COASTAL CONSERVANCY

Staff Recommendation
February 19, 2026

NORTH COAST WILDFIRE RESILIENCE PLANNING AND IMPLEMENTATION GRANT PROGRAM-VANAUKEN CREEK FUEL BREAK

Project No. 24-015-01
Project Manager: Lilly Allen

RECOMMENDED ACTION: Authorization for the Humboldt County Resource Conservation District (HCRCD) to disburse up to $500,000 of the Conservancy's previously granted North Coast Wildfire Resilience Planning and Implementation Grant Program funds to Sanctuary Forest to implement the Vanauken Creek Fuel Break Project, consisting of creating shaded fuel breaks and conducting fuel reduction through forest thinning and prescribed burning on a total area of approximately 597 acres near the community of Whitethorn in Humboldt County; and adoption of findings under the California Environmental Quality Act.

LOCATION: Humboldt County

EXHIBITS

Exhibit 1: Project Location Map

Exhibit 2: April 18, 2024 Staff Recommendation

Exhibit 3: CalVTP Project-Specific Analysis and Addendum, Vanauken Creek Fuel Break Project

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RESOLUTION AND FINDINGS

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

Resolution:

The Conservancy authorizes the Humboldt County Resource Conservation District (HCRCD) to disburse up to $500,000 of Conservancy funds previously granted to HCRCD for the North Coast Wildfire Resilience Planning and Implementation Grant Program ("Grant Program") to Sanctuary Forest to implement the Vanauken Creek Fuel Break Project, consisting of creating shaded fuel breaks and conducting fuel reduction through forest thinning and prescribed burning on a total area of approximately 597 acres near the community of Whitethorn in

Humboldt County, subject to the terms of the Conservancy's grant to HCRCD for the Grant Program.
Findings:

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

1. The proposed authorization is consistent with Section 31113 of 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 Conservancy has independently reviewed and considered the Vanauken Creek Fuel Break Project CalVTP Project-Specific Analysis and Addendum (PSA) and included Mitigation Monitoring and Reporting Program adopted by the Humboldt County Resource Conservation District on February 17, 2026 pursuant to the California Environmental Quality Act ("CEQA") and attached to the accompanying staff recommendation as Exhibit 2. The Conservancy finds, as described further in the accompanying staff recommendation, that:
    a. The Vanauken Creek Fuel Break Project will have potentially significant environmental effects in the areas of Cultural Resources, Biological Resources, and Public Services, Utilities, and Service Systems. The Conservancy finds that the mitigation measures identified in PSA will avoid, reduce, or mitigate these possible significant environmental effects to less-than-significant levels and that these mitigation measures have been required or incorporated into the project.
    b. The Conservancy further finds that the Project will result in significant and unavoidable environmental effects in the areas of Air Quality, Greenhouse Gases, and Transportation, but environmental and other benefits of the Project as described in the accompanying staff recommendation outweigh or render acceptable these unavoidable adverse environmental effects to achieve the objectives of the Project.
4. The Conservancy adopts the Findings regarding Significant Effects and Statement of Overriding Considerations set forth in the accompanying staff recommendation.

STAFF RECOMMENDATION

PROJECT SUMMARY:

Staff recommends the Conservancy authorize the Humboldt County Resource Conservation District (HCRCD) to disburse up to $500,000 of Conservancy funds previously granted to HCRCD for the North Coast Wildfire Resilience Planning and Implementation Grant Program ("Grant Program") to Sanctuary Forest to implement the Vanauken Creek Fuel Break Project, consisting of creating shaded fuel breaks and conducting fuel reduction through forest thinning and prescribed burning on a total area of approximately 597 acres near the community of Whitethorn (Project) in Humboldt County.

On April 18, 2024, the State Coastal Conservancy authorized a grant of $6,000,000 to Humboldt County Resource Conservation District (HCRCD) (subsequently increased to $6,500,000 by the Executive Officer) for the North Coast Wildfire Resilience Planning and Implementation Grant Program (Grant Program), which is a program for awarding grants to public entities and nonprofit organizations for planning, community outreach, environmental review, permitting, and implementation of projects that increase wildfire resilience through improved management of natural lands and open space, increased collaboration among land managers, and capacity building in northern California's coastal watershed counties (Exhibit 3). As a condition of funding the Grant Program, the Conservancy required the HCRCD to obtain Conservancy approval of HCRD grants and approval of projects that HCRCD will undertake directly. Such approval must be by the Conservancy's Board for projects that require adoption of CEQA findings (and may be by the Executive Officer for projects that are exempt from CEQA). The HCRCD proposes to grant up to $500,000 to Sanctuary Forest to implement the Project. The Conservancy funded the preparation of the CEQA document for the Project (Exhibit 2). The HCRCD is the lead agency under CEQA for the Project. In approving the Project, the Conservancy will consider the CEQA document.

