (ATV), utility task vehicle (UTVs), portable water tanks, water pumps, fire hoses, leaf blowers, and terra torches (see Table 2-1). Unmanned aerial systems (UAS) may be used for ignition when an area has limited accessibility. All burning would occur in accordance with regulations regarding the use of prescribed burning. This would include the preparation and implementation of a burn plan that includes a smoke management plan.

MECHANICAL VEGETATION TREATMENT

Mechanical treatments would primarily include masticating target vegetation to reduce ladder fuels and increase space between trees as well as chipping biomass produced by manual and mechanical treatment activities. It may also include the use of bulldozers, tractors, skid steers, tracked chippers, and excavators to move treated vegetation to areas where they would be processed (see Table 2-1). In addition, drill seeding may occur after initial fuel reduction treatment to promote establishment of native species.

Mechanical mastication and chipping of fuels would occur in areas that are accessible to the equipment, or via existing skid trails and roads on steeper slopes. Masticated material would not exceed an average of 8 inches in depth and chipped materials would not exceed an average of 4 inches in depth. Material would not be chipped or masticated within WLPZs and chips would not be broadcast into the water or dry channel of any stream. Chips would not be concentrated at the base of retained trees.

Equipment would include masticators, chippers, excavators, skid steers, tractors, and bulldozers (see Table 2-1). Mechanical treatments would typically require up to 20 crew members.

Generally, mechanical treatments would:

- remove ladder fuels and dead/downed woody material less than 12 inches DBH;
- cut and fell larger trees up to 18 inches DBH in WUI fuel reduction areas and fuel breaks;
- select larger trees could be removed if they are dead, dying, diseased, or considered a safety hazard;
- prune up lower branches of trees;
- masticate or chip biomass;
- remove downed logs; and mow invasive plants and noxious weeds where population size indicates this is the best treatment method.
- Excavators may be used to pull up root balls of sprouting trees and shrubs where herbicides are not viable.

Mechanical equipment would not be driven within WLPZs. Some mechanical treatments may be conducted by reaching an excavator arm into a riparian area or WLPZ such that no ground disturbance would occur within WLPZs.

MANUAL VEGETATION TREATMENT

Manual treatments would primarily include hand thinning and pruning target vegetation to reduce ladder fuels and increase space between trees, as well as hand piling of removed vegetation. Cut material would be disposed of using either chipping or piling treatments and may also be hauled to the masticator unit for mastication. Cut material within WLPZs is required to be manually removed from the WLPZ before disposal. In addition, seeding and planting may occur after initial fuel reduction treatment to promote establishment of native species. Equipment would include chainsaws, pole saws, weed-trimmers, and other hand tools (see Table 2-1). Manual treatments would typically require between 20 and 40 crew members. Several crews may be conducting treatments simultaneously and would be dispersed throughout the project area.

Generally, manual treatments would:

- remove ladder fuels less than 12 inches DBH;
- cut and fell larger trees up to 18 inches DBH in WUI fuel reduction areas and fuel breaks;
- remove shrubs;
- prune up lower branches of trees;
- remove downed logs;
- hand-pull or cut invasive plants and noxious weeds; and
- flaming of invasive plants and noxious weeds (see Section 1.1.3, "Purpose of This PSA/Addendum").

HERBICIDE APPLICATION

Herbicides would be used sparingly to control invasive plant species (e.g., Scotch broom) that threaten the native biodiversity or increases wildfire hazards. 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. Treatment would involve removing invasive plant species and noxious weeds through herbicide application.

Herbicides may be used to treat native trees and shrubs in fuel breaks and WUI fuel reduction treatment types to prevent resprouting where sprouting species (e.g., toyon, buck brush, interior live oak) are present and would reduce the effectiveness of fuel reduction treatments.

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

- Clopyralid (monoethanolamine salt);
- Glyphosate (isopropylamine salt, potassium salt, dimethylamine salt & diammonium salt);
- Imazapyr (isopropylamine salt);
- Sulfometuron methyl;
- Triclopyr (butoxyethyl ester & triethylamine salt);
- Nonylphenol 9 Ethoxylates (NP9E);
- Cleantraxx (penoxsulam & oxyfluorfen);
- Borax (tetraborate decahydrate);
- Hexazinone;
- Velpar (hexazinone); and
- Indaziflam.

Only ground-level application would occur; no aerial spraying of herbicides would occur. The method that is least likely to affect nontargeted vegetation would be used at any given site. Several herbicide application methods are available for use by on-the-ground personnel, including painting herbicide on stems and using a backpack sprayer and hand application. Herbicide treatments would typically use a one- to five-person crew, a pickup truck, a porta-potty, a passenger vehicle to transport crew, a UTV or ATV with a sprayer/reservoir tank, and backpack sprayers (see Table 2-1). Herbicide application would comply with EPA label directions, as well as California Environmental Protection Agency 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.

The use of herbicides may result in standing dead biomass that would need to be treated. When using herbicides for localized spot treatments, handheld devices are the preferred method for chemical application in treating invasive plants. Invasive plants and noxious weeds would be treated by piling for on-site decomposition, burning, or off-site biomass disposal. Native vegetation would be treated by burning, chipping, masticating, or off-site biomass disposal.

PRESCRIBED HERBIVORY

Prescribed herbivory for hazardous fuel reduction is the intentional use of domestic livestock to remove, rearrange, or convert vegetation in wildlands to reduce the costs and losses associated with wildfires and to enhance the condition of forests, rangelands, and watersheds. Prescribed herbivory can offer a variety of benefits in comparison to other types of vegetation treatments. In addition to fire prevention benefits, carefully managed grazing can provide important environmental benefits such as increased soil organic matter, control of invasive species, and improved plant and wildlife habitat.

The most appropriate livestock species would be determined based on vegetation type(s) and condition (e.g., height, age class), and may include sheep or goats. A herder, fencing, mineral block, and/or a watering site may be required to keep the animals within the desired area (see Table 2-1). 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.

Prescribed herbivory may be used for secondary treatments and maintenance after initial treatments of dense vegetation have been completed. In addition, prescribed herbivory would be used to control regrowth of existing invasive plants and noxious weeds and to help prevent establishment of new populations of invasive plants and noxious weeds.

BIOMASS DISPOSAL

Biomass created during the proposed vegetation treatments described above would be disposed of primarily by the following means:

- masticating (mulching) vegetative debris and placing it on the ground concurrently with vegetation removal, and the biomass remaining after mastication would be no more than 8 inches deep on average;
- chipping and chipped biomass would be broadcast over treatment areas not exceeding an average of 4 inches in depth, or put in piles less than 6 feet tall and wide, and separated by at least 20 feet;
- lopping and scattering within the treatment boundaries, and the biomass would be no more than 8 inches deep to promote decomposition;
- creating piles of cut biomass for pile burning;
- broadcast burning; or
- taken off-site to a disposal facility.

Invasive plant and noxious weed biomass would be piled for on-site decomposition, treated on-site to eliminate the spread of seeds and propagules (e.g., piled for burning at the appropriate time), or would be disposed of off-site at an appropriate waste collection facility 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. They may be placed on-site in piles to be burned.

2.1.3 Scotch Broom Treatments

Scotch broom is widespread throughout the project area, the greater Nevada County, and the surrounding region. It is anticipated that Scotch broom could invade areas post-treatment, despite the use of best practices to eliminate the spread of seed during treatments (per SPR BIO-9). Seeds often lay dormant in soils and germinate after treatments in response to soil disturbance, sun exposure, and reduction of competition from native species. The control of Scotch broom requires a long-term effort because its seeds can survive in the soil for several decades. This means that regular follow-up treatments must be applied and that Scotch broom plants must be controlled before they begin to set seed in their third year of life. In addition, younger Scotch broom can resprout when cut, making the complete control of younger Scotch broom more difficult. The combination of long seed life and the resprouting of young plants requires an integrated strategy that utilizes a variety of control techniques performed on a consistent basis. Treatment goals are to minimize the seed produced, which can be accomplished by using reliable control efforts every 2-3 years, and to maximize mortality rates by selecting control techniques suited to the density and size of the infestation and the life stage of the broom plants. Regular application of effective techniques would result in the rapid decline of the extant population of Scotch broom on a site. Removal and control of Scotch broom is a treatment goal within ecological restoration, WUI fuel reduction, and fuel break treatment types. It could entail the use of any combination of the following treatment activities: prescribed burning, mechanical treatment, manual treatment, or herbicide application.

Prescribed burning may be an effective treatment activity for large infestations of Scotch broom, particularly in areas where control barriers such as roads are in place. Prescribed burning can result in high mortality of Scotch broom, even for younger plants. Although fire stimulates germination of Scotch broom seeds in the seed bank, this can help deplete the seed bank more quickly than other treatment activities, thereby reducing future infestations. This approach is particularly beneficial when the seed bank is large and would otherwise pose a persistent issue for a decade or longer. Seedlings could be retreated with follow-up prescribed burning, or other methods such as green flaming with a modified propane torch.

Mechanical and manual treatment activities are an effective control option for moderate sized infestations and include the use of motorized equipment such as brush cutters, chainsaws, pole saws, mowers, and tractors for mowing/cutting activities. Motorized cutting machines may be used to mow weeds based on the size of the weed infestation. Scotch broom plants may require repeated cutting throughout the growing season, or they could resprout from their base and continue to grow, flower, and produce seed. Infestations would likely need retreatment on an annual basis to prevent regrowth and setting of seed. Mowing would be carefully timed according to phenology to minimize the amount of resprouting and to avoid spreading ripe seed. Repeated mowing may reduce the vitality of plants and lead to mortality. Mowing is intended as a temporary measure that controls reproductive spread and can eventually reduce populations, but other subsequent treatments (e.g., pulling, herbicide application) would be necessary to eradicate plants. Mowing would not be used on steep slopes, saturated soils, or in locations with desirable native plants unless the timing of the mowing can be selected to affect only target plants. Mowing would not occur during times in which ignition of fire is possible, specifically during the summer and fall. A tractor-pulled rotary mower may be used to control mature Scotch broom infestations. This method would generally be used on larger sites where control needs to be accomplished over tens or hundreds of acres. Several different sizes of tractors and rotary cutters would be used. For less mature stands of Scotch broom, or for stands where the terrain is too difficult for tractors, hand-held motorized chainsaws, pole saws, or brush cutters would be used.

Manual treatments without motorized tools are effective for the removal of small populations, individual occurrences, and populations that occur near special-status species and their habitat or sensitive natural communities. Additionally, they would be used as a follow-up vegetation treatment in areas where herbicide is applied to larger invasive plant populations. The following is a general summary description of how manual treatments would be applied to Scotch broom:

- Pull: Depending on the size of the plants, the stem would be grasped by hand or with the assistance of a weed wrench and the entire plant, including the roots, would be pulled out of the ground. A weed wrench is a lever-type tool that is used to pull up invasive plants that are between 1 and 6 feet tall with roots that penetrate more than a few inches into the soil, providing it to be very useful to remove Scotch broom. Pulling is not suitable in areas where there is steep terrain, where the operator cannot gain a firm stance, or where the activity may lead to disruptive soil erosion.
- Cut: Manually cut with loppers or sever plant at base of stem at or slightly below soil level with sharp shovel or similar hand tool. This technique would be used in areas where a persistent seed bank is present. Cutting or severing reduces soil disturbance, which can minimize the germination of new plants.

While non-chemical strategies would be employed when feasible, herbicides would be used when there is no other available or reasonable means to control Scotch broom infestations and reduce the impacts on sensitive biological resources, biodiversity, and other conservation values. Herbicide application may also be necessary for large infestations that are impractical to treat by other means or for treating shrubs likely to resprout after cutting. Applying herbicide to freshly cut Scotch broom stumps (i.e., cut-stump method) significantly increases mortality rates.

When selecting an herbicide, label information and effectiveness against target species would be evaluated. In general, herbicides chosen would be those proven effective against Scotch broom, with low risk of drift, leaching to groundwater, or runoff into streams. Herbicides such as glyphosate (Round-up), triclopyr (Garlon), and imazapyr (Arsenal) are most likely to be used for Scotch broom treatments, although others could be used (listed above under "Herbicide Application"). The following is a description of how herbicides would be applied to Scotch broom:

- Cut-stump application: Under this treatment, the woody plant would be cut close to the ground at a 90-degree or 45-degree angle with loppers, brush-cutter, chainsaw, pole saw, or mower. Debris would be removed from the cut stump and herbicide immediately applied to the circle of living cells. Cut-stump application would be used to selectively eliminate shrubs. Woody plants tend to resprout frequently when cut unless treated with an herbicide.
- Targeted spray application: Herbicides would be applied using a backpack sprayer for smaller areas or a tank mounted on an ATV for larger areas. Spraying methods would be selective; a trained operator, skilled in plant identification, would directly control the sprayer, aiming the spray tip precisely at the target, and manually adjusting the spray equipment to control the amount and direction of the application.
- Wick application: Under this treatment, herbicide would be applied to the target plant using a rope wick applicator for selective treatment. This method generally results in less potential for herbicide drift than spraying, although care must be taken that the applicator does not drip onto non-target plants.

Dead plants that remain after herbicide treatment would be removed or burned in order to reduce flammable biomass and ladder fuels.

2.1.4 Rices Fire Restoration Area

A portion of the project area (approximately 100-125 acres) on the western border burned in the Rices Fire in 2022. The fire was a high intensity wind driven fire that resulted in close to 90 percent mortality of vegetation on parcels within the project area. Little post-fire cleanup has occurred and there are large areas of predominately dead standing and downed biomass. Native shrubs have begun to reestablish. This is a priority treatment location where ecological restoration and fuel break treatment types would be implemented. All treatment activities could be implemented in this area. The majority of dead and downed biomass would be removed; however, snags and downed logs would be retained where it is safe to provide wildlife habitat and assist with erosion control and soil development. Scotch broom that has established throughout the area would be treated using the methods described above.

2.2 TREATMENT MAINTENANCE

Maintenance, or retreatment, of the areas treated under the proposed project could include the same treatment types (i.e., ecological restoration, WUI fuel reduction, fuel breaks) and treatment activities (i.e., mechanical treatments, manual treatments, prescribed burning, prescribed herbivory, and herbicide application) as implemented for the initial treatments. Maintenance treatment would be dependent on regrowth conditions and would differ by location and treatment type. Retreatment in ecological restoration areas would be implemented within a given vegetation type only if that vegetation type is outside of its natural fire return interval (i.e., time since last burn is greater than the average fire return interval for the habitat type). These intervals vary by vegetation type. For WUI fuel reduction areas and fuel breaks, retreatment is anticipated to occur every 5-10 years for forested and woodland areas, and every 3-10 years for shrub-dominated areas. Treatment maintenance methods would involve the same vegetation treatment activities used in the original treatment. Mechanical and manual treatments, understory burning, prescribed herbivory, and herbicide treatments may be used for maintenance of native plant regrowth and invasive plant and noxious weed control and removal after initial treatments of dense vegetation have been completed. As described above, retreatment of Scotch broom infestations would occur on a more frequent basis, regardless of the treatment type, as to effectively control the regeneration and spread of this species in treated areas. All treatment maintenance would typically be implemented between approximately late August and February, outside of the nesting bird season, if feasible, but could be implemented year-round. Periodic treatment maintenance would occur as needed, determined by qualified staff who would monitor vegetation growth conditions and ensure treatment objectives continue to be met. This project would be implemented only on properties where the landowner is a willing participant, and, although a project goal is to maintain treatments, it is possible that not every acre initially treated would be maintained in the future. For example, the landowner may change their management objectives, their land use type, or the land may change owners or management stewards.

Prior to implementing a maintenance treatment, it will be verified that the expected site conditions as described in the PSA/Addendum are present in the treatment area. As time passes, the continued relevance of the PSA/Addendum will be considered in light of potentially changed conditions or circumstances. If environmental conditions evolve (e.g., a wildfire occurs in a portion of the project area) or project approaches change to the degree that new or substantially more severe impacts may occur, a new PSA/Addendum or other environmental analysis may be warranted if determined by Nevada County or other responsible agency.

In addition to verifying that the PSA/Addendum continues to provide adequate CEQA coverage for treatment maintenance, the PSA/Addendum will be updated at the time a maintenance treatment is needed if more than 10 years have passed since the approval of the PSA/Addendum or the latest PSA/Addendum update. For example, a reconnaissance survey may be conducted 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:** South Yuba Rim Hazardous Fuel Reduction Project
2. **CalVTP I.D. Number:** 2024-34
3. **CEQA Lead Agency Name and Address:** Nevada County Office of Emergency Services
   950 Maidu Ave
   Nevada City, CA 95959
4. **Contact Person Information and Phone Number:**
   Alex Keeble-Toll
   530-470-2521
   Alex.Keeble-Toll@nevadacountyca.gov
5. **Implementing Entity's Name and Address (for implementation on 800 acres):**
   Yuba Watershed Institute
   PO Box 2198
   Nevada City, CA 95959
6. **Contact Person Information and Phone Number:**
   Chris Friedel
   530-955-1822
   Chris@yubawatershedinstitute.org
7. **Project Location:** San Juan Ridge, Nevada County
   Bridgeport State Park to Malakoff Diggins State Park
   North rim of the South Fork of the Yuba River
8. **Total Area to Be Treated (acres):** Initial treatments funded by a FEMA grant would be by Yuba Watershed Institute on up to 800 acres; subsequent treatments could occur on up to 7,320 acres.
9. **Description of Project:**

   Refer to Chapter 2, "Project Description," above for a detailed description of the proposed project.

   a. Initial Treatment

   Treatment Types

   ☒ Wildland-Urban Interface Fuel Reduction

   ☒ Fuel Break

   ☒ Ecological Restoration

   Treatment Activities

   ☒ Prescribed Burning (Broadcast), Up to 7,320 acres

   ☒ Prescribed Burning (Pile Burning), Up to 7,320 acres

   ☒ Mechanical Treatment, Up to 6,495 acres

   ☒ Manual Treatment, Up to 7,320 acres

   ☒ Prescribed Herbivory, Up to 6,495 acres

   ☒ Herbicide Application, Up to 7,320 acres

Fuel Type

☒ Grass Fuel Type

☒ Shrub Fuel Type

☒ Tree Fuel Type

b. Treatment Maintenance

Refer to Section 2.2 "Treatment Maintenance," above for a detailed description of the proposed project, maintenance.

Treatment Types

☒ Wildland-Urban Interface Fuel Reduction

☒ Fuel Break

☒ Ecological Restoration

Treatment Activities

☒ Prescribed Burning (Broadcast), Up to 7,320 acres

☒ Prescribed Burning (Pile Burning), Up to 7,320 acres

☒ Mechanical Treatment, Up to 6,495 acres

☒ Manual Treatment, Up to 7,320 acres

☒ Prescribed Herbivory, Up to 6,495 acres

☒ Herbicide Application, Up to 7,320 acres

Fuel Type

☒ Grass Fuel Type

☒ Shrub Fuel Type

☒ Tree Fuel Type

Use of the PSA for Treatment Maintenance

See "Treatment Maintenance" above.

