

COASTAL CONSERVANCY

Staff Recommendation  
September 14, 2023

**SONOMA LAND TRUST PRESERVES FOREST RESILIENCE PROJECT**

Project No. 23-060-01  
Project Manager: Morgan Wright

**RECOMMENDED ACTION:** Authorization to disburse up to \$469,100 to Sonoma Land Trust to reduce wildfire risk and improve forest health through thinning, pile burning, and removing vegetation to prepare for prescribed burns at three preserves in Sonoma County, and adoption of findings under the California Environmental Quality Act.

**LOCATION:** Pole Mountain Preserve, Little Black Mountain Preserve, and Laufenburg Ranch Preserve, in Sonoma County

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EXHIBITS

- Exhibit 1: [Project Location Map](#)
- Exhibit 2: [California Vegetation Treatment Program \(CalVTP\) Statewide Programmatic Environmental Impact Report](#)
- Exhibit 3: [Project Specific Analysis Checklist and Addendum under the California Vegetation Treatment Program Statewide Programmatic Environmental Impact Report, Mitigation, Monitoring and Reporting Program \(CalVTP Project ID 2021-15\)](#)
- Exhibit 4: [Site Photographs](#)
- Exhibit 5: [Project Support Letters](#)

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**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 sixty-nine thousand, one hundred dollars (\$469,100) to Sonoma Land Trust (“the

grantee”) to reduce wildfire risk and improve forest health through thinning, pile burning, and removing vegetation to prepare for prescribed burns on its preserves in 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 Sonoma Land Trust 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 (PIER), which was certified by the California Board of Forestry and Fire Protection (CALFIRE) on December 30, 2019, pursuant to the California Environmental Quality Act (CEQA), and the Project Specific Analysis and Addendum to the CalVTP for the Sonoma Land Trust Preserves Vegetation Treatment Project (Cal Project ID 2021-15), “PSA-Addendum”) (attached to the accompanying staff recommendation as Exhibits 2 and 3), and the Conservancy finds:
  - a. The Sonoma Land Trust Preserves Forest Resilience (“Project”) is within the scope of the CalVTP and the CalVTP PIER adequately describes the Project for the purposed 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 the State CEQA Guidelines Section 15162 calling for preparation of a subsequent Environmental Impact Report (EIR) have occurred.
  - b. The PIER and PSA-Addendum identify potentially significant impacts of the Project in the areas of Archaeological, Historical, and Tribal Cultural Resources, Biological Resources, Hazardous Materials, Public Health, and Safety as identified in the accompanying staff recommendation. With implementation of Mitigation Measures, these impacts will be mitigated to a less than significant level.

- c. The PIER and PSA-Addendum identify significant and unavoidable impacts of the Project in the areas of Air Quality, Greenhouse Gas Emissions, and Transportation. The Project's air quality impacts are from emissions associated with treatment activities and maintenance. Standard Project Requirements will reduce these impacts but not avoid them. No feasible Mitigation Measures exist. The Greenhouse Gas Emission impacts are due to the use of vehicles and mechanical equipment and prescribed burning during initial and maintenance treatments. The Standard Project Requirements and Mitigation Measures will reduce these impacts but not avoid them. The project will have Transportation impacts due to a temporary increase of vehicle miles traveled above baseline conditions because the treatment areas are in remote locations. No feasible Mitigation Measures exist. The Conservancy finds it 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 Project as described in the Statement of Overriding Considerations contained in the accompanying Conservancy staff recommendation outweigh and render acceptable the significant unavoidable effects.

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## **STAFF RECOMMENDATION**

### **PROJECT SUMMARY:**

Staff recommends the Conservancy authorize a \$469,100 grant to Sonoma Land Trust (SLT) to reduce wildfire risk and improve forest health through thinning, pile burning, and removing vegetation to prepare for prescribed burns at three preserves in Sonoma County, shown in Exhibit 1. All three preserves: Laufenburg Ranch, Little Black Mountain, and Pole Mountain are in the "very high" risk category of CALFIRE hazard severity maps.

