

# **Low Gap Road Forest Resilience Project**

## **Project-Specific Analysis**

**And Addendum to the CalVTP Programmatic EIR**



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CalVTP Project ID: 2023-04

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## LIST OF ABBREVIATIONS

AD	Administrative
AES	Aesthetics and Visual Resource
AG	Agriculture and Forestry
AQ	Air Quality
BIO	Biological Resources
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalVTP	California Vegetation Treatment Program
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CUL	Archaeological, Historical, and Tribal Cultural
EIR	Environmental Impact Report
ENG	Energy Resources
ESA	Endangered Species Act
GEO	Geology, Soils, Paleontology, and Mineral Resources
GHG	Greenhouse Gas Emission
HAZ	Hazardous Materials and Public Health
HCP	Habitat Conservation Plan
HYD	Hydrology and Water Quality
LTS	Less Than Significant
LTSM	Less Than Significant with Mitigations
LU	Land Use and Planning, Population, and Housing
MAMU	Marbled Murrelet
MCPBA	Mendocino County Prescribed Burn Association
MCRCD	Mendocino County Resource Conservation District
MDBM	Mount Diablo Baseline and Meridian
MM	Mitigation Measure
MRC	Mendocino Redwood Company
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NCCP	National Continued Competency Program
NOI	Noise Standard Project Requirements
NSO	Northern Spotted Owl
PEIR	Programmatic Environmental Impact Report
PRC	Public Resources Code
PS	Potentially Significant
PSA	Project Specific Analysis
PSU	Potentially Significant and Unavoidable
REC	Recreation
RPF	Registered Professional Forester
SENL	Single Event Noise Level
SPR	Standard Project Requirement
SRA	State Responsibility Area
SU	Significant and Unavoidable

THP	Timber Harvesting Plan
TPZ	Timber Production Zone
TRAN	Transportation
USGS	United States Geological Survey
UTIL	Public Services and Utilities
VMT	Vehicle Miles Traveled
WIL	Wildfire
WLPZ	Watershed and Lake Protection Zone
WUI	Wildland Urban Interface

# 1: INTRODUCTION

The California Vegetation Treatment Program (CalVTP) directs implementation of vegetation treatments within the California Department of Forestry and Fire Protection's (CAL FIRE's) State Responsibility Area (SRA) to serve as one component of the state's range of actions to reduce wildfire risk, reduce fire suppression efforts and costs, and protect natural resources as well as other assets from wildfire. The Program Environmental Impact Report (PEIR) for the CalVTP evaluates the environmental impacts of the CalVTP. The CalVTP is described in Chapter 2, "Program Description" of the PEIR. The PEIR has been prepared under the direction of CEQA lead agency, California Board of Forestry and Fire Protection (Board), in accordance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines. The document functions as a Program EIR in accordance with State CEQA Guidelines Section 15168 for streamlining of CEQA review of later activities consistent with the CalVTP.

## PURPOSE OF THIS DOCUMENT

This document serves as the Project specific Analysis (PSA) to determine if the project as proposed is within the scope of the CalVTP PEIR. This document also serves as an Addendum to the CalVTP PEIR to provide CEQA compliance for proposed treatments outside the CalVTP treatable landscape analyzed in the PEIR. Portions of the proposed project treatment areas extend outside the CalVTP treatable landscape. If the areas of the proposed project outside the CalVTP treatable landscape have essentially the same landscape conditions as the treatable landscape, the environmental analysis in the PEIR is applicable.

Of the 1007 acres of proposed treatment area, 292 acres are outside of the CalVTP treatable landscape; however, these areas are dispersed in small sections outside of the treatable landscape (Figure 3).

## CEQA LEAD AGENCY AND PROPOSED PROJECT

The Mendocino County Resource Conservation District (MCRCD) will function as the lead agency and project proponent for this CalVTP. The project proponent will be responsible for the prescription of all vegetation treatments proposed, including the implementation, monitoring of vegetation treatments, mitigation measures, and SPRs shown in Attachment A. The MCRCD will make the final determination regarding this proposed projects CEQA compliance and the necessity of any additional environmental review.

## PROJECT OVERVIEW

Low Gap Road, a county-maintained, open-to-the-public roadway west of Ukiah, California, is located on a strategic ridge at the junction of the upper reaches of the Big River, Navarro River, and upper Russian River basins in Mendocino County. Current conditions along this road are conducive to the spread of fire between watersheds, as most of the ridge-top stands are densely stocked with smaller diameter trees and dense underbrush. Invasive and non-native exotic species, as well as Douglas-fir encroachment, threaten true oak woodlands in portions of the ridgeline, which transitions from oak woodland and grassland in the east to mixed conifer forest in the west.

