El Dorado Irrigation District

NOTICE OF INTENT
TO CONSIDER AN ADDENDUM TO A NEGATIVE DECLARATION

EL DORADO IRRIGATION DISTRICT VEGETATION MANAGEMENT PROJECT

The El Dorado Irrigation District (EID) proposes to consider an Addendum to a Mitigated Negative Declaration (MND) prepared pursuant to the California Environmental Quality Act (CEQA) (Section 15000 et seq., Title 14, California Code of Regulations) for the EID Vegetation Management Project (proposed Project). The proposed Project, approved in 2019, provides for vegetation management activities at four EID facilities: Weber Reservoir, Sly Park Recreation Area, Camp 5 Maintenance Yard, and Flume 46 on the El Dorado Canal. The vegetation management activities associated with the Project are intended to return the areas to a more managed, fire resistant condition and to protect local communities, EID's critical infrastructure, and water quality from the effects of catastrophic wildfire. Since approval of the Project, EID has completed the mechanical mastication and hand treatments on EID-owned lands on the north side of Weber Reservoir as described in the MND. EID has identified the need to add herbicide treatments to the vegetation management prescription in order to control vegetation re-sprouting in previously masticated areas, provide effective fuels management over a longer term, and reduce the frequency of re-treatment. The proposed Addendum to the MND has been prepared by EID to evaluate the addition of herbicide treatments to the proposed Project within an area of approximately 250 acres on previously masticated areas located on lands on the north side of Weber Reservoir.

The proposed Project site is not identified on the lists specified in Government Code section 65962.5. EID is the lead agency under CEQA for the proposed Project and has directed the preparation of an Addendum to the MND to address changes in the approved project in accordance with the requirements of CEQA, the State CEQA Guidelines, and EID's Guidelines for Implementing CEQA. In accordance with CEQA Guidelines, an Addendum may be prepared if only minor technical changes or additions to the adopted MND are required to address the change in the Project and no new significant impacts or mitigation measures are required.

Agencies and members of the public are invited to comment on the proposed Addendum to the MND. The comment period is from June 24, 2021 to July 23, 2021. The proposed Addendum and MND can be reviewed at EID's Customer Service Building, 2890 Mosquito Road, Placerville, CA 95667 or on the EID web site at www.eid.org/ceqa. Comments must be received by 5:00 p.m. on July 23, 2021. Comments can be sent to Doug Venable, Environmental Review Analyst, El Dorado Irrigation District, at the address above or by email at dvenable@eid.org. The Addendum to the MND will be considered by the EID Board of Directors at the regularly scheduled Board of Directors meeting on August 9, 2021, or at a subsequent regularly scheduled meeting of the EID Board of Directors. Please check EID's website for information regarding the meeting time and format: https://www.eid.org/about-us/board-of-directors/meetings-agendas-and-minutes.

In accordance with the Americans with Disabilities Act (ADA) and California law, it is the policy of the El Dorado Irrigation District to offer its public programs, services and meetings in a manner that is readily accessible to everyone, including individuals with disabilities. If you are a person with a disability and require information or materials in an appropriate alternative format; or if you require any other accommodation for this meeting, please contact the EID ADA coordinator at 530.642.4045 or email at adacoordinator@eid.org at least 72 hours prior to the meeting. Advance notification within this guideline will enable the District to make reasonable accommodations to ensure accessibility.

ADDENDUM TO THE
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
(State Clearinghouse No. 2019069040)

FOR THE EL DORADO IRRIGATION DISTRICT
VEGETATION MANAGEMENT PROJECT
WEBER HERBICIDE TREATMENT

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JUNE 2021

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1.0 Introduction

1.1 Background

In July 2019, the El Dorado Irrigation District (EID), as the Lead Agency under the California Environmental Quality Act (CEQA), approved an Initial Study/Mitigated Negative Declaration (IS/MND; State Clearinghouse No. 2019069040) for the EID Vegetation Management Project ("Project" or "Approved Project"). The Approved Project provides for vegetation management activities at four EID facilities (Weber Reservoir, Sly Park Recreation Area, Camp 5 Maintenance Yard, and Flume 46 on the El Dorado Canal) to return the areas to a more managed, fire resistant condition and to protect local communities, EID's critical water system infrastructure, and water quality from the effects of catastrophic wildfire. Vegetation management activities associated with the Approved Project include a variety of treatments and prescriptions such as mechanical mastication and hand treatments, removal of ladder fuels, and tree removal and pruning to inhibit vertical fire spread and reduce the potential for crown fire.

Since approval of the Project in 2019, EID has completed mechanical mastication and hand treatments on EID-owned lands on the north side of Weber Reservoir as described in the 2019 IS/MND. To control vegetation re-sprouting in masticated areas and provide more effective fuels management over a longer term, EID has identified the need to add herbicide treatments to the vegetation management prescription for approximately 250 acres of land in the vicinity of EID's Weber Reservoir facility where mechanical mastication has been completed ("Revised Project"). The Revised Project includes no other changes to the Approved Project. Herbicide treatments would be consistent with management prescriptions carried out on managed timber properties throughout the Project region. Funding for the work is supported by a grant administered through CAL FIRE and is designed to prevent catastrophic wildfire and associated greenhouse gas emissions, protect critical facilities located in a very high fire hazard severity zone, reduce fuel loads and create defensible space for neighboring communities. The Revised Project would extend the effective term of the mechanical treatments and reduce the frequency of re-treatment.

1.2 Purpose of Addendum to the IS/MND

The California Code of Regulations, Title 14, Section 15000 et seq. (State CEQA Guidelines) discuss a lead agency's responsibilities in handling new information that was not included in a project's MND. Section 15162 of the State CEQA Guidelines provides:

a) *When an environmental impact report (EIR) has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:*

    1) *Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;*

    2) *Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to*

the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3) *New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:*

   A. *The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*

   B. *Significant effects previously examined will be substantially more severe than shown in the previous EIR;*

   C. *Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*

   D. *Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

Section 15164(a) of the State CEQA Guidelines provides that an addendum to an adopted negative declaration may be prepared if minor technical changes or additions are necessary or none of the conditions listed above calling for the preparation of a subsequent EIR or negative declaration have occurred. In accordance with CEQA Guidelines Section 15164(e), the addendum should include a brief explanation of the decision not to prepare a subsequent EIR or MND pursuant to Section 15162, and the explanation must be supported by substantial evidence. The addendum need not be circulated for public review. While not required, EID has elected to circulate this addendum to allow for public comment and review.

As further discussed below, although minor changes to the Project are proposed, these changes would result in no new significant impacts, substantial increases in previously identified significant impacts, and would require no new or additional mitigation measures. Therefore, an addendum, rather than a subsequent MND, is appropriate. Note that for the purposes of the following analysis, the term "Approved Project" refers to the project that was analyzed in the IS/MND that was approved by EID in July 2019. The term "Revised Project" refers to the project, as modified by the minor changes that are described in Section 2 of this addendum. The Mitigation Monitoring and Reporting Program adopted by EID for the Approved Project is attached as Appendix A. No changes have been made to the adopted Mitigation Monitoring and Reporting Program and all measures remain applicable to the Revised Project.

2.0 Revised Project

The EID Vegetation Management Project ("Approved Project"), approved in 2019, provides for vegetation management activities at four EID facilities: Weber Reservoir, Sly Park Recreation Area, Camp 5 Maintenance Yard, and Flume 46 on the El Dorado Canal. The vegetation management activities associated with the Approved Project are intended to return the treated areas to a more managed, fire resistant condition and to protect local communities, critical water infrastructure, and water quality from the effects of catastrophic wildfire. As part of the Approved Project, EID has completed mechanical mastication and hand treatments on approximately 321 acres of EID-owned land on the north side of Weber Reservoir as described in the 2019 IS/MND. Figure 1 – Project Location, shows the regional location and overall boundaries of the treatment area. Figure 2 – Weber Treatment Areas, provides detailed mapping of areas where mechanical mastication and hand treatments have occurred, as well as areas where no treatments will occur, such as setbacks to waterways, to protect water quality and sensitive riparian zones. The proposed change in the Vegetation Management Project ("Revised Project") would include the application of herbicide treatments within areas where mechanical mastication has been conducted by EID on approximately 250 acres on the north side of Weber Reservoir within treatment Units 1 and 2 (Figure 2). Herbicide treatments are needed to reduce vegetation re-sprouting in masticated areas to provide more effective fuels management over a longer term and to reduce the required frequency of mechanical re-treatment.

Project Location and Setting

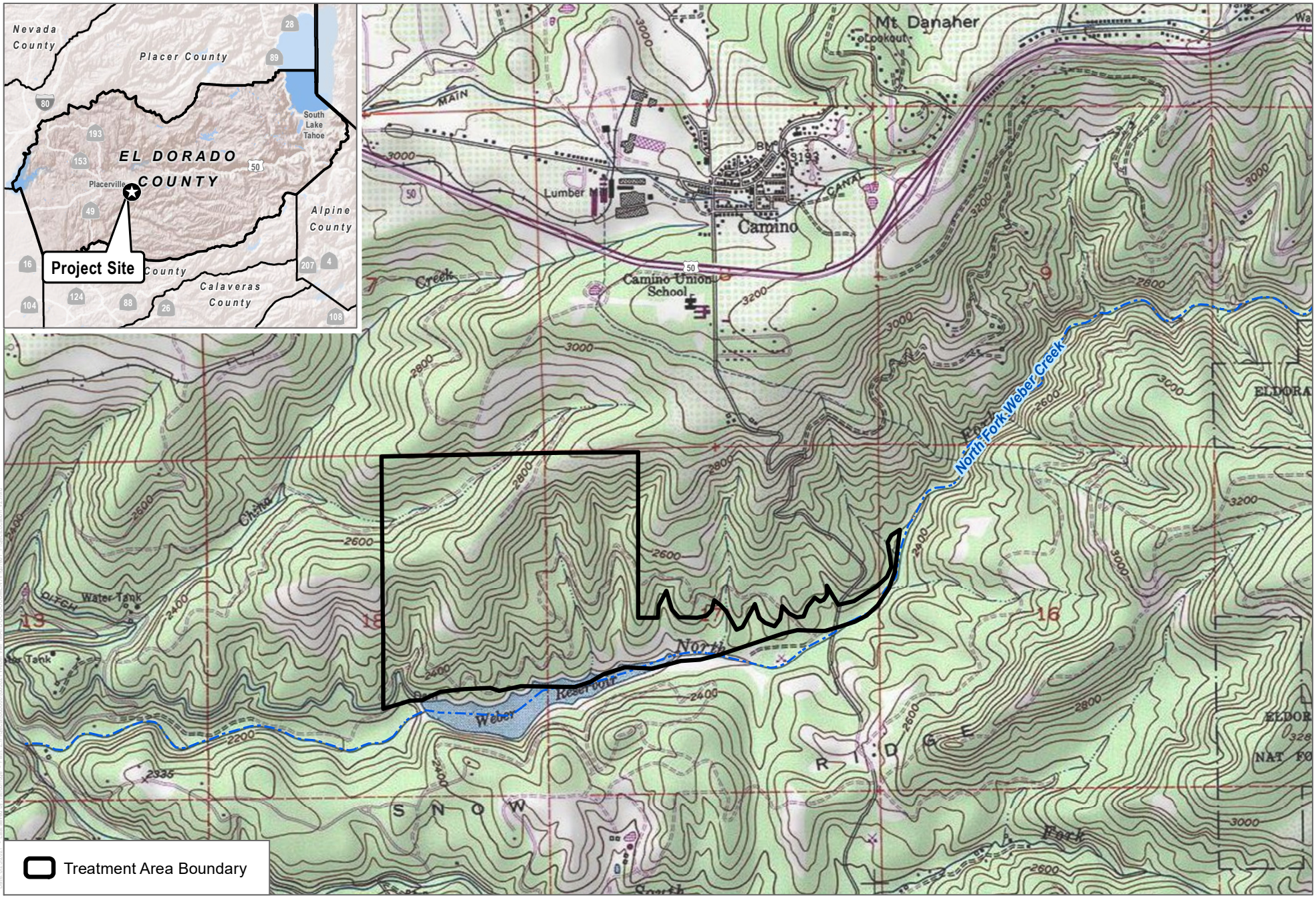
The Revised Project would provide for the application of herbicides in the treated areas adjacent to Weber Reservoir in El Dorado County. Weber Dam and Reservoir is sited along Weber Creek in the Camino community region of El Dorado County (Figure 1). It is located within Township 10 North, Range 12 East, Sections 17, 18, Mount Diablo Base & Meridian within the U.S. Geological Survey (USGS) 7.5-minute Camino Quadrangle. The population centers nearest Weber Reservoir are the rural communities of Camino and Pollock Pines.