The Project will occur in the vicinity of Whitethorn (Exhibit 1). The main objective of the Project is to safeguard the rural community of Whitethorn from wind-driven wildfires by establishing three shaded fuel breaks covering approximately 171 acres that will reduce the amount and continuity of hazardous fuels, and by fuel reduction through forest thinning and prescribed burning on up to an additional 426 acres, for a total project area of approximately 597 acres. Fuel removal will focus on areas of high fuel concentrations and will disrupt the horizontal and vertical continuity of fuel loads. Treatments will improve forest health and ecosystem function by reducing the number of trees per acre. This will result in a landscape that is more resilient to wildfire. Biological diversity will be improved by promoting conditions that favor native plant and animal species. Forest health will be improved through enhancing native, fire-resilient plant communities primarily through ladder fuel and weed removal, opening space for native plants to return. Healthy, mature trees and scrub dominating the canopy will be thinned out and retained. Fuels may be chipped, lopped and scattered, or pile burned. The Project also includes prescribed broadcast burns. Prescribed burns will occur after adequate burn prep has been done to ensure that the objectives of the burn can be met while keeping impacts to forest health to a minimum. Burn prep includes forest thinning, removal of forest duff around the base of high value trees, and other activities needed to ensure a safe and effective burn can be done. Prescribed burns will be used for maintenance of the Fuel Break treatment and will also be done multiple times over the next 5-7 years as needed to meet the objectives of lower fire risk and improved forest health. The Project will create protective buffers around homes, shielding them from wildfires that may start in timberlands, while also protecting timber resources and ecological values from fires that could originate in nearby developed areas or along roads.

The project area is classified as a "High" Fire Hazard Severity Zone. It is also located within the Wildland-Urban Interface zone, as designated by the California Department of Forestry and Fire Protection (CAL FIRE) in its 2024 mapping. The Project aligns with the priorities set forth in the 2019 Humboldt County Community Wildfire Protection Plan and the Southern Humboldt

Planning Unit Action Plan. CAL FIRE has identified the area as a Priority Landscape in its Reducing Wildfire Threats to Communities mapper.

Site Description: The Project is located in the vicinity of the community of Whitethorn, which is a small community of approximately 1,444 residents located in Humboldt County, along the Lost Coast. Situated within the fire-prone Lost Coast region, the project area is dominated by Douglas fir and montane hardwood mixed forest on steep slopes. Annual grasslands and riparian habitat are also present. The fuel break will reduce wildfire risk and improve defensible space for nearby communities such as Whitethorn, Ettersburg, and Shelter Cove, while protecting key infrastructure including Briceland Road and local emergency access routes. The project will support broader regional fire resilience efforts in the Mattole River watershed and Southern Humboldt. The fuel break will be implemented across a mix of ownerships, including private parcels and lands managed by conservation groups such as SFI and Lost Coast Forestlands.

Grant Applicant Qualifications: See Exhibit 3.

CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA:

See Exhibit 3.

PROJECT FINANCING

See Exhibit 3.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

This Grant Program is funded pursuant to the Climate Ready Program, established in 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 undertake projects to address within its jurisdiction, including those that reduce greenhouse gas emissions, and address extreme weather events.

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 and preserving natural lands.

Consistent with these sections, the Grant Program, and the Project, will restore the health and resilience of California forests, grasslands, and/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 Project addresses the impacts of climate change on natural resources within the Conservancy's jurisdiction because it will improve forests, grasslands, and other natural lands and reduce the risk of wildfire that will adversely impact water quality and habitat in coastal watersheds (Chapter 5.5).

CONSISTENCY WITH CONSERVANCY'S 2023-2027 STRATEGIC PLAN:

See Exhibit 3.