The project consists of forest thinning, pile burning, and prescribed fire unit preparation designed to improve the health and resilience of the deciduous oak woodlands. Oak woodlands were historically maintained by low intensity and frequent fires set by indigenous peoples tending the land, a practice that was outlawed during colonization. Without regular fire, conifers outcompete and encroach on the oaks stands. Conifers are more susceptible to drought leading to intense wildfires. After these intense fires, habitat conditions favor bay laurel, live oak, madrone trees, and the invasive French broom, instead of oak woodland. Deciduous oak forests (black oak, Oregon oak, blue oak) have been particularly impacted by the absence of low intensity fire on the landscape.

The project builds on work accomplished under a 2021 Conservancy grant by continuing management of restored areas and increasing the scale and connectivity of treated areas: critical for wildfire resilience for ecosystems and nearby communities. Pole Mountain Ridge is a strategic location to control wildfire spread during emergencies. The project aims to establish a 100+ acre connected zone of reduced fuels along the top of the ridge that would make fire suppression activities, like backburns, possible. The project will also prepare stands for future prescribed burning.

Prescribed fire unit preparation work will involve reducing fuel loads around the perimeter of fire units, or future prescribed burn locations, and as needed within the units to protect key resources. Five units will be prepared for future prescribed fire. The prescribed fire preparation will also include conducting surveys and mapping of botanical, cultural, wildlife, and other resources to meet CalVTP requirements. SLT has will hire archaeologists to survey two large locations within the project areas with high potential for cultural sites, registered professional foresters to aid in resource training, project design, and crew supervision, and may hire tribal monitors as needed. When possible, implementation will be scheduled outside of sensitive wildlife movement and nesting windows, and a biologist will be hired to survey for species if not.

Forest thinning will be conducted around the perimeter of the fire units to protect ancient trees from fire. Efforts will be focused on removing encroaching conifers from oaks, reducing stem density in bay laurel forests, and maintaining roadside treatments. Invasive French broom, which crowds native plants and creates additional fire fuels, will be hand pulled or spot sprayed.

Pile burning will be completed after the forest thinning to reduce fuels and remove biomass from thinned areas. Pile burning will be conducted by a combination of support from CALFIRE, local fire districts, volunteers, staff members, hired fuel crews, and Conservation Corps North Bay (CCNB) workforce, depending on the steepness of the terrain, size of units, and unit preparation plans. SLT has identified 8 weeks of work for CCNB, with CCNB providing funding for the project.

Project outcomes will include approximately 50 acres of forest thinning to restore oak woodlands, 40 acres of pile burning, and preparation of 5 prescribed fire units.

**Site Description:** The project will be implemented at three SLT owned preserves: the 174-acre Laufenburg Ranch in Knights Valley, and the coastal and adjacent 500-acre Little Black Mountain and 238-acre Pole Mountain Preserves. All three sites are in Sonoma County.

Laufenburg Ranch Preserve consists of forested and riparian habitat. The lack of fire in the Preserve has led to overcrowded forests where encroaching conifers are dying from drought, further increasing the buildup of surface and ladder fuels. The proposed project will contribute towards watershed health in the headwaters of salmon streams by reducing the risk of catastrophic fire. The work at Laufenburg ranch is adjacent to the impaired Bidwell Creek, which hosts steelhead, and will reduce the risk of watershed damage during potential wildfire. The Preserve is open to the public during guided outings only. Laufenburg Ranch will be a demonstration site for tours of best fire management practices.

Little Black Mountain and Pole Mountain Preserves are located on the Sonoma Coast and consist of steep ridgetop terrain. Both sites host a diverse mix of oak woodland, bay laurel forest, grassland, and Douglas-fir Forest. The area burned at moderate to high severity in the Creighton Ridge Fire of 1978. Since then, conifers have encroached into oak woodlands and are similarly threatening oak forest health. Bay laurel stands have grown in with dense resprouts creating significant ladder fuels. The Ranch Road on these Preserves serves as an alternate

escape route for the nearby community and a wildfire defense location for CALFIRE. Pole Mountain is open to the public via the Sea to Sky Trail starting at Jenner Headlands Preserve.