The Weber Reservoir fuels treatment activity area, as described in the IS/MND prepared for the Approved Project, includes approximately 321 acres on the north side of Weber Reservoir, sloping generally from north to south at elevations ranging from 2,240 to 2,900 feet above mean sea level. Soils are rocky and cobbly loam derived from volcanic and slate/sandstone parent material. Vegetation in the Weber Reservoir project site is characterized by the transition from foothill annual grassland and mixed chaparral to mixed conifer forest. Several creeks/streams and small, seasonal drainages traverse the site from north to south, as shown in Figure 2. The river drainage, ridgelines, and canyon terrain in the treatment area are oriented in an east-west alignment that combined with prevailing wind direction creates a likely fire path extending directly into the neighborhoods of Camino and Pollock Pines; making this a high priority treatment area for the purpose of controlling wildfire spread, intensity, and impact to communities.

Proposed Treatment Compounds and Methodologies

Herbicides as a vegetation management tool are used to suppress undesirable competing vegetation, allowing the desired species ample space to grow, to reduce or eliminate noxious or invasive weed species, and to eliminate dense regrowth of mechanically removed understory species that contribute to high fuel loads that can result in high fire intensity and rapid wildfire spread into the forest canopy and across the landscape. Herbicide treatments would be conducted by an individual with a Qualified Applicator License (QAL) in accordance with a pest control recommendation prepared by a licensed Pest Control Advisor (PCA). The QAL would apply herbicides to individual

plants using a backpack sprayer and/or a spray rig to selectively target understory shrub and plant species on EID lands on the north side of Weber Reservoir. Target species include, but would not be limited to, buckbrush ceanothus (*Ceanothus cuneatus*), hoary coffeeberry (*Frangula californica* ssp. *tomentella*), manzanita (*Arctostaphylos* sp.), Pacific madrone (*Arbutus menziesii*), toyon (*Heteromeles arbutifolia*), *and poison oak (Toxicodendron diversilobum*). The Revised Project proposes the use of Garlon-4 Ultra (or Vastlan), Rodeo, and SYL-TAC-EA Surfactant; all of which are approved for the intended use in California. Each compound would be mixed with water prior to application and Hi-Light Blue Colorant, a temporary colorant, would be added to the solution to assist in identifying spray patterns on treated areas. All herbicide formulas and applications would be conducted as specified in the licensed PCA's pest control recommendation for the Revised Project (Appendix B).



SOURCE: ESRI Imagery 2021

DUDEK

0 1,000 2,000 Feet

FIGURE 1

Project Location - Weber Reservoir Treatment Area

El Dorado Irrigation District Vegetation Management Project

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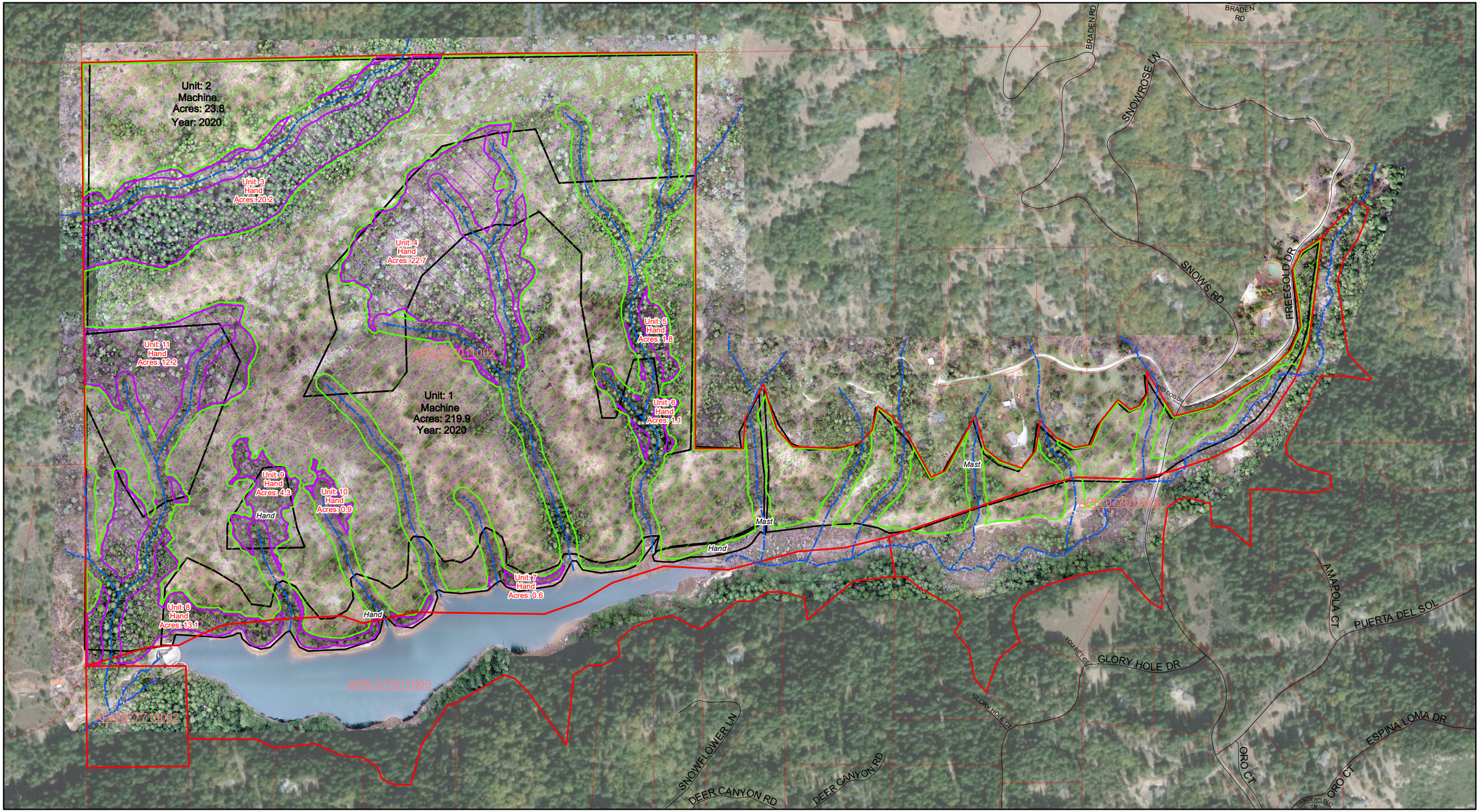

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N

PGC
Mapping Your World

GIS & Map Production:
pricegeographic.com
(208) 920-1903

Legend

- EID Owned Parcels
- Adjacent Parcels
- Roads
- Streams (2021)

Treatment Areas (Total 320.66 ac)

- Hand (Total 76.96 ac)
- Machine (Total 243.70 ac)

Notes:
1. UAV Aerial Imagery collected March 22, 2021
Ortho Photomosaic processed in Pix4D by PGC.
2, NAIP Aerial Imagery collected in 2018
3. Planned Treatment Areas provided by EID
4. Actual Treatment Areas mapped by PGC
5. Parcel lines, Roads by El Dorado County GIS

www.eid.org

Weber Fuel Project

UAV Aerial Mapping
Ortho PhotoMosaic (2021) &
Actual Treatment Areas

Figure 2
Weber Treatment Areas

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All herbicides used would be reported to the El Dorado County Department of Agriculture, as required by the El Dorado County Agricultural Commissioner's Office and the Department of Pesticide Regulation under California's Pesticide Use Reporting (PUR) program. The chemicals would be applied per label instructions and the PCA's pest control recommendation, and would be used, stored, and disposed of in accordance with applicable federal, state, and local laws. The full list of anticipated herbicide compounds and uses are presented in Table 1.

Table 1. Herbicide Compounds and Uses

Herbicide General Name	Primary Compound	Uses
Garlon-4 Ultra	Triclopyr, butoxyethyl ester (60.45%)	For control of woody plants and vines, and annual and perennial broadleaf weeds on forest sites; non cropland areas including: electrical power and utility rights-of-way, industrial sites, non-irrigation ditch banks, pipelines, railroads, roadsides; and natural areas and wildlife habitat and management areas; including grazed areas on all listed sites.
Vastlan	Triclopyr choline, choline salt (54.72%)	For control of woody plant species and annual and perennial broadleaf weeds on range and permanent grass pastures, grasses grown for hay, Conservation Reserve Program (CRP) sites; forest sites, conifer and tree plantations, and Christmas tree plantations; non-crop areas for example, airports, barrow ditches, communication transmission lines or structures, manufacturing and storage sites, electrical power and utility rights-of-way, fencerows, gravel pits, industrial sites, military lands, mining and drilling areas, non-irrigation ditch banks, oil and gas pads, parking lots, petroleum tank farms, pipelines, railroads, roadsides, storage areas, storm water retention areas, substations, unimproved rough turf grasses, vacant lots and other non-crop residential areas, and around farm buildings; natural areas (open space) for example, campgrounds, parks, prairie management, trails and trailheads, recreation areas, wildlife openings and wildlife habitat and management areas; including grazed areas on these sites; and aquatic sites.
Rodeo	Glyphosate N-(phosphonomethyl) glycine, isopropylamine salt (53.8%)	For control of annual and perennial weeds and woody plants in natural and production (plantations), forests for site preparation, mid-rotation release treatments, timber stand improvement activities, non crop sites including industrial sites, rights-of-way (including roadsides, electric utility and communication transmission lines, pipelines, railroads, airports), irrigation and drainage ditches, canals, reservoirs, natural areas (including wildlife management areas, wildlife openings, wildlife habitats and refuges, parks and recreational areas, campgrounds, trailheads and trails), rangeland, and in and around aquatic sites and wetlands; also for perennial grass release, and grass growth suppression and grazed areas on these sites.
SYL-TAC-EA	Ethylated seed oil: Polyether-Polymethylsiloxane-Copolymer and Polyether (100%)	Used in conjunction with various agricultural chemicals, to provide spreading, wetting and penetration of the active ingredient(s) into the plant tissue.