10. Regional Setting and Surrounding Land Uses:

Land uses surrounding the project area include public federal lands (US Bureau of Land Management [BLM], US Forest Service, US Army Corps of Engineers), publicly owned state lands (California Department of Parks and Recreation), public and private recreational areas along the South Yuba River, preserved and recreational lands owned by nongovernmental organizations (Bear Yuba Land Trust), rural residential development, agriculture (farming, grazing), and private industrial and non-industrial timberland.

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

Pesticide application permit from Nevada County Agricultural Commissioner

Burn permits from the Northern Sierra Air Quality Management District

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 has 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.

12. 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 Program EIR; however, CalVTP SPR CUL-2 requires further tribal coordination during PSA preparation.*

Pursuant to CalVTP SPR BIO-2, Native American contacts in Nevada County were contacted on December 12, 2024, and consisted of Clyde Prout, Chairperson, Colfax-Todds Valley Consolidated Tribe; CTVCT Preservation, Cultural Preservation Office, Colfax-Todds Valley Consolidated Tribe; Pamela Cubbler, Vice Chairperson, Colfax-Todds Valley Consolidated Tribe; Richard Johnson, Chairman, Nevada City Rancheria Nisenan Tribe; Donald Ryberg, Chairman, TSI-AKIM Maidu of the Taylorsville Rancheria; Ben Cunningham, Tribal Council Member, TSI-AKIM Maidu of the Taylorsville Rancheria; Benn Cunningham-Summerfield, Cultural Advisor, TSI-AKIM Maidu of the Taylorsville Rancheria; Richard Cunningham, Vice Chairman, TSI-AKIM Maidu of the Taylorsville Rancheria; James Moon Jr., Tribal Member, TSI-AKIM Maidu of the Taylorsville Rancheria; Josef Fore, Tribal Historic Preservation Officer, United Auburn Indian Community of the Auburn Rancheria; Serrell Smokey, Chairperson, Washoe Tribe of Nevada and California; William "Billy Hawk" Enos, Cultural Resource Department, Washoe Tribe of Nevada and California; Cultural Preservation Department, Wilton Rancheria; and Herbert Griffin, Executive Director of Cultural Preservation, Wilton Rancheria. No responses were received as of April 2025.

DETERMINATION

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

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

☒ I find that the presence of proposed project areas outside the CalVTP treatable landscape and proposed revisions to SPRs 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 inclusion of project areas outside the CalVTP treatable landscape and revisions to SPRs 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 the geographic extent presented in the Program EIR and revisions to SPRs.

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

☐ I find that the proposed project will have effects that were not covered in the CalVTP Program EIR or will have effects that are substantially more severe than those covered in the CalVTP Program EIR. Although these effects may be significant in the absence of additional mitigation beyond the CalVTP Program EIR'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 Program EIR and/or (b) substantially more severe than those covered in the CalVTP Program EIR. 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	Date
Printed Name	Title
Agency	

4 PROJECT-SPECIFIC ANALYSIS/ADDENDUM

4.1 AESTHETICS AND VISUAL RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
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-3 AD-4 AES-2 AQ-2 AQ-3 REC-1	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	AD-3 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	Yes	AD-3	AES-3	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 Program EIR 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 Program EIR?	☐ 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 be implemented using mechanical treatment, manual treatment, prescribed burning, herbicide application, and prescribed herbivory. The potential for these treatment activities to result in short-term degradation of the visual character of a project area was examined in the Program EIR. The nearest designated state scenic highway is State Route (SR) 49 north east of the project area in Sierra County (Caltrans 2024). The portion of SR 49 that passes through the project area is an eligible state scenic highway (Caltrans 2024). Additionally, the project area is visible from a portion of SR 49 that is also an eligible state scenic highway located south of the project area and south of the South Yuba River, looking north across the river canyon.

Some of the proposed treatments would occur along public and private roadways within the county, some of which are accessible to the public. In addition, some vegetation treatments would be visible from SR 49. Although portions of the project area are visible from public viewpoints and an eligible state scenic highway (portions of SR 49), the project area has varied topography and is typically densely vegetated with some areas of mature trees, which would substantially reduce the visibility of treatments from public viewpoints. In addition, treatments would primarily 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. Equipment, crews, and smoke from prescribed burning could also be visible from public viewpoints and an eligible state scenic highway in the short term. Depending on wind direction, smoke from prescribed burning could also temporarily be visible from SR 49 in Sierra County, a designated state scenic highway.

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 Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR. 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 Program EIR. 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-3, AD-4, AES-2, AQ-2, AQ-3, and REC-1. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AES-2

Initial and maintenance treatments would be ecological restoration, WUI fuel reduction, and shaded and nonshaded fuel break treatment types. The potential for these treatment types to result in long-term degradation of the visual character of an area was examined in the Program EIR. Public viewpoints primarily include the public roadways adjacent to the proposed treatments and to the south, across the South Yuba River canyon from the proposed treatments looking north. Some treatments would also be visible from SR 49, which is an eligible state scenic highway. However, WUI fuel reduction, ecological restoration, and shaded fuel breaks would be implemented in forested areas and would maintain a canopy of trees; new linear edges devoid of vegetation would not be created from implementation of these treatments.

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 Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR. 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 Program EIR. 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 long-term aesthetic impact is also the same, as described above. SPRs applicable to the proposed treatments are AD-3, AES-1, and AES-3. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AES-3

Initial and maintenance treatments would include nonshaded fuel break treatments in areas containing shrubs with no trees (i.e., areas currently without canopy). The potential for this treatment type to result in long-term degradation of the visual character of an area was examined in the Program EIR and found to be significant and unavoidable after the application of all feasible mitigation measures because it may be infeasible to relocate a nonshaded fuel break to avoid public visibility. Public viewpoints of the nonshaded fuel breaks include the public roadways adjacent to the proposed treatments and public roadways across the South Yuba River canyon from the proposed treatments looking north. Some nonshaded fuel breaks would also be visible from SR 49, which is an eligible state scenic highway.

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 Program EIR because the proposed treatment activities are consistent with those analyzed in the Program EIR. 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 Program EIR. 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. SPR AD-3 is applicable to this impact. In addition, Mitigation Measure AES-3 would apply to this treatment to minimize visual impacts, if feasible, from any recreation areas, public roads, and state scenic highways with lengthy views (i.e., longer than a few seconds) of nonshaded fuel breaks. While implementation of Mitigation Measure AES-3 would substantially reduce the potential for substantial long-term degradation of visual character, as noted in the Program EIR, nonshaded fuel breaks may be visible from public viewpoints and it is not feasible to relocate them because they would be located in strategic locations to reduce wildfire risk, protect the WUI, and support fire suppression by providing responders with a staging area. Therefore, the potential remains for substantial long-term degradation of visual character. For purposes of CEQA compliance, this impact is considered significant and unavoidable. This determination is consistent with the Program EIR and would not constitute a new or substantially more severe significant impact than what was covered in the Program EIR.

NEW AESTHETIC AND VISUAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP Program EIR. Nevada County 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 Program EIR (refer to Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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 Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
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	AD-3	NA	LTS	No	Yes

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR 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 Program EIR?	☐ 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

The project area includes agricultural lands designated as grazing and Farmland of Statewide Importance (DOC 2025). The project area also includes forest land as defined by Public Resources Code Section 12220(g) (i.e., land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits). Treatments proposed under the project may include the removal of trees that are up to 12 inches DBH. Select larger trees may be removed if they are dead, dying, diseased, or a safety hazard, and larger trees up to 18 inches DBH would be removed in WUI fuel reduction areas and fuel breaks. Treatments would include the removal of trees in the overstory and mid-level canopy to improve forest health and reduce wildfire risk. Treatments would not affect the forest stand conditions directly or indirectly in a way that could result in conversion to a non-forest use. Vegetation management has the potential to improve forest stand conditions by reducing competition and improving the forest floor conditions to promote natural seeding of tree species. Vegetation remaining within forest land after treatment would continue to be consistent with the definition of forest land pursuant to Public Resources Code Section 12220(g).

The potential for proposed treatment activities to result in loss or conversion of forest land was examined in the Program EIR. This impact is within the scope of the Program EIR because the treatment activities and intensity are consistent with those analyzed in the Program EIR. 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 Program EIR. However, within the boundary of the project area, the composition of forest land and agricultural land present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impact on forest land is also the same, as described above. SPR AD-3 is applicable to the proposed treatments, which requires the project to comply with local plans, policies, and ordinances regarding the conversion of forest land. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW AGRICULTURE AND FORESTRY RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. Nevada County 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 Program EIR (refer to Section 3.3.1, "Environmental Setting," and Section 3.3.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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 Program EIR. Therefore, no new impact related to agriculture and forestry resources would occur that is not covered in the Program EIR.

4.3 AIR QUALITY

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
Would the project:								
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	PSU	Impact AQ-1, pp. 3.4-26 – 3.4-32; Appendix AQ-1	Yes	AD-4 AQ-1 AQ-2 AQ-3 AQ-4 AQ-5 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	AQ-1 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	Yes	AQ-1 AQ-4 AQ-5	NA	LTS	No	Yes
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	PSU	Impact AQ-4, pp. 3.4-35 – 3.4-37	Yes	AD-4 AQ-1 AQ-2 AQ-6	NA (No feasible mitigation available)	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	PSU	Impact AQ-6; pp. 3.4-38	Yes	AD-4 AQ-1 AQ-2 AQ-6	NA (No feasible mitigation available)	SU	No	Yes

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

New Air Quality Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

Nevada County is in the jurisdiction of the Northern Sierra Air Quality Management District (NSAQMD). Pursuant to SPR AQ-1, the implementing entity would comply with the applicable air quality requirements of the NSAQMD. Pursuant to SPR AQ-2, the implementing entity would prepare a smoke management plan and submit it to NSAQMD prior to implementing any prescribed burning treatment. In addition, the implementing entity would prepare a burn plan as required by SPR AQ-3, which would include fire behavior modeling. In addition, SPR AQ-6 requires the implementation of 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 NSAQMD. The Incident Action Plan would also identify the contact personnel for the NSAQMD to use in coordinating on-site briefings, posting notifications, and weather monitoring during burning.

IMPACT AQ-1

Use of vehicles, mechanical equipment, and prescribed (broadcast and pile) 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 Program EIR and found to be potentially significant and unavoidable after the application of all feasible mitigation measures because of uncertainties in the degree of emissions reduction that could occur during implementation of later treatment projects.

Emissions of criteria air pollutants related to the proposed treatments are within the scope of the Program EIR because the associated equipment and duration of use are consistent with those analyzed in the Program EIR. Mitigation Measure AQ-1 is also applicable to this impact. The emission reduction techniques proposed in Mitigation Measure AQ-1 would be implemented to the extent feasible. However, it may be cost prohibitive to use equipment meeting the latest efficiency standards, including meeting the EPA's Tier 4 emission standards, using renewable diesel fuel, using electric- and gasoline-powered equipment, and using equipment with Best Available Control Technology. Carpooling would be encouraged by the implementing entity, 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 most workers. For these reasons, this impact would remain significant and unavoidable.

When feasible, Nevada County is proposing use of specialized biomass processing technologies in place of pile burning, pursuant to Mitigation Measure GHG-2. Evaluation of criteria air pollutant emissions from these biomass processing technologies conducted by Ascent (2022) indicates that smoke and criteria air pollutant emissions can be substantially reduced, compared to open pile burning. Use of an air curtain burner would substantially reduce reactive organic gas (ROG) and particulate matter (PM) emissions by approximately 96 percent when compared to pile burning. Carbonization (i.e., use of a portable kiln or a larger carbonizer such as the Tigercat 6050 Carbonator) would substantially reduce ROG emissions by approximately 98 percent and PM emissions by 71-100 percent when compared to pile burning. For nitrous oxide (NO_X), air curtains are estimated to reduce NO_X emissions by at least 73 percent and carbonization is estimated to reduce NO_X emissions by approximately 39-94 percent (Ascent 2022). Based on available information about emissions from specialized biomass processing technologies, these technologies offer the opportunity to substantially reduce local exposure to PM from smoke, a potentially beneficial difference compared to pile burning.

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 Program EIR. 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. The SPRs applicable to the proposed project are AD-4 and SPR AQ-1 through SPR AQ-6. Despite the substantial reduction in criteria air pollutant emissions afforded by use of these biomass processing technologies, Impact AQ-1 must still be recognized as significant and unavoidable because of uncertainties in the extent of their use. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-2

Use of vehicles and mechanical equipment during initial and maintenance treatments could expose people, such as hikers and recreationists, 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 Program EIR.

Diesel particulate matter emissions from the proposed treatments are within the scope of the Program EIR because the exposure potential is the same as analyzed in the Program EIR, 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 Program EIR. 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 Program EIR. 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 AQ-1, HAZ-1, NOI-4, and NOI-5. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-3

Use of vehicles, mechanical equipment, and prescribed burning during treatments would involve ground disturbing activities. The potential to expose people to naturally occurring asbestos (NOA)-containing fugitive dust emissions was examined in the Program EIR. Most of the project area is not located on soil types where NOA would be present; however, portions of the project area are underlain by serpentine soils (USGS 2011). These types of soils could potentially contain thin veins of asbestos fibers that can become airborne when disturbed. In accordance with SPR AQ-5, no ground-disturbing activities would occur in these areas without an Asbestos Dust Control Plan if required by 17 CCR Section 93105. Potential NOA exposure from the proposed treatments is within the scope of the activities and impacts addressed in the Program EIR because the types of ground-disturbing activities and the exposure potential are consistent with the impacts analyzed in the Program EIR. 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 Program EIR. 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 air quality impact is also the same, as described above. SPRs applicable to this treatment are AQ-1, AQ-4, and AQ-5. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-4

SPRs applicable to prescribed burning and ongoing maintenance treatments are designed to minimize the risk of exposing people to smoke, which includes toxic air contaminants (TAC); however, prescribed burning during initial and maintenance treatments could still expose people to TAC. This potential exposure risk was examined as an impact in the Program EIR and found to be potentially significant and unavoidable after the application of the SPRs and all feasible mitigation measures because unpredictable changes in weather can occur during prescribed burns resulting in short-term exposure of people to concentrations of TAC and associated levels of acute health risk with a Hazard Index greater than 1.0. When feasible, the use of specialized biomass processing technologies is proposed to reduce smoke emissions and associated TACs in comparison to pile burning. TACs resulting from the combustion of biomass are generally organic in nature and are, therefore, a subset of ROG emissions. Based on evaluation conducted by Ascent (2022), the proposed use of air curtain burners would reduce ROG emissions by at least 96 percent and the use of carbonizers would reduce ROG emissions by approximately 98 percent when compared to pile burning of equivalent areas. Therefore, the exposure of persons to TACs and related health risks would likely be substantially lower with the use of air curtain burners as compared with pile burning.

The duration and parameters of the prescribed burns are within the scope of the activities addressed in the Program EIR. Therefore, the potential for exposure to TACs is also within the scope the Program EIR. 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 Program EIR. 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 air quality impact is also the same, as described above. SPRs applicable to these treatment activities are AD-4, AQ-1, AQ-2, 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 Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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 Program EIR. Consistent with the Program EIR, 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 Program EIR because the equipment that would be used and the duration of use under the proposed project are consistent with what was analyzed in the Program EIR.

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 Program EIR. 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. SPRs applicable to this impact are AQ-1, HAZ-1, NOI-4, and NOI-5. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT AQ-6

SPRs applicable to prescribed burning are designed to minimize the risk of exposing people to smoke, which includes objectionable odors; however, prescribed burning during initial and ongoing maintenance treatments could still expose people to objectionable odors. The potential to expose people to objectionable odors was examined in the Program EIR and was found to be potentially significant and unavoidable after the application of all feasible mitigation measures because short-term exposure to odorous smoke emissions from unpredictable weather changes could occur. The use of biomass processing technologies is proposed to reduce smoke emissions and associated odors in comparison to pile burning. When compared to pile burning, the proposed biomass technologies would substantially reduce smoke through filtering (i.e., air curtains) or eliminate smoke and associated odors altogether (i.e., carbonizers).

The duration and parameters of prescribed burning and the exposure potential are consistent with the activities addressed in the Program EIR, and impacts would be reduced with the use of proposed biomass processing technologies. Therefore, the resultant potential for exposure to objectionable odors from smoke is within the scope of impacts covered in the Program EIR. 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 Program EIR. 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. SPRs that are applicable to this treatment project are AD-4, AQ-1, AQ-2, 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 Program EIR. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW AIR QUALITY IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP Program EIR. Nevada County 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 Program EIR (refer to Section 3.4.1, "Regulatory Setting," and Section 3.4.2, "Environmental Setting," in Volume II of the Final Program EIR). Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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 Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
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	AD-3 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	AD-3 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	AD-3 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	AD-3	NA	LTS	MO	Yes

Notes: LTS = less than significant; NI = no impact; SU = significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR 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 Program EIR?	☐ 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 7,320-acre project area, including areas within and outside of the CalVTP treatable landscape, was performed by the North Central Information Center (NCIC) on August 30, 2024 (NCIC File Nev-24-60). The search revealed 35 previously recorded archaeological sites and historic features within the project area. Two are built-environment historic features, a barbed wire fence and present day North Bloomfield Road. The North Bloomfield Road feature has been evaluated for inclusion on the California Register of Historical

Resources (CRHR) and was recommended ineligible; therefore, it is not a resource under CEQA. Of the remaining 33 archaeological sites, 13 are Native American in nature (bedrock milling features and lithic scatters), and 20 are historic-era archaeological sites (abandoned water conveyance systems, dams, mine tailings, trash scatters, major ditches, roadbeds, structure pads, and fences).

Consistent with SPR CUL-2, an updated Native American contact list was obtained from the Native American Heritage Commission (NAHC). On December 12, 2024, letters inviting the tribes to consult were emailed to the 14 tribal representatives indicated by NAHC. No responses were received as of April 2025. A September 23, 2024 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. The NCIC records search revealed one historic feature that was previously evaluated and recommended not eligible for listing in the CRHR. Therefore, it is not considered a resource under CEQA. The NCIC also identified another historic feature, however it has not been evaluated for eligibility for listing in the CRHR. Therefore, it is not known whether this historic feature 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; these structures will 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 Program EIR. This impact is within the scope of the Program EIR, because treatment activities and the intensity of ground disturbance of the treatment project are consistent with those analyzed in the Program EIR. 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 Program EIR. However, within the boundary of the project area, the potential to encounter built-environment structures that have not yet been evaluated for historical significance in areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to historical resources is also the same, as described above. SPRs applicable to this impact are AD-3, CUL-1, CUL-7, and CUL-8. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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; this may result in damage to known or previously unknown archaeological resources. The NCIC records search revealed 33 archaeological sites; however, it is not known if they 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 will be conducted before treatment pursuant to SPR CUL-4 to identify any previously unrecorded archeological resources and identified resources will be avoided according to the provisions of SPR CUL-5.

