

COASTAL CONSERVANCY

Staff Recommendation  
June 1, 2023

**FOREST HEALTH AND WILDFIRE RESILIENCY  
AT THE JENNER HEADLANDS PRESERVE**

Project No. 21-044-02  
Project Manager: Morgan Wright

**RECOMMENDED ACTION:** Authorization to disburse up to \$449,900 to The Wildlands Conservancy for fuel reduction, vegetation management, and installation of grazing infrastructure on 796 acres on Jenner Headlands Preserve in Jenner, Sonoma County.

**LOCATION:** Jenner Headlands Preserve, Duncan Mills, Muniz Ranches, and Cazadero in Sonoma County

---

EXHIBITS

- Exhibit 1: [Project Location Map](#)
- Exhibit 2: [California Vegetation Treatment Program Statewide Programmatic Environmental Impact Report](#)
- Exhibit 3: [Project Specific Analysis Checklist and Addendum under the California Vegetation Treatment Program Statewide Programmatic Environmental Impact Report and Mitigation, Monitoring and Reporting Program](#)
- Exhibit 4: [Site Photographs](#)
- Exhibit 5: [Project Letters](#)

---

**RESOLUTION AND FINDINGS**

Staff recommends that the State Coastal Conservancy adopt the following resolution and findings.

Resolution:

The State Coastal Conservancy hereby authorizes a grant of an amount not to exceed four hundred nine thousand six hundred seventy-five dollars (\$449,900) to The Wildlands Conservancy (“the grantee”) for fuel reduction, vegetation management, and installation of

grazing infrastructure on 796 acres on and near Jenner Headlands Preserve in Jenner, Sonoma County.

Prior to commencement of the project, the grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (Executive Officer) the following:

1. A detailed work program, schedule, and budget.
2. Names and qualifications of any contractors to be retained in carrying out the project.
3. A plan for acknowledgement of Conservancy funding.
4. Evidence that all permits and approvals required to implement the project have been obtained.

Findings:

Based on the accompanying staff recommendation and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapter 3 of Division 21 of the Public Resources Code, regarding the Climate Ready Program.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria.
3. The Wildlands Conservancy is a nonprofit organization organized under section 501(c)(3) of the U.S. Internal Revenue Code.
4. The Conservancy has independently reviewed and considered the California Vegetation Treatment Program (CalVTP) Statewide Programmatic Environmental Impact Report (PEIR), which was certified by the California Board of Forestry and Fire Protection on December 30, 2019 pursuant to the California Environmental Quality Act (CEQA), and the Project-Specific Analysis and Addendum to the CalVTP PEIR for the Jenner Headlands Preserve Vegetation Treatment Project (PSA-Addendum) (attached to the accompanying staff recommendation as Exhibits 2 and 3), and the Conservancy finds:
  - a. The Jenner Headlands Preserve Vegetation Treatment Project (Project) includes the proposed project and is within the scope of the CalVTP, and the CalVTP PEIR adequately describes the Project for purposes of CEQA. As described in the PSA-Addendum, although portions of the Project will take place outside the treatable landscape as identified in the CalVTP, the Project area landscape conditions are similar to those of the treatable landscape, and the treatment types and activities are the same as those described in the CalVTP. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred.
  - b. The PEIR and the PSA-Addendum identify potentially significant impacts of the Project in the areas of Aesthetics and Visual Resources; Agricultural and Forestry Resources; Air Quality; Archaeological, Historical, and Tribal Cultural Resources; Biological Resources; Geology, Soils, and Mineral Resources; Greenhouse Gas Emissions; Energy Resources; Hazardous Materials; Hydrology and Water Quality; Land Use and Planning, Population and Housing; Noise; Recreation;

Transportation; Public Services, Utilities, and Service Systems; and Wildfire as identified in the accompanying staff recommendation. With implementation of mitigation measures, impacts to the above will be mitigated to a less than significant level.

- c. The PEIR and PSA-Addendum identify significant and unavoidable impacts of the Project in the areas of Air Quality; Archaeological, Historical, and Tribal Cultural Resources; Greenhouse Gas (GHG) Emissions; and Transportation. The Project's air quality impacts are due to vehicles and gas-powered tools associated with the initial and maintenance treatments. The standard project requirements will reduce these impacts but will not avoid them. Prescribed burning may result in air quality impacts due to smoke potentially exposing people to toxic air contaminants and objectionable odors. The standard project requirements will reduce these impacts but will not avoid them. The project's impacts on archaeological, historical, and tribal cultural resources are due to prescribed burning and mechanical treatments using heavy equipment that could churn up the surface of the ground and result in damage to known or previously unknown archaeological resources. The standard project requirements and one mitigation measure will reduce these impacts but will not avoid them. The project's GHG impacts are due to the utilization of vehicles and equipment that emit GHGs. The standard project requirements and one mitigation measure will reduce these impacts but will not avoid them. The project's transportation impacts are due to temporarily increasing vehicle miles traveled as additional trips to transport crew and equipment to remote areas will take place. The implementation of Mitigation Measure AQ-1 will reduce this impact but will not avoid it. The Conservancy finds it is infeasible to avoid, reduce, or mitigate the possible significant environmental effects of the project in these areas but that the specific environmental and other benefits of the proposed project as described in the Statement of Overriding Considerations contained in the accompanying Conservancy staff recommendation outweigh and render acceptable the significant unavoidable effects.