CEQA COMPLIANCE:

The California Vegetation Treatment Program (CalVTP) directs implementation of vegetation treatments within the California Department of Forestry and Fire Protection's (CAL FIRE's) 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. The CalVTP Final Program Environmental Impact Report (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, in accordance with the requirements of CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines. The Board of Forestry and Fire certified the PEIR and approved the CalVTP on December 30, 2019.

Using a project specific analysis (PSA) based on the PEIR, CAL FIRE 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.

Conservancy staff has reviewed the PEIR and the PSA and Addendum to the CALVTP PEIR for the Vanauken Creek Fuel Break Project, February 17, 2026 (Exhibit 2). The portions of the Project that are within the CalVTP treatable landscape are within the scope of the CALVTP and 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 finds that no additional CEQA documentation beyond this PSA and Addendum to the PEIR is required.

The portions of the Project located outside the CalVTP treatable landscape constitute a change to the project as described in the PEIR but because the landscape conditions of the Program area are similar to the treatable landscape, and the treatment types and activities are the same as those in the CALVTP and PEIR, the project change is not substantial. The inclusion of areas outside the CalVTP treatable landscape, which constitute 0.68% of the project area (4 of 597 acres), will not result in any new or substantially more severe significant impacts. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred; therefore, it is appropriate to adopt the accompanying PSA-

Addendum to address the project area that falls outside the geographic extent presented in the PEIR. Potential significant impacts of the project are discussed below.

Air Quality

Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment The use of vehicles, mechanical equipment, herbicides, and prescribed burning during initial and maintenance treatments would result in emissions of criteria pollutants that could exceed California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS) thresholds for the North Coast Air Basin. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was examined in the PEIR and was found to be potentially significant. This impact will be mitigated by Specific Project Requirements (SPRs) AD-1, AD-4, AQ-1 through AQ-4, and AQ-6, which require public notification for prescribed burning, compliance with applicable North Coast Unified Air Quality Management District (NCUAQMD) air quality requirements, submittal of a Smoke Management Plan (SMP) and Burn Plan if the prescribed burning triggers the threshold (17 CCR Section 80160), minimizing dust, following all safety procedures required of a CAL FIRE crew, and implementing on-road vehicle and off-road equipment exhaust emission reduction techniques to the extent feasible. Although this significant impact will be mitigated it is unavoidable.

Impact AQ-4: Prescribed burning during initial and maintenance treatments could expose people to toxic air contaminants (TACs). The potential to expose people to TACs from prescribed burning was examined in the PEIR and found to be potentially significant. The duration and parameters of the prescribed burns are within the scope of the activities addressed in the PEIR, and within the North Coast Air Basin, air quality conditions are consistent with those analyzed in the PEIR for Humboldt County. Therefore, the potential for exposure to TACs is also within the scope of the PEIR. SPRs applicable to these treatment activities are AD-4, AQ-1, AQ-2, AQ-3, and AQ-6, all of which were summarized in Impact AQ-1 above. All feasible measures to prevent and minimize smoke emissions, as well as exposure to smoke, are included in SPRs; however, this impact would remain significant and unavoidable, as explained in the PEIR.

Impact AQ-6: Prescribed burning during initial and maintenance treatments could expose people to objectionable odors. The potential to expose people to objectionable odors from prescribed burning was examined in the PEIR and found to be potentially significant. The duration and parameters of the prescribed burn treatment and the exposure potential are consistent with the activities addressed in the PEIR. Therefore, the resultant potential for exposure to objectionable odors from smoke is also within the scope of impacts covered in the PEIR. SPRs that are applicable to this treatment project are AD-4, AQ-1, AQ-2, AQ-3, and AQ-6, all of which were summarized in Impact AQ-1 above. All feasible measures to prevent and minimize smoke odors, as well as exposure to smoke odors, are included in SPRs; however, this impact would remain significant and unavoidable, as explained in the PEIR.