As described under Section 1.1.3, "Purpose of This PSA/Addendum," the project proposes to revise requirements under SPR CUL-4 to exempt manual treatments when woody material is chipped and scattered, chipped and removed, or lopped and scattered, from needing an archaeological and historical resource survey. This constitutes a revision to the program description analyzed in the Program EIR. Requirements under SPR CUL-4 are intended to prevent damage to archaeological and historical resources. The proposed revisions to SPR CUL-4 would not result in any adverse effects to cultural resources, because the revision would only allow treatment activities that could not result in damage to cultural resources to occur without a survey. Those activities that may result in damage to cultural resources (e.g., mechanical treatments and prescribed burning) would require pre-treatment surveys. Therefore, proposed revisions to SPR CUL-4 would not result in a substantially more severe significant effect related to disturbance of cultural resources than what was covered in the Program EIR. The proposed revisions to SPR CUL-4 are shown in the MMRP (Attachment A).

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 Program EIR. This impact was identified as significant and unavoidable in the Program EIR 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. For the proposed project, 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. However, 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 Program EIR; therefore, for purposes of CEQA compliance, this PSA/Addendum notes the impact as significant and unavoidable.

This impact is within the scope of the Program EIR, because treatment activities and intensity of ground disturbance of the treatment project are consistent with those analyzed in the Program EIR. 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 Program EIR. However, within the boundary of the project area, the potential for discovery of archaeological resources is essentially the same within and outside the treatable landscape; therefore, the potential impact to unique archaeological resources or subsurface historical resources is also the same, as described above. SPRs applicable to this impact are AD-3, 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 Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT CUL-3

Native American contacts in Nevada County were contacted on December 12, 2024, and included Clyde Prout, Chairperson, Colfax-Todds Valley Consolidated Tribe; CTVCT Preservation, Cultural Preservation Office, Colfax-Todds Valley Consolidated Tribe; Pamela Cubbler, Vice Chairperson, Colfax-Todds Valley Consolidated Tribe; Richard Johnson, Chairman, Nevada City Rancheria Nisenan Tribe; Donald Ryberg, Chairman, TSI-AKIM Maidu of the Taylorsville Rancheria; Ben Cunningham, Tribal Council Member, TSI-AKIM Maidu of the Taylorsville Rancheria; Benn Cunningham-Summerfield, Cultural Advisor, TSI-AKIM Maidu of the Taylorsville Rancheria; Richard Cunningham, Vice Chairman, TSI-AKIM Maidu of the Taylorsville Rancheria; James Moon Jr., Tribal Member, TSI-AKIM Maidu of the Taylorsville Rancheria; Josef Fore, Tribal Historic Preservation Officer, United Auburn Indian Community of the Auburn Rancheria; Serrell Smokey, Chairperson, Washoe Tribe of Nevada and California; William "Billy Hawk" Enos, Cultural Resource Department, Washoe Tribe of Nevada and California; Cultural Preservation Department, Wilton Rancheria; and Herbert Griffin, Executive Director of Cultural Preservation, Wilton Rancheria. No responses were received as of April 2025.

As described under Section 1.1.3, "Purpose of This PSA/Addendum," the project proposes to revise requirements under SPR CUL-4 to exempt manual treatments when woody material is chipped and scattered, chipped and removed, or lopped and scattered, from needing an archaeological and historical resource survey. This constitutes a revision to the program description analyzed in the Program EIR. Requirements under SPR CUL-4 are intended to prevent damage to archaeological and historical resources. The proposed revisions to SPR CUL-4 would not result in any adverse effects to cultural resources, because the revision would only allow treatment activities that could not result in damage to cultural resources to occur without a survey. Those activities that may result in damage to cultural resources (e.g., mechanical treatments, prescribed burning) would require pre-treatment surveys. Therefore, proposed revisions to SPR CUL-4 would not result in a substantially more severe significant effect related to disturbance of cultural resources than what was covered in the Program EIR. The proposed revisions to SPR CUL-4 are shown in the MMRP (Attachment A).

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 Program EIR. This impact is within the scope of the Program EIR, because the intensity of ground disturbance of the treatment project is consistent with that analyzed in the Program EIR. As explained in the Program EIR, 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 Program EIR. However, within the boundary of the project area, the tribal cultural affiliations present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to tribal cultural resources is also the same, as described above. SPRs applicable to this impact are AD-3, CUL-1 through CUL-6, and CUL-8. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT CUL-4

Vegetation treatment activities would include mechanical treatments using heavy equipment, including skid steers, excavators, 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 Program EIR. This impact is within the scope of the Program EIR, because the treatment activities and intensity of ground disturbance are consistent with those analyzed in the Program EIR. Additionally, consistent with the Program EIR, 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 Program EIR. 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. The SPR applicable to this impact is AD-3. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCE IMPACTS

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP Program EIR. 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 Program EIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. 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. Revisions to SPR CUL-4 as described in Section 1.1.3, "Purpose of This PSA/Addendum," and shown in the MMRP (Attachment A), would constitute a change to the project analyzed in the Program EIR. Revisions to SPR CUL-4 exempt certain treatment activities (e.g., manual treatments, when woody material is chipped and scattered, chipped and removed, or lopped and scattered) from needing an archaeological and historical resource survey. Requirements under SPR CUL-4 are intended to prevent damage to archaeological and historical resources. Those activities that may result in damage to cultural resources (e.g., mechanical treatments and prescribed burning) would still require pre-treatment surveys; therefore, revisions to SPR CUL-4 would not result in a new impact that was not analyzed in the Program EIR. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape, and revisions to SPR CUL-4, 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 Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
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	AD-1 AQ-3 AQ-4 BIO-1 BIO-2 BIO-7 BIO-9 GEO-1 GEO-3 GEO-4 GEO-5 GEO-7 HYD-5	BIO-1a BIO-1b BIO-1c	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) PSU (bumble bees)	Impact BIO-2, pp 3.6-138 – 3.6-184	Yes	AD-1 BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-10 BIO-11 HAZ-5 HAZ-6 HYD-1 HYD-3 HYD-4 HYD-5	BIO-2a BIO-2b BIO-2c BIO-2e BIO-2g BIO-3a BIO-3b BIO-3c BIO-4	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	AD-1 BIO-1 BIO-2 BIO-3 BIO-4 BIO-5 BIO-6 BIO-9 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	AD-1 BIO-1 HYD-1 HYD-3 HYD-4	BIO-4	LTSM	No	Yes

Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
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	AD-1 BIO-1 BIO-4 BIO-5 BIO-10 BIO-11 HYD-1 HYD-4	BIO-5	LTSM	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife, Including Nesting Birds	LTS	Impact BIO-6, pp 3.6-197 – 3.6-198	Yes	AD-1 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-1 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	AD-1	NA	—	—	—

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

New Biological Resources Impacts: Would the treatment result in other impacts to biological resources that are not evaluated in the CalVTP Program EIR?	☐ 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 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 (i.e., sensitive natural communities, wetlands) with potential to occur in the project area. CAL FIRE's Fire and Resource Assessment Program (FRAP) vegetation layer was used to identify the general vegetation and land cover types in the project area.

The project area is primarily within the Sierra Nevada ecoregion, with the westernmost portion of the project area in the Sierra Nevada Foothills ecoregion. The project area ranges in elevation from approximately 1,240 feet to 3,120 feet and encompasses multiple different vegetation types as a result. Land cover and vegetation types, classified

according to the California Wildlife Habitat Relationships (CWHR) classification system, within the project area and total acreage for each treatment type are presented in Table 4.5-1.

Table 4.5-1 Vegetation and Land Cover Types in the Project Area

Vegetation/Land Cover Type	Ecological Restoration (Acres)	WUI (Acres)	Fuel Break (Acres)	Total (Acres)
Forest/Woodland				
Blue Oak Woodland	73.9	93.7	60.3	227.9
Blue Oak–Foothill Pine	311.0	525.0	217.9	1,053.9
Douglas Fir	70.7	289.8	52.6	413.1
Montane Hardwood	556.8	1,153.7	361.5	2,072
Montane Hardwood–Conifer	145.9	552.6	204.8	903.3
Ponderosa Pine	287.6	990.5	291.9	1,570
Forest/Woodland Total	1,445.9	3,605.3	1,189.0	6,240.2
Shrub/Scrub				
Mixed Chaparral	304.3	368.6	141.9	814.8
Shrub/Scrub Total	304.3	368.6	141.9	814.8
Herbaceous				
Annual Grassland	17.1	90.7	45.1	152.9
Herbaceous Total	17.1	90.7	45.1	152.9
Wetland/Riparian[1]				
Valley Foothill Riparian	5.7	14.0	2.6	22.3
Fresh Emergent Wetland	0.0	3.3	0.0	3.3
Lacustrine	2.0	19.0	0.3	21.3
Wetland/Riparian Total	7.7	36.3	2.9	46.9
Agricultural				
Cropland	0.0	21.7	0.1	21.8
Irrigated Hayfield	0.0	0.2	0.4	0.6
Agricultural Total	0.0	21.9	0.5	22.4
Developed/Disturbed/Barren				
Urban	0.0	11.5	0.1	11.6
Barren	0.0	19.5	11.8	31.3
Developed/Disturbed/Barren Total	0.0	31.0	11.9	42.9
All Vegetation Types Total	**1,775.0**	**4,153.8**	**1,391.3**	**7,320.1**

[1]Wetland and riparian habitats are generally underrepresented in CAL FIRE FRAP vegetation data. While montane riparian habitat is not mapped in the project area, species typically associated with this habitat type, such as bigleaf maple and willow, were observed during reconnaissance-level surveys.

Source: CAL FIRE FRAP vegetation data, downloaded and compiled by Ascent in 2024.

A list of special-status plant and wildlife species with potential to inhabit the project area was compiled by completing a review of the California Natural Diversity Database (CNDDB) and California Native Plant Society Inventory of Rare and Endangered Plants of California records for the US Geological Survey (USGS) quadrangles containing and surrounding the project area (15 quadrangles total; CNDDB 2024; CNPS 2024a); the US Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool (USFWS 2024); and Appendix BIO-3 (Table 4a, Table

4b, Table 13a, Table 13b, Table 14a, Table 14b, and Table 19) in the Program EIR (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 within the project area was compiled by searching the Manual of California Vegetation online (CNPS 2024b) and reviewing Table 3.6-9 (pages 3.6-42–3.6-43), Table 3.6-22 (pages 3.6-83–3.6-85), and Table 3.6-24 (pages 3.6-88–3.6-90) in the Program EIR (Volume II) for sensitive natural communities that could occur in the Sierra Nevada Foothills and Sierra Nevada ecoregions in the vegetation types mapped in the project area.

Ascent conducted reconnaissance surveys on October 28, 29, and 30, 2024, 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 vegetation types were verified where possible, and incidental wildlife observations were recorded (Attachment B). Reconnaissance surveys included walking and driving surveys of private land (i.e., private property owners) and "windshield" surveys from public roads in areas where permission to enter was not obtained. The reconnaissance surveys were designed to sample as many different habitat types and conditions as possible, with a focus on sensitive habitats (e.g., streams, wetlands, riparian habitat, sensitive natural communities [e.g., chaparral habitat]). Characteristics of these habitats (e.g., species composition, percent cover of dominant vegetation type, total canopy percent cover, human disturbance level) were noted and extrapolated to habitats that were not surveyed to supplement the information gathered during the desktop analysis (e.g., FRAP land cover, aerial imagery). While this extrapolation approach accurately describes much of the habitat in the project area, it is also likely that some areas that were not surveyed may have unique characteristics that are not directly comparable to the surveyed areas. The SPRs and mitigation measures described below are applied to conservatively account for all potential habitat types and resource occurrences.

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 in the project area as assessed during reconnaissance surveys, a complete list of all species with potential to occur in the vicinity of the proposed project was assembled (Attachment B). These species are discussed in detail under Impact BIO-1 (special-status plants) and Impact BIO-2 (special-status wildlife).

IMPACT BIO-1

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects on special-status plant species in the project area, if these species are present. 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. 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 special-status plant populations; however, repeated treatments at too frequent intervals can have adverse effects on those same special-status plants.

SPR BIO-7 would apply to all treatment activities, including maintenance treatments, and protocol-level surveys for special-status plants would be conducted pursuant to *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018a) prior to implementing mechanical treatment, manual treatment, prescribed burning, prescribed herbivory, and herbicide application in any habitat potentially suitable for special-status plants. Pursuant to SPR BIO-7, surveys would not be required for special-status plants not listed under the California Endangered Species Act (CESA) or the federal Endangered Species Act (ESA) if all the following conditions apply:

- the target special-status plant species is an herbaceous annual species, stump-sprouting species, or geophyte species (e.g., perennial rhizomatous herbs);
- the treatment is carried out during the dormant season for that species or when the species has completed its annual life cycle;

- the treatment would not alter habitat in a way that would make it unsuitable for the special-status plants to reestablish following treatment; and
- treatments are limited to those that do not disturb below the soil surface (i.e., manual treatments, herbicide application, prescribed herbivory, and broadcast burning) as not to destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts of special-status plants.

However, this would require that treatments in habitat potentially suitable 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, broadcast burning, prescribed herbivory, herbicide application) without prior knowledge of their presence, which may unnecessarily or infeasibly constrain treatment implementation. In this case, surveys could be conducted to determine presence or absence and, depending on the results, may provide greater flexibility in terms of the timing and types of treatments that may be implemented.

Multiple special-status plant species that may occur within the project area are herbaceous annual species or geophytes, and are not listed under ESA or CESA, as indicated in Attachment B. Impacts on these species would be avoided by implementing non-ground-disturbing treatment activities (i.e., manual treatments, prescribed burning, prescribed herbivory, herbicide application) 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 inch), and cold snap, which generally occurs between October–December (Levine et al. 2008). Control lines for prescribed burning would have to be created outside of potential habitat for special-status plants or the proposed control line areas would need to be surveyed for special-status plants, including annual species, stump-sprouting species, or geophyte species, prior to installing any control lines. Ground-disturbing treatment activities (i.e., mechanical treatments) and pile burning may result in adverse effects on these plant species even when dormant and would not be conducted without prior implementation of SPR BIO-7. If non-ground-disturbing treatments 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 Measure BIO-1b) must be implemented, as described below.

The remaining special-status plant species that have potential to occur within the project area are perennial, moss species, or annual or geophytic species that are protected under ESA or CESA. Perennials and moss species could not be avoided seasonally in the same manner as herbaceous annual species, stump sprouters, or geophytes. Pursuant to SPR BIO-7, any species protected under ESA or CESA cannot be seasonally avoided regardless of their life form. Therefore, protocol-level surveys under SPR BIO-7 would be necessary to identify these species prior to implementing treatment activities in habitat that may support these species, regardless of the timing of treatments.

Where protocol-level surveys are required (per SPR BIO-7) and special-status plants are identified during these surveys, Mitigation Measures BIO-1a and 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, targeted herbicide treatment, and prescribed herbivory would not occur unless a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging plants. Treatment of Scotch broom is proposed within the 50-foot buffer to protect non-listed rare plant species. Scotch broom is a highly invasive species that aggressively outcompetes native plants, forming dense monocultures that degrade habitat conditions and limit resources for rare species. If left untreated, it can also increase fire hazards by promoting high-intensity burns that exceed natural fire regimes, posing a significant risk to special-status plants. Only localized, targeted removal methods, including manual or selective herbicide treatments (i.e., cut-stump method), would be implemented to minimize disturbance to rare plant species while preventing long-term habitat degradation. Mechanical treatment, prescribed burning, and prescribed herbivory would not occur within the 50-foot buffer to control Scotch broom.

If a no-disturbance buffer is reduced below 50 feet from an ESA or CESA listed plant for reasons other than to remove Scotch broom, a qualified RPF or botanist will provide the project proponent with a site- or treatment activity-specific explanation for the buffer reduction and a science-based justification for the deviation, which will be

included in the Completion Report. The no-disturbance buffer for species not listed under ESA or CESA may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid loss of or damaging special-status plants, or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. No fire ignition (and associated use of accelerants) will occur within 50 feet of ESA or CESA listed plants, or within the no-disturbance buffer for species not listed under ESA or CESA.

Treatments may not occur in areas occupied by special-status species unless a qualified RPF or botanist 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 ESA or CESA, the determination of beneficial effects would need to be made in consultation with 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. Treatment activities and maintenance treatments would be designed so that treatments, including follow-up maintenance treatments, maintain habitat function for the special-status plant species present. If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided, then Mitigation Measure BIO-1c will apply and compensatory mitigation will be required.

In addition, pursuant to SPR HYD-5, nontarget vegetation and special-status plant species would be protected from herbicides. No herbicides will be applied within a 50-foot buffer of ESA or CESA listed plant species. For spray applications in and adjacent to habitats suitable for special-status species, herbicides containing dye will be used to prevent overspray. In riparian habitats, herbicides would be applied by hand and only during low-flow periods or when seasonal streams are dry. To avoid nontarget vegetation via run-off or aerial drift, herbicide application will not occur during precipitation events, sustained winds, or when weather parameters exceed label specifications.

Conclusion

The potential for treatment activities to result in adverse effects on special-status plants was examined in the Program EIR. This impact on special-status plants is within the scope of the Program EIR 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 and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR. 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 Program EIR. 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.

As described under Section 1.1.3, "Purpose of this PSA/Addendum," Nevada County proposes to revise requirements under SPR GEO-1. Proposed revisions to SPR GEO-1 would allow for suspension of mechanical treatments, prescribed herbivory, and herbicide treatments if it is raining, soils are saturated, or soils are wet enough to be compacted by mechanical or prescribed herbivory activities, rather than when there is a minimum 30 percent chance of rain. This modification constitutes a revision to the program description analyzed in the Program EIR.

Requirements under SPR GEO-1 are intended to prevent soil destabilization during precipitation events that could result in soil compaction and disturbance that could have adverse effects on special-status plants if present. Suspension of mechanical, prescribed herbivory, and herbicide treatments in the above-mentioned conditions (e.g., rain, saturated soils, or soils wet enough for compaction to occur) would provide the same level of protection for indirect effects on special-status plants resulting from soil destabilization as the original SPR GEO-1, because these activities would not continue during conditions where soil destabilization could occur. Suspension of these activities would not be based on weather forecasts alone, but rather if weather predictions materialize and lead to precipitation events. Therefore, proposed revisions to SPR GEO-1 would not result in a substantially more severe significant effect on special-status plants than what was covered in the Program EIR.

