

COASTAL CONSERVANCY

Staff Recommendation  
June 1, 2023

**HEALDSBURG ARUNDO REMOVAL PROJECT**

Project No. 23-014-01  
Project Manager: Morgan Wright

**RECOMMENDED ACTION:** Authorization to disburse up to \$989,300 to Russian Riverkeeper to implement the Healdsburg Arundo Removal Project, which consists of removing invasive *Arundo donax* along 5 miles of the Russian River to reduce fire risk to Fitch Mountain and Healdsburg in Sonoma County.

**LOCATION:** Healdsburg, 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: [Healdsburg Open Space and Surrounding Community Fuels Reduction Project \(CalVTP Project ID 2021-14\)](#)
- Exhibit 4: [Site Photographs](#)
- Exhibit 5: [Project 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 nine hundred eighty-nine thousand three hundred dollars (\$989,300) to Russian Riverkeeper (“the grantee”) to remove invasive *Arundo donax* along 5 miles of the Russian River to reduce fire risk to Fitch Mountain and Healdsburg 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
4. Evidence that all permits and approvals required to implement the project have been obtained.
5. Evidence that the grantee has entered into agreements sufficient to enable the grantee to implement, operate, and maintain the project.

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 Russian Riverkeeper 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 (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 Healdsburg Open Space and Surrounding Community Fuels Reduction Project (CalVTP Project ID 2021-14, “PSA-Addendum”) (attached to the accompanying staff recommendation as Exhibits 2 and 3), and the Conservancy finds:
  - a. The Healdsburg Arundo Removal Project (“Project”) is within 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 PSA-Addendum identify potentially significant impacts of the Project in the areas of Archaeological, Historical, Tribal Cultural Resources, and Biological Resources 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 PEIR and PSA-Addendum identify significant and unavoidable impacts of the Project in the areas of Air Quality and Greenhouse Gas Emissions. The Project's air quality impacts are from emissions associated with treatment activities and maintenance. Standard project requirements will reduce these impacts but will not avoid them. No feasible mitigation measures exist. The greenhouse gas emissions impacts are due to the use of vehicles and equipment associated with initial and maintenance treatments. The standard project requirements and one mitigation measure 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 Project as described in the Statements 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 \$989,300 grant to Russian Riverkeeper ("RRK") to implement the Healdsburg Arundo Removal Project ("project"), which consists of removing invasive Arundo donax along 5 miles of the Russian River to reduce fire risk to Fitch Mountain and Healdsburg in Sonoma County, referenced in Exhibit 1.

The City of Healdsburg Fire Department completed the Healdsburg Open Space and Surrounding Area Fuels Reduction Project, which analyzed fire risk in the area and sequentially developed recommendations for reducing the risk of catastrophic wildfire and creating a fire resilient ecosystem. This effort contributed to the Community Wildfire Prevention Plan for the City of Healdsburg and Sonoma County. The project is one of three top priorities in this plan.

The invasive giant reed, Arundo donax (Arundo), is highly flammable and grows in dense strands around the Russian River, where prevailing winds could cause a fire in the Arundo to threaten the communities of Fitch Mountain and Healdsburg. Fitch Mountain is a very high-risk area for mortality due to its steep terrain, dense housing, and narrow roads. While the priority of the project is to reduce the risk of wildfire, Arundo also consumes large volumes of water, which diminishes the aquatic ecosystem, and outcompetes native vegetation. Arundo degrades the river flow by interrupting sediment transport, resulting in permanently entrenched low flow channels. The project will remove Arundo from a five-mile section of the Russian River using manual and mechanical methods followed by herbicide treatment to mitigate regrowth. The methods were selected based on other successful projects in the Russian River and from review of the California Invasive Plant Council Arundo Reports. There have been three major projects to remove Arundo from the Russian River watershed over the past 20 years. This project will build on those successes and continue a coordinated approach to ridding the watershed of this

invasive weed. The project was designed with input and resources from a local Tribe, the Healdsburg Fire Department, City of Healdsburg, CAL FIRE officials, and community input.