## **STAFF RECOMMENDATION**

### **PROJECT SUMMARY:**

Staff recommends the Conservancy authorize a \$449,900 grant to The Wildlands Conservancy (TWC) for fuel reduction, vegetation management, and installation of grazing infrastructure treatment on 796 acres of land on Jenner Headlands Preserve, Jenner, Sonoma County, referenced in Exhibit A.

The project consists of conducting fuel reduction and vegetation management on 132 acres of ridgelines and access roads adjoining previously established Shaded Fuel Breaks (SFB), resulting in expansion of the SFB, and installing fencing, water troughs, and pipelines to allow targeted grazing to reduce fuel loads. The project is in a High Fire Hazard Severity Zone, heavily impaired by the rapid spread of Sudden Oak Death Syndrome, and adjacent to disadvantaged communities and communities at risk of wildfire due to high forest fuel loads. The proposed

project will expand the existing 134 acres of SFB to over 260 acres through the following activities: shrubs and understory trees will be removed to reduce surface and ladder fuels and create safer places for firefighters to stage equipment and fight wildfire; live trees up to 10 inches diameter at breast height will be felled; live trees greater than 10 inches diameter at breast height will be limbed up to 10–15 feet; and spaces of 15–20 feet width will be created between trees. In oak woodlands, treatment will focus on removing encroaching conifers and California bay trees to promote protection of tree health in native oak woodland. The shade of the retained canopy will reduce the potential for rapid regrowth of shrubs and sprouting hardwoods and reduce rill and gully erosion. The project's SFBs will be located within 300 feet of existing roads, skid trails, existing fuel breaks, and historic bulldozer lines. SFBs reduce wildfire risk and support fire suppression by providing emergency responders with a staging area or access to a remote landscape. The SFBs will also provide important control lines for prescribed fire activities.

The project will reduce wildfire risk for multiple rural communities (Jenner, Duncan Mills, Muniz Ranches, and Cazadero) with close to a thousand habitable structures within the Wildland Urban Interface. It will also reduce ignition risks from adjacent utilities (a PG&E 60 Kilovolt power line runs parallel to SFB) and reduce fire risk to coastal recreation areas. After completion of the proposed project, TWC intends to continue ongoing and future work with CALFIRE in applying prescribed fire on the SFB, and to showcase efforts as a demonstration forest for local community stakeholders. Additionally, TWC will construct 5,347 feet of perimeter fencing along the northeastern portion of the property and install two troughs and at least 3,600 feet of water pipeline to provide water for livestock. These improvements will allow the reintroduction of grazing to at least 664 acres of grassland and mixed conifer forest on the Preserve. Prescribed grazing is the most cost-effective means of reducing fine fuel loads (thatch buildup) across a large swath of the Preserve, impeding the spread of fire. Carefully managed grazing can also provide important environmental benefits such as increased soil organic matter, control of invasive species, and improved plant and wildlife habitat. TWC intends to use the fencing and livestock infrastructure for cattle grazing, although goats or sheep could potentially be utilized. Cattle grazing would be implemented from 3 to 12 months at a time, depending upon the amount of forage and the stocking rates used. A prior Conservancy grant to TWC in May 2022 funded the installation of wildlife-friendly fencing, water troughs, tanks, pipelines, and a solar pump to manage and control grazing on 787 acres of coastal prairie on the Jenner Headlands Preserve. Combined with the current funding, these improvements will allow for management of grazing to reduce grassland fuels and enhance wildlife habitat, while avoiding impacts to riparian and wetland habitats that resulted from overgrazing before TWC acquired the property. After acquisition of the Preserve, the Sonoma Land Trust and TWC prepared an Integrated Resource Management Plan which recommends managed grazing of the 1,431 acres covered by the two Conservancy grants for grazing infrastructure to enhance coastal prairie habitat. TWC has conducted community workshops in the past demonstrating management techniques and is planning to host SFB workshops in 2023 and beyond to showcase benefits and to share experiences at the Jenner Headlands Preserve. Attendees usually include community members, local agency representatives, and elected officials.

**Site Description:** The Jenner Headlands Preserve consists of 5,630 acres of coastal land located just east of Highway 1, north of the Russian River where it meets the Pacific Ocean. The property's elevation ranges from 120 to 1,800 feet above sea-level with gentle west and southwest-facing slopes closer to Highway 1 gradating to steeper slopes (approximately 40%) on the upper reaches of the property. The Preserve is bounded to the west by views of the ocean and to the south by the popular tourist route from Jenner inland along Russian River Road. The primary land use of the property is open space preservation and public access, with limited cattle grazing for habitat management.

The Preserve includes 13 types of habitats comprising approximately 3,200 acres of mixed redwood/Douglas fir forest and oak woodland and 1,400 acres of coastal prairie and other grasslands. The remaining acreage consists of coastal scrub, chaparral, and riparian/wetland habitats. The property includes portions of eight watersheds, most of which have been designated as Significant Natural Areas by the California Department of Fish and Wildlife. This variety of forests, grasslands, wetlands, and riparian areas is home to such fish and wildlife species as steelhead, river otter, red tree vole, fox, bobcat, mountain lion, red-legged frog, peregrine falcon, and osprey.