Herbicide applications could occur during dry conditions throughout the year and would most likely occur in late spring through fall. Herbicides would be applied to individual resprouting plant species on a spot treatment basis using a directed ground spray to avoid herbicide waste and limit application to target species. Maintenance of these invasive and resprouting species would occur annually or as needed to control resprouts. Herbicide application would not occur when wind speed exceeds 10 miles per hour or when drift is visually observed. Herbicide treatments would not occur in or near any lakes, ponds, streams or other bodies of water; as shown in Figure 2, treatment areas would be limited to masticated treatment areas and would avoid all streams and drainages within the treatment area.

Project Authorization and Grant Funding

The Revised Project would be financed with grant funds administered by CAL FIRE and financed with surplus funds from CAL FIRE grant number 5GG17111 (Weber Lake Vegetation Management Project). CAL FIRE authorized the Project on February 11, 2021.

3 Impact Analysis

3.1 Topics Eliminated from Further Analysis

It has been determined that the Revised Project would result in no change in environmental effects in the resource topics identified below, and that no further analysis of these topics beyond that included in the 2019 IS/MND is required. A brief discussion of the determination is provided below.

Aesthetics

The IS/MND prepared for the Approved Project concluded that implementation of the prescribed vegetation management activities would not result in significant aesthetic impacts. The Approved Project would maintain the scenic resources of the treatment areas by retaining the existing forested characteristics and protecting against catastrophic wildfire that could substantially alter the existing landscape. The overall visual character of the treatment area within the forested landscape would be unchanged in the long term and vegetation management activities would improve the long-term viability of the scenic landscape by creating conditions to promote a more fire resilient forest and would reduce the potential for wildfire to damage structures in the area. Activities associated with the Approved Project would not introduce new sources of substantial light or light that would adversely affect day or nighttime views in the area.

The Revised Project would not change the vegetation management activities associated with the Approved Project. However, the Revised Project proposes to apply herbicide to an area of approximately 250 acres of treated land on the north side of Weber Reservoir. Herbicides would be applied to control vegetation re-sprouting in masticated areas and provide more effective fuels management over a longer term and reduce the frequency of re-treatment. The application of herbicides would be limited to the Weber Reservoir treatment area, which is an area that was included within and evaluated with the Approved Project. The Revised Project would not result in new or more significant visual impacts beyond those identified in the IS/MND prepared for the Approved Project. Impacts would remain less than significant, as concluded by the 2019 IS/MND.

Agriculture and Forestry Resources

The areas within the Approved Project site are not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide importance, as shown on the maps prepared pursuant to the Farmland Mapping Monitoring Program of the California Resources Agency. The Project site is not zoned for agricultural use or under a Williamson Act contract. Vegetation treatment activities associated with the Approved Project would not alter the land use, conflict with existing zoning or cause rezoning of forest land or timberland. Vegetation management activities associated with the Approved Project would follow the provisions set forth by the California Forest Practice Rules and would not result in the loss of forest land or conversion of forest land to non-forest use.

The Revised Project would entail the application of herbicides to approximately 250 acres of masticated lands adjacent to the Weber Reservoir and within the boundaries of Approved Project site. No activities would occur on land previously unevaluated. Accordingly, agriculture and forestry resource impacts would remain less than significant, consistent with the findings of the 2019 IS/MND prepared for the Approved Project.

Cultural Resources

The Approved Project would not involve disturbance to any known cultural resources. While the vegetation management practices previously evaluated carry the potential to negatively impact previously unknown resources or remains, the implementation of mitigation measures identified in the IS/MND prepared for the Approved Project would ensure that vegetation management activities have a less than significant impact.

The Revised Project would provide for herbicide treatment in previously masticated areas. This proposed change to the Approved Project would not result in ground disturbing activities and would not include activities on land previously unevaluated. The Revised Project would be subject to implementation of the mitigation measures identified in the 2019 IS/MND to ensure that impacts to undiscovered resources and remains would be less than significant, consistent with the conclusion of the 2019 IS/MND.

Energy

The 2019 IS/MND prepared for the Approved Project concluded that impacts due to wasteful, inefficient, unnecessary consumption of energy resources during vegetation management activities would be less than significant. The equipment and machinery used during project activities would comply with all state and local energy efficiency standards.

The Revised Project, which entails the application of herbicide to treated areas within the project site, would not result in any new energy-related impacts not already analyzed in the 2019 IS/MND and would not increase the severity of any impact identified and analyzed for the Approved Project.

Geology and Soils

The Approved Project would not include the construction of structures that would be subject to geologic hazards. While the 2019 IS/MND concluded that vegetation activities associated with the Approved Project could result in soil erosion, EID would follow all measures set forth in the California Forest Practice Rules. Compliance with the California Forest Practice Rules would reduce the potential for soil erosion. The 2019 IS/MND determined that impact would be less than significant.

The Revised Project would include the application of herbicides to approximately 250 acres of land adjacent to Weber Reservoir. There would be no new disturbance or development associated with the proposed change nor would there be a change in land use associated with its implementation. Impacts would remain less than significant.

Land Use and Planning

The Approved Project would not result in development and would be consistent with the Sly Park Recreation Area (SPRA) Master Plan and the California Forest Practice Rules.

The Revised Project would include the application of herbicides to approximately 250 acres of land adjacent to the Weber Reservoir. There would be no new development associated with the proposed change nor would there be a change in land use associated with its implementation. The Revised Project would result in no land use impacts.

Mineral Resources

The Approved Project would not occur within an area with a known mineral resource and would not result in a loss

of availability of an unknown mineral resource. There are no mineral extraction sites on or in the vicinity of the project area. The project area is also not included in any Mineral Resources designation of the El Dorado General Plan. The IS/MND for the Approved Project concluded that there would be no impacts to mineral resources.

The Revised Project would include herbicide treatment to previously masticated areas within the Approved Project site. There would be no ground disturbing activities associated with the herbicide application and the treatment activities would not occur on land previously unevaluated. Therefore, the Revised Project would not result in impacts to mineral resources.

Noise

The Approved Project would include the use of mechanical mastication equipment, chainsaws, chippers, pole saws, and hand tools. As indicated in the IS/MND, vegetation clearance would cause short-term and temporary increases in noise levels that could exceed County noise compatibly standards on short term basis. Noise generated by project activities would move as specific treatment areas are targeted at each of the sites and cease upon completion of the vegetation clearance. Project-related activities may also generate perceptible vibration and groundbourne noise levels in the immediate vicinity. However, proposed activities would be short-term, intermittent, and occur during daytime hours. Therefore, noise impacts associated with the Approved Project were determined to be less than significant.

The Revised Project would include the application of herbicide to previously masticated areas north of Weber Reservoir and would not result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity, nor would it produce any noticeable ground-borne vibration. Herbicide applications would be carried out during normal daytime hours as described for the Approved Project in the 2019 IS/MND. No public or private airports are within 2 miles of the project site, and the site is not within an airport land use plan. The Revised Project would not result in any new impacts nor increase the severity of a significant impact as previously identified and analyzed in the adopted MND. Impacts would remain less than significant.

Population and Housing

The vegetation management activities associated with the Approved Project would not directly or indirectly induce substantial unplanned population growth, nor would Project-related activities displace housing or people. The IS/MND for the Approved Project concluded that there would be no population or housing impacts.

The Revised Project would not include the construction of new homes or businesses nor would it directly or indirectly induce substantial unplanned population growth or result in the displacement of housing or people. Consistent with the findings of the 2019 IS/MND prepared for the Approved Project, there would be no population or housing impacts associated with the Revised Project.

Public Services

Implementation of the Approved Project would reduce future fire intensity and severity by reducing surface fuels, increasing the height to tree canopy, decreasing crown density, and retaining large fire-resistant trees. The Approved Project would not include new housing or businesses that would increase population levels and result in an increase demand for fire, police, school, parks, or other public services and facilities. The 2019 IS/MND concluded that the Approved Project would have no impact related to the provision of public services.

The Revised Project would not include construction of new homes or businesses and would not result in an increased demand for public services. There would be no impact.

Recreation

The Approved Project would not increase the population in the project area because of new housing or employment opportunities nor would it include recreational facilities or create additional recreational demand that would increase the use of existing neighborhood and regional parks or other recreational facilities.

Consistent with the Approved Project, the Revised Project would have no impact related to recreational facilities. The Revised Project would not create a demand for additional park facilities or require the construction of additional park or recreational facilities. The Revised Project does not include new housing and would not generate the need for new housing. Consistent with the 2019 IS/MND, the Revised Project would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. The Revised Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical adverse physical effect on the environment. Consistent with the findings of the 2019 IS/MND prepared for the Approved Project, no recreation impacts would occur with implementation of the Revised Project.

Transportation

The Approved Project would not include the construction of land uses that would result in an increase in traffic to the site. Traffic volumes to the site following implementation of vegetation management activities would not change as compared to current traffic volumes. While there would be a slight short-term increase in traffic volumes during implementation of the Approved Project, long-term vehicle miles traveled would not increase. Access to the treatment sites would be provided from existing roadways with adequate line of site. The Approved Project would not substantially increase hazards due to a design feature or incompatible use and emergency access would be maintained on all public roads during project-related activities. Traffic-related impacts associated with the Approved Project were determined to be less than significant.

The Revised Project would include the application of herbicide to treated areas within the Approved Project site in the area north of Weber Reservoir. This activity would not result in any long-term changes to traffic volumes to the Weber treatment area. Impacts would remain less than significant, consistent with the findings of the 2019 IS/MND prepared for the Approved Project.

Tribal Cultural Resources

Tribal consultation was conducted by EID. On October 10, 2019, tribes requesting consultation pursuant to AB 52 were notified of the Approved Project. Tribes notified include United Auburn Indian Community of the Auburn Rancheria, Wopumnes Nisenan-Mewuk Nation of El Dorado County, Torres Martinez Desert Cahuilla Indians, and Wilton Rancheria. United Auburn Indian Community of the Auburn Rancheria (UAIC) responded and requested consultation. On March 20, 2019, EID met with the United Auburn Indian Community of the Auburn Rancheria and toured the Sly Park and Weber Reservoir sites. No tribal cultural resources within the project area have been identified as a result of this consultation. Though unlikely, soil disturbance during project activities could damage previously unrecorded cultural resources. If buried historical or archaeological resources were inadvertently discovered and impacted during implementation of the Approved Project, this would be a potentially significant impact. Accordingly, the IS/MND prepared for the Approved Project includes a mitigation measure to ensure that impacts remain less than significant.

The Revised Project would not result in changes to the vegetation management activities associated with the Approved Project. The Revised Project would provide for herbicide application in a portion of the Approved Project area. The herbicide application would occur to previously masticated areas and would not result in additional ground disturbance. The mitigation measures prescribed in the IS/MND would still be applicable and necessary to reduce the significance of impacts under the Revised Project.