The project is identified in the Healdsburg Open Space and Surrounding Area Fuels Reduction Project, which is within the scope of the CAL FIRE Vegetation Treatment Program (CalVTP). The Healdsburg Fire Department prepared a project specific analysis of the Healdsburg Open Space and Surrounding Area Fuels Reduction Project for purposes of the CalVTP Programmatic Environmental Impact Report (PEIR). The City of Healdsburg submitted the required notice for coverage under the CalVTP. The grant applicant has consulted with the National Marine Fisheries and Army Corps regulatory staff and found no additional permits from these agencies were needed to implement the project. A site visit was conducted with the California Department of Fish and Wildlife (CDFW) and the State Waterboard. RRK will comply with any requirements of these agencies.

The Fitch Mountain Association and the Communities Organized to Prepare for Emergencies (COPE) have conducted member outreach to enlist residential properties for the project. Owner outreach to obtain access agreements started in 2022, and verbal agreements have been secured with owners representing one half of the project area. The project area consists of 234 parcels and 178 owners, with an estimated 70% of the property being owned by residential landowners. RRK has secured 37 verbal agreements, including those with the largest properties, estimating 40% of the total project area. Written agreements are needed with all property owners. RRK expects to have agreements with the 178 property owners by June 1, 2023. The California Department of Fish and Wildlife (CDFW), Sonoma County Regional Parks, and the City of Healdsburg own public land in the project area. Unhoused individuals live within the project area. RRK secured a local Rotary Club grant to purchase battery powered equipment for cutting down Arundo canes and secured a training grant from Sonoma County to train 24 farmworkers to remove Arundo. Most of the Arundo removal work will be conducted by RRK staff and contracted farmworkers under the Resilience Force, CA. Some work will be conducted by volunteer property owners and community members to build long term maintenance capacity. Having property owners participate in the Arundo removal process will provide education and training opportunities to illustrate why Arundo is a problem and how removal helps the environment. A FAQ sheet and section of RRK's website will be developed to inform the community of the project and need. In October 2022, RRK began work on the project using donor funds and removed and treated Arundo in ½ mile high hazard area.

A biological survey was completed for the 5-mile project area by Frontier Resource Management. No special status plants were found. The Western Pond Turtle, Steelhead Trout, Chinook Salmon were found in the river and standard project requirements will be implemented to minimize impacts to these species. The project includes the following tasks. Prior to beginning work in an area, RRK's biologist performs pre-construction biological surveys in the event species have moved into the project area, per CalVTP project standard requirements. Project areas found with birds, bats, or Western Pond Turtle nests will be avoided. Follow-up site visits will remove Arundo in any potentially avoided areas. Removal work will start with cutting Arundo canes using chainsaws and hedge trimmers. The Arundo will be hauled to various floodplain terraces, or staging areas, for chipping. The process is designed to avoid erosion by leaving roots and removing canes above ground, and cutting, and

treating re-growth with approved herbicides. Re-growth is inevitable and will require several follow up efforts for complete eradication. The CalVTP calls for burning or chipping Arundo canes, and after consultations with Sonoma Resource Conservation District (RCD), and a local expert, Karen Gaffney, RRK determined it was more sustainable to chip the material. The Arundo will be chipped, and the chips spread on the floodplain terraces to build soil carbon and avoid entrainment in flood events. Four to eight weeks after initial cutting, Arundo re-growth will be treated with an Imazapyr-based herbicide to kill re-growth without causing soil disturbance or erosion. The project includes RRK's monitoring of the project area for ten years to address regrowth and new propagations to meet project goals.