**Grant Applicant Qualifications:** The Wildlands Conservancy (TWC) is a California private nonprofit public benefit corporation dedicated to preserving biodiversity and to providing passive recreation and education opportunities for free to the public. Over the past twenty-five years, TWC has established the largest nonprofit nature preserve system in California, comprised of twenty-two preserves encompassing nearly 200,000 acres of diverse mountain, valley, desert, river, and oceanfront landscapes. These preserves are open to the public free of charge for passive recreation including camping, hiking, horseback riding, picnicking, birding, and more. In addition, TWC has preserved more than 800,000 acres of land with private funds.

TWC has demonstrated experience as a successful project partner, having completed grants from the Conservancy for acquisitions including the Estero Americano Coast Preserve and Santa Margarita River Trails Preserve, and for public access improvements at the Jenner Headlands Preserve. TWC has demonstrated the capacity to protect habitable structures, reduce excessive fuel loads, and improve forest health at the Jenner Headlands Preserve and at many of its preserves throughout the State of California. It has conducted extensive outreach to both public and private landowners to help facilitate the implementation of fuel reduction work throughout the region.

#### **CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA:**

The proposed project is consistent with the Conservancy's Project Selection Criteria, last updated on September 23, 2021, in the following respects:

##### **1. Extent to which the project helps the Conservancy accomplish the objectives in the Strategic Plan.**

See the "Consistency with Conservancy's Strategic Plan" section below.

**2. Project is a good investment of state resources.**

The proposed project is a good investment of state funding. The project is feasible, has a reasonable budget, and addresses a need for wildfire resilience. The project implements many statewide wildfire and forest resiliency goals. The proposed project is consistent with several state plans, and specifically with the following:

- California's Wildfire and Forest Resilience Action Plan (Governor's Forest Management Task Force, January 2021), which calls for activities such as fuels reduction, forest thinning, vegetation management, prescribed fire, shaded fuel breaks, defensible space, and enhancement of fire-prone habitats to reduce fire risk.
- The California Forest Carbon Plan (California Natural Resources Agency, 2018), which calls for restoration of natural fire regime and forest composition through a multitude of approaches including thinning, prescribed burns, invasive vegetation management, and shaded fuel breaks.
- The Community Wildfire Prevention & Mitigation Report (CALFIRE, 2019), which urges state and local agencies to implement the goals of the Carbon Forest Plan and lays out recommendations to agencies to increase the scale and pace of management and mitigation actions to improve forest health and resiliency.

The project will protect natural and cultural resources, expand landscape-level ecological resilience to fire hazard conditions and a changing climate, and facilitate ecologically sensitive wildland fire response and training while enhancing public safety and education. Community outreach will raise awareness about the project, beneficial fire, and the benefit to the community for regional wildfire and forest health projects.

**3. Project includes a serious effort to engage tribes. Examples of tribal engagement include good faith, documented efforts to work with tribes traditionally and culturally affiliated to the project area.**

TWC is conducting initial outreach to the Kashia Band of Pomo Indians and other potentially interested Tribes, with the goal of building relationships and collaborating on prescribed burns and other management where appropriate. TWC's tribal outreach is currently in an initial phase.

Conservancy tribal consultation letters were sent on January 26, 2023, and January 27, 2023, to 14 tribes. The Kashia Band of Pomo Indians requested a site visit to the Jenner Headlands Preserve and a consultation with the Conservancy. The Tribal consultation with Conservancy staff took place on March 3, 2023, and discussed overall support of wildfire and wildlife protections projects and the use of hand tools. A site visit took place on April 3, 2023, with TWC, the Kashia Band of Pomo Indians, and Conservancy staff to discuss methods used during treatment and impacts to the land. No other responses have been received.

**4. Project benefits will be sustainable or resilient over the project lifespan.**

The proposed project will help increase fire resiliency in the context of anticipated climate change. Fire resilience is a critical issue due to increased average temperatures, reduced marine fog, and longer and more severe droughts. California is facing unprecedented fire risk due to climate change, a growing populace, and an increasing number of people living in high fire risk areas, including areas adjacent to wildlands. Both the 2020 and 2021 fire seasons broke numerous records. The proposed project facilitates sustainable land management techniques like prescribed grazing and prescribed fire to make our natural landscapes more resilient.

TWC has partnered with Sonoma Land Trust and Point Blue Conservation Science through a Cornell Lab of Ornithology grant to monitor bird abundance, diversity, and distribution within treated areas of the Project. TWC anticipates using birds as ecosystem indicators and providing a metric to analyze ecosystem benefits from the work.

**5. Project delivers multiple benefits and significant positive impact.**

The proposed project will deliver multiple benefits including habitat enhancement, sensitive species protection, and wildfire resilience. The project contributes to regional benefits in reducing catastrophic fire risk that can indirectly yet significantly impact underserved communities when severe smoke is prolonged throughout the larger region, as was evident in the 2020 fires, causing people to shelter at home and exposing many to high levels of particulate matter. Further, the vegetation treatments along escape routes will increase nearby community preparedness and resilience to catastrophic wildfire. The recommended project was selected because it includes multiple benefits, including native habitat restoration, and implements community education workshops demonstrating management techniques.