Utilities and Service Systems

The Approved Project would involve vegetation management within EID-owned land. No structures or facilities would be constructed as a result of the Approved Project and there would be no increased demand for water supply, water, or wastewater treatment services. All materials produced by the Approved Project would be green waste and would be utilized within the site for ground cover and slope stabilization. The Approved Project would not substantially alter drainage patterns or increase runoff on the treatment sites, and therefore no new storm water drainage facilities or expansion of existing storm water facilities would be necessary. Therefore, no impact would occur.

The Revised Project would include the application of herbicides within the Weber Reservoir treatment area. The Revised Project would not include any development or increased demand for utility services. The Revised Project would not require or result in the construction or expansion of any public utilities. The Revised Project would have no impacts to utilities and services systems, consistent with the findings of the 2019 IS/MND prepared for the Approved Project.

Wildfire

The IS/MND prepared for the Approved Project concluded that there would be no impacts related to wildfire risks. The purpose of the Approved Project is to reduce fuel load within the forested Project site. Implementation of the Approved Project would support several wildfire strategic plans and the approved vegetation management activities would help to reduce the risk of potential wildfires.

The Revised Project includes herbicide treatment to 244 acres near Weber Reservoir. The application of herbicide would not increase the risk of accidental fire ignition and would reduce the overall fuel load. Wildfire prevention measures, as discussed in Section 3.2.4(g) of this Addendum, would apply to the Revised Project. Herbicide treatment would extend the effective term of the mechanical treatments and reduce the frequency of re-treatment. Accordingly, the Revised Project would have no impact related to exacerbating wildfire risks.

3.2 Topics Analyzed with Proposed Change

In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code §§ 21000-21178.1), this Addendum has been prepared using the Initial Study (IS) form Appendix G of the CEQA Guidelines to analyze the Revised Project to determine if any potential significant impacts upon the environment would occur beyond those disclosed in the adopted MND for the Approved Project.

Evaluation of Environmental Impacts

3.2.1 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Setting

The Revised Project site is located within the Mountain Counties Air Basin (MCAB) and is within the jurisdictional boundaries of the El Dorado County Air Quality Management District (EDCAQMD), which has jurisdiction over El Dorado County. Primary sources of air pollution in the Project vicinity include local vehicle and equipment emissions, industrial emissions from nearby metropolitan areas, emissions associated with wildfire and wood-burning appliances, and dust particulates.

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants that are evaluated include volatile organic compounds (VOCs, also referred to as reactive organic gases (ROGs)), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), particulate matter with an aerodynamic diameter less than or equal to 10 microns in size (PM_{10}), and particulate matter with an aerodynamic diameter less than or equal to 2.5 microns in size ($PM_{2.5}$). VOCs and NO_x are important because they are precursors to ozone (O_3) formation. Criteria air pollutant emissions from construction activities is typically associated with operation of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicle trips. Operational

emission sources for a utility project such as a flume or canal replacement would typically include mobile (vehicle) sources related to maintenance and operation, and area sources associated with use of consumer products, as well as energy use associated with facility operations (power generation).

The significance criteria used to evaluate the Project impacts to air quality is based on the recommendations provided in Appendix G of the CEQA Guidelines. For the purposes of this air quality analysis, a significant impact would occur if the project would (14 CCR 15000 et seq.):

1. Conflict with or obstruct implementation of the applicable air quality plan.
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
3. Expose sensitive receptors to substantial pollutant concentrations.
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

In addition, Appendix G of the CEQA Guidelines indicates that where available, the significance criteria established by the applicable air quality management district may be relied upon to determine whether a project would have a significant impact on air quality. The EDCAQMD has adopted thresholds to address the significance of air quality impacts resulting from a project. These thresholds are identified in Table AIR-1. According to the EDCAQMD, if ROG and NO_x are less than significant during construction, then exhaust CO and PM_{10} are also considered to be less than significant. During operation, if ROG and NO_x are less than significant, then exhaust CO, nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and PM_{10} would also be considered less than significant.

Table AIR-1. EDCAQMD Air Quality Significance Thresholds

Pollutant	Construction Thresholds	Operational Thresholds
	Maximum Daily Emissions (lbs/day)	
ROG	82	82
NO_x	82	82

Source: EDCAQMD 2002.
Notes:
Construction Screening: If ROG and NO_x are less than significant during construction, then exhaust CO and PM_{10} would also be less than significant.
Operational Screening: If ROG and NO_x are less than significant during operation, then exhaust CO, NO_2, SO_2, and PM_{10} would also be less than significant.
EDCAQMD = El Dorado County Air Quality Management District; lbs/day = pounds per day; ROG = Reactive Organic Gases; NO_x = nitrogen oxides.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

The Mountain Counties Air Basin (MCAB) is currently non-attainment for ozone (O3) (state and federal ambient standards) and particulate matter (PM10) (state ambient standard). While an air quality plan exists for ozone, none currently exists for particulate matter. The Sacramento Regional 2008 NAAQS (National Ambient Air Quality Standards) 8-Hour Ozone Attainment Plan and Reasonable Further Progress Plan (Ozone Attainment Plan) was developed for application within the Sacramento region, including the MCAB portion of El Dorado County (SMAQMD 2017). If a project can demonstrate consistency with the Ozone Attainment Plan for ROG and NOx emissions, it would be determined that it would not have a significant cumulative impact with respect to ozone.

Projects within the MCAB portion of the County are considered consistent with the Ozone Attainment Plan if they are found to meet the following consistency criteria:

1. The project does not require a change in the existing land use designation (e.g., a general plan amendment or rezone), or projected emissions of ROG and NOx from a project are equal to or less than the emissions anticipated for the site if development occurred under the existing land use designation;
2. The project does not exceed the "project alone" significance criteria;
3. The lead agency for the project requires the project to implement any applicable emission reduction measures contained in and/or derived from SMAQMD's Ozone Attainment Plan; and
4. The project complies with all applicable district rules and regulations.

With regard to the first criteria for determining compliance of the Revised Project with the Ozone Attainment Plan, it must be determined the population density and land use that would result from the Revised Project are consistent with the growth assumptions used in the plans for the MCAB.

The Revised Project includes no uses that would generate a long-term increase in population or vehicle miles traveled and does not propose additional land for development or require a change in land use designations applied to the project sites and would not result in a long-term increase in population or vehicle miles traveled in the region. Furthermore, the Revised Project would not directly induce substantial population growth in the area because the Revised Project includes no new housing. Therefore, the Revised Project would be consistent with the regional growth forecasts and would not conflict with or exceed the assumptions of the Ozone Attainment Plan.

The second criterion requires that the Revised Project's contribution to existing air quality violations be evaluated. The Revised Project would add few temporary vehicle trips to the overall number of trips required to carry out the vegetation management treatments and would reduce the need for future larger scale mechanical vegetation treatments that would result in greater use of gas-powered vehicles and equipment. The Revised Project does not include any proposed actions that would substantially increase the contribution to existing air quality violations over that evaluated for the Approved Project in the 2019 IS/MND.

To evaluate consistency with the third criterion the Revised Project's compliance with control measures in the Ozone Attainment Plan must be evaluated. Most of the control strategies in the Ozone Attainment Plan include measures in the categories of transportation and stationary sources. The non-regulatory control measures include on-road and off-road mobile incentive programs, and an emerging/voluntary urban forest development program. These are followed by the regulatory control measures which include indirect source rules and a variety of stationary and area-wide source control measures (CARB 2008). The California Air Resources Board's (CARB's) strategy for reducing mobile source emissions includes the following: new engine standards, reducing emissions from the in-use fleet, requiring the use of cleaner fuels, supporting the use of alternative fuels, and pursuing long-term advanced technology measures. The Revised Project introduces no new elements that would result in any conflict with CARB's strategy for controlling mobile source emissions that has not been previously evaluated by the 2019 IS/MND.

The final criterion requires evaluating compliance with EDCAQMD rules and regulations. The Revised Project will comply with all applicable EDCAQMD rules during implementation. The EDCAQMD has adopted rules designed specifically to address a variety of air quality impacts through measures that regulate

various activities and their related air quality emissions. Rules designed to control air pollutant emissions, and which may be applicable to the Revised Project include:

- Rule 210 related to the discharge of air contaminants
- Rule 223 related to fugitive dust
- Rule 223-1 related to fugitive dust from construction and disturbed areas
- Rule 223-2 related to asbestos
- Rule 300 relates to the regulating of the burning of wastes that result from land development clearing.

In summary, the Revised Project does not conflict with the growth assumptions for the region, does not exceed the EDCAQMD significance thresholds, would be consistent with all control measures of the Ozone Attainment Plan, and would comply with applicable EDCAQMD rules. The Revised Project would not conflict with or obstruct implementation of an applicable air quality plan and would therefore result in a **less than significant** impact associated with conflict or obstruction of an applicable air quality plan.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the EDCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used in the determination of whether a project's individual emissions would have a cumulatively considerable contribution on air quality. If a project's emissions would exceed the EDCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. The 2019 IS/MND provided a quantitative analysis to determine whether the Approved Project would result in a cumulatively considerable net increase in emissions of criteria air pollutants for which the MCAB is designated as nonattainment under the National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS).

Appendix G of the CEQA Guidelines indicates that, where available, the significance criteria established by the applicable air district may be relied upon to determine whether a project would have a significant impact on air quality. The EDCAQMD has established Air Quality Significance Thresholds which set forth quantitative emissions significance thresholds below which a project would not have a significant impact on ambient air quality (EDCAQMD 2002). The 2019 IS/MND determined that the Approved Project would not result in any exceedance of EDCAQMD thresholds

The Revised Project would result in a minimal and temporary addition of pollutants to the local airshed caused by on-site sources (i.e., operation of an ATV or UTV with spray rig) and off-site sources (i.e., worker vehicle trips). Short-term operation of an ATV or UTV for several days during herbicide application would not substantially increase overall project emissions and would not result in daily emissions approaching EDCAQMD daily significance thresholds. Furthermore, the Project would comply with all applicable EDCAQMD rules and regulations during the treatment activities.

Emissions of carbon monoxide (CO) from idling vehicles can create pockets of high CO concentrations, called "hot spots." These pockets can exceed the state standards for CO. High CO concentrations can cause headaches, dizziness, and nausea and can contribute to chronic health conditions. At very high

concentrations and/or with prolonged contact, CO exposure can be fatal. Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service, where many thousands of cars are idling, and/or with extremely high traffic volumes. Implementation of the Revised Project would not result in a large number of vehicles idling or unacceptable levels of service, as discussed in Section 3.1, and the Revised Project would not result in significant CO concentrations.

The Revised Project includes no new stationary emission sources and no impact to air quality would result from stationary source emissions. The Revised Project would not violate any air quality standard and impacts associated with the Revised Project's contribution to regional emissions would be **less than significant**.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Air quality varies as a direct function of the amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions. Air quality problems arise when the rate of pollutant emissions exceeds the rate of dispersion. Reduced visibility, eye irritation, and adverse health impacts upon those persons termed "sensitive receptors" are the most serious hazards of existing air quality conditions. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution, include children, the elderly, athletes, and people with cardiovascular and chronic respiratory diseases. Sensitive receptors include residences, schools, playgrounds, child-care centers, athletic facilities, long-term health-care facilities, rehabilitation centers, convalescent centers, and retirement homes. The discussion below reviews the significance of emissions within the context of potential impacts to sensitive receptors.