Cultural Resources

Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources. Vegetation treatment activities would include

mechanical treatments that use heavy equipment that could result in ground disturbance as vegetation is removed, which could result in adverse impacts to unknown historical resources (archaeological sites) or unique archaeological resources if present within a treatment area. According to the NWIC records search, two previously recorded resources are located within the project area. The potential for treatment activities to result in disturbance to, damage to, or destruction of archaeological resources was examined in the PEIR and found to be significant. This impact would be less than significant for the Project with implementation of SPRs and mitigation. This impact is within the scope of the PEIR because the treatment activities and the intensity of ground disturbance that would occur under the proposed project are consistent with those analyzed in the PEIR. SPRs applicable to this impact are CUL-1 through CUL-5 and CUL-8. SPRs CUL-1-CUL-4 have been implemented through the preparation of a cultural resources assessment report for the project area, including a background records search, notifications to local Native American representatives, cultural resource research, and a stratified sampling-approach pedestrian survey of the project area. Further, SPR CUL-8 will be implemented, which requires worker training regarding the protection of sensitive archaeological, historical, and Tribal cultural resources. MM CUL-2 would also apply to this treatment; this measure requires working with a qualified archaeologist to protect any inadvertent discoveries of archaeological resources. This impact would be less than significant after mitigation.

Biological Resources Impacts

Impact BIO-1: Treatment activities, including manual and herbicide treatments, may result in adverse impacts on special-status plant species with the potential to occur in the Treatment Sites. Pre-treatment surveys were conducted in keeping with SPRs BIO 1 and 7. No special status plant species were identified, although follow up surveys during the flowering season will be conducted for giant fawn lily. The following SPRs and mitigation measures will reduce this impact to less than significant: SPRs BIO-1 (conducting a data review and reconnaissance-level survey; already implemented), BIO-2 (environmental resource training for all personnel), BIO-3 (protocol-level survey for sensitive natural communities and sensitive habitats; already implemented), BIO-6 (prevent spread of plant pathogens), BIO-7 (conducting a protocol-level survey for special status plant species; already implemented), and BIO-9 (preventing the spread of invasive species), AQ-3 (creating a burn plan following the CAL FIRE burn plan template), AQ-4 (minimizing dust during treatment activities), GEO-1 (suspending all activities during rain events), GEO-3 (stabilizing soil disturbance), GEO-4 (monitoring for erosion and implementing erosion control), GEO-5 (draining stormwater via water breaks), and GEO-7 (minimizing erosion), HAZ-5 (spill prevention and response plan), HAZ-6 (comply with herbicide application regulations) and HYD-5 (protect non-target vegetation and special-status species from herbicide). In addition to the SPRs, the following MMs are applicable. If special-status plants listed under ESA or CESA are documented during the protocol level surveys (e.g. if giant fawn lily is found during flowering season surveys), MM BIO-1a would be implemented to avoid loss of identified special-status plants (i.e., a no-disturbance buffer will be established around the area occupied by the species; the buffer size will be determined by a qualified botanist). If special-status plants not listed under ESA or CESA are identified during protocol level surveys, Mitigation Measure BIO-1b would be implemented, establishing a buffer, and determining if

treatment can occur consistent with protection of species and habitat. If any special-status plant is documented and cannot be avoided, Mitigation Measure BIO-1c will be implemented to prepare and implement a Compensatory Mitigation Plan. Impacts to special-status plant species would be less than significant with incorporation of these mitigation measures. Additionally, treatment activities may also result in improving habitat conditions by removing invasive plant species, restoring the natural fire return interval, clearing debris build-up and thinning tree canopy.

Impact BIO-2: The potential for the proposed treatments to result in direct and indirect impacts on special-status wildlife species was evaluated in the PEIR. Treatment activity and intensity are consistent with the PEIR evaluation as are the resulting potential impacts. SPRs related to wildlife biological resources that are relevant for this project include SPR BIO-1-3 (BIO-1 and BIO-3 have already been implemented), BIO 4 (riparian habitat treatments), BIO 6 and 9, BIO-10 (conduct focused or protocol-level surveys for special-status wildlife species or nursery sites), BIO-11 (installation of wildlife-friendly fencing around herbicide treatment areas), BIO-12 (protect common nesting birds, including raptors), GEO-1, GEO-3-5, GEO-7, HAZ-5 and 6, and HYD-1 (comply with water quality regulations), HYD-4 (establish Watercourse and Lake Protection Zones), and HYD-5. Impacts could occur to 11 sensitive wildlife species that may be present in the project area, including foothill yellow-legged frog – north coast DPS, coho salmon – southern Oregon/northern California ESU, steelhead – northern California DPS summer-run, steelhead – northern California DPS winter-run, chinook salmon – California coastal ESU, northern spotted owl, monarch butterfly (migrating or breeding only), southern torrent salamander, red-bellied newt, northwestern pond turtle and Sonoma tree vole. In addition to the SPRs listed above, the following Mitigation Measures would be implemented to reduce to the potential for impacts to less than significant to special-status wildlife species: BIO-2a, BIO-2b, BIO-2c, BIO-2d, BIO-3a, BIO-3b and BIO-3c. Pursuant to Mitigation Measures BIO-2a to BIO-2d, loss of special-status wildlife species and functioning habitat would be avoided and, should loss be unavoidable, a Compensatory Mitigation Plan would be developed. Pursuant to MM BIO-3a, treatments would be designed to avoid loss of sensitive natural communities including riparian habitat, and pursuant to MM BIO-3b and 3c, should loss be unavoidable, a Compensatory Mitigation Plan would be developed. Implementation of the SPRs and MMs listed above, impacts are expected to be less than significant.