Biological resource SPRs that apply to project impacts under Impact BIO-1 are SPRs AD-1, AQ-3, AQ-4, BIO-1, BIO-2, BIO-7, BIO-9, GEO-1, GEO-3, GEO-4, GEO-5, GEO-7, and HYD-5. Biological resource mitigation measures that apply to project impacts under Impact BIO-1 are Mitigation Measure BIO-1a, Mitigation Measure BIO-1b, and Mitigation Measure BIO-1c. As explained above, impacts on special-status plants resulting from the proposed project, including proposed revisions to SPR GEO-1, would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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 in 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.

Wildlife Agency Consultation

Pursuant to Mitigation Measure BIO-2a, consultation with USFWS and CDFW is required, as applicable (i.e., depending on the listing status of the species), about the determination that, with implementation of the proposed project, mortality, injury, or disturbance would not occur, and habitat function would be maintained for species listed as endangered or threatened under ESA; listed as endangered or threatened, or candidates for listing under CESA; or designated as fully protected under California Fish and Game Code. As noted below under the discussions for each species, Nevada County and YWI conducted the wildlife agency consultation required under Mitigation Measure BIO-2a. On April 4, 2025, Nevada County and YWI contacted Ryan Olah and Mia Guarnieri at USFWS Sacramento Office and Amy Kennedy at CDFW Region 2 describing the measures that would be taken to avoid mortality, injury, and disturbance to species under their jurisdiction and to maintain habitat function in compliance with Mitigation Measure BIO-2a. No refinements to the project description or measures resulted from the notification with CDFW. USFWS provided several general best practice measures related to herbicides that have been incorporated into the project description and project-specific guidance to SPR HAZ-8 and SPR HYD-5 (Attachment A). No species-specific comments were provided by USFWS.

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). There are no documented occurrences in the project area, however there is one occurrence approximately 1.9 miles southeast of the project area near Blue Tent, California (CNDDB 2024). Approximately 8,280 acres of California red-legged frog critical habitat, which incorporates the location of the occurrence described above, have been designated by USFWS in Nevada County southeast of the project area. The boundaries of the project area and the California red-legged frog critical habitat do not intersect and are approximately 0.2 miles apart at their nearest points. Based on the few documented occurrences in the region, and the California red-legged frog population in the region being small and fragmented, it is unlikely that the project area supports a large population of California red-legged frogs. However, most private land in the region has not been surveyed and California red-legged frogs may exist in aquatic habitat, including perennial streams with deep pools, stock ponds, seeps, and wetlands in and near the project area. The potential for initial treatment activities and maintenance treatments to result in adverse effects on California red-legged frogs was examined in the program EIR.

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); however, these studies were conducted in coastal watersheds where conditions are generally much wetter than Nevada County. A study focused on the California red-legged frog population in Hughes Pond at the headwaters of Jack Creek (abandoned lumber mill pond, Butte County) using radio tagged frogs determined that frogs in Hughes Pond did not travel greater than approximately 65 feet (20 meters) into upland habitats and that larger movements were only observed within aquatic habitats (Tatarian and Tatarian 2008). While

similar studies have not been conducted for the possibly extirpated California red-legged frog population in Nevada County, it is likely that frogs in Nevada County would exhibit similar dispersal behaviors (i.e., strong fidelity to aquatic habitats) because the Sierra foothill habitat in Nevada County is more similar to that in Butte County (e.g., elevation, rainfall average) than in coastal California.

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 WLPZs. Wetland delineations will be conducted to determine if other wetland, spring, and seep habitats are present in the project area, and where aquatic habitats are delineated, no-disturbance buffers of at least 25 feet will be implemented (per Mitigation Measure BIO-4). 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 frogs as determined by a qualified RPF or biologist), wetlands, and 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 1 acre (i.e., not considered a lake under Forest Practice Rules and therefore not protected by WLPZ requirements), or if manual treatment activities implemented within a WLPZ resulted in injury or mortality of frogs.

The one known occurrence of California red-legged frog in Nevada County is outside of the project area where no treatments would occur; therefore, impacts on this population, if present, would be avoided. As noted above, aquatic breeding habitat potentially suitable for California red-legged frogs may be present in perennial streams with deep pools and stock ponds in the project area. Aquatic nonbreeding habitat potentially suitable for California red-legged frogs is also present (e.g., streams without deep pools, other wetlands). California red-legged frogs have not been documented in other ponds or streams in the project area and populations have been fragmented and nearly eliminated from the region (USFWS 2002). Because of the low likelihood of presence coupled with the additional protections that would be implemented as described below, injury or mortality of California red-legged frogs is unlikely to occur as a result of treatments near these habitats. 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 measure will be implemented: a 200-foot buffer will be applied to Class I streams, Class II streams with water, permanent ponds, and wetlands that meet the definition of aquatic breeding habitat suitable for the species as determined by a qualified RPF or biologist, within which no mechanical treatments or pile burning will occur. Further, year-round measures would require all trees to be felled away from aquatic habitat suitable for California red-legged frogs and would prohibit pile burning within 200 feet of these aquatic habitats year-round.

If these buffers are determined to be infeasible for certain treatments, then SPR BIO-10 would apply, and protocol-level surveys for California red-legged frogs would be conducted by a qualified RPF or biologist pursuant to the *Revised Guidance on Site Assessments and Field Surveys for the California Red-Legged Frog* (USFWS 2005) in aquatic habitat potentially suitable for the species. If California red-legged frogs are not detected in the project area during protocol-level surveys, then no mitigation for the species would be required and the buffers would not be required. If California red-legged frogs are identified during focused surveys, then a no-disturbance buffer of at least 300 feet would be implemented. If California red-legged frogs are detected, all treatment activities will pause, and USFWS will be contacted pursuant to Mitigation Measure BIO-2a to provide further guidance regarding avoidance measures. Areas for avoidance in which no treatment activities would occur would be flagged/marked, and/or other measures recommended by USFWS would be implemented as necessary to avoid injury to or mortality of California red-legged frog (e.g., biological monitoring).

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). However, local studies suggest that upland movements in the Sierra foothills may be much more limited (Tatarian and Tatarian 2008). 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 1.9 miles, which is greater than the typical dispersal distance of the species (CNDDB 2024). It is unlikely that California red-legged frogs would migrate between these two locations. However, there are many additional potential aquatic breeding sites (e.g., ponds, streams) near the project area to which frogs from the documented occurrence in Nevada County, if this occurrence is not extirpated, could disperse.

California red-legged frogs generally make overland movements (i.e., dispersal, migration) during the wet season (i.e., October to May) and these movements are typically made at night (Bulger et al. 2003). While some nighttime prescribed burning and prescribed herbivory may occur, treatment activities would mostly occur during the daytime. As noted above, it is unlikely that the project area supports a large population of California red-legged frogs, and as a result, upland habitat use by the species would likely be concentrated in areas within the typical dispersal distance of the documented occurrence southwest of the project area. As noted above, a telemetry study focused in Butte County determined that California red-legged frogs in similar environmental conditions did not travel greater than approximately 65 feet (20 meters) into upland habitats and that larger movements were only observed within aquatic habitats (Tatarian and Tatarian 2008). Therefore, the aquatic buffers described above would be sufficient to avoid dispersing and migrating California red-legged frogs in the project area, especially because the persistence of this population is unknown.

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, no fire ignition for broadcast burning, 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 WLPZs; and no-disturbance buffers of at least 25 feet will be implemented surrounding other wetland, spring, and seep habitats. Additionally, select large downed logs would be retained in treatment areas, where they do not create an additional hazard or prevent project objectives from being met (e.g., downed logs would not be retained within 200 feet of fuel breaks) (see Section 2.1, "Proposed Treatments"). Chipped biomass would not exceed 4 inches in depth on average to prevent suppression of seed germination in areas where amphibians may require vegetative cover. Finally, within the 50- to 150-foot WLPZs, removal of understory vegetation would occur in a mosaic pattern, where some herbaceous understory remains such that cover is still available for California red-legged frog, with a minimum retention of 10 percent relative cover per acre.

SPRs identified in other resource areas (see Section 4.6, "Geology, Soils, Paleontology, and Mineral Resources") would also avoid indirect adverse effects on aquatic habitat: SPR GEO-3 (requires stabilization of disturbed soil), SPR GEO-4 (requires erosion monitoring), SPR GEO-5 (requires use of water breaks to drain stormwater), SPR GEO-7 (limits heavy equipment on steep slopes), and HYD-1 (requires compliance with water quality regulations).

Pursuant to Mitigation Measure BIO-2a, and because this species is listed under ESA, Nevada County and YWI must notify USFWS about its proposed measures to avoid mortality, injury, or disturbance of the species and its determination that habitat function would be maintained after treatments. For the reasons summarized above, Nevada County and YWI determined that implementation of treatments would maintain habitat function for California red-legged frog and contacted USFWS to seek technical input on this determination, as required. On April 4, 2025, Nevada County and YWI contacted Ryan Olah and Mia Guarnieri at USFWS Sacramento describing the

measures that would be taken to avoid mortality, injury, and disturbance to California red-legged frogs and to maintain habitat function in compliance with Mitigation Measure BIO-2a. USFWS provided several general best practice measures related to herbicides that have been incorporated into the project description and project-specific guidance to SPR HAZ-8 and SPR HYD-5 (Attachment A). No species-specific comments were provided by USFWS.

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

Coast Horned Lizard

Coast horned lizard (*Phrynosoma blainvillii*) has potential to occur in the project area within shrub habitat (e.g., mixed chaparral, scrub) or oak woodland habitat. Treatment activities, including mechanical treatments, manual treatments, prescribed burning, herbicide application, and prescribed herbivory would be implemented within these habitat types. Because these habitats would not be avoided through implementation of other measures, adverse effects on coast horned lizard could occur. The potential for treatment activities and maintenance treatments to result in adverse effects on coast horned lizard was examined in the Program EIR.

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 within several habitats that would be treated, it is unlikely that all habitat potentially suitable for the species can be avoided. 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 mechanical treatments, manual treatments, prescribed burning, 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, additional measures would be required, including flagging/marking 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 coast horned lizards.

Habitat function for coast horned lizard would be maintained because under SPR BIO-5, treatments implemented in chaparral will be designed to avoid type conversion of chaparral vegetation (the optimal habitat for this species) and to maintain chaparral habitat function. This will include determining the minimum percent cover of mature native shrubs to maintain habitat function, identifying appropriate percent cover specific to the vegetation alliances present, and retaining a mix of middle to older aged shrubs to maintain heterogeneity. Mitigation Measure BIO-3a and BIO-3b would also result in the maintenance of habitat function of oak woodlands, which may provide habitat for this species. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Foothill Yellow-Legged Frog

Aquatic habitat potentially suitable for the foothill yellow-legged frog (*Rana boylii*; North Sierra Distinct Population Segment [DPS]) may be present within Class I and Class II streams in the project area. Foothill yellow-legged frog is known to occur within upland habitat up to approximately 200 feet, but typically no more than 50 to 70 feet, away from aquatic habitat (CDFW 2018b).

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 treatments activities, including maintenance treatments, to result in adverse effects on foothill yellow-legged frog was examined in the Program EIR.

Per SPR BIO-1, to fully avoid habitat potentially suitable for foothill yellow-legged frogs, a 200-foot no-disturbance buffer would be implemented prior to commencement of treatment activities by flagging an exclusion zone along perennial streams (Class I and Class II) 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 frogs 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 in 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 for the species would be implemented.

Under Mitigation Measure BIO-2a, flagging/marking 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 these species would be required.

Habitat function for foothill yellow-legged frogs 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 would be limited (e.g., no mechanical treatment, no fire ignition for broadcast burning, retention of at least 75 percent surface cover). Additionally, select large downed logs would be retained where they do not create an additional hazard or prevent project objectives from being met (e.g., downed logs would not be retained within 200 feet of fuel breaks) (see Section 2.1, "Proposed Treatments"). Chipped biomass will not exceed an average of 4 inches in depth within WLPZs to prevent suppression of seed germination in areas where amphibians may require vegetative cover. Finally, within WLPZs, removal of understory vegetation would occur in a mosaic pattern, where some herbaceous understory remains such that cover is still available for amphibians, with a minimum retention of 10 percent relative cover per acre.

Pursuant to Mitigation Measure BIO-2a, and because this species is listed under CESA and ESA, Nevada County and YWI must notify CDFW and USFWS about its proposed measures to avoid mortality, injury, or disturbance of the species and its determination that habitat function would be maintained after treatments. For the reasons summarized above, Nevada County and YWI determined that implementation of treatments would maintain habitat function for foothill yellow-legged frog and contacted CDFW and USFWS to seek technical input on this determination, as required. On April 4, 2025, Nevada County and YWI contacted Ryan Olah and Mia Guarnieri at USFWS Sacramento and Amy Kennedy at CDFW Region 2 describing the measures that would be taken to avoid mortality, injury, and disturbance to foothill yellow-legged frogs and to maintain habitat function in compliance with Mitigation Measure BIO-2a. No refinements to the project description or measures resulted from the notification with CDFW. USFWS provided several general best practice measures related to herbicides that have been incorporated into the project description and project-specific guidance to SPR HAZ-8 and SPR HYD-5 (Attachment A). No species-specific comments were provided by USFWS.

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

Northwestern Pond Turtle

Aquatic habitat suitable for northwestern pond turtle (*Actinemys marmorata*) is present within ponds and streams in and adjacent to the project area, and this species could use the upland habitat within the project area in the vicinity of these features. Northwestern pond turtles may be present within upland habitat up to approximately 1,500 feet from aquatic habitat (Thomson et al. 2016). Northwestern pond turtle is proposed for listing under ESA, and as such, currently does not have protection under ESA; however, it is possible that the species will be listed during the life of the project. USFWS also proposed the 4(d) rule, which would provide certain exceptions to take prohibitions in the ESA for projects that have beneficial or negligible impacts to the northwestern pond turtle, including wildfire suppression and management projects, such as the proposed project. "Take" is defined under ESA as to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct."

If present, western pond turtle could be inadvertently injured or killed by pile burning, mechanical treatments, and manual tree and snag removal. Prescribed herbivory would not result in injury or mortality to western pond turtles, because grazing is not likely to remove or collapse burrows in upland habitat and the species may also move to avoid

grazing animals. Workers conducting other manual treatment activities (e.g., limbing of trees, hand pulling of invasive plants) and herbicide application on foot are also unlikely to cause injury, mortality, or substantial disturbance to individual western pond turtles because they move relatively slowly throughout the project area. Also, if pile burning occurs on or near a nest, injury or mortality of eggs and young, due to crushing or elevated temperatures. The potential for treatment activities and maintenance treatments to result in adverse effects on northwestern pond turtles was examined in the Program EIR.

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 (e.g., drainage canals, irrigation ditches) streams. However, these measures may not avoid impacts on northwestern pond turtles if turtles are present further than 150 feet from stream or lake habitat, are present within ponds smaller than 1 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.

Per SPR BIO-1, if it is determined that adverse effects on northwestern pond turtles can be clearly avoided by physically avoiding the habitat suitable for the species, then no mitigation would be required. However, because northwestern pond turtles may be present relatively large distances (i.e., up to 1,500 feet) from aquatic habitat in or near the project area, it is unlikely that all habitat potentially suitable for the species can be avoided. As a result, SPR BIO-10 would apply, and focused visual encounter surveys for northwestern pond turtle would be conducted by a qualified RPF or biologist within upland habitat areas suitable for the species prior to ground-disturbing treatment activities (i.e., mechanical treatments), manual tree/snag removal, and pile burning. If northwestern pond turtles are identified during focused surveys, Mitigation Measure BIO-2b for this species would be implemented.

If treatments are implemented before northwestern pond turtle is listed under the ESA or if this species is listed with the proposed 4(d) ruling, Mitigation Measure BIO-2b would apply to northwestern pond turtle. Under Mitigation Measure BIO-2b, additional measures would be required, including flagging/marking areas for avoidance, and/or other measures recommended by a qualified RPF and biologist as necessary to avoid injury to or mortality of northwestern pond turtles.

Habitat function for northwestern pond turtles 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, no fire ignition for prescribed burning, retention of at least 75 percent surface cover).

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

California Spotted Owl

The California spotted owl Sierra Nevada DPS is proposed for listing under ESA, and as such, currently does not have protection under ESA. However, it is possible that the species will be listed during the life of the project. USFWS also proposed the 4(d) rule, which would provide certain exceptions to take prohibitions under ESA for projects that have beneficial or negligible impacts to California spotted owl, including forest or fuels management to reduce the risk or severity of wildfire.

Much of the project area does not contain habitat suitable for California spotted owl. A single California spotted owl nest site has been documented outside, but within 0.25 miles, of the project area, and several detections have been documented in the project area. However, these detections occurred from 1993 through 1997, with the single nest confirmation occurring in 1995. Since this period, the only reported detections near the project area occurred over a 3-day period in 2007, more than 0.5 miles away from the project area (CNDDB 2024). Several California spotted owl nests were detected during planning efforts for the nearby Nevada County Landscape Resilience Projects; the nearest of which was approximately 0.5 miles away from the project area (in the 'Inimim Forest project area), which was detected in 2018 (YWI 2024). Additional nests have been detected within approximately 0.7 miles of the project area (in the Round Mountain project area) in 2021 (YWI 2024). Although California spotted owls may be sporadically

present, it is unlikely the project area supports resident California spotted owls, or high-quality nesting habitat suitable for the species.

Portions of the project area that contain mature forest may also contain marginal nesting habitat for California spotted owl. Removal of nest trees would not occur because trees greater than 12 inches DBH would not be removed as a part of ecological restoration treatments. Trees of up to 18 inches DBH could be removed for fuel breaks and WUI fuel reduction treatments; however, if these treatment areas contain habitat suitable for California spotted owls as determined by a qualified RPF or biologist, nest trees in these treatment areas would be identified as part of protocol-level surveys conducted pursuant to SPR BIO-10 prior to project activities and would not be considered for removal. Further, in forest habitats determined by a qualified RPF or biologist to be occupied (i.e., through implementation of protocol-level surveys under SPR BIO-10) or assumed to be occupied by California spotted owl (e.g., forests with canopy cover greater than 60 percent, late seral forest characteristics, complex forest structure), treatments would be designed to reduce canopy cover by no more than 30 percent from existing conditions, and a minimum of 60 percent canopy cover would be retained. Modification of California spotted owl habitat is not expected to occur such that any habitat would be unsuitable for the species after treatment. However, treatment activities that include the use of heavy equipment, multiple vehicles, or loud hand tools (e.g., chainsaws) could result in disturbance of nesting California spotted owls in suitable nesting habitat within or adjacent to the project area, if these activities occur during the sensitive nesting season (March 1–August 15). The potential for treatment activities to result in adverse effects on special-status birds was examined in the Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on habitat suitable for California spotted owl can be clearly avoided by conducting treatments outside of the season of sensitivity (i.e., nesting season), then further mitigation would not be required. Because California spotted owl nesting occurrences are widespread throughout eastern Nevada County as well as north of the project area in eastern Yuba County, to determine whether a documented California spotted owl nesting occurrence is present in or within 0.25 miles of the project area under SPR BIO-1, a qualified RPF or biologist will review California spotted owl occurrence data in the CNDDB and the project proponent will contact US Forest Service biologists from Tahoe National Forest and BLM biologists to obtain any recent survey and occurrence data for California spotted owl on land adjacent to a treatment area that has not been made publicly available (e.g., in the CNDDB). If present, or if habitat suitable for California spotted owl nesting as determined by a qualified RPF or biologist is present in or within 0.25 miles of a treatment area, potential impacts on the nesting occurrence will be avoided by implementing a limited operating period within 0.25 miles of the occurrence or nesting habitat during the spotted owl nesting season (March 1–August 15) for mechanical treatments, manual treatments, and prescribed burning activities.