Toxic Air Contaminants. The greatest potential for toxic air contaminants (TACs) during construction would be diesel particulate matter (DPM) emissions from heavy equipment operations and/or heavy-duty trucks during implementation of the proposed treatment activities and the associated health impacts to sensitive receptors. Emissions of TACs are normally localized and not region-wide. EDCAQMD considers implementation of "project alone" mitigation requirements, and compliance with all applicable emission limits and mitigation measures required by EPA, CARB, EDCAQMD rules and regulations, and local ordinances sufficient for a finding of less than significant related to TACs. The Revised Project would not require the extensive use of heavy-duty construction equipment, which is subject to CARB's Airborne Toxic Control Measures for in-use diesel construction equipment to reduce DPM emissions, and it would not involve extensive use of diesel trucks.

Herbicide Application: Herbicide applications would be carried out by a QAL in accordance with a pest control recommendation prepared by a licensed PCA. Applications would be conducted during calm conditions and by spot applications of ground-directed sprays to avoid any drift of pesticides to non-targeted areas. Herbicide applications would be limited to onsite areas and no impact to offsite areas would occur.

Therefore, the Revised Project would not result in exposure of sensitive receptors in the vicinity of the project site to substantial TAC concentrations and no herbicide drift to offsite areas or sensitive receptors would occur with implementation of the proposed herbicide application. Impacts would be **less than significant**.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

It is possible that odors could be released during implementation of the proposed project changes. Objectionable odors could be generated from the application of herbicides in the immediate area of application prior to surface application drying. Herbicide applications would be carried out by a QAL in accordance with a pest control recommendation prepared by a licensed PCA. Applications would be conducted during calm conditions and by spot applications of ground-directed sprays to avoid any drift of pesticides to non-targeted areas. Herbicide applications would be limited to onsite areas and no impact to offsite areas would occur. The Project site is located away from residences and other occupied facilities, and the Project includes no activities that are expected to result in odors inconsistent with normal motor vehicle or landscaping equipment operation. The potential release of odors associated with treatment activities and equipment would be minor, temporary, and unlikely to be detectable from rural residential or public places in the vicinity of the Project; impacts would be **less than significant**.

Mitigation Measures

No mitigation measures are necessary.

3.2.2 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
BIOLOGICAL RESOURCES – Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Setting

EID's Vegetation Management Program includes approximately 570 acres of District-owned property spanning the four following District facilities located in El Dorado County, California:

- Weber Reservoir
- Sly Park Recreation Area (SPRA)
- Camp 5 Maintenance Yard (Camp 5)
- Flume 46 on the El Dorado Canal (Flume 46)

The biological study area for the Approved Project encompasses the locations of EID's facilities as well as adjacent lands that were surveyed by biologists as part of the evaluation included in the 2019 IS/MND. Biological surveys were conducted within and adjacent to each project site for vegetation type, wetlands and other waters, riparian habitat, wildlife habitats, and general observations of wildlife usage. The combined project sites total approximately 570 acres of temporary disturbance associated with project staging, access, vegetation treatment, and monitoring. The Revised Project would provide for herbicide application on approximately 250 acres of masticated lands in the designated treatment area adjacent to Weber Reservoir (see Figure 2). The Revised Project would not change any other components of the Approved Project or extend treatments to areas outside of the study area evaluated in the 2019 IS/MND for the Approved Project.

Weber Reservoir is located on North Fork Weber Creek. The treatment area around Weber Reservoir consists of approximately 321 acres on the north side of the reservoir. Soils in the treatment area are rocky and cobbly loam derived from volcanic and slate/sandstone parent material. Vegetation in the Weber Reservoir treatment site is characterized by the transition from foothill annual grassland and mixed chaparral to mixed conifer forest. Several creeks/streams and small, seasonal drainages traverse the site from north to south.

As discussed in the IS/MND prepared for the Approved Project, biological resources field surveys of the study area were conducted in March of 2019. Field surveys identified, characterized, and documented onsite vegetation communities and land cover types; and evaluated the potential for special-status plant and animal species to occur

within the study area, based on habitat types observed within the study area. The findings and recommendations of the surveys are included in the 2019 IS/MND and summarized below.

Special Status Plants: No special-status plant species were found in the study area during the reconnaissance surveys. The database searches resulted in 35 special-status plant species being evaluated for their potential to occur in the study area or vicinity. Of these, the 2019 IS/MND concluded that 23 species have no potential to occur because of a lack of suitable habitat or the study area is outside the known elevation range of the species. The remaining 12 species were determined to have some potential to occur in the study area. Of these, Tehachapi monardella (*Monardella linoides ssp. oblonga*) is considered not likely to occur; no occurrences of Tehachapi monardella have been recorded near the study area, and even though potentially suitable habitat may occur, the species' current known range is restricted to areas far from the study area.

There are occurrence records of 6 special-status plant species within 5 miles of the study area. Of these, 4 species are considered likely to occur: Pleasant Valley mariposa lily (*Calochortus clavatus* var. *avius*), oval-leaved viburnum (*Viburnum ellipticum*), Red Hills soaproot (*Chlorogalum grandiflorum*), and Stebbins phacelia (*Phacelia stebbinsii*). The other special-status plants were determined to have no potential to occur due to lack of specific habitat requirements (e.g., clay soils, shale ridges, serpentine soils, decomposed granite soils).

Special Status Wildlife: No special status wildlife species were identified onsite during the reconnaissance surveys. Twelve special-status wildlife species have a low potential to occur within or near the study area; Southern longtoed salamander (*Ambystoma macrodactylum sigillatum*), California red-legged frog (*Rana draytonii*), foothill yellow-legged frog (*Rana boylii*), Western pond turtle (*Emys marmorata*), Northern goshawk (*Accipiter gentilis*), California spotted owl (*Strix occidentalis, occidentalis*), sharp-shinned hawk (*Accipiter striatus*), Sierra Nevada mountain beaver (*Aplodontia rufa californica*), hoary bat (*Lasiurus cinereus*), silver-haired bat (*Lasionycteris noctivagans*), fringed myotis (*Myotis thysanodes*), and long-legged myotis (*Myotis Volans*). One special-status species is known to occur at the Sly Park Recreation Area; bald eagle (*Haliaeetus leucocephalus*).

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No special-status plant or wildlife species were observed during reconnaissance-level surveys. However, the 2019 IS/MND concluded that suitable habitat is present on or adjacent to the study area for several special-status plant and wildlife species that occur within the Sierra Nevada foothills. The 2019 IS/MND concluded that project activities could result in potentially significant impacts on populations of special status plants through ground and vegetation disturbance.

To reduce potentially significant impacts to special status species to a less than significant level, the 2019 IS/MND identified Mitigation Measures BIO-1, BIO-2, BIO-3, and BIO-4. Mitigation Measure BIO-1, which requires pre-construction surveys for special status plants and measures to be implemented to avoid or reduce impacts if special status plants are discovered, would reduce or avoid impacts on special-status plant populations. Mitigation Measure BIO-2 requires pre-construction nesting surveys and measures to avoid or minimize disturbance or disruption of any active nesting sites of migratory birds and/or raptors if active nests are discovered. Mitigation Measure BIO-3 requires habitat assessments for bats prior to vegetation removal activities and measures to avoid or minimize impacts to any active roost sites. Mitigation Measure BIO-4 requires EID to develop a worker environmental awareness program and provide environmental training to all personnel working on the project site during vegetation removal to ensure that

workers are aware of potential for special-status species to occur and aware of required protocol should special-status species be discovered during project implementation.

The aforementioned mitigation measures would apply to herbicide treatment activities included in the Revised Project and would ensure that impacts to special-status species with potential to occur within the treatment area would be less than significant. The herbicide application associated with the Revised Project would occur in disturbed areas where vegetation management activities carried out as part of the Approved Project have been implemented and mitigation measures would ensure that herbicide treatments would avoid impacts to any special-status species. All herbicides selected for use are recommended for use in wildlife management areas, as noted in Table 1, and would be handled, applied, and disposed of by a QAL in accordance with the recommendations of the PCA, safety data sheet and all local, state, and federal laws. Impacts would remain **less than significant**, consistent with the findings of the 2019 IS/MND prepared for the Approved Project.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No sensitive natural vegetation communities are present in the proposed treatment area. As noted in the 2019 IS/MND prepared for the Approved Project, the edges of Weber Reservoir may provide riparian habitat functions and several linear drainages, most of which are seasonal in nature, were mapped in the study area and may also contain riparian habitat. Riparian habitat is under the jurisdiction of CDFW under Section 1600 of the California Fish and Game Code, and includes vegetation growing in association with waterways (e.g., creeks and drainages).

Project-related activities, including herbicide treatments, would avoid all riparian habitat and onsite drainages and would result in no direct or indirect temporary or permanent loss of riparian habitat or removal of riparian vegetation. As shown in Figure 2, no project activities are proposed within a water body/water course, and Watercourse and Lake Protection Zones established by a Registered Professional Forester would be observed around all watercourses, lakes, channels, flood-prone areas, and riparian zones in accordance with California Forest Practice Rules (Title 14, California Code of Regulations, Chapters 4, 4.5, and 10) (CAL FIRE 2017). Impacts to riparian zones would be less than significant.

As concluded in the 2019 IS/MND prepared for the Approved Project, implementation of Mitigation Measures BIO-4 and BIO-5 would ensure that impacts to riparian habitat are avoided or minimized and would ensure that impacts to riparian habitat remain less than significant. As discussed previously, Mitigation BIO-4 requires EID to develop a worker environmental awareness program and provide environmental training to all personnel working on the project site during vegetation treatment activities. Mitigation Measure BIO-5 stipulates that EID shall avoid and minimize indirect impacts on riparian habitat by implementing Watercourse and Lake Protection Zones, and measures to minimize erosion and runoff in accordance with California Forest Practice Rules (Title 14, California Code of Regulations, Chapters 4, 4.5, and 10).

Herbicide application included in the Revised Project would be subject to the aforementioned mitigation measures. Vegetation management activities associated with the Approved Project have been completed in the Weber Reservoir treatment area and herbicide application under the Revised Project would occur within previously disturbed areas and no herbicide applications would occur within riparian habitat within

Watercourse and Lake Protection Zones. Herbicide treatments would be consistent with management prescriptions carried out on managed timber properties throughout the Project region and all herbicides would be handled, applied, and disposed of in accordance with the safety data sheet and all local, state, and federal laws. Impacts would remain **less than significant**, consistent with the findings of the 2019 IS/MND prepared for the Approved Project.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No activities are proposed within a water body/water course; therefore, activities associated with the Revised Project would result in no direct fill or indirect temporary or permanent loss of state or federally protected wetlands. Herbicide treatments would be conducted by a QAL under the direction of a PCA and no herbicide would be applied to any hydrologic features and herbicide would only be applied during dry and calm weather conditions. Equipment mobilization and staging areas for the proposed herbicide application activities would be located in existing access roads and uplands (i.e., annual grassland and ruderal areas) such that these activities would not directly affect any state or federally protected wetlands.