**Site Description:**

The Russian River originates in the elevated region of the Inner North Coast Ranges, where it flows southbound from Ukiah into Sonoma County, where it then veers west and empties into the Pacific Ocean. The upper river consists of large areas of chaparral habitat with manzanita and scrub oak. Lower elevations feature fertile soils with hardwood tree species, such as Valley Oak, Blue Oak, Pacific Madrone, and California Buckeye. The middle river is made up of moisture retaining habitats to the west of highway 101, and drier conditions to the east. Habitats in this region consist of oak woodland, North coast coniferous, and upland broadleaf forests, and wetland areas consist of riparian corridors with alder, big leaf maple, and willow trees. The portion of the lower river flows into the Pacific Ocean and experiences cool and moist conditions with redwood, tanoak, and Douglas fir populations, with upland patches of coastal prairie. The Russian River watershed is 1,500 square miles and home to many species of wildlife, such as coyotes, mountain lions, white-tailed deer, striped and spotted skunks, snowy egrets, and osprey, all which utilize the watershed for food, shelter, nesting, and breeding. The river has been known for its abundant fish populations, many of which are endangered today; these species are Coho Salmon, Chinook Salmon, and Steelhead Trout. The river provides over 600,000 residents of the greater San Francisco Bay Area with water. The Russian River provides summer recreation opportunities to canoe, kayak, fish, and swim for over a million visitors per year.

The Healdsburg Arundo Removal Project is located along 5 miles of the Russian River, adjacent to the intersection of Demostene Ave and Rio Lindo Ave in Healdsburg, to the confluence with Dry Creek, as shown in Exhibit 1. The project will be conducted on 201 acres of riparian habitat, where the upstream and downstream portions are open and flat. The middle section curves around Fitch Mountain in a steep and confined canyon-like area. The upper section of the river was subject to gravel mining for a 110-year period that ended in 2008, when RRK's litigation stopped mining on the river. Because of mining, water quality became impaired due to an excess of sediment and temperature, which led to the degradation of the native plant community and provided ideal habitat for Arundo to grow. The project area was chosen for the high density and well-established strands of Arundo.

**Grant Applicant Qualifications:**

RRK is celebrating its 30<sup>th</sup> anniversary in 2023 and has developed and implemented over two dozen habitat restoration, fire recovery, mitigation, and volunteer projects. Since 2017, RRK has conducted fire recovery projects with over 1,000 property owners and \$550,000 in reimbursement-based grants and contracts. RRK has been awarded more than \$500,000 in funds from the California Natural Resources Agency and the State Water Quality Control Board for projects in park development and water quality monitoring. Over the last three years, Sonoma County and RRK coordinated the Clean Team and Clean Camp trash programs with contracts over \$520,000. To date, RRK and the City of Healdsburg have invested over \$110,000 in the Healdsburg Arundo Removal Project for community outreach, permitting, procuring property access agreements, and moving towards project implementation.

RRK's Restoration Program Director, Birkin Newell, is a biologist and a licensed landscape contractor and pesticide applicator and has more than 15 years of experience implementing restoration projects, managing contracts, and supervising staff. Don McEnhill is the Executive Director of RRK and has 22 years of experience developing and managing restoration projects in the Russian River watershed. RRK has continually met the expectations of funders and delivered projects on time and within budget. RRK conducts careful management of financial reporting and implements time keeping systems to ensure the accuracy of staff time and project tracking expenses.

#### **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 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 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 (CAL FIRE, 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 reduce wildfire risk while improving habitat of the channel and floodplain.

**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.**

A nearby Tribe conducted an 80-acre Arundo removal project in Alexander Valley in 2018. RRK met with tribal elders on the Tribe's various fire recovery and restoration projects to gain an understanding of best practices in removing Arundo, the rate of recurrence, and native plant recruitment. While the Tribe's project utilized excavators to mechanically dig Arundo, RRK will be using hand methods, however, follow up techniques will be the same and based on the Tribe's advice. RRK has been advised by the Tribe's former Environmental Director for this project. RRK utilized tribal knowledge for their expertise in the development of this project. The project's farmworkers trained with Tribal members in Lake County through a Traditional Ecological Knowledge fire program and are indigenous people from Oaxaca, Mexico.

