



**Biodiversity, Fire, and Fuels  
Integrated Plan Revisions and  
CEQA Addendum**

Board of Directors'  
Regular Bi-Monthly Meeting

July 11, 2023



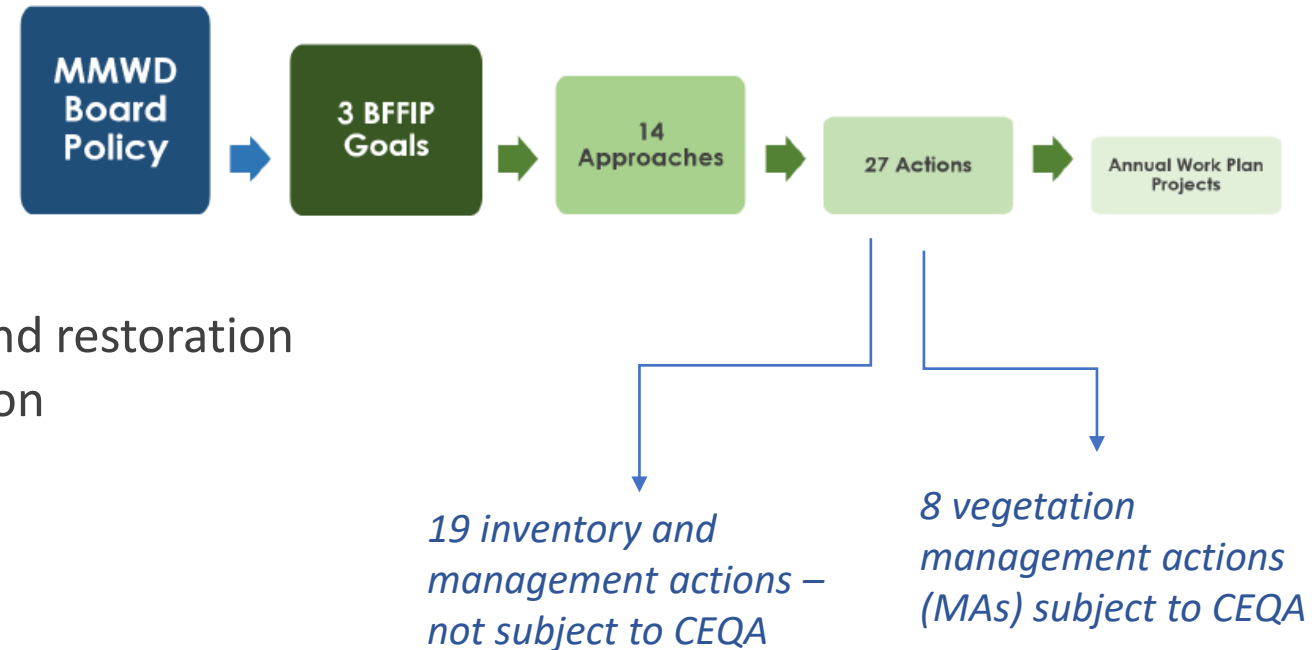
# Background on BFFIP and CEQA Review

- Biodiversity, Fire, and Fuels Integrated Plan completed in October 2019
- Final Environmental Impact Report approved on October 15, 2019 with Findings Overriding Considerations
- In 5<sup>th</sup> year of implementation – completed annual reports each year



# Structure of BFFIP

- Comprised of management actions that were developed to meet specific goals
- On-the-ground actions include:
  - Fuelbreak construction & maintenance
  - Weed detection and control
  - Forest stand improvement
  - Grassland, wet meadow and oak woodland restoration
  - Continued experimentation and innovation
- Methods include:
  - Manual and mechanical methods
  - Grazing
  - Prescribed burning
- Includes adaptive management





# Based on Experience, Some Operational Refinements to BFFIP Proposed to:

- Combining broom treatments into one management action and increasing year 5 to the maximum
- Increasing the acreages treated to improve conifer and mixed hardwood forest stand structures
- Allowing beneficial treatments, including prescribed burning, in areas of sensitive resources, namely rare plants
- Making clarifications to prescribed burning implementation to identify that pre-treatment occurs before prescribed burning and to describe the burn plan process
- Making clarifications to a few EIR mitigation measures to address BFFIP changes related to prescribed burning planning and rare plants



# Management Action Refinements

Current BFFIP Management Actions	BFFIP Updates
<b>Broom Management</b> <ul style="list-style-type: none"><li>• MA 20 'Cyclic Removal of Broom from Optimized and Transitional Zones' (260 acres)</li><li>• MA 24 Remove 600 acres of reproductive broom</li></ul>	<ul style="list-style-type: none"><li>• Combine all broom-related MAs/year into MA-20: <math>260 + 600 = 860</math> acres</li><li>• Improve operational flexibility for long-term broom management</li></ul>
<b>Forestry Restoration &amp; Management</b> <ul style="list-style-type: none"><li>• MA 23, 'Initial Forest Fuel Reduction' (60 acres/year)</li><li>• MA 23, 'Forest Fuel Maintenance' (100 acres/year)</li></ul>	<ul style="list-style-type: none"><li>• Increase from 60 to 100 acres/year</li><li>• Increase from 100 to 300 acres/year</li></ul>

# Mitigation Measure Refinements

- **MM Air-1: Minimization of Air Pollutant Risk**

The District shall require that prescribed burns on its lands are conducted a minimum of 1,000 feet away from sensitive receptors, specifically residences, schools, and childcare centers or the distance specified to avoid smoke impacts to sensitive receptors in the Smoke Management Plan, as required under BAAQMD Regulation 5.