**Grant Applicant Qualifications:** SLT is a non-profit organization that works closely with private landowners, public agencies, non-profit organizations, and foundations to protect the scenic, natural, agricultural, and open landscapes of Sonoma County for the benefit of the community. SLT has received many private, local, state and federal grants. SLT staff is experienced and maintains the organizational structure necessary to complete the work and manage the grant.

Since 2020, SLT has completed fuels reduction and forest management on 108 acres and two prescribed burns on 34 acres. SLT has burned over 600 piles, completed five miles of roadside fuel reduction and shaded fuel breaks, and now have six fire-line trained staff members. SLT recently completed an SCC Wildfire Resilience grant for \$150,000 and has acted as the fiscal administrator and co-recipient for over \$2 million in CALFIRE funding to the Sonoma Valley Wildlands Collaborative.

In the past 12 months, the Project Specific Analysis and Addendum to the CalVTP for the Sonoma Land Trust Preserves Vegetation Treatment Project was completed and SLT has entered into a Resource Sharing Agreement with CALFIRE. SLT partnered with Sonoma Agriculture and Open Space and Sonoma Resource Conservation District to implement three miles of ridgetop shaded fuel breaks and is working with CALFIRE to conduct prescribed burns that have been previously prepared at the three preserves listed in this project. SLT has partnered with The Wildlands Conservancy and Point Blue Conservation Science on a grant from the Cornell Lab of Ornithology Land Trust Bird Conservation Initiative to survey bird occupancy and abundance before and after forest management treatments, with a special focus on special status and indicator species.

SLT recently completed a 5-year strategic plan which focuses on fire-adaptive management practices with community input. SLT plans to host community meetings, communicate in English and Spanish when posting smoke advisories, use press releases, and other multi-media outreach methods to keep the community informed and tell the story of fire adaptive land management practices. Starting in 2024, SLT plans to host 2-3 community tours per year at Laufenburg Ranch to demonstrate this work. Meaningful Tribal engagement was an important part of project development and is referenced in Project Selection Criteria #3, below.

#### **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:

##### **Selection Criteria**

##### **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 demonstrated need or regional problem. 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** (CNRA, 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.

**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.**

SLT has a strong working relationship with a Tribe whose ancestral lands include the Coastal Preserves of Pole Mountain and Little Black Mountain. In past projects, SLT has collaborated with the Tribal Historic Preservation Officer (THPO) on cultural resource protection and will continue this practice with future projects. SLT has practiced early consultations with the Tribe and has received Tribal support of SLT's forest and stewardship goals. The Tribe has expressed concerns about pile burning and ground disturbance work. SLT has incorporated the concerns into treatment plans. Funds are budgeted for THPO monitoring as an essential part of project review and implementation. SLT will incorporate tribal objectives into the project, such as pruning specific areas of bay trees that resprouted into many stems after the 1978 fire and using smoke and heat from prescribed burns to increase the quantity and quality of bay nuts produced in the groves of Pole Mountain.

At Laufenburg Ranch Preserve, SLT has worked to foster a relationship with a Tribe by providing updates on projects and stewardship activities and requesting feedback for cultural resource protection. The Tribe has expressed support of forest management and prescribed burn activities. SLT is actively working to strengthen this relationship by contacting the Tribe to schedule an in-person site visit to assess proposed project activities, strategies, and monitoring of project areas. SLT may need to adjust project boundaries and activities based on Tribal feedback received so far. SLT is prepared to hire Tribal monitors as needed.

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

The project will help increase fire resiliency in the context of anticipated climate change. Fire resiliency 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 forest thinning, pile burning, and prescribed burn preparation to make natural landscapes more resilient.