Impact BIO-3: The potential for the proposed treatments to result in direct and indirect impacts on sensitive habitats including sensitive natural communities (CDFW 2019) was evaluated in the PEIR. Treatment activity and intensity are consistent with those evaluated in the PEIR, as are the resulting potential impacts. Review of available and relevant literature and databases and a field reconnaissance survey of project-specific biological resources were performed according to SPR BIO-1. Based on the database search and protocol surveys, Tanoak Forest and Woodland, a sensitive natural community, has the potential to be impacted by treatment activities. In addition, riparian habitat (White Alder and Red Alder Forest and Woodland) in the project area could be impacted by treatment activities. SPRs applicable to the proposed treatment are BIO-1-4, BIO-6, BIO-9, GEO-1, GEO-3-5, GEO-7, HAZ-5, HAZ-6, and HYD-4. MMs BIO-3a, 3b and 3c are also applicable to the proposed treatment and will reduce this impact to less than significant.

Impact BIO-5: Treatment activities include mechanical treatment which may result in direct or indirect adverse impacts to wildlife movement corridors or nurseries. SPR's BIO-1, 4, and BIO-10 (conduct focused or protocol-level surveys for special-status wildlife species or nursery sites), BIO-11 (installation of wildlife-friendly fencing around herbicide treatment areas), and HYD-4. As was discussed in the PEIR, implementation of these SPR's would minimize these impacts. However, wildlife nursery sites could still be damaged, disturbed or degraded by treatment activities. Impacts would further be reduced to less than significant with implementation of MM BIO-5 (retaining nursery sites and establishing no-disturbance buffers). This impact is less than significant with mitigation, and within the scope of the PEIR.

Impact BIO-6: Treatment activities including mechanical treatment and herbicide application, if used, may result in direct or indirect adverse impacts to the reduction of habitat or abundance of common wildlife including nesting birds. The potential for treatment activities to result in adverse effects to habitat and abundance of wildlife was addressed in the PEIR. The potential for adverse effects to common wildlife, including nesting birds, is within the scope of the activities and impacts addressed in the PEIR because the treatment activities and level of disturbance are consistent with those analyzed in the PEIR. The SPRs that apply to this impact are BIO-1-4, BIO-12 (protect common nesting birds, including raptors), and HYD-4. Additionally, MM BIO-5 applies to this impact.

With implementation of the applicable SPRs and MM described above, the Project would not substantially reduce habitat or abundance of common wildlife. Impacts to habitat or abundance of common wildlife are consistent with those analyzed in the PEIR and would be less than significant.

<u>Greenhouse Gas Emissions</u>

Impact GHG-2: The use of vehicles and mechanical equipment, herbicide application, and prescribed burning during initial and maintenance treatments would result in GHG emissions. However, these treatments would have relatively low GHG emissions compared to GHG emissions from catastrophic wildfires. Wildfire hazards, including wildfire intensity and rate of spread, could be somewhat reduced through implementation of the Project. The potential for treatments under the CalVTP to generate GHG emissions was examined in the PEIR and found to be potentially significant and unavoidable. This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions related to wildfire, are consistent with those analyzed in the PEIR. Methods for reducing GHG emissions from burns would be integrated into SPR AQ-3 (Burn Plan) as described in MM GHG-2. MM GHG-2 would be implemented and would reduce GHG emissions associated with pile burning by burning when fuels have a higher fuel moisture content, reducing the total area burned by mosaic burning and isolating and leaving large fuels unburned, and by scheduling burns before new fuels appear. Treatment activities would contribute to annual GHG emissions generated under the CalVTP, and this impact would fall within the finding of the PEIR of potentially significant and unavoidable.