**6. Project planned with meaningful community engagement and broad community support.**

TWC collaborates with Sonoma Land Trust and other non-profits and community members and attends partner meetings. TWC has conducted extensive outreach to both public and private landowners to help facilitate the implementation of fuel reduction work throughout the area. In 2017, TWC completed an acquisition for the 547-acre Estero Ranch to protect natural resources and wildlife habitats, and to expand the California Coastal Trail. Estero Ranch has a diverse assemblage of wetland communities and estuarine habitats and is recognized by the California Department of Fish and Wildlife as one of the most significant habitat areas of the State. The property contains rare coastal prairie and estuarine habitats and is adjacent to and near several protected lands and marine areas. In 2018, TWC completed the construction of a 30-space parking area for cars, bicycles, and buses, and drainage improvements at the Jenner Headlands Preserve in a project associated with a larger public access improvement which included ADA-accessible restrooms, a day-use area with picnic tables, a trailhead to existing trails, interpretive signage, and kiosks, and 0.67 acres of wetland restoration and enhancement. Following completion of the parking area and related improvements, TWC opened the Jenner Headlands Preserve to free daily public access. The Preserve acts as a gateway to Sonoma Land Trust's Little Black Mountain and Pole Mountain. With completion in early 2022, TWC

completed the preparation of final designs and implementation of six fish passage and habitat improvement projects in the East Branch of the Russian Gulch in coastal Sonoma County. The project entailed removal or modification of six large woody debris jams to improve fish passage conditions for federally listed salmonids and improve overall stream function, making more than 3 miles of spawning and rearing habitat for anadromous fish. The ongoing Jenner Headlands Coastal Prairie Enhancement Project provides infrastructure improvements to manage and control grazing on 787 acres of the Preserve. The improvements made to rangeland increased TWC's ability to prescriptively graze to support a high level of native biological diversity, enhance habitat for local wildlife, improve ecosystem function, reduce fire fuels, and improve the recreational experience for Preserve visitors. This project is a publicly accessible teaching ground demonstrating the benefits of working landscapes in restoring native coastal prairie and mitigating wildfire risk. Support letters from Marshall Turbeville, Battalion Chief with the CALFIRE Sonoma-Lake Napa Unit and Lynda Hopkins, Supervisor, Fifth District with the County of Sonoma Board of Supervisors are attached as Exhibit 5.

**PROJECT FINANCING**

<b>Coastal Conservancy</b>	<b>\$449,900</b>
Others	\$0
<b>Project Total</b>	<b>\$449,900</b>

Conservancy funds for this project are expected to come from Fiscal Year 2022-2023 appropriations from the General Fund to the Conservancy for the purpose of wildfire risk reduction. (The Budget Act of 2021, AB 128, as amended by SB 170 and Budget Act of 2022, SB 154 as amended by AB 178). The proposed project is consistent with these fund sources because it will help reduce the risk of catastrophic wildfire.

Unless specifically identified as "Required Match," the other sources of funding and in-kind contributions described above are estimates. The Conservancy does not typically require matching funds or in-kind services, nor does it require documentation of expenditures from other funders or of in-kind services. Typical grant conditions require grantees to provide any funds needed to complete a project.

**CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:**

The recommended project would be undertaken pursuant to Section 31113 of Chapter 3 of Division 21 of the Public Resources Code, which authorizes the Conservancy to address the impacts and potential impacts of climate change on resources within the Conservancy's jurisdiction (Section 31113(a)).

Pursuant to Section 31113(b), the Conservancy is authorized to award grants to nonprofit organizations and public agencies to undertake projects that include reducing greenhouse gas



emissions, and addressing extreme weather events, sea level rise, flooding, and other coastal hazards that threaten coastal communities, infrastructure, and natural resources.

Pursuant to Section 31113(c), the Conservancy must prioritize grants for projects that maximize public benefits and have one of several purposes, including reducing emissions of greenhouse gases.

Consistent with these sections, the proposed project will restore the health and resilience of California forests, grasslands, or natural lands and reduce fire risk to communities. The project will help California's natural lands to be more resilient to catastrophic wildfires which may ultimately reduce greenhouse gas emissions released from increased wildfires due to climate change.

The proposed project addresses resources within the Conservancy's jurisdiction by improving forests, grasslands, or natural lands and reducing the risks of wildfire that would adversely impact water quality and habitat in a coastal watershed (Chapter 5.5 of Division 21 of the Public Resources Code).

**CONSISTENCY WITH CONSERVANCY'S [2023-2027 STRATEGIC PLAN](#) GOAL(S) & OBJECTIVE(S):**

Consistent with **Goal 1.1 Commit Funding to Benefit Systemically Excluded Communities**, the proposed project benefits the disadvantaged communities of Jenner and Cazadero by improving the climate resilience of the community.

Consistent with **Goal 4.2 Wildfire Resilience Projects**, the proposed project supports local partners in developing and implementing projects that improve ecological health of natural lands and reduce the risk of catastrophic fire in areas where people live. The project includes prescribed burning, prescribed herbivory, mechanical and manual treatments.

Consistent with **Goal 4.3 Multi-benefit Nature-Based Climate Adaptation**, the proposed project will implement nature-based climate adaptation by increasing resiliency to wildfire by expanding and improving to shaded fuel breaks, reducing ignition risks, and removing surface and ladder fuels.

**CEQA COMPLIANCE:**

The California Vegetation Treatment Program (CalVTP) directs implementation of vegetation treatments within the California Department of Forestry and Fire Protection's (CALFIRE's) State Responsibility Area (SRA). The CalVTP is one component of the state's plan to reduce wildfire risk, minimize fire suppression efforts and costs, and protect natural resources as well as other assets from wildfire. Pursuant to the Conservancy's obligation as a responsible agency under CEQA, staff has independently evaluated the two applicable CEQA documents:

- A. The California Vegetation Treatment Program Final Program Environmental Impact Report (PEIR), certified by CALFIRE in December 2019.