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

The project will increase resilience to future climate change impacts of extreme heat and wildfires by improving forest health and strategically reducing fuel loads. The project seeks to reduce catastrophic wildfire and prepare the preserves for prescribed burns. The project will stabilize carbon contained in the preserve’s forests by modifying fuel and vegetation structure so that potential wildfire would burn less intensely. In addition, the project will have workforce benefits by partnering with CCNB. The project also includes community education tours to demonstrate management techniques. Finally, SLT has partnered with The Wildlands Conservancy 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. SLT anticipates using birds as ecosystem indicators and providing a metric to analyze ecosystem benefits from the work.

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

Living with Fire is one of six strategies in SLT’s recently completed 5-year strategic plan and focuses on the adoption of fire-adaptive management practices. During the planning phases of the strategic plan, SLT sought feedback from local, county, state, tribal and non-profit organization partners, hosted a bi-lingual meeting with the community, and engaged in one-on-one discussions with experts.

SLT’s partners include CALFIRE, Coast Community Forest, a Tribe, the Natural Resources Conservation Service, the State Coastal Conservancy, The Nion Robert Theriot foundation, and has received feedback from their forester, and various biologists to plan and fund wildfire resiliency on SLT preserves. SLT has collaborated with local Scout Troops, CCNB, and fuel crews to complete fuel reduction work. SLT is part of a network of non-profit organizations, parks, and conservation groups working to manage forest ecosystems for wildfire resiliency.

Laufenburg Ranch will be SLT’s primary demonstration site in eastern Sonoma County. SLT hosted a tour for CalPoly’s Fuel Management Training Program in May of 2023, and is planning 2-3 community tours per year starting in 2024.

**PROJECT FINANCING**

<b>Coastal Conservancy</b>	<b>\$469,100</b>
National Resource Conservation Service (NRCS)	\$13,354
CCNB	\$51,700
Impact 100 Redwood Circle	\$16,500
<b>Project Total</b>	<b>\$550,654</b>

SLT anticipates receiving \$13,354 from NRCS.

SLT anticipates receiving \$51,700 from CCNB. \$5,400 in SCC funds are anticipated to purchase Personal Protective Equipment for CCNB, specific to fire, such as hardhats and fire-resistant clothing, to help increase their cache of equipment.

SLT anticipates receiving \$16,500 in funding from Impact 100 Redwood Circle.

SLT anticipates a match of \$60,000 from their operating funds.

SLT anticipates 320 hours of volunteer time at \$11,900.

The anticipated source of funding is the Fiscal Year 2022-2023 appropriation 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 the anticipated funding source 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 projects 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](#):**

Consistent with **Goal 1.4.1 Incorporate Workforce Development in Our Projects**, the proposed project will utilize the CCNB workforce to complete activities such as forest thinning, pile burning, and prescribed burn unit preparation as appropriate.

Consistent with **Goal 4.2.2 Wildfire Resilience**, the proposed project will implement forest management techniques and result in 50 acres of forest thinned, 40 acres of pile burning, and 5 units, totaling 46 acres, prepared for prescribed fire.

Consistent with **Goal 4.3.2 Multi-benefit Nature-Based Climate Adaptation**, the proposed project will implement nature-based climate adaptation by increasing resilience to wildfire by reducing ignition risks and removing flammable surface and ladder fuels from conifers, French broom, burn piles, and prepare for prescribed fire to restore structure and composition of oak woodlands.

**CEQA COMPLIANCE:**

The California Vegetation Treatment Program (CalVTP) directs implementation of vegetation treatments within the California Department of Forestry and Fire Protection's (CALFIRE) State Responsibility Area (SRA) to serve as one component of the state's range of actions to reduce wildfire risk, reduce 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 the California Environmental Quality Act (Public Resources Code [PRC] Section 21000 et seq.)(CEQA), staff has independently evaluated the two applicable CEQA documents:

- The California Vegetation Treatment Program Final Program Environmental Impact Report (PEIR), certified by CALFIRE in December 2019.
- The Project Specific Analysis (PSA)/Addendum to the CalVTP PEIR for the Sonoma Land Trust Preserves Vegetation Treatment Project, prepared for the Northern Sonoma County Fire Protection District, dated February 2022.