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

Arundo impacts are expected to become more severe with climate change. RRK recently adopted a strategic plan which identifies Arundo eradication as one of two priorities. RRK plans to continue to maintain the project area and determine other priority areas for Arundo removal to expand efforts in the watershed. After the initial project period, RRK will commit up to \$20,000 per year, for annual maintenance for ten years. This will support staff to monitor for future re-growth and treat any new plants that propagate or establish after flood events. During the project period and for the ten-year maintenance period RRK will engage property owners to educate them about the benefits of maintaining Arundo eradication efforts. RRK has trained 60 local volunteers and property owners in Arundo removal methods and is planning to continue training additional community members in these methods during implementation. RRK plans to engage more property owners in volunteer work for Arundo removal as they continue implementation of the Project to build local capacity. RRK believes that raising awareness of the fire risks along with building stewardship of the local community will maintain the project benefits into the future.

RRK previously conducted a smaller scale pilot program that removed 22 acres of Arundo. The knowledge from the previous project, combined with resources and input from the local Tribe and the Sonoma Resource Conservation District, found that 3.5 years is a sufficient period to

ensure the current populations of Arundo are eradicated. The 10-year monitoring period is an additional contingency factor in case follow-up maintenance is required.

RRK has demonstrated securing property agreements after the Tubbs, Kincaid, Walbridge, and Glass fires. Agreements were secured with over 1,000 property owners who had lost their homes, a difficult task as physical addresses and landlines no longer existed. Working with real estate agents, title companies, insurance agents, and the County Office of Emergency Services allowed RRK to discuss the project and terms to achieve successful property agreements. RRK has recruited Healdsburg Fire Department and the local CAL FIRE Station to assist with talking with property owners about the benefits of the project, if necessary. The City of Healdsburg and Sonoma County have both passed ordinances that allow eminent domain to abate nuisance weeds if they are deemed a fire hazard; properties with substantial Arundo areas may be subject to this ordinance, however, RRK would prefer to avoid this method and will educate homeowners by outreach methods to acquire necessary agreements.

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

The recommended project will increase community-preparedness and resilience to future climate change impacts under the themes of wildfire, air quality, and drought by removing about 200 acres of highly flammable Arundo. The project reduces the risk of catastrophic wildfire, protecting communities and potentially avoiding the many impacts associated with those fires including smoke inhalation.

Arundo causes sediment to become trapped, which leads to increased erosion and unnatural aggradation rates on gravel bars. By removing Arundo, the river flow and surrounding terrain will be significantly improved. Removing Arundo from the project area will greatly benefit the plant community by reducing competition for water for tree species such as cottonwoods, willows, and walnut. By restoring the five-mile section of river, habitat complexity will be established and benefit salmonid species of special concern.

The training and use of volunteers and property owners on portions of the project will build local capacity and stewardship. RRK has engaged over 60 volunteers and expects to engage over 350 throughout the life of the project. In another Arundo removal project area, residents and dog walkers have been breaking and stomping on new shoots of Arundo, demonstrating increased awareness and stewardship.

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

The planning effort for the Healdsburg Arundo Removal Project was created through collaborations from the Healdsburg Fire Department, City of Healdsburg staff, CAL FIRE officials, fire experts, and community input. The project is a component of the larger and publicly reviewed Healdsburg Community Wildfire Prevent Plan. In developing project plans, Russian Riverkeeper consulted with the local Tribe's fire experts and with Sonoma County and Mendocino County Resource Conservation Districts, Sonoma County Water Agency, and local property owners. RRK met and received input from the Board of the Fitch Mountain Association and the Communities Organized to Prepare for Emergencies (COPE) groups for Fitch Mountain, Healdsburg, and Toyon Ridge.



During a previous project, RRK engaged with the disadvantaged communities of Corazon Healdsburg, the North Bay Jobs with Justice and Resilience Force (NBJJ) and the County of Sonoma, which resulted in the implementation of the 2022 program to provide wildfire prevention training for local farmworkers. With this partnership, RRK and NBJJ developed a compensation program that exceeded pay scales in the local vineyard industry. In response to complaints regarding potentially hazardous working conditions, RRK developed a hazard pay and worker health protection program, which prioritizes the safety of workers and ensures pay in the event of severe smoke levels. RRK plans to hire the same workers for the Healdsburg Arundo Removal Project implementation. Most workers are indigenous to Oaxaca, Mexico.