- B. The Project Specific Analysis (PSA)/Addendum to the CalVTP PEIR Jenner Headlands Vegetation Treatment Management Project, prepared for the Forest Health and Wildfire Resiliency at the Jenner Headlands Preserve (Project), dated March 2023.

The CalVTP PEIR evaluates the environmental impacts of the CalVTP. The PEIR has been prepared under the direction of the CEQA lead agency, the California Board of Forestry and Fire Protection (Board), in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the CEQA Guidelines. The PSA-Addendum evaluates whether the Jenner Headlands Vegetation Treatment Management Project's proposed treatments are within the scope of the CalVTP Program EIR or require additional environmental documentation or its own independent environmental review.

The Jenner Headlands Vegetation Treatment Management Project involves implementation of vegetation treatments on up to 4,843 acres of land in Sonoma County. The proposed treatment types (i.e., ecological restoration, fuel breaks) and the treatment activities (i.e., prescribed burning, mechanical treatments, manual treatments, prescribed herbivory) are consistent with those evaluated in the CalVTP PEIR. The objectives are to construct fuel breaks and restore healthy ecological fire regimes for the vegetation communities within the Preserve, which would reduce the risk of catastrophic wildfire in the communities surrounding the Preserve; to create opportunities for emergency responders to control or contain wildfires; and restore natural ecosystem processes, conditions, and resilience through the removal of targeted dense understory fuels and invasive species. The proposed project is within the scope of the Jenner Headlands Vegetation Treatment Management Project.

Using the Project-specific Analysis (PSA) in reliance on the PEIR, CALFIRE or other project proponents evaluate each vegetation treatment project intended to implement the CalVTP as a later activity addressed by the PEIR to determine whether the later activity qualifies as within the scope of this PEIR or requires additional environmental documentation or its own independent environmental review.

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, the proposed revision or change in the project, compared to the PEIR, is the inclusion of areas outside of the CalVTP treatable landscape. Pursuant to the Conservancy's obligation as a responsible agency under CEQA, Conservancy staff has reviewed the PEIR and the Project Specific Analysis (PSA)/Addendum to the CalVTP PEIR, prepared for the Forest Health and Wildfire Resiliency at the Jenner Headlands Preserve Project dated March 2023. The portions of the Forest Health and Wildfire Resiliency at the Jenner Headlands Preserve Project that are within the CalVTP treatable landscape are within the scope of the CalVTP PEIR. Since preparation of the PEIR, no new circumstances have occurred, nor has any new information been identified requiring new analysis or verification. Staff therefore recommends that the Conservancy find that no additional CEQA documentation beyond this PSA and Addendum to the PEIR is required.

The portions of the project located outside of the CalVTP treatable landscape constitute a change to the project as described in the PEIR but because the landscape conditions of the project area are similar to the treatable landscape, and the treatment types and activities are the same as those in the CalVTP PEIR, the project change is not substantial. The inclusion of areas outside the CalVTP treatable landscape will not result in any new or substantially more severe significant impacts. Further, since preparation of the PEIR, no substantial changes in circumstances have occurred, and no new information of substantial importance has been identified. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred; therefore, the accompanying PSA-Addendum is adopted to address the project areas outside the geographic extent presented in the PEIR. Potential significant impacts of the project are discussed below.

The PSA-Addendum identifies standard project requirements and mitigation measures to avoid, reduce, or mitigate the possible significant environmental effects. Standard project requirements and mitigation measures will reduce potentially significant environmental effects in the areas of Biological Resources and Hazardous Materials, Public Health and Safety to less than significant levels. While standard project requirements and mitigation measures will reduce potentially significant environmental effects in the areas of Air Quality, Archaeological, Historical, and Tribal Cultural Resources, Greenhouse Gas Emissions, and Transportation, these impacts remain potentially significant and unavoidable. The potentially significant impacts of the Project and associated mitigation measures as listed in Exhibit 3 are summarized below:

Air Quality:

Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS). Emissions from project treatment activities will result in pollutants in the air that will exceed air quality standards. Standard Project Requirements (SPRs) applicable to the treatment project are AD-4, AQ-1 through AQ-4, and AQ-6. SPR AD-4 requires public and administrative noticing of prescribed burns. SPR AQ-1 consists of complying with air quality requirements in the jurisdiction of the project area. SPR AQ-2 requires submission of a smoke management plan. SPR AQ-3 requires the creation of a burn plan under the CALFIRE template for prescribed burns. SPR AQ-4 consists of minimizing dust emissions through various measures such as limiting the speed of vehicles and wetting unpaved or dirt roads with non-toxic chemical dust suppressant. SPR AQ-6 is the requirement that fire crews comply with CALFIRE safety measures and Incident Action Plan (IAP). Mitigation Measure AQ-1 is applicable and involves measures to reduce exhaust emissions from vehicles and equipment, such as using electric equipment, renewable diesel fuel and encouraging carpooling. Impacts remain significant and unavoidable because Mitigation Measure AQ-1 would be cost prohibitive to the Wildlands Conservancy, who does not have the funding to purchase renewable energy (electric) type equipment. TWC will encourage use of renewable energy type equipment among hired contractors; however, crews may not be employed by the same companies, and this measure may not be able to be implemented. TWC will encourage carpooling; however, it may not be feasible due to the remote location of the project, and with workers from many different companies. Impacts remain significant and unavoidable. No other feasible mitigation measures exist, other than what is listed in the SPRs. This determination is consistent with the

PEIR and would not constitute a substantially more severe impact than what is covered in the PEIR.

Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk. Prescribed burning may expose people to dangerous air matter. SPRs applicable to the treatment project are AD-4, AQ-2, and AQ-6. Impacts remain significant and unavoidable. No other feasible mitigation measures exist, other than what is listed in the SPRs. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PEIR.

Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning. Prescribed burning treatments may expose people to odors from smoke. SPRs applicable to the treatment project are AD-4, AQ-2, AQ-3, and AQ-6. No feasible mitigation measures exist, other than what is listed in the SPRs. Impacts remain significant and unavoidable. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PEIR.

Archaeological, Historical, and Tribal Cultural Resources:

Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources. A tribal cultural resource could be adversely impacted in the project area and could have a substantial negative change in significance. Project activities utilize heavy equipment, which will break the ground surface. 36 historical or archaeological sites have been recorded on the Jenner Headlands, including fences, ranch components, bedrock milling features, rock shelters, and petroglyphs. The sites have not been evaluated under the California Register of Historical Resources (CRHR). This is a potentially significant impact and is unavoidable due to the large area of treatable landscape. Any sites that could be impacted by the project would be evaluated and potential impacts avoided, minimized, and mitigated through SPRs CUL-1, CUL-2, CUL-3, CUL-4, CUL-5, and CUL-8, and Mitigation Measure CUL-2. SPR CUL-1 consists of conducting a historical and archaeological records search according to state or local procedures. SPR CUL-2 requires contacting regionally connected Native American Tribes. SPR CUL-3 consists of conducting research prior to treatment activities to survey and locate resources likely to be found. SPR CUL-4 is coordinating with an archaeological professional to conduct a survey in the proposed project area. SPR CUL-5 requires coordination with an archaeologist and tribes if a cultural or historic resource is identified and cannot be avoided in the treatment area and the development of protection measures to ensure the safety of the resource. SPR CUL-8 consists of training crew and contractors on the protection of sensitive resources. Mitigation Measure CUL-2 requires halting ground-disturbing activities within 100 feet of cultural sites and consulting with a qualified archaeologist if archaeological or historic resources are inadvertently discovered. If an archaeologist finds that the discovery is significant, the integrity of the resource will be protected. While the SPRs and mitigation measure would reduce potential impacts, the potential for significant impacts remain unavoidable. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PEIR.

Biological Resources:

Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications. Vegetation in the project area consists of grassland, redwood forest, oak woodland, chaparral, eucalyptus, and serpentine wildflower fields. Proposed project activities consist of vegetation and maintenance treatments which can affect 78 special-status plant species within the project area. While treatment activity will imitate natural fire, the intensity and frequency of fire can dictate whether treatments will negatively affect plant species or benefit them. SPRs applicable to the proposed Project are AQ-3, AQ-4, BIO-1, BIO-2, BIO-7, BIO-9, GEO-1, GEO-3, GEO-4, GEO-5, and GEO-7. SPR BIO-1 consists of requiring a biologist or qualified registered professional forester (RPF) to review and survey biological resources within the project area. SPR BIO-2 requires biological resource training by a biologist or RPF for crew and contractors. SPR BIO-7 consists of a survey to be conducted by a biologist or qualified RPF prior to treatment activities. SPR BIO-9 requires actions to be taken to prevent the spread of invasive plants and wildlife and noxious weeds by measures including pressure washing heavy equipment after travel off road if feasible and inspecting equipment and tools. SPR GEO-1 includes suspension of project activities if: (1) it is raining, (2) soils are saturated, and/or (3) soils are wet enough to be compacted by mechanical or prescribed herbivory activities. SPR GEO-3 is stabilizing the areas of disturbed soils after treatments that result in bare soil over 50% or more. SPR GEO-4 specifies erosion monitoring to be conducted and implemented. SPR GEO-5 consists of the creation of water breaks to properly drain stormwater and runoff using erosion control guidelines. SPR GEO-7 minimizes erosion by prohibiting heavy equipment and prescribed herbivory under certain conditions, including steep slopes. Mitigation Measure BIO-1a avoids the loss of special-status plants listed under the Endangered Species Act (ESA) or the California Endangered Species Act (CESA) by avoiding and protecting the identified species and implementing a no-disturbance buffer. Mitigation Measure BIO-1b avoids the loss of special-status plants not listed under ESA or CESA by either physically avoiding the area with a no-disturbance buffer or conducting treatments outside of growing season (for certain species), designing treatments to keep plant habitat, or by not igniting fire in the area. Impacts have been identified as less than significant with mitigation measures. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PEIR.

Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications. Special-status wildlife and their habitats may indirectly or directly be affected by project activities. SPRs applicable to the proposed project are BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-10, BIO-11, HYD-1, HYD-3, and HYD-4. SPR BIO-3 requires a mapping survey be conducted of sensitive natural communities and sensitive habitats by a biologist or RPF. SPR BIO-4 consists of planning treatment to avoid the deterioration or loss of riparian habitat function by measures including limiting treatment to the removal of dead and dying vegetation and minimizing the removal of large native riparian hardwood trees. SPR BIO-5 requires avoiding type conversion and maintaining habitat function in chaparral and coastal sage scrub by consulting with a biologist and RPF to develop a treatment plan to maintain a minimum percent cover and retaining mature native shrubs or multiple age class shrubs. SPR BIO-10 consists of surveying suitable habitat and nursery sites for special-status wildlife. SPR BIO-11 requires installing wildlife-friendly fencing for prescribed herbivory to minimize wildlife entanglement. SPR HYD-3 requires prescribed herbivory to not be conducted within 50 feet of

riparian areas, bodies of water, and wetlands. SPR HYD-4 consists of implementing a WLPZ buffer zone adjacent to all Class I and Class II streams, and heavy equipment, burn piles and ignition of burn piles, and prohibiting refueling in the WLPZ area. Impacts to all wildlife species have been identified as less than significant with mitigation measures (BIO-2a, BIO-2b, and BIO-2e). Mitigation measure BIO-2a protects wildlife and habitat function for wildlife species listed under the ESA and CESA by requiring project activities to be conducted outside of sensitive periods (breeding and nesting) and outside of occupied habitat. Mitigation Measure BIO-2b consists of avoiding injury, mortality, or disturbance and maintaining habitat function for special status wildlife not listed under the ESA or CESA by implementing no disturbance buffers with clearly defined markers, and ensuring no project activities are conducted in the area until a biologist or RPF determines that the species has vacated the site or are no longer active.

**Giant Salamander, Red-Bellied Newt, and Foothill Yellow-Legged Frog** may indirectly or directly be affected by project activities. Applicable SPRs are BIO-1, HYD-4, GEO-1, and BIO-10. Mitigation Measure BIO-2b applies. Prescribed burning will only take place outside of sensitive periods (breeding or nesting).

**California Red-Legged Frogs** have been identified in the project area. Impacts to this species will be avoided by SPRs BIO-1, BIO-10, GEO-1, HYD-4, and HYD-3. Mitigation measure BIO-2a applies.

The **Western Pond Turtle** may be present in part of the project area. Implementation of SPRs BIO-1 and HYD-4, and Mitigation Measure BIO-2b would reduce the likelihood of injury or death to any Western Pond Turtles in aquatic areas.

The **Marbled Murrelet** has not been documented within the project area and the nearest occurrence is about 17 miles north of the proposed project area. It is possible that marbled murrelets have gone undetected in the area. Applicable SPRs are BIO-1 and BIO-10 and Mitigation Measure BIO-2a would apply.

The **Northern Spotted Owl** is known to occur within the proposed project area and monitoring is ongoing regarding this species. Proposed project activities may disturb northern spotted owl habitat if implemented during nesting season (February 1 through September 15). Applicable SPRs are BIO-1 and BIO-10 and Mitigation Measure BIO-2a apply and will protect this species.

**Other Special-Status Birds** include thirteen species of birds, which may forage and utilize habitats within the project area. Applicable SPRs are BIO-1 and BIO-10. Mitigation Measures are BIO-2a and BIO-2b.

**Special-Status Fish and California Freshwater Shrimp** such as Coho and Chinook salmon, pacific lamprey, hardhead, steelhead, among others may occur or are known to occur within the project area. SPRs consists of GEO-1, GEO-3, GEO-4, GEO-5, BIO-1, HYD-1, HYD-3, and HYD-4. SPR HYD-1 requires compliance with water quality regulations, specifically Waste Discharge Requirements (WDRs) and Conditional Waivers of Waste Discharge Requirements (Waivers).

**Special-Status Butterflies** may be found within the project area. The monarch butterfly, Behren's silverspot butterfly, and Myrtle's silverspot butterfly habitats consist of forest and grassland areas. Cattle grazing is an ongoing activity that is conducted in the area; however, grazing will not take place in areas suited for the Behren's silverspot butterfly and the Myrtle's

silverspot butterfly. SPRs include BIO-1, and BIO-10. If monarch overwintering sites are detected, mitigation measure BIO-2b will apply. SPR BIO-9 applies to Behren's silverspot butterfly and Myrtle's silverspot butterfly. Mitigation Measure BIO-2e requires designing treatments to preserve special-status butterfly host plants in all treatment sites. The Behren's silverspot and Myrtle's silverspot butterflies are listed under ESA and TWC must consult with the United States Federal Fish and Wildlife Service (USFWS).

The **American Badger** can be adversely affected by proposed project activities from prescribed burning, mechanical and manual treatments, and prescribed herbivory. The American Badger makes its habitat and dens in grassland and woodland areas. Treatment can result in loss or disturbance of dens, and loss or disturbance to young and adult badgers. Manual treatments are conducted by crews on foot, and it is unlikely that dens will be crushed or destroyed. Manual treatments conducted by crews on foot are unlikely to disturb feeding because crews would not be in the area long enough to do so. Badger dens being crushed by cattle is unlikely due to the size and length of the badger burrows. The American Badger maternity season lasts from February 15 through July 1, and during this window, it is likely that vegetation treatments and herding activities could disturb feeding and result in the loss of young, however, adverse effects on the American Badger population within the project area is unlikely and can be avoided by conducting SPRs and mitigation measures, such as surveys, no disturbance buffer zones established, and conducting project activities outside of maternity season. Applicable SPRs are BIO-1 and BIO-10. Mitigation Measure BIO-2b applies.