Prescribed herbivory and herbicide application would not result in adverse effects on nesting spotted owls because prescribed herbivory would not occur in nesting habitat suitable for the species, and because these activities would not involve the use of loud and continuous noise from equipment or tools, significant habitat modification, or substantial visual stimuli from human presence close enough to a California spotted owl nest to result in disturbance of the nest.

If the limited operating period is determined to be infeasible, then SPR BIO-10 would apply, and protocol-level surveys for California spotted owl would be conducted by a qualified RPF or biologist within nesting and foraging habitat for California spotted owl in a 0.25-mile buffer surrounding the project area prior to implementation of treatment activities. Surveys for California spotted owl will be conducted pursuant to the *Protocol for Surveying for Spotted Owls in Proposed Management Activity Areas and Habitat Conservation Areas* (USFS 1993, 2006) or any protocol subsequently developed or otherwise required by USFWS should the species be listed. If nesting California spotted owls are not identified during protocol-level surveys, then further mitigation for the species would not be required. If nesting California spotted owls are identified during protocol-level surveys, Mitigation Measure BIO-2b would be implemented. Under Mitigation Measure BIO-2b, a no disturbance buffer of 0.25 miles would be established around active California spotted owl nests and no treatment activities would occur within this buffer.

Habitat function for California spotted owl would be maintained because treatment activities would not result in removal of trees (i.e., conifers, hardwoods) greater than 12 inches DBH in ecological restoration treatments or 18 inches DBH in fuel break and WUI fuel reduction treatments, and select snags would be retained (the number of

retained snags would be dependent on the treatment type), which would be the most likely features to be used by this species due to the cover provided by larger trees. For ecological restoration treatments, canopy cover within forest habitats occupied or potentially occupied by California spotted owl would be maintained at 60 percent or greater, and treatments would be designed by a qualified RPF or silviculturist to maintain tree age class diversity and sufficient young understory trees to facilitate forest regeneration and long-term maintenance of habitat function.

If treatments are implemented before California spotted owl is listed under the ESA or if this species is listed with the proposed 4(d) ruling, Mitigation Measure BIO-2b would apply. Should the proposed ESA 4(d) rule for California spotted owl be issued when the species is listed, the project would qualify for take exemption as a project conducting forest fuels management activities that reduce the risk of large-scale high-severity wildfires, and further consultation with USFWS would not be required.

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

Special-Status Birds

Twelve additional special-status birds may occur within the project area: American goshawk (*Accipiter atricapillus*), bald eagle (*Haliaeetus leucocephalus*), bank swallow (*Riparia riparia*), black swift (*Cypseloides niger*), golden eagle (*Aquila chrysaetos*), great gray owl (*Strix nebulosa*), long-eared owl (*Asio otus*), olive-sided flycatcher (*Contopus cooperi*), purple martin (*Progne subis*), Vaux's swift (*Chaetura vauxi*), yellow warbler (*Setophaga petechia*), and yellow-breasted chat (*Icteria virens*) (Attachment B).

For these additional special-status bird species, 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 ground nests or trees or shrubs containing nests are removed or burned. For nests within vegetation that would not be removed, mechanical treatments, manual treatments, prescribed burning, herbicide application, and prescribed herbivory 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. Some of these species, including bank swallow and yellow warbler, are associated with habitats that would not be targeted by treatments (e.g., river banks, marshes, wetlands). However, in forested areas, these habitats may be difficult to detect (e.g., hillslope seeps) and may be targeted for treatment (e.g., grassy slopes), and treatment activities conducted near these habitats could result in disturbances to these species. The potential for treatment activities to result in adverse effects on special-status birds was examined in the Program EIR.

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, which is typically February 1–August 31.

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 American goshawk, bald eagle, bank swallow, black swift, golden eagle, great gray owl, long-eared owl, olive-sided flycatcher, purple martin, Vaux's swift, yellow warbler, and yellow-breasted chat would be conducted by a qualified RPF or biologist prior to implementation of treatment activities. Established survey protocols would be followed for certain species including but not limited to great gray owl (USFS 2016) and American goshawk (USFS 2006). These two special-status species are associated with mature forest habitats which are most likely to be present within US Forest Service or BLM land adjacent to the project area. Prior to implementing SPR BIO-10 for these species, the implementing entity will contact US Forest Service biologists from Tahoe National Forest to obtain any recent survey and occurrence data for great gray owl and northern goshawk for areas adjacent to the treatments that have not been made publicly available (e.g., in the CNDDB).

If no active bird nests are observed during the 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, bank swallow, golden eagle, and great gray owl) and BIO-2b (for American

goshawk, black swift, long-eared owl, olive-sided flycatcher, purple martin, Vaux's swift, yellow warbler, and yellow-breasted chat) would be implemented.

Under Mitigation Measures BIO-2a or BIO-2b, a no-disturbance buffer of at least 1 mile would be established around bald eagle and golden eagle nests; 0.25 miles for American goshawk and great gray owl nests; and at least 100 feet around the nests 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 or golden 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 (i.e., conifers, hardwoods) greater than 12 inches DBH within ecological restoration treatment areas, or trees greater than 18 inches DBH in fuel breaks and WUI fuel reduction treatment areas, and select snags would be retained (the number of retained snags would be dependent on the treatment type), which would be the most likely features to be used by these species due to the cover provided by larger trees. As a result, habitat function would be retained within treatment areas. Additionally, treatments within riparian habitat (which provides habitat for several special-status species that may occur in the project area [e.g., yellow warbler, yellow-breasted chat]) that is included within a WLPZ would be limited pursuant to SPR HYD-4 (e.g., no mechanical treatment, no fire ignition for prescribed burning, no pile burning, retention of at least 75 percent surface cover). Additionally, pursuant to SPR HYD-3, livestock would be excluded from 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, Nevada County and YWI must consult with CDFW about its determination that mortality, injury, or disturbance would not occur and that habitat function for bald eagle, bank swallow, golden eagle, and great gray owl would be maintained. For the reasons summarized above, Nevada County and YWI determined that implementation of treatments would maintain habitat function for bald eagle, bank swallow, golden eagle, and great gray owl and consulted with CDFW to seek technical input on this determination, as required. On April 4, 2025, Nevada County and YWI contacted Amy Kennedy at CDFW Region 2 describing the measures that would be taken to avoid mortality, injury, and disturbance to bald eagle, bank swallow, golden eagle, and great gray owl and to maintain habitat function in compliance with Mitigation Measure BIO-2a. No refinements to the project description or measures resulted from the notification with CDFW.

This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact that what was covered in the Program EIR.

Crotch's Bumble Bee

Crotch's bumble bee (*Bombus crotchii*), along with three other bumble bee species, was designated as a candidate for listing as endangered under CESA by the California Fish and Game Commission on May 31, 2022. In June of 2023, CDFW released *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species*, which included survey and mitigation guidance for the four candidate species, as well as updated current range maps for each species (CDFW 2023). Crotch's bumble bee has recently undergone declines in abundance and distribution and is no longer present across much of its historic range (Xerces Society 2018). There are no verified detections of Crotch's bumble bee in Nevada County (Bumble Bee Watch 2024; CNDDB 2024); however, the project area is within the currently accepted range of the species (CDFW 2023).

Bumble bees have three basic habitat requirements: suitable nesting sites for the colonies, availability of nectar and pollen from floral resources throughout the duration of the colony period (spring, summer, and fall), and overwintering sites suitable for the queens. In California, Crotch's bumble bees typically inhabit open grassland and scrub habitat (Xerces Society 2018). Crotch's bumble bees nest underground and likely use, at least in part, old rodent burrows (Williams et al. 2014; Xerces Society 2018). Some bumble bees favor nest sites near woody transitional habitats and nest in holes or crevices in leaf litter, beneath woody debris, at the base of a tree, in herbaceous plant debris, or near grass clumps (Lanterman et al. 2019). Overwintering likely occurs primarily in woodlands (USFWS 2021). Overwintering queens may prefer shaded areas near trees in areas without dense vegetation and north-facing slopes (Liczner and Colla 2019; Williams et al. 2019). Bumble bees in California have been documented overwintering

under 1–2 inches of duff, between leaf/needle litter and mineral soil (Williams et al. 2014). The project area contains habitat suitable for Crotch's bumble bee nesting, foraging, and overwintering.

Treatment activities (i.e., manual treatments, mechanical treatments, prescribed burning, herbicide application, and prescribed herbivory) could result in temporary removal of floral resources, as well as inadvertent destruction of bumble bee nests or overwintering sites, if present in the project area, through trampling, crushing, or removal of nesting or overwintering substrate (e.g., downed woody debris, leaf litter). The potential for treatment activities to result in adverse effects on special-status bumble bees was examined in the Program EIR.

In the Program EIR, Mitigation Measure BIO-2g was proposed as a feasible set of actions to reduce potentially significant impacts on special-status bumble bees by requiring avoidance of prescribed burning and targeted ground application of herbicide treatment during the flight/nesting season and retention of habitat in the range of these species, or compensation for unavoidable loss of special-status bumble bees or habitat function. Recognizing the difficulty in detecting overwintering and nesting bumble bees and determining the occurrence and severity of impacts, limited information about nesting and overwintering behaviors, and the statewide scope of potential effects analyzed, for the purpose of good faith and full disclosure under CEQA, this impact was designated in the Program EIR as potentially significant and unavoidable. However, addressing this potential effect at a project-specific level may result in a different significance conclusion if evidence supports it.

Per SPR BIO-1, if it is determined that adverse effects on Crotch's bumble bee would be clearly avoided by conducting treatments outside of the season of sensitivity or physically avoiding habitat for these species, then additional survey and avoidance measures would not be required. However, because Crotch's bumble bees may use habitat in the project area year-round, implementation of SPR BIO-10 would be required prior to treatment activities. Under SPR BIO-10, a habitat evaluation for special-status bumble bees would be conducted based on the recommendations within *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (CDFW 2023). If the habitat evaluation determines that habitat for this species is present within a treatment area, focused surveys for Crotch's bumble bee would be conducted following the recommendations in CDFW 2023 (or any additional, more recent guidance if developed by CDFW). In lieu of conducting focused surveys (e.g., if conducting a valid survey is not feasible), the potential presence of Crotch's bumble bee in the project area may be assumed. This survey guidance does not provide survey methods for determining the presence of overwintering bumble bees because overwintering habitat is not well understood (CDFW 2023).

If Crotch's bumble bees are detected, then Mitigation Measure BIO-2g will be implemented and a no-disturbance buffer will be established around active nests for mechanical treatments. If presence of special-status bumble bees is assumed within habitat suitable for this species as determined pursuant to SPR BIO-10, then Mitigation Measure BIO-2g would apply and prescribed burning, mechanical treatments, and herbicide application will be avoided during the colony active season (April through August). Furthermore, Mitigation Measure BIO-2g includes additional measures to avoid mortality, injury, or disturbance to Crotch's bumble bees. These measures include conducting treatments in a patchy pattern to retain floral resources for active colonies and to provide refuge for overwintering bumble bees. Additional project-specific implementation has been added to Mitigation Measure BIO-2g based on recent feedback from CDFW staff, including restrictions on herbicide application techniques and division of the project area such that the entirety of overwintering or colony habitat is not treated in a single year to further provide refuge.

With implementation of Mitigation Measure BIO-2g and applicable SPRs, habitat function for Crotch's bumble bee would be maintained during and after treatment implementation. Treatments would be designed and implemented in a patchy pattern to retain floral resources and provide refuge for bumble bees. Treatment activities in ecological restoration treatment areas would retain select logs and snags that provide wildlife habitat but do not pose safety hazards, and some of these features may provide nesting or overwintering sites suitable for Crotch's bumble bee. The proposed vegetation treatments would not cause any conversion or loss of natural land cover or permanent soil disturbance that could remove availability of potential underground nesting or overwintering sites over the long term. SPR BIO-9 would be implemented, which would prevent the spread of invasive plants and noxious weeds through application of best management practices before, during, and after treatments. With implementation of Mitigation Measure BIO-2g and applicable SPRs, the impact of the project on habitat function for Crotch's bumble bee would be less than significant with mitigation.

Pursuant to Mitigation Measure BIO-2g, the determination that habitat function would be maintained for Crotch's bumble bee must be made in consultation with CDFW. For the reasons summarized above, Nevada County and YWI determined that implementation of treatments would maintain habitat function for Crotch's bumble bees and consulted with CDFW to seek technical input on this determination, as required. On April 4, 2025, Nevada County and YWI contacted Amy Kennedy at CDFW Region 2 describing the measures that would be taken to avoid mortality, injury, and disturbance to Crotch's bumble bees and to maintain habitat function in compliance with Mitigation Measure BIO-2a. No refinements to the project description or measures resulted from the notification with CDFW. With implementation of Mitigation Measure BIO-2g and applicable SPRs, project-specific determination for this impact for the project would be less than significant with mitigation.

These potential effects would not constitute a substantially more severe impact than what was covered in the Program EIR.

Monarch Butterfly

Monarch (*Danaus plexippus*) is proposed 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 Program EIR. However, it is possible that the species will be listed during the life of the project. USFWS also proposed the 4(d) rule, which would provide certain exceptions to take prohibitions in the ESA for actions that may maintain, enhance, remove, or establish milkweed and nectar plants within the breeding and migratory range that do not result in conversion of native or naturalized grassland, shrubland, or forested habitats, including fire management actions (e.g., prescribed burning, hazardous fuel reduction activities, vegetation management, maintenance of fuel breaks and minimum clearance requirements, and other fuels reduction activities).

There are several documented observations of breeding monarchs within South Yuba River State Park, adjacent to the project area (Xerces Society et al. 2023). It is likely there are additional undocumented occurrences of both monarch butterflies and milkweed (*Asclepias* spp.) plants in the project area. The project area is outside of 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 (i.e., mechanical treatment, manual treatment, prescribed burning, prescribed herbivory, and herbicide application) could result in 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 Program EIR.

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 2023). In the project area, some foraging and breeding habitat for monarchs would occur in grasslands, which comprise approximately 2.1 percent of the total project area. 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 SPRs HYD-3, HYD-4, BIO-4, and Mitigation Measure BIO-4, and milkweed would not be targeted for treatments in these habitats.

Treatment activities implemented within grassland habitat would be prescribed burning and prescribed herbivory. After prescribed burning in meadows located in the foothills of Butte County where purple milkweed (*Asclepias cordifolia*), showy milkweed (*Ascelpias 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 heart-leaf 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 Nevada County, as is Kotolo milkweed (*Asclepias eriocarpa*). 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). 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.

The Xerces Society for Invertebrate Conservation has identified regionally appropriate monarch breeding habitat management windows during which vegetation removal should occur to avoid impacts on monarch eggs and larvae (Xerces Society 2019). The window identified for the Sierra Nevada foothill region (the location of the project area) is September 30–June 1 (Xerces Society 2019). Prescribed burning activities under the proposed project would occur from September through July, and while this mostly overlaps the recommended windows, prescribed burning could occur during the month of July, when monarchs may be foraging and breeding in the project area.

While treatments would not target and are not expected to remove significant amounts of milkweed plants, and treatments may maintain grassland habitats or improve habitat for milkweed species in grasslands, woodlands, and forests, prescribed burning would occur during the monarch breeding season and could result in loss of monarch eggs and larvae.

SPR BIO-10 would apply, and prior to implementation of treatment activities within habitats suitable for milkweed (i.e., grassland, woodland, forest, chaparral, meadows, riparian habitat, wetlands), focused surveys for monarch host plants (milkweed [*Asclepias* spp.]) would be conducted in and within 10 feet of the project area prior to implementing treatment activities. If milkweed is detected during focused surveys, further surveys for monarch butterflies would be conducted by a qualified RPF or biologist or the species would be assumed to be present. If focused surveys are conducted and monarchs are not detected, then further mitigation for the species would not be required. If monarchs are detected during focused surveys, or are assumed to be present, then Mitigation Measure BIO-2e would be implemented. Under Mitigation Measure BIO-2e, several measures will be implemented to reduce the likelihood of mortality, injury, or disturbance to monarchs and to maintain habitat function. These measures include retention of host plants (i.e., native milkweed) and conducting treatments in a patchy pattern to retain floral resources and provide refuge for butterflies.

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.

If treatments are implemented before monarch is listed under ESA or if this species is listed with the proposed 4(d) ruling, contacting USFWS would not be required under Mitigation Measure BIO-2e. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe impact than what was covered in the Program EIR.

American Badger

Habitat potentially suitable for American badger (*Taxidea taxus*) is present within grassland and open woodlands in the project area. Mechanical treatments and prescribed burning could result in direct loss of active dens and potential loss of young. Manual treatments, herbicide application, and prescribed herbivory are not expected to result in adverse effects on American badger dens. Personnel implementing manual treatments and herbicide application 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 Program EIR.

Per SPR BIO-1, if it is determined that adverse effects on American badgers 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 prior to 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 will be established around the den, the size of which will be determined by the qualified RPF or biologist and no mechanical treatments or prescribed burning will 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 Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Northern California Ringtail

Northern California ringtail (*Bassariscus astutus raptor*) 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 larger than 12 inches DBH in ecological restoration treatments and 18 inches in fuel break and WUI fuel reduction treatments would not be removed during initial 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 Program EIR.

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. Herbicide application, prescribed herbivory treatments, and some manual 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, prescribed burning, and manual treatments that would remove trees or snags greater than 12 inches DBH 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 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 northern California ringtails would be clearly avoided for mechanical treatments, prescribed burning, and manual treatments that would remove trees or snags greater than 12 inches DBH that would occur outside of the ringtail maternity season (April 15–June 30) under SPR BIO-1.

If conducting mechanical treatments, manual treatments that would remove trees or snags greater than 12 inches DBH, or 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 ringtails would be assumed, or focused surveys for ringtails would be conducted within the project area prior to implementation of mechanical treatments, prescribed burning, and manual treatments that would remove trees or snags greater than 12 inches DBH. Surveys for ringtails would include the use of trail cameras, track plates, and other non-invasive survey methods to determine whether ringtails are present within the project area and would be conducted by a qualified RPF or biologist. If baited trail cameras are used, the qualified professionals may be required to obtain a valid CDFW Scientific Collecting Permit. If ringtails are not detected during focused surveys, 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 project 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 of at least 0.25 miles will be established around the den, and CDFW will be consulted to provide technical information on the size and shape of the den buffer. No mechanical treatments, manual treatments that would remove trees or snags greater than 12 inches DBH, or prescribed burning would occur within this buffer.