The CalVTP PEIR evaluates the environmental impacts of the CalVTP. The PSA/Addendum evaluates whether the Sonoma Land Trust Preserves Vegetation Treatment Project's proposed treatments are within the scope of the CalVTP PEIR, and whether the project requires additional environmental documentation, or its own independent environmental review.

This project, known as the Sonoma Land Trust Preserves Forest Resilience ("proposed Project") is within the Sonoma Land Trust Preserves Vegetation Treatment Project and therefore is within the scope of the PSA/Addendum. The proposed treatment types (i.e., fuel breaks and ecological restoration) and the treatment activities (i.e., prescribed burning, manual and mechanical treatments, and herbicide application) for the proposed Project are consistent with those evaluated in the CalVTP PEIR. Ongoing maintenance of initial treatments (referred to as

“retreatment/treatment maintenance” or “maintenance” in this PSA/Addendum) would involve the same vegetation treatment types and activities used in the original treatment.

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. (PRC 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. Conservancy staff has reviewed the PEIR and the PSA) Addendum. The portions of the 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. Potential significant impacts of the project are discussed below.

All applicable Standard Project Requirements and Mitigation Measures identified in the PSA/Addendum will be followed.

The PSA/Addendum indicates that the Project could have potential significant effects on the following types of resources: Air Quality, Archaeological, Historical, and Tribal Cultural Resources, Biological Resources, Greenhouse Gas Emissions, Hazardous Materials, Public Health, and Safety, and Transportation. The PSA/Addendum identifies Standard Project Requirements and Mitigation Measures that, when implemented, will 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 Archaeological, Historical, and Tribal Cultural Resources, Biological Resources, Hazardous Materials, Public Health, and Safety and to less than significant levels. While Standard Project Requirements and Mitigation Measures will reduce potentially significant environmental effects in the areas of Air Quality, Greenhouse Gas Emissions, and Transportation, these impacts remain potentially significant and unavoidable.

The potentially significant impacts of the Project and associated Mitigation Measures are listed in Exhibit 3 and 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). Standard Project Requirements (SPRs) applicable to the treatment project are as follows: AD-4 requires the public and administrative notice of prescribed burns, AQ-1 consists of complying with air quality requirements in the jurisdiction of the project area, AQ-2 requires the submission of a smoke management plan, AQ-3 requires the creation of a burn plan under the CALFIRE template for prescribed burns, AQ-4 consists of minimizing dust emissions through measures such as limiting the speed of vehicles and wetting unpaved or dirt roads with non-toxic chemical dust suppressant, and AQ-6 requires that fire crews comply with CALFIRE safety measures and Incident Action Plan (IAP). No feasible Mitigation Measures (MMs) exist, other than what is listed in the SPRs. Impacts remain significant and unavoidable. This determination is consistent with the PIER and would not constitute a substantially more severe impact than what was covered in the PIER.

Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk. Applicable SPRs related to the proposed project are AD-4, AQ-2, AQ-3, and AQ-6. No feasible MMs exist, other than what is listed in the SPRs. Impacts remain significant and unavoidable. This determination is consistent with the PIER and would not constitute a substantially more severe impact than what was covered in the PIER.

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 MMs 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. Applicable SPRs are as follows: CUL-1 consists of conducting an historical and archaeological resource record search, CUL-2 requires contacting geographically affiliated Native American Tribes and notifying where treatment activity is located, CUL-3 consists of conducting pre-field research as part of a cultural resource investigation utilizing records, maps, and literature. CUL-4 involves coordination with a qualified archaeologist to conduct a site-specific survey of the treatment area, CUL-5 consists of the avoidance of, or changing treatment activities, if resources are identified in the project area and cannot be avoided, and CUL-8 requires cultural resource training for all crew members and contractors implementing treatment activities. MM 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. Impacts are less than significant with MMs. This determination is consistent with the PIER and would not constitute a substantially more severe impact than what was covered in the PIER.