The **Ringtail** is a nocturnal species and habitat areas consist of shrub, forested, and riparian areas. Denning locations include dense shrubs, rocky outcrops and crevices, and large trees. Rocky areas are not part of proposed treatment areas and trees larger than 10 inches in diameter will not be removed. SPRs applicable are BIO-1, BIO-10, and HYD-4. Mitigation measures include BIO-2a if ringtails are found in the project area and would minimize adverse effects on the species.

**Special-Status Bats**, such as the western red bat, pallid bat, and Townsend's big-eared bat are known to reside within the project area. These bats' habitats include buildings, rocks, and forest. Rocks and structures are part of the proposed project treatment areas. Trees larger than 10 inches will not be felled, however, pruning of trees could potentially negatively affect bat roosts. Negative effects can be avoided to special-species bats by mitigation measures such as, avoiding maternity roosts during maternity season (April 1 through August 31). SPRs applicable are BIO-1, BIO-10, and Mitigation Measure BIO-2b would apply.

Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation That Leads to Loss of Habitat Function. Vegetation treatment may result in direct or indirect impacts on vegetation communities within the project area. Retreatment that occurs too soon potentially can adversely affect the sensitive woodland, chaparral, and riparian plant species. SPRs applicable to the proposed project are BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-9, and HYD-4. SPR BIO-6 requires preventing the spread of pathogens by measures including cleaning and sanitizing vehicles and equipment and minimizing movement of plant and soil material. Impacts have been identified as less than significant with mitigation measures. Mitigation Measure BIO-3a requires designing treatments

to avoid the loss of sensitive natural communities and oak woodlands through measures including restoring fire and returning natural vegetation to improve habitat function and ensuring fuel breaks are not implemented in sensitive communities and will not remove more than 20% of native vegetation. Mitigation Measure BIO-3b would be implemented if significant impacts on sensitive natural communities or oak woodlands cannot feasibly be averted under Mitigation Measure BIO-3a. It requires implementing a Compensatory Mitigation Plan to restore habitat functions and acreage, restore degraded habitat outside of the project area, or preserve existing habitat of greater or equal value to the habitat lost by conservation easement. Mitigation Measure BIO-3c requires similar compensation through a Compensatory Mitigation Plan but is focused exclusively on riparian habitat. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PEIR.

Impact BIO-4: Substantially Affect State or Federally Protected Wetlands. Federally protected wetlands may be indirectly or directly impacted due to project activities of prescribed burning, manual and mechanical treatments, and prescribed herbivory in the project area. If other unmapped wetland areas are identified in the project area, a biologist or a RPF will determine the appropriate boundaries of the wetland area. SPRs applicable to the proposed project are BIO-1, HYD-1, HYD-3, and HYD-4. Impacts have been identified as less than significant with mitigation measures. Mitigation Measure BIO-4 applies and requires the avoidance of federally protected wetlands; boundaries and buffers will be determined by a biologist or RPF with high visibility markers. Soil disturbance and fire ignition is prohibited within the buffer zone and prescribed burning may be allowed with permission from a biologist or RPF. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PEIR.

Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries. Wildlife corridors and nurseries may be indirectly or directly impacted due to project activities of prescribed burning, manual and mechanical treatments, and prescribed herbivory in the project area. SPRs applicable to the project are BIO-1, BIO-4, BIO-5, BIO-10, HYD-1, and HYD-4. During implementation of SPR BIO-1 (wildlife survey), no fawning sites or rookery trees were identified. If nursery sites are detected during proposed project activities, mitigation measure BIO-5 would apply, which requires preserving nursery habitat and applying a no disturbance buffer to avoid nursery sites as established by a biologist or RPF. Impacts have been identified as less than significant with mitigation measures. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PEIR.

Greenhouse Gas Emissions:

Impact GHG-2: Generate GHG Emissions through Treatment Activities. Prescribed burning and mechanical vegetation treatment would generate GHG emissions. These same project activities mitigate wildfire risk and reduce potential GHG emissions due to wildfire. SPR AQ-3 is applicable to the treatment project. Impacts remain significant and unavoidable. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PEIR.



Transportation:

Impact TRAN-3: Result in a Net Increase in VMT (vehicle miles traveled) for the Proposed CalVTP. A short-term increase in VMT will take place during the proposed project because vehicle trips to transport crews and equipment to sites of project treatment are required. However, a net reduction of VMT would be possible due to activities that reduce the risk of wildfire, thus, reducing the VMT in the long term from emergency response personnel and vehicles. The project would produce less than 110 trips per day, a number implemented in the CalVTP, however, this section in the PIER deems this impact significant. Impact TRAN-3 has been identified as significant and unavoidable because carpooling to remote locations of the project may not be feasible. There are no SPRs applicable. This determination is consistent with the PEIR.

Statement of Overriding Considerations

The project's benefits significantly outweigh and render acceptable the unavoidable Air Quality, Archaeological, Historical, and Tribal Cultural Resources, Greenhouse Gas Emissions, and Transportation impacts that may occur during project implementation.

The project's benefits are that it will lower the risk of catastrophic wildfire events that could cause environmental harm to the property, significantly contribute to greenhouse gas emissions and spread to nearby communities where they could damage property and threaten lives; and it will enhance grasslands and other habitats through prescribed grazing. The air quality, greenhouse gas emissions, and transportation impacts that would result from such wildfire events are many orders of magnitude larger than the potential impacts associated with project implementation.

Upon approval of the project, Conservancy staff will file a Notice of Determination and file project information with CALFIRE, as required under the CalVTP program.