Roughly 45 unhoused individuals camp in the downstream section of the project area, near the Syar asphalt plant. RRK’s Clean Camp program works with individuals to help maintain a trash-free camp by providing a weekly trash service. RRK works in partnership with the local homeless organization, Reach for Home. RRK, Reach for Home, the City of Healdsburg, and the City of Healdsburg Fire Department discussed the project with the unhoused individuals to ensure they were aware of proposed project activities. Reach for Home and the City of Healdsburg are offering alternative transitional and permanent supportive housing to the individuals in the Project area. RRK will assist the community in moving belongings and cleaning up trash prior to commencing project activities.

Support letters received for the project are shown in Exhibit 6 and are from Senator Mike McGuire, The Healdsburg Fire Department, COPE, the County of Sonoma Board of Supervisors, and the Fitch Mountain Association.

**PROJECT FINANCING**

<b>Coastal Conservancy</b>	<b>\$989,300</b>
Others	\$397,500
<b>Project Total</b>	<b>\$1,386,800</b>

Conservancy funds for this project are expected to come from the Fiscal Year 2021-2022 and 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. RRK will be contributing \$397,500 toward the project, \$70,000 of which funded most of the initial removal of the first ½ mile, pest control applicator licensing for staff, CalVTP monitoring, and hiring a Pest Control Advisor to develop an herbicide use plan. The \$989,000 will fund the 4.5 miles of the project and at least two follow up treatments of the first ½ mile, and CalVTP monitoring requirements.

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 floodplain habitat along the Russian River 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 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 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.

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 reducing ignition risks and removing highly flammable and invasive Arundo.

**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 California Vegetation Treatment Programmatic Environmental

Impact Report (PEIR) for the CalVTP evaluates the environmental impacts of the CalVTP. The CalVTP is described in Chapter 2, “Program Description” of the PEIR. The PEIR has been prepared under the direction of CEQA lead agency, 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 document functions as a Programmatic EIR in accordance with CEQA Guidelines Section 15168 for streamlining of CEQA review of later activities consistent with the CalVTP. The Board certified the PEIR and approved the CalVTP on December 30, 2019.

Using the Project-specific Analysis (PSA) in reliance 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.

The City of Healdsburg Fire Department prepared the Project-Specific Analysis and Addendum to the CALVTP PEIR for the Healdsburg Open Space and Surrounding Community Fuels Reduction Project (“PSA/Addendum”).

The Healdsburg Arundo Removal Project (“proposed project”) is within the Healdsburg Open Space and Surrounding Community Fuels Reduction Project and therefore is within the scope of the PSA/Addendum. All of the effects of the proposed project are covered in the CalVTP PEIR. The project site is entirely within the CalVTP treatable landscape. 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, Greenhouse Gas Emissions, Archaeological, Historical, and Tribal Cultural Resources, and Biological Resources. 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 Archaeological, Historical, and Tribal Cultural Resources and Biological Resources to less than significant levels. While standard project requirements and mitigation measures will reduce potentially significant environmental effects in the areas of Air Quality and Greenhouse Gas Emissions, 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). 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-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 CAL FIRE safety measures and Incident Action Plan (IAP). No other feasible mitigation measures 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 requires the submission of a smoke management plan, AQ-3 requires the creation of a burn plan under the CAL FIRE template for prescribed burns, and AQ-6. No other feasible mitigation measures 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.

#### 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. Mitigation Measure (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, and HYD-4. 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 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 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. 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 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.

#### Greenhouse Gas (GHG) Emissions

Impact GHG-2: Generate GHG Emissions through Treatment Activities due to the use of vehicles and equipment. SPR AQ-3 is applicable to the treatment project. 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.

#### Statement of Overriding Considerations

The project's benefits significantly outweigh and render acceptable the unavoidable Air Quality and Greenhouse Gas Emission 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 wetland habitat through invasive Arundo removal, allowing native

species to thrive. 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 CAL FIRE, as required under the CalVTP program.