#### Biological Resources

Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications. SPRs applicable to treatment activities are, BIO-1, BIO-2, BIO-6, BIO-7,

BIO-9, GEO-1, GEO-3, GEO-4, GEO-5, GEO-7, HYD-4, and HYD-5. 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-6 requires preventing the spread of pathogens by measures including cleaning and sanitizing vehicles and equipment and minimizing movement of plant and soil material. 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. SPR GEO-1 includes suspension of project activities if the National Weather forecast shows a 30% chance or more of rain within the next 24 hours until precipitation stops, and soil is no longer sodden. 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. SPR HYD-4 consists of implementing a Watercourse and Lake Protection Zone (WLPZ) buffer zone adjacent to all Class I and Class II streams, heavy equipment, burn piles and ignition of burn piles, and prohibiting refueling in the WLPZ area and SPR HYD-5 implements projection measures when applying herbicides to non-target vegetation and special-status species. MM BIO-1a avoids the loss of special-status plants listed under ESA or CESA and MM 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 are less than significant with MMs. This determination is consistent with the PIER and would not constitute a substantially more severe impact than what was covered in the PIER.

Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications. SPRs applicable to the treatment Project are BIO-1, BIO-2, BIO-9, BIO-10, GEO-1, and HYD-4. SPR BIO-10 consists of surveying suitable habitat and nursery sites for special-status wildlife. 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. Impacts are less than significant with MMs. This determination is consistent with the PIER and would not constitute a substantially more severe impact than what was covered in the PIER.

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, GEO-1, GEO-3, GEO-4, GEO-5, GEO-7, HAZ-5, HAZ-6, HYD-4, and HYD-5. SPR BIO-3 will survey for sensitive natural communities and other sensitive habitats; SPR BIO-4 will design treatment to avoid loss or degradation of riparian habitat function; SPR BIO-5 will avoid environmental effects of type conversion and maintain habitat function in chaparral and coastal sage scrub; HAZ-5 will require the preparation of a spill prevention and response plan; and HAZ-6 will comply with herbicide application plan regulations. MMs consist of BIO-3a designing treatments to avoid loss of sensitive natural communities and oak woodlands and MM BIO-3b compensate for loss of sensitive natural communities and oak woodlands. Impacts have been identified as less than significant with MMs. 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. SPRs are as follows: BIO-1, BIO-2, BIO-3, BIO-4, BIO-5, BIO-6, BIO-9, GEO-1, GEO-3, GEO-4, GEO-5, GEO-7, HAZ-5, HAZ-6, HYD-4, and HYD-5. MM BIO-4 consists of avoiding State and Federally protected wetlands and applies to the project. Impacts have been identified as less than significant with MMs. 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-2, BIO-3, and HYD-4. Impacts have been identified as less than significant with MMs. No MMs apply. 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 (Greenhouse Gas) 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. Mitigation Measure GHG-2 applies and requires the implementation of GHG Emission reduction techniques during prescribed burns including but not limited to isolating and leaving large fuel loads unburned and reducing the total area burned through mosaic burning. 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.

#### Hazardous Materials, Public Health, and Safety

Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites. There are no applicable SPRs. Mitigation Measure HAZ-3 consists of database searches for hazardous material sites within the project site. The database search found two leaking underground storage tank sites are located within 0.25 miles of the Russian River Watershed preserves; however, both sites have been remediated and closed. Impacts have been identified as less than significant with MMs. 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 and 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 PEIR deems this impact significant. Impact TRAN-3 has been identified as significant and unavoidable. There are no SPRs or MMs 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, 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 project area, significantly contribute to greenhouse gas emissions, and spread to nearby communities where they could damage property and threaten lives; and it will enhance oak woodland habitat. The air quality and greenhouse gas emission 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.