While no herbicide treatments are planned within riparian zones or within or adjacent to hydrologic features, the Revised Project would be subject to Mitigation Measure BIO-5, which would further ensure that effects on state or federally protected wetlands would be avoided through pre-project establishment and marking of Watercourse and Lake Protection Zones by a Registered Professional Forester and putting in place appropriate runoff controls to control erosion, siltation, and potential discharge of pollutants to riparian areas. In addition to compliance with Mitigation Measure BIO-5, the herbicide application that would occur under the Revised Project would be conducted by a QAL following a pest control recommendation from a licensed PCA and all materials would be handled, applied, and disposed of in accordance with the product safety data sheet, product labeling, and local, state, and federal laws. Accordingly, impacts from the Revised Project to state or federally protected waters would be **less than significant** and no further mitigation is required.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Wildlife movement corridors typically are associated with ridgelines and valleys, rivers, and creeks supporting riparian vegetation. The 2019 IS/MND concluded that the project area provides good cover for movement and foraging for many species; however, more typical movement corridors are available adjacent to the site. The herbicide treatment associated with the Revised Project would not impede wildlife movement of wildlife through the treatment area but could limit vegetation cover for movement within treated areas. However, primary movement corridors associated with vegetated riparian areas and drainages would not be treated and would remain for unimpeded movement by wildlife as required by Forest Practice Rules and Mitigation Measure BIO-5. Effects on wildlife movement would be localized and limited to areas of lower value for wildlife movement and would not substantially affect wildlife movements on the site or in the greater surrounding area. No known wildlife nursery sites exist within the Weber Reservoir treatment area. The impact would be **less than significant**. No mitigation is required.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The Revised Project is entirely within land owned by EID and would not conflict with any local policies or ordinances. The Revised Project would be consistent with provisions of the El Dorado County General Plan Conservation and Open Space Element. The Revised Project is not within an important biological corridor or priority conservation area as identified in the General Plan. **No impact** would occur.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No draft or adopted habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans exist. **No impact** would occur.

Mitigation Measures:

BIO-1: Conduct Pre-Construction Surveys for Special-status Plants

Before project implementation, EID will conduct appropriately-timed botanical surveys for all areas of project-related ground disturbance. Floristic surveys will be conducted by a qualified botanist during the species' blooming period in accordance with methods described in CDFW's 2018 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018).

If no special-status plants are found during surveys, the findings will be documented in a letter report, and no further mitigation would be required. If special-status plants are found during surveys, locations of special-status plant populations would be completely avoided by clearly identifying avoidance areas in the field by staking or flagging before vegetation removal activities. No project activity would occur in the marked areas.

BIO-2: Conduct Pre-Construction Surveys for Raptors and Migratory Birds

Trees and vegetation are planned to be removed outside the nesting season, August 16 through February 14. If construction occurs between February 15 and August 15, EID will conduct preconstruction surveys for active nests of special-status and MBTA protected birds before the start of any project activities. Surveys for nesting raptors will be conducted in accordance with established CDFW raptor survey protocols. If active nests are found, EID will establish avoidance buffers around nests that are sufficient so that breeding is not likely to be disrupted or adversely affected by project activities. An avoidance buffer will constitute an area where project-related activities (i.e., vegetation removal, earth moving, and construction) will not occur. Typical avoidance buffers during the nesting season will be 100 feet for nesting passerine birds and 500 feet for nesting raptors unless a qualified biologist determines that smaller buffers will be sufficient to avoid impacts on nesting raptors and/or other birds. Factors to be considered for determining buffer size will include: the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; and baseline levels of noise and human activity. A qualified biologist will monitor any active nests during construction, to ensure that the species is not being harmed or harassed by the noise or activity resulting from project-related activities. Buffers will be

maintained until a qualified biologist has determined that young have fledged and are no longer reliant on the nest or parental care for survival.

BIO-3: Avoid Disturbance to Roosting Bat Species

Bats species known to occur in the proposed Project region may roost in trees within the proposed Project area. If Project activities are planned to occur during the bat maternity season (May through mid-August), the District shall conduct a habitat assessment of the Project site to identify potential habitat for bat maternity roosts (e.g., large-diameter trees, snags). Potential roost habitat identified during the assessment shall be marked and avoided, if possible. If the potential roost habitat cannot be avoided and removal of potential roost habitat must be conducted during the maternity season, preconstruction inspections for potential roost habitat shall be conducted using appropriate methods (e.g., camera inspection, exit survey with night optics, acoustic survey) within the 14-day period prior to vegetation removal. If bats are found during inspections, removal of that roost feature shall be delayed until the end of the maternity season or until a qualified bat biologist has determined that the young are capable of flight. If Project activities occur outside of the maternity season, no mitigation shall be required.

BIO-4: Develop and Implement Worker Environmental Awareness Training

Before the start of vegetation removal activity, EID will develop a worker environmental awareness program. Before the start of project activities, the environmental training will be provided to all personnel working on the project site during vegetation removal. EID, consultant, and construction personnel entering the project site will be trained before being allowed on-site.

BIO-5: Protect Riparian Habitat

EID shall avoid and minimize indirect impacts on riparian habitat by implementing watercourse and lake protection zones, and measures to minimize erosion and runoff in all drainage plans, in accordance with California Forest Practice Rules (Title 14, California Code of Regulations, Chapters 4, 4.5, and 10) (CAL FIRE 2017). Prior to project activity, EID will assign a qualified Registered Professional Forester to identify the locations of riparian habitat and water bodies, and corresponding setbacks (Watercourse and Lake Protection Zones) for avoidance. Identification of riparian habitat/water bodies for avoidance will be in addition to and distinguished from any required construction boundary fencing or flagging. Watercourse and Lake Protection Zones will be identified as appropriate on project maps. Appropriate runoff controls, such as berms, straw wattles, silt fencing, filtration systems, and sediment traps, will be implemented to control siltation and the potential discharge of pollutants. Watercourse and Lake Protection Zones and appropriate runoff controls, such as berms, straw wattles, silt fencing, filtration systems, and sediment traps, will be implemented to protect riparian habitat and control siltation and the potential discharge of pollutants.

3.2.3 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Setting

The California Natural Resources Agency adopted amendments to the CEQA Guidelines on December 30, 2009, which became effective on March 18, 2010. With respect to GHG emissions, the amended CEQA Guidelines state in Section 15064.4(a) that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. 15064.7(c) of the CEQA Guidelines specifies that "[w]hen adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." Similarly, the revisions to Appendix G, Environmental Checklist Form, which is often used as a basis for lead agencies' selection of significance thresholds, do not prescribe specific thresholds.

Rather, the CEQA Guidelines establish two CEQA thresholds related to GHGs, which will be used to discuss the significance of project impacts (14 CCR 15000 et seq., Appendix G):

1. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
2. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Accordingly, the CEQA Guidelines do not prescribe specific methodologies for performing an assessment, establish specific thresholds of significance, or mandate specific mitigation measures. Rather, the CEQA Guidelines emphasize the lead agency's discretion to determine the appropriate methodologies and thresholds of significance that are consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009).

EDCAQMD

California has 35 Air Pollution Control Districts (APCD) and Air Quality Management Districts (AQMDs), many of which are currently addressing climate change issues by developing significance thresholds, performance standards, and mitigation measures. At this time, there are no adopted quantitative federal or state guidelines for GHG emission impacts. EDCAQMD was part of the committee of air districts in the Sacramento Region involved in the development of GHG thresholds of 1,100 metric tons (MT) of CO_2e per year for the construction phase of

projects or the operational phase of land use development projects, or 10,000 MT CO_2e per year from the operation of stationary sources. If the significance thresholds are exceeded, then the Project may have a cumulatively considerable contribution to a significant cumulative environmental impact, and all feasible mitigation is required. (SMAQMD 2014, 2019).

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The 2019 IS/MND prepared for the Approved Project found that the activities associated with implementation of the proposed project could produce GHGs when conducting prescribed burns or burning slash piles but that the prescribed burns would contribute far less CO2 or ozone than what wildland fires generate. Implementation of the Approved Project would result in GHG emissions associated with the use of maintenance equipment such as trucks, a tractor, and other small gas and diesel-powered tools. The changes associated with the Revised Project would result in temporary operation of an ATV or UTV for the purposes of applying herbicide and would add several worker vehicle trips a day over a period of several days for each treatment application. The Revised Project would result in no long term GHG emissions and no substantial increase in GHG emissions over that evaluated by the 2019 IS/MND for the Approved Project. Impacts associated with GHG emissions generated by the Revised Project would remain **less than significant**.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The Climate Change Scoping Plan, approved by CARB on December 12, 2008, provides an outline for actions to reduce California's GHG emissions. The Scoping Plan provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. As such, the Scoping Plan is not directly applicable to specific projects. Moreover, the Final Statement of Reasons for the amendments to the CEQA Guidelines reiterates the statement in the Initial Statement of Reasons that "[t]he Scoping Plan may not be appropriate for use in determining the significance of individual projects … because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan" (CNRA 2009).

There are several federal and state regulatory measures aimed at the identification and reduction of GHG emissions; most of these measures focus on area source emissions (e.g., energy usage) and changes to the vehicle fleet (increased use of hybrid, electric, and more fuel-efficient vehicles). While federal and state legislation would ultimately reduce GHG emissions associated with the project, no specific plan, policy, or regulation would be directly applicable to the Revised Project. To date, El Dorado County has not adopted a Climate Action Plan or GHG reduction plan. No local mandatory GHG regulations, plans, or policies would apply to implementation of the Revised Project, and no conflict would occur. Therefore, the Revised Project would result in **no impact** from a potential conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

3.2.4 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Setting

Hazardous materials stored and used in the Project area include typical hazardous materials associated with motor vehicle and heavy equipment used in construction and agricultural or forestry operations, including small quantities of petroleum fuels, lubricants and pesticides, as well as household and construction materials including solvents, paints and household cleaning agents. The SWRCB GeoTracker and the California Department of Toxic Substances Control (DTSC) EnviroStor database were searched to identify toxic releases, hazardous waste, or other violations that could affect the Revised Project site (SWRCB 2021; DTSC 2021). No hazardous materials sites were identified in the vicinity

of the Weber treatment area. No school exists within 0.25 mile of the Weber Reservoir treatment area and the site is not near any private airstrip or within the boundaries of an airport land use plan.