If the presence of northern California ringtails within the project area is assumed, then implementation of avoidance and minimization measures will be required pursuant to Mitigation Measure BIO-2a prior to and during implementation of mechanical treatments, prescribed burning, and manual treatments that would remove trees or snags greater than 12 inches DBH between April 15 and June 30. Avoidance and minimization measures will include pre-treatment den surveys, daily sweeps of the project area, and biological monitoring.

Habitat function for ringtails 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 in ecological restoration treatments or 18 inches DBH in fuel break and WUI fuel reduction treatments, and select snags would be retained (the number of retained snags would be dependent on the treatment type), which would be the most likely features to be used by this species due to the cover provided by larger trees, and rocky areas would not be targeted for vegetation treatment.

Pursuant to Mitigation Measure BIO-2a, and because northern California ringtail is a fully protected species under California Fish and Game Code, Nevada County and YWI has notified CDFW regarding its determination that mortality, injury, or disturbance would not occur, and habitat function would be maintained. For the reasons summarized above, Nevada County and YWI determined that implementation of treatments would maintain habitat function for northern California ringtail and consulted with CDFW to seek technical input on this determination, as required. On April 4, 2025, Nevada County and YWI contacted Amy Kennedy at CDFW Region 2 describing the measures that would be taken to avoid mortality, injury, and disturbance to northern California ringtail and to maintain habitat function in compliance with Mitigation Measure BIO-2a. No refinements to the project description or measures resulted from the notification with CDFW.

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

Special-Status Bats

Habitat potentially suitable for four special-status bat species—pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), western mastiff bat (*Eumops perotis californicus*), and western red bat (*Lasiurus frantzii*)—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 can 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 by conducting initial and maintenance treatments outside of the bat maternity season (April 1–August 31) (Caltrans 2004).

Mechanical treatments, manual treatments, prescribed burning, and prescribed herbivory conducted within habitat suitable for bats during the bat maternity season (April 1–August 31) could disturb active bat maternity roosts from auditory and visual stimuli (e.g., heavy equipment, chainsaws, vehicles, personnel, livestock) or smoke (e.g., broadcast burning, pile burning) potentially resulting in abandonment of the roost and loss of young. Herbicide treatments 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. The potential for treatment activities to result in adverse effects on special-status bats was examined in the Program EIR.

If conducting some mechanical treatments, manual treatments, prescribed burning, or prescribed herbivory 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 prior to initiation of mechanical treatments, manual treatments, prescribed burning, and prescribed herbivory. 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, western mastiff bat, or western red bat roosts and mechanical treatments, manual treatments, prescribed burning, and prescribed herbivory 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 in ecological restoration treatments or 18 inches DBH in fuel break and WUI fuel reduction treatments, and select snags would be retained (the number of retained snags would be dependent on the treatment type), which would be the most likely features to be used by this species due to the cover provided by larger trees, and rocky areas would not be targeted for vegetation treatment. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

Conclusion

The potential for treatment activities to result in adverse effects on special-status wildlife was examined in the Program EIR. This impact on special-status wildlife is within the scope of the Program EIR 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 and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR. 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 Program EIR. 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. Biological resource SPRs that apply to project impacts under Impact BIO-2 are SPRs AD-1, BIO-1 through BIO-5, BIO-10, BIO-11, HAZ-5, HAZ-6, HYD-1, HYD-3, HYD-4, and HYD-5. Biological resource mitigation measures that apply to this impact are Mitigation Measures BIO-2a through BIO-2c, BIO-2e, BIO-2g, BIO-3a through BIO-3c, and BIO-4. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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, oak woodland, chaparral, and riparian habitat. Potential impacts resulting from maintenance activities would be generally the same as 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 result in adverse effects on sensitive habitats was examined in the Program EIR.

Based on the vegetation types mapped in the project area (Table 4.5-2) and observations from the reconnaissance-level survey conducted pursuant to SPR BIO-1, 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, their associated rarity rank, and the vegetation type within which the communities may occur are presented in Table 4.5-2, below. In addition, several oak woodland and forest types (i.e., California black oak forest and woodland, blue oak woodland, blue oak-foothill pine, canyon live oak forest), which are sensitive habitats pursuant to the Oak Woodlands Conservation Act and Public Resources Code Section 21083.4, were observed in project area during reconnaissance-level surveys. A small amount of valley oaks (*Quercus lobata*) was observed sporadically in the project area during surveys, but large-scale valley oak woodlands were not observed.

Table 4.5-2 Sensitive Natural Communities with Potential to Occur in the Project Area

Sensitive Natural Community[1]	Rarity Rank[2]	CWHR Type
Forest/Woodland		
Bigleaf maple forest*	S3	Douglas Fir, Montane Hardwood-Conifer, Montane Hardwood
California bay forest	S3	Coastal Oak Woodland, Montane Hardwood
California buckeye grove*	S3	Montane Hardwood

Sensitive Natural Community[1]	Rarity Rank[2]	CWHR Type
Incense cedar forest*	S3	Sierran Mixed Conifer
Tanoak forest*	S3.2	Montane Hardwood
Ultramafic cypress woodland	S3	Closed-Cone Pine-Cypress
Valley oak woodland*	S3	Valley Oak Woodland
Shrub/scrub		
Bush chinquapin chaparral	S3.3	Montane chaparral
Canyon live oak - Interior live oak chaparral*	S3 S4	Mixed Chaparral
Hoary, common, and Stanford manzanita chaparral	S3	Mixed Chaparral
Shrub tanoak chaparral	S3	Mixed Chaparral
Herbaceous/Barren		
Blue wild rye montane meadows*	S3?	Perennial Grassland, Wet Meadow
California brome-blue wildrye prairie	S3	Perennial Grassland, Wet Meadow
Deer grass bed*	S2?	Perennial Grassland
Needle grass - Melic grass grassland	S3 S4	Perennial Grassland
Onion - twistflower - dwarf-flax serpentinite rock outcrop	S2 S3	Barren
White-tip Clover Swales	S3	Annual Grassland
Riparian		
Black cottonwood forest	S3	Montane Riparian, Valley Foothill Riparian
Booth's willow - geyer's willow - yellow willow thickets	S2	Montane Riparian, Wet Meadow
Box-elder forest	S2.2	Valley Foothill Riparian
Button willow thicket	S2	Valley Foothill Riparian
California coffeeberry - western azalea scrub - Brewer's willow	S3	Fresh emergent wetland, Valley foothill riparian
California sycamore - coast live oak riparian woodlands	S3	Valley Foothill Riparian
California rose briar patch	S3	Valley Foothill Riparian
Fremont cottonwood forest*	S3.2	Montane Riparian, Valley Foothill Riparian
Goodding's willow - red willow riparian woodland and forest	S3	Desert Riparian, Fresh Emergent Wetland, Valley Foothill Riparian
Mountain alder thicket	S3	Montane Riparian
Oregon ash grove	S3.2	Montane Riparian, Valley Foothill Riparian
Red-osier dogwood - interior rose - currant thickets	S3	Montane Riparian
Torrent sedge patch	S3	Montane Riparian, Valley Foothill Riparian
Valley oak riparian forest and woodland*	S3	Valley Oak Woodland
Western labrador-tea thicket	S2	Montane Riparian
Wild grape shrubland*	S3	Montane Riparian, Valley Foothill Riparian

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

* Species associated with these sensitive natural communities were observed during SPR BIO-1 reconnaissance-level surveys.

[2] Older ranks, which need to be updated, may still contain a decimal "threat" rank of .2 or .3, where .2 indicates moderate threat and .3 indicates few or no current known threats. Ranks that contain two state ranks (e.g., S3 S4) indicate a range of uncertainty about the status of the species or ecosystem, which may fall under either of the two state rank categories listed. Ranks that are followed with a question mark indicate that the numeric rank is considered inexact or tentative. This inexactness suggests there is uncertainty or insufficient information available to confirm the exact rarity rank of the species or habitat.

Source: CNPS 2024b; compiled by Ascent in 2024.

During reconnaissance-level surveys conducted pursuant to SPR BIO-1, several species associated with sensitive natural communities were observed, including bigleaf maple, California buckeye (*Aesculus californica*), incense cedar, tanoak, valley oak, canyon live oak, blue wild rye (*Elymus glaucus*), deer grass (*Muhlenbergia rigens*), Fremont cottonwood (*Populus fremontii*), willow, dogwood (*Cornus* sp.), and wild grape (*Vitis californica*). While not all dominant species associated with sensitive natural communities included in Table 4.5-2 were observed during reconnaissance-level surveys, these communities may be present. 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 project area to the alliance level pursuant to *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018a).

Valley foothill and montane riparian habitat is present within the project area adjacent to streams, lakes, and ponds. Valley foothill riparian habitat is mapped in the project area, and species associated with this habitat type, including valley oak, willows, and Fremont cottonwood, were observed during reconnaissance-level surveys. While montane riparian habitat is not mapped in the project area, species typically associated with this habitat type, including bigleaf maple and willow, were observed. Other possible riparian hardwood tree species that may occur in the project area include ash (*Fraxinus* ssp.), box-elder (*Acer negundo*), mountain maple (*Acer glabrum*), alder (*Alnus* ssp.), California sycamore, and black cottonwood (*Populus balsamifera*). Under SPR BIO-4, the removal of large, native riparian hardwood trees would be minimized to the extent feasible and treatments in riparian habitats would retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation and would be limited to removal of uncharacteristic fuel loads (e.g., dead or dying vegetation, invasive plants). Willows, maples, box-elder, alders, ash, California sycamore, cottonwoods, and valley oaks in riparian habitats would be retained regardless of size unless they are dead, dying, diseased, or a safety hazard (see Section 2.1.1, "Treatment Types"). Therefore, this would prevent removal of the larger, more mature trees within the riparian communities dominated by these species that provide wildlife habitat and a seed source for natural regeneration.

SPR BIO-4 requires that treatments be designed to avoid loss or degradation of riparian habitat functions. 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 mechanical treatment, manual treatment, prescribed burning, prescribed herbivory, and herbicide application which would limit the extent of treatment activities within riparian habitat. In addition, prescribed herbivory treatments would be excluded within 50 feet of environmentally sensitive areas such as waterbodies, wetlands, or riparian areas using temporary fencing or active herding, pursuant to SPR HYD-3. 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 incorporated within WLPZs. As a result, prior to implementation of treatment activities, SPR BIO-3 would need to be implemented to identify and map the extent of riparian habitat within the project area. Additionally, prior to any treatments in riparian habitat, CDFW would be notified pursuant to California Fish and Game Code 1602, when required.

As described in Table 4.5-1, approximately 814.8 acres of chaparral habitat (i.e., mixed chaparral) is present in the project area. Areas mapped as chaparral in CAL FIRE's FRAP vegetation layer were visited during reconnaissance-level surveys conducted pursuant to SPR BIO-1. Sticky whiteleaf manzanita (*Arctostaphylos viscida*) was the dominant shrub species throughout most of the chaparral habitat observed during the reconnaissance surveys. Other shrub species that were found in chaparral habitat in various compositions and percent cover were buck brush, Lemmon's ceanothus, toyon, coffeeberry, yerba santa *(Eriodictyon californicum*), and occasionally coyote brush (*Baccharis pilularis*) and golden fleece (*Ericameria arborescens*). Some chaparral habitat has been recently treated and shrub species have been thinned, such as the CAL FIRE treatments near Miser Road. SPR BIO-5 requires avoidance of the environmental effects of type conversion within chaparral and that the habitat function of chaparral communities be maintained. The effects of type conversion for this project are evaluated within a spatial scale based on the hierarchical classification of ecological regions. Ecoregions denote areas of general similarity in ecosystems and in the type, quality, and quantity of environmental resources. They are designed to serve as a spatial framework to assess environmental risks and manage ecosystems effectively, based on the ecological characteristics of each region (Griffith et al. 2016). The spatial scale evaluated for this project consists of publicly owned or otherwise protected lands located in Ecoregion IV, subsections 5d (Northern Sierra Mid-Montane Forests) and 5e (Northern Sierra Lower Montane Forests) within Nevada and Yuba counties. In total, this area encompasses approximately 3,233.6 acres of

chaparral habitat. This spatial scale is appropriate because these publicly owned lands have protected status as land managed by agencies including California Department of Parks and Recreation, Bear Yuba Land Trust, California Department of Fish and Wildlife, or BLM. This is a substantial landscape scale at which ecologically functional habitat that retains chaparral vegetation composition can be maintained within the subsections of these ecoregions.

Fuel break treatments would permanently remove up to a maximum of approximately 141.9 acres of chaparral habitat and WUI fuel reduction treatments would remove up to a maximum of approximately 368.6 acres of chaparral habitat from the project area. This constitutes approximately 15.8 percent of the 3,233.6 acres of chaparral within the publicly owned properties within and surrounding the treatment areas. Therefore, this would not constitute conversion of chaparral habitat to other habitat types because the majority of chaparral habitat would be maintained and there would not be a substantial loss of habitat function at the identified spatial scale. Within the remaining approximately 304.3 acres of chaparral habitat in the project area, which would be subject to ecological restoration treatments, treatment types would be designed to maintain chaparral habitat function pursuant to SPR BIO-5. This includes maintaining at least 35 percent relative cover of chaparral vegetation, retaining a mix of middle to older aged shrubs to maintain heterogeneity and provide nurse plants for seeding, and implementing maintenance treatments at a frequency that allows regeneration of the characteristic species of each chaparral community within ecological restoration treatment areas. In addition, most fuel break, WUI fuel reduction, and ecological treatments would be implemented over a long-term period, and only a portion of the chaparral habitat in the total project area would be removed in any given year, resulting in a mosaic of different age groups of shrubs (i.e., older, middle-aged, younger) at any given time in the project area.

Treatment activities are proposed to occur within habitat that has been mapped by CAL FIRE's FRAP vegetation layer as blue oak woodland and blue oak-foothill pine. It is possible that some of these mapped areas are not dominated by blue oak or valley oak and would not be sensitive habitats. However, during reconnaissance-level surveys conducted pursuant to SPR BIO-1, many areas were dominated by blue oak, valley oak, black oak, and canyon live oak and may meet the definition of sensitive habitats. As required under SPR BIO-3, oak woodlands within the project area will be mapped by an RPF or qualified biologist prior to treatment activities. Prior to implementing treatment activities, an RPF or qualified biologist would verify whether these mapped habitats are dominated by one or more species of oak and whether the habitats would qualify as oak woodlands. Mitigation Measure BIO-3a would apply in these areas. If field-verified oak woodlands are present where ecological restoration treatment types would occur, the natural fire regime for the oak woodland habitat would be determined, and treatments within oak woodlands would be designed to restore this natural fire regime and return vegetation composition and structure to their natural condition. This includes removing uncharacteristic vegetation from oak woodlands, such as shrubs and encroaching conifers, to maintain or improve habitat function. Additionally, under Mitigation Measure BIO-3a, implementation of shaded fuel breaks would not remove more than 20 percent of the native vegetation relative cover in oak woodland habitat.

Treatments would retain vegetation types with characteristics qualifying as sensitive natural communities to the extent possible; however, if treatment activities within identified sensitive natural communities or oak woodlands cannot be avoided, then Mitigation Measure BIO-3a would apply in these areas. 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 determined to be present in the project area. 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.

The potential for treatment activities to result in adverse effects on sensitive habitats, as described above, was examined in the Program EIR. 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 Program EIR. However, this impact on sensitive habitats is within the scope of the Program EIR, 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 outside the treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and resulting intensity of disturbance are consistent with those analyzed in the Program EIR. 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 Program EIR. 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 sensitive habitats is also the same, as described above. Biological resource SPRs that apply to project impacts under Impact BIO-3 are SPRs AD-1, BIO-1 through BIO-6, BIO-9, HYD-4, and HYD-5. The 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 Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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 Program EIR.

During the reconnaissance-level survey conducted pursuant to SPR BIO-1, multiple different types of aquatic habitats were observed including Class I, Class II, and Class III watercourses, seasonal wetlands, freshwater forested-shrub wetlands, a reservoir, and stock ponds. The National Wetland Inventory (NWI) for the project area includes approximately 56.6 acres of riverine habitat (i.e., rivers, streams), 16.8 acres of freshwater pond, and 10.6 acres of freshwater forested-shrub wetland habitat. However, it is likely that this is an undercalculation of the amount of wetland habitat present in the project area because many aquatic and herbaceous wetland habitats, including seasonal streams and wetlands, are often too small to be included in the NWI data. Other wetlands, such as seeps, fens, and marshes may be hidden beneath a woodland or forest canopy making them undetectable from aerial or satellite imagery that is often used to map vegetation.

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 within the project area for mechanical treatments, manual treatments, prescribed burning, prescribed herbivory, and herbicide application. Establishment of WLPZs would result in avoidance of all stream and pond habitat for mechanical, manual, pile burning, and herbicide treatments. In addition, prescribed herbivory treatments would be excluded within 50 feet of environmentally sensitive areas such as waterbodies, wetlands, or riparian areas using temporary fencing or active herding, pursuant to SPR HYD-3.

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). Mitigation Measure BIO-4 would apply for 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, seeps, and other wetlands; 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., foothill yellow-legged frog; see Impact BIO-2).

The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the Program EIR. This impact on wetlands is within the scope of the Program EIR 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 and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR. 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 Program EIR. 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 wetlands is also the same, as described above. Biological resource SPRs that apply to project impacts under Impact BIO-4 are SPRs AD-1, BIO-1, HYD-1, HYD-3 and HYD-4. 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 Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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 Program EIR.

Based on review and survey of the project-specific biological resources (SPR BIO-1), there is one mapped essential connectivity area that follows the South Yuba River, which flows east to west, south of the project area (CNDDB 2024). The western portion of the project area overlaps with a natural landscape block, in the proximity of French Corral (CNDDB 2024).

WUI fuel reduction 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 historic urban and residential 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.

Being further from development and human presence, ecological restoration treatments and fuel breaks would occur in areas that contain less-disturbed wildlife habitat, and may function as consistent wildlife movement corridors, including riparian 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, no fire ignition for prescribed burning, retention of at least 75 percent surface cover) that would likely function as a wildlife movement corridor. Within WLPZs, removal of understory vegetation would occur in a mosaic pattern, where some herbaceous understory remains such that cover is still available for amphibians, with a minimum retention of 10 percent relative cover per acre. 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. 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 will apply to all treatment activities and a no-disturbance buffer will be established around these features, the size of which would be determined by a qualified biologist or RPF. Trees larger than 12 inches DBH would be retained in ecological restoration areas and pursuant to SPRs BIO-3, BIO-4, and BIO-5, treatments would be designed to maintain habitat function of sensitive natural communities, riparian habitat, and chaparral. 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. Fuel break treatments would primarily be shaded fuel breaks and would retain forest canopy and forest structure. SPRs would limit the extent of treatments activities within the project area and otherwise maintain the function of habitat that could function as a wildlife movement corridor.