The District shall require that prescribed burns on its lands are managed to reduce District worker exposure to CO concentrations and other air pollutants through implementation of the following measures:

- Use of realtime CO monitors,
- Rotate personnel out of heavy smoke areas,
- Avoid burning heavy fuel loads on the ground, such as large logs, to avoid additional mop-up,
- Tested and approved by NIOSH full-face and half-face air purifying respirators shall be equipped with filters for CO, formaldehyde, acrolein, and respirable particulate matter and available at all times for District staff or contractors working in the immediate vicinity of broadcast and pile burns, or
- Or otherwise follows the requirements of relevant regional, state, and federal laws pertaining to human health during prescribed burning.

- **MM Biology-2: Protection of Special-Status Plants**

...b. For listed species with known rarity or declining populations that could be adversely impacted by treatments, including CRPR Rank 1B, 2, and some rank 4 species that are known rare), as determined and listed below by the MMWD botanical staff, the MMWD's botanical staff shall:

- i. Flag or otherwise demarcate the individual or population to ensure workers avoid the species, for no loss of individuals.
- ii. Establish a buffer of 100 feet around the individual or population, for species that could be adversely impacted by the treatments.

...c. For other listed species of CRPR rank 1B or 2 (beyond those identified in part b, above) with the potential to occur on District lands, the following measures shall be implemented for any treatments that could adversely impact the species (per Approaches 2.3 and 2.4 of Chapter 4 of the BFFIP):

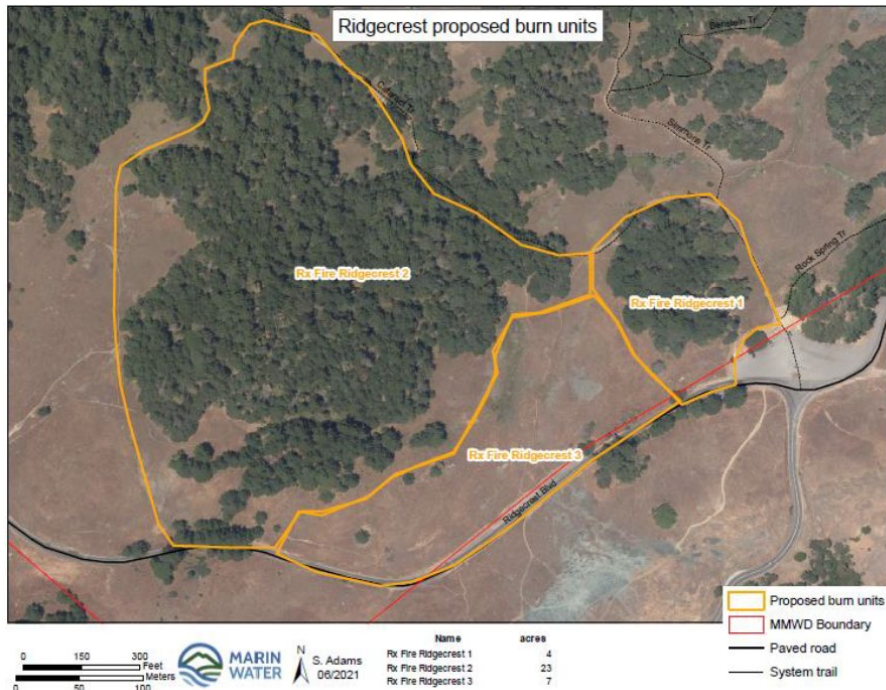


# Mitigation Measure Refinements

- MM Hazards-5: Roads and Trails Around Broadcast Burns

## Trails and District-Use-Only Roads

District-use-only roads and trails shall be closed to public recreational access if determined to be necessary in accordance with the burn-specific Burn Plan and/or Incident Action Plan within at least 500 feet of the outermost edges of a broadcast burn. District-use-only roads and trails shall be posted and blockaded with temporary fencing or the like, if closures are needed. Notices of closures shall be posted at the trail heads and on the District's website, when needed. Additional measures such as staffing trail head closures can be implemented as needed.



# EIR Addendum

- **Section 15162 and 15164 of the CEQA guidelines**

- A subsequent or supplemental EIR if
  - (a) a new significant environmental effect or
  - (b) a substantial increase in the severity of a previously identified significant effect.
- Addendum to an adopted EIR shall be prepared for minor technical changes or additions when criteria a and b above are not met.

- **Analysis of Environmental Parameters**

- CEQA topics reviewed to determine if all changes fall within existing analysis and impacts

- **Addendum Determination**

- No new or substantially more severe significant impacts from the revisions
- No new substantial changes would occur
- The mitigation measures and determination of significance for impacts included in the certified BFFIP PEIR would continue to be valid.
- Addendum is appropriate document – per Section 15164(c), no public review needed