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Please refer to the discussion under b), below.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The herbicide applications that would occur under the Revised Project would be conducted by a QAL following a pest control recommendation from a licensed PCA and all materials would be transported, stored, handled, applied, and disposed of in accordance with the product safety data sheet, product labeling, and local, state, and federal laws. No long-term storage of herbicides on the Project site would occur with the Revised Project. All herbicides that would be applied are approved for use in the State of California and are commonly used in the Project region on lands managed for timber production and wildlife management purposes (see Table 1). Implementation of the Revised Project would not result in long-term transport, use, or storage of large quantities of hazardous materials. Impacts associated with a hazard to the public or the environment resulting from the routine transport, use, or disposal of hazardous materials would remain **less than significant**, consistent with the determination provided by the 2019 IS/MND prepared for the Approved Project.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The Project area is not located within 0.25 mile of any school. **No impact** would occur.

d) Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The Project site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, therefore, would have **no impact**.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The Project area is not located within an airport land use plan area or within 2 miles of a public or public use airport (El Dorado County Transportation Commission 2012). There would be **no impact**.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The Revised Project would result in no change from the Approved Project with respect to road closures, vehicle trip generation or traffic volumes that could create a hazard or slow the movement of vehicles. Therefore, implementation of the Revised Project would not interfere with any adopted emergency response

plan or emergency evacuation plan, including any EID emergency response plan or the El Dorado County Operational Area Multi-Hazard Functional Emergency Operations Plan, as implemented by the County Office of Emergency Services (OES) of the County Sheriff's Department. **No impact** would occur.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Project activities would temporarily introduce potential sources of fire ignition as a result of equipment operation and other treatment activities, which could temporarily increase the risk of wildfire. The Project is within a Very High Fire Hazard Severity Zone where an increased risk of wildfire would represent a significant impact to the environment and surrounding development and residents. Herbicide application would be carried out consistent with the Forest Practice Rules and EID's fire prevention policies that apply to all work carried out on EID facilities and lands. Herbicide application under the Revised Project would be required to comply with a Fire Safety Plan during all activities and operations would cease or a prescribed fire watch would be required to be deployed when weather and humidity conditions indicate an increased risk of fire. Fire prevention measures would apply to herbicide application activities included in the Revised Project and the proposed herbicide application would not increase impacts associated with risk of wildfire.

The Project involves vegetation management with the intent to reduce the risk of wildfire exposure to people or structures and directly or indirectly reduce the risk of loss, injury, or death involving wildfire. Herbicide application included in the Revised Project would enhance the effectiveness of vegetation management treatments and further reduce the risk of wildfire in the treatment area. Impacts would be **less than significant**.

3.2.5 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on or off site;	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Setting

Climate in EID's service area is characterized by warm and dry weather in the summer, moderate to heavy precipitation in the winter, and wide temperature ranges. Strong flows of marine air from the Pacific Ocean result in heavy precipitation in the winter. Precipitation in the summer is generally limited to a few scattered thunderstorms during the summer months. The region surrounding the Project site receives approximately 52 inches of rainfall and 61 inches of snowfall annually. Average temperatures range from approximate 28°F to 92°F (WRCC 2021). Elevations within the Project site range from 3,875 to 4,075 feet above mean sea level. Elevations within the Weber Reservoir treatment area range from 2,200 to 2,900 feet above mean sea level.

The Project area lies within the Upper South Fork American River watershed and is not located within a 100-year floodplain (FEMA 2021). Two perennial waterways and several ephemeral drainages occur within the Project site.

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

As discussed in the 2019 IS/MND prepared for the Approved Project, compliance with best management practices outlined in the California Forest Practice Rules, which require setbacks to disturbance from streams, riparian habitat, and water bodies (Watercourse and Lake Protection Zones), would minimize the potential for surface runoff to transport sediment to onsite drainages and degrade water quality. The 2019 IS/MND found that impacts associated with degradation of water quality would be less than significant.

Herbicide application proposed under the Revised Project would be limited to approximately 250 acres of areas treated by mechanical mastication within the Weber Reservoir treatment area. Areas treated by mechanical mastication and proposed for herbicide treatment are of lower slope gradient and situated at a greater distance from onsite waterways than areas where hand treatment methods were implemented

(Figure 2). To avoid drift, herbicide application would not occur when wind speed exceeds 10 miles per hour or when drift is visually observed. Herbicide treatments would occur only during dry conditions and would not occur in or near any lakes, ponds, streams or other bodies of water; as shown in Figure 2, treatment areas would be limited to masticated treatment areas and would avoid all streams and drainages within the treatment area. All herbicide treatments would be conducted by a contractor with a valid QAL following a pest control recommendation from a licensed PCA and in compliance with all applicable laws, regulations, safety precautions, and product labeling and safety data sheets. All herbicides proposed for use are approved for the intended use in the State of California. The Revised Project would result in no change in impact determination and impact associated with degradation of water quality would remain **less than significant**.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Implementation of the Revised Project would not involve extraction of groundwater or involve placement of impervious surfaces in an area designated for groundwater recharge. Herbicides proposed for use are commonly used in timber and wildlife management areas throughout the Project region and would have no effect on groundwater. The Revised Project would not deplete groundwater supplies and would not interfere with groundwater recharge. **No impact** would occur.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in substantial erosion or siltation on or off site;

Vegetation management activities would not alter the course of a stream or river. The Revised Project would follow California Forest Practice Rules found in Title 14, California Code of Regulations, Chapters 4, 4.5, and 10 that require prescribed activities to protect against soil erosion and siltation of waterways, by establishing buffers to disturbance from sensitive stream zones and requiring that treatments on steeply sloped treatment areas be carried out by hand crews. Additionally, cut material would remain onsite as mulch and would act to protect soils from mechanical erosion from rain and concentrated stormwater. Herbicide applications included in the Revised Project would result in no change in existing drainage patterns within the treatment area. Therefore, impacts would remain **less than significant**.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;

Project implementation, including herbicide treatments included in the Revised Project, would not introduce pavement or other impervious surfaces that would substantially increase the rate of surface runoff beyond existing conditions. Project-related activities would follow measures set forth in the California Forest Practice Rules to minimize surface runoff and protect soils. Therefore, the Revised Project would not substantially increase the potential for onsite and off-site flooding by increasing the amount of surface runoff through the addition of impervious surfaces. Therefore, impacts of the Revised Project would remain **less than significant**.

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

The Project does not drain to an existing stormwater drainage system. There would be **no impact**.

iv) impede or redirect flood flows?

The Project area is not located within a 100-year floodplain (FEMA 2021). Therefore, runoff flows from the Project area would not impede or redirect flood flows. There would be **no impact**.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The Project area is not located within a 100-year floodplain (FEMA 2021). There are no surface water bodies in the vicinity of the Project site that could generate damaging seiches (i.e., sloshing of water in an enclosed or restricted water body). Herbicide application included in the Revised Project would result in no change in impacts associated with the risk of flood, tsunami, or seiche. The Revised Project would have **no impact**.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Herbicide application included in the Revised Project would be carried out by a contractor with a valid QAL following a pest control recommendation from a licensed PCA and in accordance with product safety data sheets and all local, state, and federal laws and would not result in conflicts with implementation of a water quality control plan or sustainable groundwater management plan. Herbicide application would be part of an effective vegetation management approach, which can reduce the likelihood of wildfire to result in adverse effects on water quality associated with elimination of riparian vegetation and shade cover, and post-fire erosion and sediment transport. Impacts to water quality from the Revised Project would remain **less than significant**.

3.2.6 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

The Project treatment sites provide suitable habitat for nesting birds and other wildlife, as discussed in Section 3.2.2 of this Addendum. With implementation of mitigation measures identified in Section 3.2.2, the Project would not reduce habitat for fish or wildlife species, threaten to eliminate a plant or animal community, or adversely affect rare or endangered species. Implementation of Mitigation Measures BIO-1 through BIO-5 would ensure that Project impacts to biological resources would be **less than significant**.

As discussed in Section 3.1, the Revised Project would not increase the Approved Project's impacts as the herbicide treatment would not result in an increase in ground disturbing activities. This proposed change to the Approved Project would not result in ground disturbing activities and would not include activities on land previously unevaluated.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

The Project would help manage vegetation growth in forested areas within EID-owned land for the purpose of fuel reduction and defensible space management and would result in only temporary impacts associated with fuel reduction activities. Cumulative impacts of the Revised Project and other similar projects would result in **less than significant effects** identified throughout this Addendum and the 2019 IS/MND.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The Approved Project effects are primarily short-term during vegetation reduction activities. The Revised Project would be consistent with applicable local ordinances and policies related to land use, noise, and protection of natural resources and the environment, as disclosed in Section 3.1 and 3.2 of this Addendum. The Revised Project would result in **less than significant impacts** associated with any cumulatively considerable impacts within any resource areas analyzed.

4 List of Preparers

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5 References Cited

14 CCR 15000–15387 and Appendices A through L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

CARB (California Air Resources Board). 2008. Local Government Operations Protocol: For the Quantification and Reporting of Greenhouse Gas Emissions Inventories. Version 1.0. September 25, 2008. Available: http://www.arb.ca.gov/cc/protocols/localgov/pubs/pubs.htm. Accessed June 2021.

CAL FIRE (California Department of Forestry and Fire Protection). 2017. California Forest Practice Rules. Prepared for Licensed Timber Operator and California Registered Professional Foresters.

California Public Resources Code, Section 21000–21177. California Environmental Quality Act, as amended.

CDFW (California Department of Fish and Wildlife). 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. State of California, Natural Resources Agency. March 20, 2018.

CNPS (California Native Plant Society), Rare Plant Program. 2019. Inventory of Rare and Endangered Plants of California (online edition, v8-03 0.39). Website http://www.rareplants.cnps.org. Accessed June 2021.

CNRA (California Natural Resources Agency). 2009. 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008. Accessed June 2021. https://resources.ca.gov/CNRALegacyFiles/docs/climate/Statewide_Adaptation_Strategy.pdf.

DTSC (California Department of Toxic Substances Control). 2019. EnviroStor. Available: https://www.envirostor.dtsc.ca.gov/public/search. Accessed June 2021

EDCAQMD (El Dorado County Air Quality Management District). 2002. Determining Significance of Air Quality Impact Under the California Environmental Quality Act (CEQA). Available: https://edcgov.us/Government/AirQualityManagement/pages/Guide_to_Air_Quality_Assessment.aspx. Accessed June 2021.

El Dorado County Transportation Commission. 2012. El Dorado County airport land use compatibility plan. Available: https://www.edctc.org/aviation. Accessed June 2021.

El Dorado Irrigation District. 2007. Sly Park Recreation Area Master Plan. Available: https://www.eid.org/Home/ShowDocument?id=375. Accessed June 2021.

El Dorado Irrigation District.2019. Initial Study/Mitigated Negative Declaration for the El Dorado Irrigation District Vegetation Management Project (SCH No. 2019069040. Available: https://www.eid.org/home/showpublisheddocument/12771/636957697157600000. Accessed June 2021.

FEMA (Federal Emergency Management Agency). 2021. FEMA Flood Map. Available: https://msc.fema.gov/portal/search?AddressQuery=pollock%20pines#searchresultsanchor. Accessed June 2021.

SMAQMD (Sacramento Metropolitan Air Quality Management District). 2017. Sacramento Regional 2008 NAAQS 8-Hour Ozone Attainment and Reasonable Further Progress Plan. Available: www.airquality.org/businesses/air-quality-plans. Accessed June 2021.

SWRCB (State Water Resources Control Board). 2021. Geotracker. Available: https://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0601700008. Accessed June 2021.