Additionally, implementation of proposed treatments would not result in any conversion of land cover or create 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.

The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the Program EIR. This impact is within the scope of the Program EIR 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 and extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed in the Program EIR. 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 Program EIR. 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 wildlife movement corridors is also the same, as described above. SPRs that apply to project impacts under Impact BIO-5 are SPR AD-1, SPR BIO-1, SPR BIO-4, SPR BIO-5, SPR BIO-10, SPR BIO-11, SPR HYD-1, 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 Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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. Mechanical treatments, manual treatments, prescribed burning, herbicide application, and prescribed herbivory, 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 prior to 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 project area is approximately 7,050 acres along the South Yuba Rim in Nevada County. Habitat retention standards would be applied to all treatments, as described under Section 2.1, "Proposed Treatments," including DBH limits for tree and shrub removal, canopy percent cover requirements, and downed log and snag retention standards. While treatment activities would remove vegetation and alter habitat structure (e.g., amount of cover, size-class distribution) locally, treatments would not cause permanent habitat degradation or conversion to a different habitat type that would substantially reduce habitat for common wildlife species over the long term with implementation of these standards and SPRs.

The potential for treatment activities to result in adverse effects on these resources was examined in the Program EIR. The potential for adverse effects on common wildlife, including nesting birds, is within the scope of the Program EIR 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 and extent of expected disturbances as a result of implementing treatment activities are consistent with those analyzed in the Program EIR. 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 Program EIR. 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 common wildlife, including nesting birds, is also the same as described above. Biological resource SPRs that apply to project impacts under Impact BIO-6 are SPRs AD-1, BIO-1 through BIO-5, and BIO-12. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what is covered in the program EIR.

IMPACT BIO-7

The potential for treatment activities to result in conflicts with local policies or ordinances was examined in the Program EIR. There are several applicable local policies outlined in the Nevada County General Plan that are relevant to biological resources and are applicable to the project. The Nevada County General Plan's Wildlife and Vegetation element emphasizes protecting sensitive habitats, maintaining biodiversity, and supporting sustainable habitat management. Key objectives include minimizing fragmentation of significant habitats, preserving wildlife movement corridors, ensuring the integrity of wildlife environments, and supporting habitat restoration and continuity for wildlife enhancement. The policies that support these goals include conducting site-specific biological inventories to protect special-status species and achieving no net loss of habitat function, particularly where special-status species are present. Impacts BIO-1 through BIO-6 of Section 4.5 of this PSA/Addendum outlines SPRs and mitigation measures to survey for sensitive biological resources, maintain habitat function of sensitive habitats, and prevent loss of sensitive species. In addition, Policy 13.7 allows for fuels control activities, exempting them from requiring a Conditional Use Permit (CUP) for altering significant environmental features. Policies 13.8 and 13.9 help minimize impacts on the preservation of heritage trees, landmark groves, and sensitive oak habitats. SPR BIO-1, SPR BIO-3, and Mitigation Measure BIO-3a would be implemented under Impact BIO-3, and these SPRs and mitigation measure would provide protection for oak woodland habitat (i.e., California black oak forest and woodland, blue oak woodland, blue oak-foothill pine, canyon live oak forest, valley oak woodland) within the project area. Therefore, there would be no conflict with these policies as a result of implementation of treatment activities.

The potential for treatment activities to result in conflicts with local policies or ordinances was examined in the Program EIR. The potential for the treatment project to conflict with local policies is within the scope of the Program EIR 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 Program EIR. However, within the boundary of the project area, 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. Biological resource SPRs that apply to project impacts under Impact BIO-7 are SPRs AD-1 and AD-3. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT BIO-8

Implementation of the proposed vegetation treatments would not result in a conflict with adopted habitat conservation plans (HCPs) or natural community conservation plans (NCCPs) because the project area is not within the plan area of any adopted HCP or NCCP.

NEW BIOLOGICAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. Nevada County 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 Program EIR (refer to Section 3.6.1, "Environmental Setting," and Section 3.6.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR and revisions to SPRs constitute a revision to the Program. 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 the same and, for the reasons described above, impacts are also consistent with those considered in the Program EIR. Revisions to SPR GEO-1 would allow for work to continue if precipitation does not materialize. Therefore,

revisions to SPR GEO-1 would be consistent with the intent of the SPR and would not result in a new impact that was not covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and the revision to SPR GEO-1 would not give rise to any new significant impacts not addressed in the Program EIR. Therefore, no new impact related to biological resources would occur that is not covered in the Program EIR.

4.6 GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
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	AD-3 AQ-3 AQ-4 GEO-1 GEO-2 GEO-3 GEO-4 GEO-5 GEO-6 GEO-7 GEO-8 HYD-3 HYD-4	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	AD-3 AQ-3 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 Program EIR 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 Program EIR?	☐ 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 within the Sierra Nevada physiographic and geologic province. The geology of this province has also evolved through other smaller-scale local processes, such mass wasting, weathering, erosion, and sedimentation changing the landscape. Uplift along the eastern Sierra Nevada margin produced erosion and resulted in the predominantly east-to-west trends of incised drainages. As discussed in Section 3.7.1, "Environmental Setting," of the CalVTP Program EIR, the Sierra Nevada geomorphic province is overlapped on the west by sedimentary rocks of the Great Valley and on the north by volcanic sheets extending south from the Cascade Range. A blanket of volcanic material caps large areas in the northern part of the range. Most of the southern half of the Sierra Nevada and the eastern part of the northern half are composed of plutonic (chiefly granitic) rocks of the Mesozoic age (DeCourten 2009). Dominant soil types within the project area include Boomer, hard bedrock - rock outcrop complex, Hoda sandy loam, and Chaix-Rock outcrop complex. These soil types are well, to somewhat excessively, drained

(NRCS 2025). As discussed in Section 3.7.1, "Environmental Setting," of the CalVTP Program EIR, shallow-landsliding occurrence is most likely to occur in the mountainous portions of the Sierra Nevada geomorphic province. The Sierra Nevada geomorphic province is also susceptible to erosion.

IMPACT GEO-1

Proposed treatment types are ecological restoration, WUI fuel reduction, and fuel breaks, which would be implemented using mechanical treatment, manual treatment, prescribed burning, prescribed herbivory, and targeted ground application of herbicides. Most of these activities would result in vegetation removal and soil disturbance. The potential for these treatment activities to cause substantial erosion or loss of topsoil was examined in the Program EIR. This impact is within the scope of the Program EIR because the use and type of equipment, extent of vegetation removal, and intensity of prescribed burning are consistent with those analyzed in the Program EIR.

As described above under Section 1.1.3, "Purpose of this PSA/Addendum," Nevada County proposes to revise the language under SPR GEO-1 to suspend mechanical treatments, prescribed herbivory, and herbicide treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted be mechanical activities. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated. In the region where the project is located, forecasts often include a chance of rain; however, precipitation sometimes does not materialize. Therefore, suspension of treatment activities in these cases could result in unnecessary loss of work time. Suspending mechanical treatments, prescribed herbivory, and herbicide treatments during precipitation events would minimize the risk of soil compaction and disturbance; therefore, this revision would not result in any new or substantially more severe impacts related to erosion. This revision is consistent with the purpose of SPR GEO-1 to suspend disturbance during heavy precipitation to minimize the risk of soil compaction and disturbance. Therefore, the proposed revisions to SPR GEO-1 would not result in substantial erosion or loss of topsoil or an increased risk of landslides, and revisions to SPR GEO-1 would not result in a substantially more significant effect related to erosion or loss of topsoil and landslides than what was covered in the Program EIR.

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 Program EIR. However, within the boundary of the project area, the soil characteristics of the project area are essentially the same within and outside the CalVTP treatable landscape; therefore, the potential impact related to soil erosion is also the same, as described above. SPRs applicable to this treatment project are AD-3, AQ-3, AQ-4, GEO-1 through GEO-8, HYD-3, and HYD-4. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT GEO-2

Treatments would include vegetation removal in areas with steep slopes. The project is not within an earthquake-induced landslide zone as mapped by the California Geological Survey (CGS 2025). However, the potential for landslides to occur within the project area is moderate to high (Nevada County 2024; USGS 2025). In addition, along roadways, small slip outs and slumps are relatively common during severe winter storms. The potential for treatment activities to increase landslide risk was examined in the Program EIR. This impact is within the scope of the Program EIR because the extent of vegetation removal, intensity of treatment activities, and required avoidance of steep slopes and areas of instability are consistent with those analyzed in the Program EIR.

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 Program EIR. 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 related to landslide risk is also the same, as described above. SPRs applicable to this treatment project are AD-3, AQ-3, GEO-3, GEO-4, GEO-7, and GEO-8. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. Nevada County 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 Program EIR (refer to Section 3.7.1, "Environmental Setting," and Section 3.7.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR and revisions to an SPR constitutes a revision to the Program. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to geology, soils, paleontology, and mineral 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 the same and, for the reasons described above, impacts are also consistent with those covered in the Program EIR. Revisions to SPR GEO-1 would allow for work to continue if precipitation does not materialize and would replace the work stoppage of mechanical operations that cause soil disturbance, herbicide, and prescribed herbivory based on forecasted rain with a stoppage based on rain and soil saturation and compaction, which would be equally protective. Therefore, revisions to SPR GEO-1 would be consistent with the intent of the SPR and would not result in a new impact that was not covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and the revision to SPR GEO-1 would not give rise to any new significant impacts not addressed in the Program EIR. Therefore, no new impact related to geology, soils, paleontology, or mineral resources would occur that is not covered in the Program EIR.

4.7 GREENHOUSE GAS EMISSIONS

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
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	AD-3	NA	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	PSU	Impact GHG-2, pp. 3.8-11 – 3.8-17	Yes	AD-3 AQ-3	GHG-2	SU	No	Yes

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

New GHG Emissions Impacts: Would the treatment result in other impacts to GHG emissions that are not evaluated in the CalVTP Program EIR?	☐ 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 Program EIR. Consistent with the Program EIR, although GHG emissions would occur from equipment and vehicles used to implement treatments, the purpose of the proposed project is to reduce wildfire risk, which could reduce GHG emissions and increase carbon sequestration over the long term. This impact is within the scope of the Program EIR because the proposed activities, as well as the associated equipment, duration of use, and resulting GHG emissions, are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 AD-3, which requires consistency with local plans, policies, and ordinances, is applicable to this impact. SPR GHG-1 is not applicable to the proposed project because this project is not a registered offset project under the Board's Assembly Bill 1504 Carbon Inventory Process. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT GHG-2

Use of vehicles and mechanical equipment and prescribed burning during initial and maintenance treatments and biomass processing would result in GHG emissions. The potential for treatments under the CalVTP to generate GHG emissions was examined in the Program EIR. This impact was found to be potentially significant and unavoidable after the application of all feasible mitigation measures because of the infeasibility of implementing specific emission reduction techniques and the uncertainties associated with all the parameters and objectives of prescribed burning. Mitigation Measure GHG-2 in the CalVTP Program EIR requires project proponents to implement feasible methods to reduce the GHG emissions from prescribed burning, including pile burning. Accordingly, Nevada County is proposing the use of air curtain burners and carbonizers (e.g., Tigercat 6050 Carbonator and portable kilns). The essential function of these specialized biomass processing technologies is to reduce smoke, and resultant GHG emissions, compared to pile burning by consuming biomass quickly and efficiently. According to a 2020 study of biomass, air curtain burners and Oregon kilns emit 54 percent less CO_2 emissions compared to pile burning (Puettmann et al. 2020, as cited in Ascent 2022). The specific GHG emissions of pyrolysis depend on multiple factors, but are lower than pile burning in all cases (Ascent 2022). In addition, the production of biochar by these technologies and subsequent application as a soil amendment provides long-term carbon sequestration benefits that are not available from pile burning.

This impact is within the scope of the Program EIR 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 Program EIR. Mitigation Measure GHG-2 will be implemented by using air curtain burners and carbonizers when feasible to reduce GHG emissions associated with prescribed burning. Although use of these specialized biomass processing technologies would substantially reduce GHG emissions, emissions generated by the proposed treatments 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 Program EIR.

The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the climate conditions present in the areas outside the treatable landscape are the same as those within the treatable landscape; therefore, the GHG impact is also the same, as described above. SPR AD-3 and SPR AQ-3 are applicable to this treatment. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR. New Impacts Related to GHG Emissions

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. Nevada County 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 Program EIR (refer to Section 3.8.1, “Regulatory Setting,” and Section 3.8.2, “Environmental Setting,” in Volume II of the Final Program EIR). Including land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 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 Program EIR. 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 Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
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 Program EIR for this impact.

New Energy Resource Impacts: Would the treatment result in other impacts to energy resources that are not evaluated in the CalVTP Program EIR?	☐ 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, mechanical equipment, and some manual equipment (e.g., chainsaws, weed-trimmers, drip torches, propane torches, leaf blowers) 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 Program EIR. The consumption of energy during implementation of the treatment project is within the scope of the Program EIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the Program EIR. 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 Program EIR. 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 Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW ENERGY RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP Program EIR. Nevada County 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 Program EIR (refer to Section 3.9.1, "Environmental Setting," and Section 3.9.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions pertinent to energy resources 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 Program EIR. 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 energy resources would occur.

4.9 HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered In the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
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	AD-3 HAZ-1 HAZ-2 HAZ-3 HAZ-4 HYD-4	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	Yes	AD-3 HAZ-2 HAZ-3 HAZ-4 HAZ-5 HAZ-6 HAZ-7 HAZ-8 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	AD-3 HAZ-2 HAZ-3 HAZ-4	HAZ-3	LTSM	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 Program EIR 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 Program EIR?	☐ 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 treatment activities include mechanical treatment, manual treatment, prescribed burning, prescribed herbivory, and targeted ground application of herbicides. 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 Program EIR. This impact is within the scope of the Program EIR because the types of treatments and associated equipment and types of hazardous

materials that would be used are consistent with those analyzed in the Program EIR. 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 Program EIR. However, the exposure potential and regulatory conditions are essentially the same within and outside the treatable landscape; therefore, the hazardous material impact is also the same, as described above. SPRs AD-3, HAZ-1 through HAZ-4, and HYD-4 are applicable to this project. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HAZ-2

Treatments would include herbicide application to target plant species using ground-based methods, such as using a UTV, ATV, or 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 Program EIR. This impact is within the scope of the Program EIR because the types of herbicides and application methods that would be used are consistent with those analyzed in the Program EIR. 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 Program EIR. 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 hazardous materials impact is also the same, as described above. SPRs AD-3 and HAZ-2 through HAZ-9 are applicable to this project. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HAZ-3

Initial and maintenance treatments would include soil disturbance and prescribed burning, which could expose workers, the public, or the environment to hazardous materials if a contaminated site is present within the project area. The potential for workers participating in treatment activities to encounter contamination that could expose them, the public, or the environment to hazardous materials was examined in the Program EIR. This impact was identified as potentially significant in the Program EIR because hazardous materials sites could be present within treatment sites throughout the large geographic extent of the treatable landscape, and the feasibility of implementing mitigation for exposure of people or the environment to hazards resulting from soil disturbance or burning in a hazardous materials site was uncertain.

As directed by Mitigation Measure HAZ-3, database searches for hazardous materials sites within the project area have been conducted. Three sites were identified within the project area that have been remediated and closed. In addition, one site is currently being evaluated within the project area (21045 Pleasant Valley Road [60003433]) (DTSC 2025a; DTSC 2025b; SWRCB 2025; CalEPA 2025). Because one site under evaluation has been identified within the project area that could have potential contaminants not specified yet, these areas will be marked and no prescribed burning or soil disturbing treatment activities will occur within 100 feet of the site boundaries in accordance with Mitigation Measure HAZ-3. Therefore, with the implementation of Mitigation Measure HAZ-3, no hazardous materials sites would be disturbed by treatments and this impact would be less than significant.

This impact is within the scope of the Program EIR because the types of treatments and associated equipment that could potentially expose workers or the environment to hazardous materials are consistent with those analyzed in the Program EIR. 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 Program EIR. 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. SPRs AD-3, HAZ-2, HAZ-3, and HAZ-4 are applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. Nevada County 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 Program EIR (refer to Section 3.10.1, "Environmental Setting," and Section 3.10.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project areas constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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 Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
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	AD-3 AQ-3 BIO-4 BIO-5 GEO-4 GEO-6 HYD-2 HYD-4	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	AD-3 BIO-1 GEO-1 GEO-2 GEO-3 GEO-4 GEO-5 GEO-7 GEO-8 HYD-1 HYD-2 HYD-4 HYD-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	AD-3 HYD-2 HYD-3	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	AD-3 BIO-4 HAZ-5 HAZ-7 HYD-2 HYD-5	NA	LTS	No	Yes

Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-31	Yes	AD-3 GEO-5 HYD-2 HYD-4 HYD-6	NA	LTS	No	Yes

Notes: LTS = less than significant; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR 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 Program EIR?	☐ 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 within the Yuba River watershed which is part of the Sacramento River watershed. The project is between the South Yuba River and Yuba River confluence (Sacramento River Watershed 2024). The Yuba River and other hydrologic features in the project area are dependent on winter rain and snowfall, with the Sierra snowpack being the primary source of water for the watersheds. The seasonal as well as annual water flows are highly variable, with rainfall peaks typically occurring between November and February, and snowmelt-related peaks typically occurring between April and June (Nevada County 1995). Average annual rainfall is approximately 20 inches in the lower watershed, where the project area is located (Sacramento River Watershed 2024). While there are no significant hydrologic features in the project area, the Yuba River, South Yuba River, and Spring Creek are near the project area. Several small reservoirs, and perennial portions of Shady Creek, French Corral Creek, Little Shady Creek, and Sweetland Creek are within the project area (NWI 2024). Numerous intermittent and ephemeral drainages are scattered throughout the project area; these drainages capture winter and spring rains but stop flowing in the dry summer months.