<u>Transportation</u>

Impact TRAN-3: The project treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the project access locations are in semi-remote locations along fire roads and other small, local roadways. Therefore, vehicle trips would be required to access the treatment areas which would increase the total VMT in the area. This impact was identified as potentially significant and unavoidable in the PEIR because implementation of the CalVTP would result in a net increase in VMT. However, as stated in Impact TRAN-3 of the PEIR and described in the Technical Advisory on Evaluating Transportation Impacts published by the Governor's Office of Planning and Research (Governor's Office of Planning and Research 2018), individual projects under the CalVTP are likely to generate fewer than 110 trips per day are expected to cause a less-than-significant transportation impact for specific later activities. Because of the small sizes of the crews needed for the proposed project, the limited equipment needed, and the limited materials to be hauled in any one day, it is not expected that VMT would typically exceed 110 trips per day; however, it is possible multiple crews would be out at the same time. Additionally, as identified under Impact AQ-1, Humboldt County would implement MM AQ-1 to the extent feasible to reduce exhaust emissions impacts from on- and off-road vehicles. While carpooling would be encouraged under Mitigation Measure AQ-1, crew sizes would be small and may not all be employed with the same company, and would therefore not be a feasible option in all cases.

Based on this, the potential for the Project to result in a net increase in VMT would remain potentially significant and unavoidable, as stated in the PEIR. The impacts from the Project would not be substantially more severe than those described in the PEIR.

<u>Public Services, Utilities and Service Systems</u>

Impact UTIL-2: The project could generate solid waste in excess of state standards. Mechanical and manual vegetation treatments would generate organic woody biomass as a result of vegetation removal within the Project treatment areas. Methods for managing biomass for this Project include natural decomposition (e.g., chip and broadcast, lop and scatter), pile burning, and prescribed fire. Natural decomposition is the preferred method of biomass management because natural decomposition aids in erosion prevention and excessive soil disturbance, prevents the spread of disease and pathogens off-site, and reduces greenhouse gas emissions that result from transporting materials off-site. If broadcasting woody material is not possible, the remaining biomass would be disposed of via pile burning. The potential to generate solid waste in excess of state standards was examined in the PEIR and was found to be a less-than-significant impact. SPRs AD-3 and UTIL-1 would apply to this potential impact. SPR AD-3 requires the project proponent to design and implement the project consistent with local plans and ordinances, and SPR UTIL-1 requires the project proponent to prepare a Solid Organic Waste Disposition Plan to guide biomass disposal. The potential biomass impact is within the scope of the activities and impacts identified in the PEIR as the conditions for removing biomass are consistent with the analysis in the PEIR.

The PEIR found that while some localities within the state may currently have the requisite infrastructure to process woody biomass or may develop this capacity in the near future, it cannot be guaranteed that all localities across the state would develop the capacities to process excess solid organic waste produced from treatment activities within the timeframes of the

proposed activities. Therefore, because feasible mitigation is not available, and to not risk understating potential future impacts in light of uncertainties about market response, the PEIR classified this impact as potentially significant and unavoidable, notwithstanding the possibility that capacity could increase with the scale of treatments such that it would not be exceeded for most or all individual treatments. However, biomass is not anticipated to be hauled off-site for this Project. Considering biomass is not anticipated to be hauled off-site, the Project's impact to solid waste disposal is less than significant. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Statement of Overriding Considerations

The project's wildfire risk reduction and habitat enhancement benefits significantly outweigh and render acceptable the unavoidable air quality, greenhouse gas emissions, and transportation impacts that may occur during project implementation. The immediate benefit of the project will be to reduce wildfire risk by reducing existing fuel load in treatment areas. The longer-term benefit of the project will be the increased wildfire resilience, the ecological benefits provided by removal of invasives and increased woodland health, and the public access benefits provided by developing trails.

The project will lower the risk of wildfire events that could ignite and spread to nearby communities, while enhancing habitat and providing public access. 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 CAL FIRE, as required under the CalVTP program.