WRCC (Western Regional Climate Center). 2021. Pacific House, California (046597) Coop Station Monthly Climate Summary. Accessed June 2021. https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca6597

Appendix A

Mitigation Monitoring and Reporting Program

(No changes from 2019 IS/MND)

Mitigation Monitoring and Reporting Program

El Dorado Irrigation District Vegetation Management Project (2019) Summary of Mitigation Measures, Responsible Parties, and Timing			
Mitigation Measure	**Party Responsible for Monitoring**	**Timeframe for Implementation**	**Monitoring Compliance (Provide Name/Date)**
Biological Resources			
BIO-1: Conduct Pre-Construction Surveys for Special-status Plants Before project implementation, EID will conduct appropriately-timed botanical surveys for all areas of project-related ground disturbance. Floristic surveys will be conducted by a qualified botanist during the species' blooming period in accordance with methods described in CDFW's 2018 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW 2018). If no special-status plants are found during surveys, the findings will be documented in a letter report, and no further mitigation would be required. If special-status plants are found during surveys, locations of special-status plant populations would be completely avoided by clearly identifying avoidance areas in the field by staking or flagging before vegetation removal activities. No project activity would occur in the marked areas.	EID and contractor	Surveys completed before vegetation clearance activities begin.	
BIO-2: Conduct Pre-Construction Surveys for Raptors and Migratory Birds Trees and vegetation are planned to be removed outside the nesting season, August 16 through February 14. If construction occurs between February 15 and August 15, EID will conduct preconstruction surveys for active nests of special-status and MBTA protected birds before the start of any project activities. Surveys for nesting raptors will be conducted in accordance with established CDFW raptor survey protocols. If active nests are found, EID will establish avoidance buffers around nests that are sufficient so that breeding is not likely to be disrupted or adversely affected by project activities. An avoidance buffer will constitute an area where project-related activities (i.e., vegetation removal, earth moving, and construction) will not occur. Typical avoidance buffers during the nesting season will be 100 feet for nesting passerine birds and 500 feet for nesting raptors unless a qualified biologist determines that smaller buffers will be sufficient to avoid impacts on nesting raptors and/or other birds. Factors to be considered for determining buffer size will include: the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; and baseline levels of noise and human activity. A qualified biologist will monitor any active nests during construction, to ensure that the species is not being harmed or harassed by the noise or activity resulting from project-related activities. Buffers will be maintained until a qualified biologist has determined that young have fledged and are no longer reliant on the nest or parental care for survival.	EID and contractor	Surveys completed before vegetation clearance activities begin.	
BIO-3: Avoid Disturbance to Roosting Bat Species Bats species known to occur in the proposed Project region may roost in trees within the proposed Project area. If Project activities are planned to occur during the bat maternity season (May through mid-August), the District shall conduct a habitat assessment of the Project site to identify potential habitat for bat maternity roosts (e.g., large-diameter trees,	EID and contractor	Surveys completed before vegetation clearance activities begin.	

El Dorado Irrigation District Vegetation Management Project (2019) Summary of Mitigation Measures, Responsible Parties, and Timing			
Mitigation Measure	**Party Responsible for Monitoring**	**Timeframe for Implementation**	**Monitoring Compliance (Provide Name/Date)**
snags). Potential roost habitat identified during the assessment shall be marked and avoided, if possible. If the potential roost habitat cannot be avoided and removal of potential roost habitat must be conducted during the maternity season, preconstruction inspections for potential roost habitat shall be conducted using appropriate methods (e.g., camera inspection, exit survey with night optics, acoustic survey) within the 14-day period prior to vegetation removal. If bats are found during inspections, removal of that roost feature shall be delayed until the end of the maternity season or until a qualified bat biologist has determined that the young are capable of flight. If Project activities occur outside of the maternity season, no mitigation shall be required.			
BIO-4: Develop and Implement Worker Environmental Awareness Training Before the start of vegetation removal activity, EID will develop a worker environmental awareness program. Before the start of project activities, the environmental training will be provided to all personnel working on the project site during vegetation removal. EID, consultant, and construction personnel entering the project site will be trained before being allowed on-site.	EID and contractor	Prior to vegetation clearance activities	
BIO-5: Protect Riparian Habitat EID shall avoid and minimize indirect impacts on riparian habitat by implementing watercourse and lake protection zones, and measures to minimize erosion and runoff in all drainage plans, in accordance with California Forest Practice Rules (Title 14, California Code of Regulations, Chapters 4, 4.5, and 10) (CAL FIRE 2017). Prior to project activity, EID will assign a qualified Registered Professional Forester to identify the locations of riparian habitat and water bodies, and corresponding setbacks (Watercourse and Lake Protection Zones) for avoidance. Identification of riparian habitat/water bodies for avoidance will be in addition to and distinguished from any required construction boundary fencing or flagging. Watercourse and Lake Protection Zones will be identified as appropriate on project maps. Appropriate runoff controls, such as berms, straw wattles, silt fencing, filtration systems, and sediment traps, will be implemented to control siltation and the potential discharge of pollutants. Watercourse and Lake Protection Zones and appropriate runoff controls, such as berms, straw wattles, silt fencing, filtration systems, and sediment traps, will be implemented to protect riparian habitat and control siltation and the potential discharge of pollutants.	EID and contractor	Prior to and during vegetation clearance activities	
Cultural Resources			

El Dorado Irrigation District Vegetation Management Project (2019) Summary of Mitigation Measures, Responsible Parties, and Timing			
Mitigation Measure	**Party Responsible for Monitoring**	**Timeframe for Implementation**	**Monitoring Compliance (Provide Name/Date)**
CUL-1: Address Previously Undiscovered Historic Properties andArchaeological Resources. EID shall implement the following measure to reduce or avoid impacts on undiscovered historic properties and archaeological resources. If interested Native American Tribes provide information demonstrating the significance of the project location and tangible evidence supportingthe determination the site is highly sensitive for prehistoric archaeological resources, EID will retain a qualified archaeologist 1) monitor for potential prehistoric archaeological resources during initial ground disturbing activities, 2) prepare a worker awareness brochure, and 3) invite tribal representatives to review the worker awareness brochure. If buried or previously unidentified historic properties or archaeologicalresources are discovered during project activities, all work within a 100-foot radius of the find shall cease. EID shall retain a professional archaeologist meeting the Secretary of the Interior's Professional Standards for Archaeologists to assess the discovery and recommend what, if any, further treatment or investigation is necessary for the find.Interested Native American Tribes will also be contacted. Any necessary treatment/investigation shall be developed with interested Native American Tribes providing recommendations and shall be coordinated with the State Historic Preservation Officer and Reclamation, if necessary, and shall be completed before project activities continue in the vicinity of the find.	EID	Prior to or during vegetation clearance activities	
CUL-2: Avoid Potential Effects on Undiscovered Burials. EID shall implement the following measures to reduce or avoid impactsrelated to undiscovered burials. In accordance with the California Health and Safety Code, if human remains are uncovered during ground-disturbing activities, all potentially damaging ground-disturbance in the area of the burial and a 100-foot radius shall halt andthe El Dorado County Coroner shall be notified immediately. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, then Federal laws governing the disposition of those remain would come into effect. Specifically, the Native American Graves Protection and Repatriation Act (NAGPRA), Pub L. 101-601, 25 U.S.C. 3001 et seq., 104 Stat. 3048 requires federal agencies and institutions that receive federal funding toreturn Native American cultural items to lineal descendants and culturally affiliated Indian Tribes and Native Hawaiian organizations. Cultural items include human remains, funerary objects, sacred objects,and objects of cultural patrimony. NAGPRA also has established procedures for the inadvertent discovery of Native American cultural items on Federal or Tribal lands, which includes consultation with potential lineal descendants or Tribal officials as part of their compliance responsibilities. California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent	EID and contractor	Prior to and during vegetation clearance activities	

El Dorado Irrigation District Vegetation Management Project (2019) Summary of Mitigation Measures, Responsible Parties, and Timing			
Mitigation Measure	**Party Responsible for Monitoring**	**Timeframe for Implementation**	**Monitoring Compliance (Provide Name/Date)**
destruction. EID shall ensure that the procedures for the treatment of Native American human remains contained in California Health and Safety Code Sections 7050.5and 7052 and Public Resources Code Section 5097 are followed.			

Appendix B

Pest Control Recommendation

WILBUR-ELLIS COMPANY PEST CONTROL RECOMMENDATION No. 210314A

OPERATOR: El Dorado Irrigation District CONTACT: Matt Warden
ADDRESS: 2890 Mosquito Road; Placerville, CA 95667
PERMIT/ID #: El Dorado 09-21-090194A, Alpine 02-21-020011A, Amador 03-21-090194A
SITE: Utility Facilities ACRES: Variable – Spot Treatments PESTS: Weeds and Brush
LOCATION: All EID locations, especially Webber Reservoir area mastication project (approx. 300 acres).

MATERIAL (ADD IN ORDER LISTED)	RATE/4 GAL BACKPACK	RATE PER 100 GAL	VOLUME PER ACRE
(1) Garlon 4 Ultra∗ (or Vastlan)	7.8 ounces	6 quarts	**Variable -**
(2) Rodeo∗∗	7.8 ounces	6 quarts	**Directed**
(3) Syl-Tac-EA Surfactant	1.0 ounce	1.5 pints	**Spray**
(4) Hi-Light Blue Colorant	1.5 ounces	1 quart	**to Wet**

HAZARDS AND/OR RESTRICTIONS:

- OBSERVE ALL LABEL PRECAUTIONS
- DO NOT ALLOW DRIFT FROM TREATMENT AREA.
- KEEP GARLON 4 OUT OF LAKES, PONDS, STREAMS, AND OTHER BODIES OF WATER
- APPLY ONLY UNDER CALM CONDITIONS
- DO NOT GRAZE TREATED AREA WITHIN 14 DAYS OF APPLICATION
- RE-ENTRY — DO NOT ENTER UNTIL SPRAY SOLUTION HAS DRIED

QAL: Contractor TBA DATES: Late Spring-Early Fall 2021 METHOD: Directed Ground Spray

COMMENTS:Fill mix tank half-full of water. Next mix in Garlon 4 Ultra (or Vastlan), then add Rodeo. Fill remainder of tank and mix in Syl-Tac-EA. When surfactant is COMPLETELY blended with water, mix in dye last. Apply as a directed foliar spray, using low pressure. Spray foliage of actively growing target plants to wet with complete coverage. Direct spray away from desirable plants, as damage may occur. Areas of dense weed or brush growth may require re-treatment, especially re-sprouting species.

∗ Direct Garlon 4 Ultra (or Vastlan) away from desirable broadleaf and woody plants or delete from spray mix. If triclopyr product is deleted, increase Rodeo to 6.5 quarts per 100 gallons.

∗∗ Direct Rodeo away from any desirable plants, or delete from mix if grass release is desired. 4 quarts per 100 of Garlon 4 Ultra alone, plus Syl-Tac-EA will control poison oak without damaging desirable grasses.

I hereby certify that alternatives and mitigation measures that would substantially lessen any significant adverse impact on the environment have been considered and, if feasible, adopted. Criteria for determining need for treatment: Pest is present.

Advisor's Signature: Scott A. Johnson

Scott A. Johnson PCA License No. 74030 Date: 3/14/2021
Wilbur-Ellis Company; 1710 Fluetsch Court; Stockton, CA 95207-3431