Several of the impacts below (i.e., HYD-1 through HYD-4) evaluate compliance with water quality standards or waste discharge requirements. The State Water Resources Control Board is requiring all projects using the CalVTP Program EIR to follow the requirements of their Vegetation Treatment General Order, as applicable, 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 Program EIR. The General Order requires treatment implementation 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. Prescribed burning would only occur outside of WLPZs, and WLPZs ranging from 50 to 150 feet will be implemented for Class I and Class II streams or lakes that are within the project area pursuant to SPR HYD-4. In addition, SPR HYD-4 requires the implementation of WLPZs for Class III and Class IV watercourses that are of a size to sufficiently prevent the degradation of downstream beneficial uses of water. The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade

water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of low intensity prescribed burns and associated impacts on water quality are consistent with those analyzed in the Program EIR. 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 Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the water quality impact from prescribed burning is also the same, as described above. SPRs applicable to this treatment are AD-3, AQ-3, BIO-4, BIO-5, GEO-4, GEO-6, HYD-2, and HYD-4. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HYD-2

Initial and maintenance treatment activities would include mechanical and manual treatments. Although most of the project area has been designed to exclude streams and watercourses, WLPZs would be implemented for any watercourses or lakes that are within the project area 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 Program EIR. This impact is within the scope of the Program EIR because the use of heavy equipment and hand-held tools to remove vegetation and associated impacts on water quality are consistent with those analyzed in the Program EIR.

As described above under Section 1.1.3, "Purpose of the PSA/Addendum," Nevada County proposes to revise the language under SPR GEO-1 to suspend mechanical treatments, prescribed herbivory, and herbicide treatments if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted be mechanical activities. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated. In the region where the project is located, forecasts often include a chance of rain; however, precipitation sometimes does not materialize. Therefore, suspension of treatment activities in these cases could result in unnecessary loss of work time. Suspending mechanical treatments, prescribed herbivory, and herbicide treatments during precipitation events would minimize the risk of soil disturbance and the potential to substantially alter an existing drainage pattern in the project area. Therefore, this revision would not result in any new or substantially more severe impacts related to existing drainage in the project area. This revision is consistent with the purpose of SPR GEO-1 to suspend disturbance during heavy precipitation to minimize the risk of soil compaction and disturbance. For these reasons, proposed revisions to SPR GEO-1 would not result in substantial erosion or loss of topsoil, and revisions to SPR GEO-1 would not result in a substantially more significant effect related to erosion or loss of topsoil than what was covered in the Program EIR.

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 Program EIR. 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 AD-3, BIO-1, GEO-1, GEO-2, GEO-3, GEO-4, GEO-5, GEO-7, GEO-8, HYD-1, HYD-2, HYD-4, HYD-5, HAZ-1, and HAZ-5. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HYD-3

Initial and maintenance treatments would include prescribed herbivory. Prescribed herbivory would primarily be used as a follow-up treatment to mechanical or manual treatments to reduce the growth of regenerating vegetation, and would generally consist of fencing livestock within targeted areas that would be moved every 1 to 3 day. As required by SPR HYD-3, environmentally sensitive areas such as ponds, wetlands, or riparian areas would be identified and livestock would be excluded from these areas during prescribed herbivory treatments using temporary fencing or active herding; a buffer of approximately 50 feet would be maintained between sensitive and actively grazed areas.

The potential for prescribed herbivory to violate water quality regulations or degrade water quality was examined in the Program EIR. This impact is within the scope of the Program EIR because the use of grazing animals (e.g., sheep, goats) and the grazing intensity to manage and remove vegetation are consistent with those analyzed in the Program EIR. 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 Program EIR. 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. Additional SPRs applicable to this treatment are AD-3 and HYD-2, which would require the project to follow local ordinances and guidance on prescribed herbivory and not construct any new roads for prescribed herbivory activities in the project area. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT HYD-4

Initial and maintenance treatments would include the occasional use of herbicides to control resprouting hardwoods (e.g., toyon, buck brush, interior live oak) and treat invasive plant species (e.g., broom, Himalayan blackberry). Herbicide application would be limited to ground-based methods such as using a backpack sprayer or painting herbicide onto cut stems. All herbicide application would comply with 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 Program EIR. This impact is within the scope of the Program EIR because the use of herbicides to remove vegetation and associated impacts on water quality are consistent with those analyzed in the Program EIR. 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 Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the water quality impact from use of herbicides is also the same, as described above. SPRs applicable to this project are AD-3, BIO-4, HAZ-5, HAZ-7, HYD-2, and HYD-5. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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 area was examined in the Program EIR. This impact on site drainage is within the scope of the Program EIR because the types of treatments and treatment intensity are consistent with those analyzed in the Program EIR. 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 Program EIR. 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 AD-3, GEO-5, HYD-2, HYD-4, and HYD-6. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW HYDROLOGY AND WATER QUALITY IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. Nevada County 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 Program EIR (refer to Section 3.11.1, "Environmental Setting," and Section 3.11.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR and revisions to an SPR constitute a revision to the Program. 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 Program EIR. Revisions to SPR GEO-1 would allow for work to continue if precipitation does not materialize and would replace the work stoppage of mechanical operations that cause soil disturbance, herbicide, and prescribed herbivory based on forecasted rain with a stoppage based on rain and soil saturation and compaction, which would be equally protective. Therefore, revisions to SPR GEO-1 would be consistent with the intent of the SPRs and would not result in a new impact that was not covered in the Program EIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and the revision to SPR GEO-1 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 Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
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 Program EIR 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 Program EIR?	☐ 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

Treatment activities would occur on private property and along private and public roadways. Land use policies related to biological resources and noise are relevant to the project; these are discussed in Sections 4.5, "Biological Resources," and 4.12, "Noise," respectively. 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 Program EIR. This impact is within the scope of the Program EIR because treatment types and activities are consistent with those analyzed in the Program EIR. 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 Program EIR. However, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the land use impact is also the same, as described above. SPR AD-3 requires compliance with applicable County plans, policies, and ordinances, such as those pertaining to noise and biological resources. No conflict would occur because Nevada County would adhere to SPR AD-3. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

IMPACT LU-2

Implementation of treatments would require between one and 50 crew members depending on the treatment, along with their associated vehicles to travel to and from the project area. However, typical crews would consist of up to 20 people. Several crews may be conducting treatments simultaneously, and crews would be dispersed throughout the project area. Crew sizes would be consistent with those analyzed in the Program EIR and would not result in substantial population growth. The potential for treatments to result in substantial population growth as a result of increases in demand for employees was examined in the Program EIR. Impacts associated with short-term increases in the demand for workers during implementation of the treatment project are within the scope of the Program EIR because the number of workers required for implementation of the treatments is consistent with the crew sizes analyzed in the Program EIR for the types of treatments proposed. 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 Program EIR. 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 population and housing impact is also the same, as described above. No SPRs are applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

NEW LAND USE AND PLANNING, POPULATION AND HOUSING IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. Nevada County 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 Program EIR (refer to Section 3.12.1, "Environmental Setting," and Section 3.12.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to land use, 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 Program EIR. 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 not addressed in the Program EIR. Therefore, no new impact related to land use and planning, population and housing would occur that is not covered in the Program EIR.

4.12 NOISE

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
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 NO1-2 NOI-3 NOI-4 NOI-5 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 Program EIR for this impact.

New Noise Impacts: Would the treatment result in other noise-related impacts that are not evaluated in the CalVTP Program EIR?	☐ 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. The proposed treatments would not require the use of helicopters, which was the loudest type of equipment evaluated in the Program EIR. Accordingly, equipment used to implement project treatments would have lower noise levels than the loudest evaluated in the Program EIR. Nevada County Code identifies noise limits for exterior noise; however, the Code states that these noise standards do not apply to construction activities, which would apply to the proposed project because the noise emitted from proposed vegetation treatment activities would be similar to noise from construction activities. Treatment activities would mostly occur during the daytime; however, prescribed burning and prescribed herbivory may occasionally occur outside these hours. In addition, treatments would be dispersed throughout the county so noise increases at any one sensitive receptor would be limited.

The potential for a substantial short-term increase in ambient noise levels from use of heavy equipment was examined in the Program EIR. This impact is within the scope of the Program EIR because the number and types of equipment proposed, and the duration of equipment use, are consistent with those analyzed in the Program EIR. 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 Program EIR. 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. SPRs AD-3 and NOI-1 through NOI-5 are applicable to this project. For any properties where residences are within 1,500 feet of a treatment area, SPR NOI-6 would also apply. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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 SR 49, and public and private roadways throughout the county. Haul truck trips on the local roadways could pass by residential receptors and the event of each truck passing by could increase the single event noise levels (SENL). The potential for a substantial short-term increase in SENL was examined in the Program EIR. This impact is within the scope of the Program EIR because the number and types of equipment proposed are consistent with those analyzed in the Program EIR. The haul trips associated with the treatment would occur during daytime hours (per SPR NOI-1), which would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. 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 Program EIR. 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. SPR NOI-1 is applicable to this treatment and would limit heavy equipment use to daytime hours. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW NOISE IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. Nevada County 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 Program EIR (refer to Section 3.13.1, "Environmental Setting," and Section 3.13.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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 Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
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	REC-1	NA	LTS	No	Yes

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

New Recreation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

There are no recreational areas within the project area. However, there are numerous recreational areas in the project vicinity. These include the South Yuba River State Park at Bridgeport Crossing, SR 49 Crossing, Purdon Crossing, and Edwards Crossing. Additionally, nearby public lands used for recreation include Malakoff Diggins State Historic Park, Tahoe National Forest property, BLM property, and US Army Corps of Engineers property. Recreational activities within these areas include swimming, wildflower viewing, birding, hiking, mountain biking, gold panning, fishing, camping, and kayaking.

IMPACT REC-1

While most treatments would occur on private lands or adjacent to roadways in areas away from recreation areas, vegetation treatment activities have the potential to disrupt recreational activities by degrading the experience of recreationists in nearby areas through the creation of noise, dust, degradation of scenic views, or increased traffic when treatments are implemented near recreation areas. The potential for vegetation treatment activities to disrupt recreation activities was examined in the Program EIR. Nuisance impacts related to noise, air quality, aesthetics, and transportation would be avoided or minimized as explained in the discussion for those respective resource areas in this PSA/Addendum.

The potential for the proposed treatment project to impact recreation is within the scope of the Program EIR because the treatment activities, and their duration and intensity are consistent with those analyzed in the Program EIR. 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 Program EIR. However, 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 Program EIR. The SPR applicable to this treatment is REC-1.

This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than covered in the Program EIR.

NEW RECREATION IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. Nevada County 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 Program EIR (refer to Section 3.14.1, "Environmental Setting," and Section 3.14.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental and regulatory 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 Program EIR. 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 Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
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	PSU	Impact TRAN-3, pp. 3.15-11 – 3.15-13	Yes	NA	AQ-1	SU	No	Yes

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

New Transportation Impacts: Would the treatment result in other impacts to transportation that are not evaluated in the CalVTP Program EIR?	☐ 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 49, Pleasant Valley Road, Birchville Road, Tyler Foote Crossing Road, 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 Program EIR. The proposed treatments would be short term, and temporary increases in traffic related to treatments are within the scope of the Program EIR 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 Program EIR. 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 Program EIR. 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 impact are AD-3 and TRAN-1. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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 Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the burn duration is consistent with that analyzed in the Program EIR. 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 Program EIR. 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 impact are AD-3, HYD-2, and TRAN-1. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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. This impact was identified as potentially significant and unavoidable in the Program EIR because implementation of the CalVTP would result in a net increase in VMT. As noted under Impact TRAN-3 in the Program EIR, individual vegetation treatment projects under the CalVTP are likely to generate fewer than 110 trips per day, which would be considered a less-than-significant transportation impact for specific later activities, as described in the Technical Advisory on Evaluating Transportation Impacts, published by the Governor's Office of Planning and Research (OPR 2018). Manual and mechanical treatments and prescribed burning under the proposed project would typically require between 1 and 50 crew members with several crews implementing treatments simultaneously, dispersed throughout the project area. Therefore, even if the maximum number of treatments occur simultaneously, the crew are sufficiently small that the total increase in VMT would not likely exceed 110 trips per day. In addition, as mentioned above, the increase in vehicle trips would be dispersed to multiple roadways. However, individual treatment projects would contribute to the overall annual net increase in VMT generated by the CalVTP. While carpooling would be encouraged under Mitigation Measure AQ-1, crew sizes would be small and may not all be employed with the same company. Therefore, carpooling may not be feasible to implement for most of the workers. While the net increase in VMT is not expected to generate greater than 110 trips per day, because the project would contribute to the overall annual net increase in VMT generated by the CalVTP, it would contribute to the environmental significance conclusion in the Program EIR; therefore, for purposes of CEQA compliance, this PSA/Addendum notes the impact as significant and unavoidable.

This impact is within the scope of the activities and impacts addressed in the Program EIR because the size and number of crews is consistent with that analyzed in the Program EIR. The increase in vehicle trips would be temporary and dispersed over 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 Program EIR. 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. No SPRs are applicable to this impact. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW IMPACTS ON TRANSPORTATION

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. Nevada County 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 Program EIR (refer to Section 3.15.1, "Environmental Setting," and Section 3.15.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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 not addressed in the Program EIR. Therefore, no new impact related to transportation would occur that is not covered in the Program EIR.

4.15 PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is this Impact Within the Scope of the Program EIR?
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	AD-3	NA	LTS	No	Yes
Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	PSU	Impact UTIL-2, pp. 3.16-10 – 3.16-12	No	AD-3 UTIL-1	NA	SU	No	Yes
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	AD-3 UTIL-1	NA	LTS	No	Yes

Notes: LTS = less than significant; PSU = potentially significant and unavoidable; SU = significant and unavoidable; NA = not applicable because there are no SPRs and/or MMs identified in the Program EIR 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 Program EIR?	☐ 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

Treatment types are ecological restoration, WUI fuel reduction, and fuel breaks, which would be implemented using mechanical treatment, manual treatment, prescribed burning, herbicide application, and prescribed herbivory. Prescribed burning would necessitate an on-site water supply as a safety precaution in case the burn goes out of prescription. If needed, water would be supplied from water trucks. In addition, prescribed herbivory could require a temporary on-site water supply, which would be supplied with portable water troughs that can be filled from an existing water system, a municipal source, or from water brought in via truck. The potential increased demand for water was examined in the Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the size of the area proposed for prescribed burns, amount of water required for prescribed

burning and prescribed herbivory, and water source types are consistent with those analyzed in the Program EIR. 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 Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the water supply impact is also the same, as described above. SPR AD-3 is applicable to this impact. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT UTIL-2

Initial and maintenance treatments would generate biomass within the treatment areas. Biomass generated by mechanical and manual treatments would be disposed of with masticating, pile or broadcast burning, chipping, lopping and scattering, or hauling off-site in areas where material cannot safely be burned. Invasive plant and noxious weed biomass would be piled for on-site decomposition, treated on-site to eliminate the spread of seeds and propagules (e.g., piled for burning at the appropriate time), or would be disposed of off-site at an appropriate waste collection facility 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. They may be placed on-site in piles to be burned. This impact was identified as potentially significant and unavoidable in the Program EIR because biomass hauled off-site could exceed the capacity of existing infrastructure for handling biomass. Nevada County is currently renovating and increasing the capacity of their McCourtney Road Transfer Station, which provides waste services for unincorporated areas of western Nevada County, including the project area (Nevada County 2025). The renovations to the transfer station include upgraded yard and green waste stations (Nevada County 2025). While the amount of biomass generated and would be hauled off-site would not exceed the capacity of existing local infrastructure in Nevada County, because the project would generate biomass needing off-site disposal, it would contribute to the environmental significance conclusion in the Program EIR; therefore, for purposes of CEQA compliance, this PSA/Addendum notes the impact as significant and unavoidable. This impact is within the scope of the activities and impacts addressed in the Program EIR because the types and amount of biomass that may need to be hauled off-site are consistent with those analyzed in the Program EIR. SPR AD-3 and UTIL-1 would be applicable to the proposed treatments for biomass that would be hauled off-site. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, conditions related to biomass 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. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

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 masticating, pile or broadcast burning, chipping, lopping and scattering, or hauling off-site 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 to be disposed of off-site at an appropriate waste collection facility. If off-site disposal is needed, Nevada County 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 Program EIR. This impact is within the scope of the activities and impacts addressed in the Program EIR because the type and amount of biomass that may need to be hauled off-site are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 AD-3 and UTIL-1 would be applicable to the proposed treatments if biomass is hauled off-site. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW IMPACTS ON PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. Nevada County 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 Program EIR (refer to Section 3.16.1, "Environmental Setting," and Section 3.16.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land in the proposed project area from outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. 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 not addressed in the Program EIR. Therefore, no new impact related to public services, utilities, and service systems would occur that is not covered in the Program EIR.

4.16 WILDFIRE

Impact in the Program EIR			Project-Specific Checklist					
Environmental Impact Covered in the Program EIR	Identify Impact Significance in the Program EIR	Identify Location of Impact Analysis in the Program EIR	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 Program EIR?	Is This Impact within the Scope of the Program EIR?
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 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	AD-3 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 Program EIR for this impact.

New Wildfire Impacts: Would the treatment result in other impacts related to wildfire that are not evaluated in the CalVTP Program EIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion
	Potentially Significant	**Less Than Significant with Mitigation Incorporated**	**Less than Significant**
	☐	☐	☐

Discussion

IMPACT WIL-1

Proposed vegetation treatment activities include mechanical treatment, manual treatment, prescribed burning, prescribed herbivory, and targeted ground application of herbicides. Machine-powered hand tools would have federal- or state-approved spark arrestors, which prevent the emissions of flammable debris. Vegetation treatment involving mechanical equipment poses a risk of accidental ignition. Vegetation treatment crews would carry one fire extinguisher per chainsaw and one long-handle shovel and one axe or Pulaski, to quickly respond to an ignition should one occur. 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 Program EIR, 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 broadcast 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 Program EIR. Increased wildfire risk associated with the use of heavy equipment in vegetated areas and with prescribed burns is

within the scope of the Program EIR 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 Program EIR. 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 Program EIR. 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 impact are AD-3, HAZ-2, HAZ-3, and HAZ-4. This impact of the proposed project is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

IMPACT WIL-2

Vegetation treatment activities include mechanical treatment, manual treatment, prescribed burning, prescribed herbivory, and targeted ground application of herbicides, which could exacerbate fire risk as described in Impact WIL-1 above. The potential for post-fire landslides and flooding was evaluated in the Program EIR. The potential exposure of people or structures to post-fire landslides and flooding are within the scope of the activities and impacts covered in the Program EIR because the equipment types and duration, and methods of prescribed burning implementation are consistent with those analyzed in the Program EIR. The inclusion of land in the proposed project area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. 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 AD-3, AQ-3, GEO-3 through GEO-5, and GEO-8. Although most mechanical treatment would occur from existing roads or on flat to moderate slopes, SPR GEO-8 would apply if a treatment area contains 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 Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR.

NEW IMPACTS ON WILDFIRE

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP Program EIR. Nevada County 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 Program EIR (refer to Section 3.17.1, "Environmental Setting," and Section 3.17.2, "Regulatory Setting," in Volume II of the Final Program EIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the Program EIR. 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 Program EIR. No changed circumstances would give rise to new significant impacts not addressed in the Program EIR. Therefore, no new impact related to wildfire would occur that is not covered in the Program EIR.

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