This public road is an asset to firefighting as well as a liability, due to ignition risks. The community of Ukiah, and a number of outlying rural communities, including Comptche, benefit from the alternative route and from fire suppression opportunities provided by the ridgeline; however, current fuel loading and degraded road conditions could hamper safe ingress and egress in the event of a fire. Facilities including public schools, parks, and county offices are concentrated at the east end of Low Gap Road. These make Low Gap Road a key resource in defense of these assets. Additionally, the public schools would be a potentially useful staging areas for fire suppression resources, further enhancing the strategic value of this ridge system.

The primary project objective is to create contiguous, fire-resilient forest conditions on a strategic ridge with the goal of protecting thousands of acres of forest land and improving public safety. The treatment will also benefit

oak woodlands where it occurs within the project area through removal of encroaching conifers. The overall prescription is thinning from below to reduce fuels density and increase quadratic mean diameter in the treated areas. Conifers and brush will be removed via mechanical harvester, mastication, or hand removal, followed by in-stand pile burning. Additionally, a small broadcast burn is proposed within an area of natural grassland.

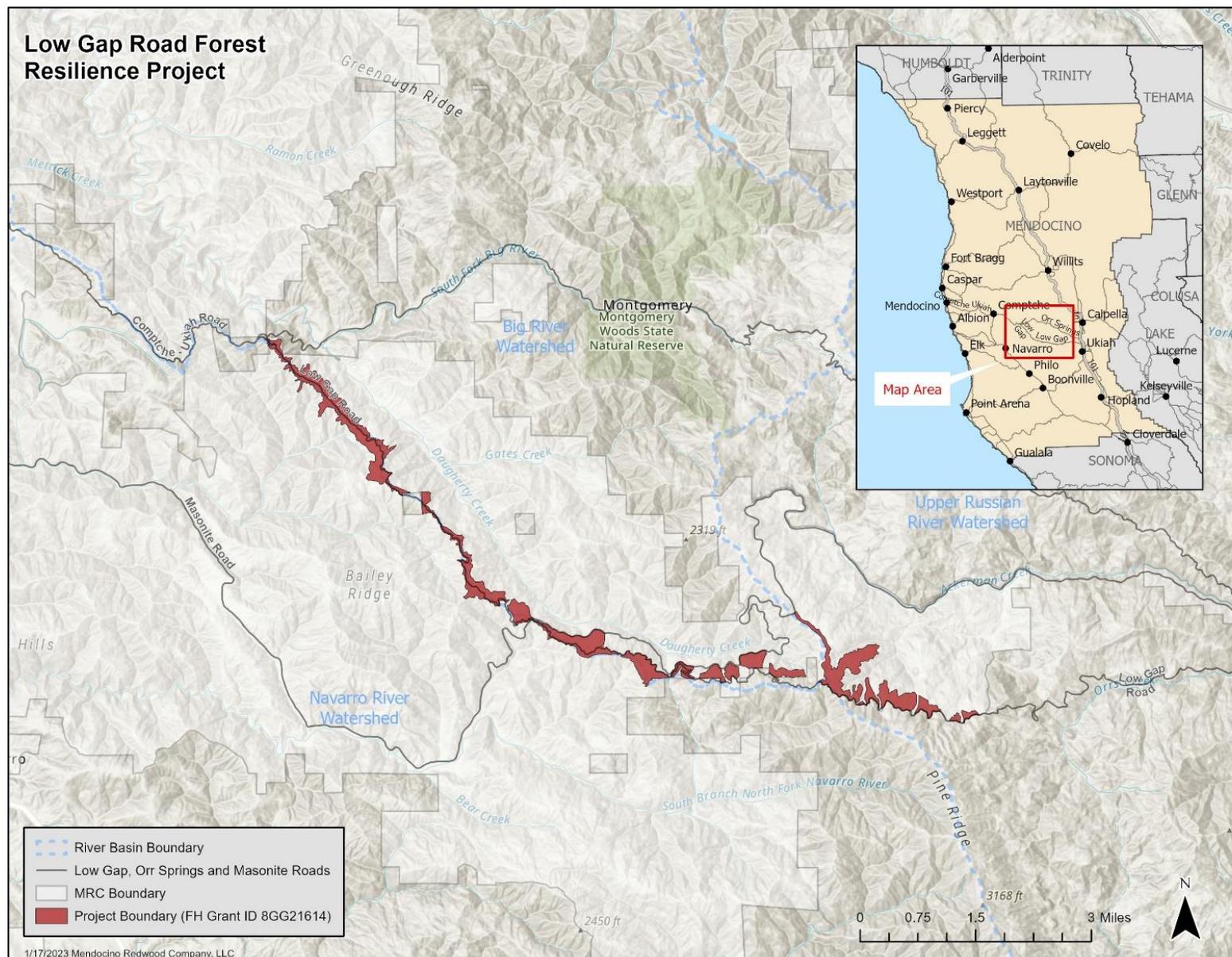
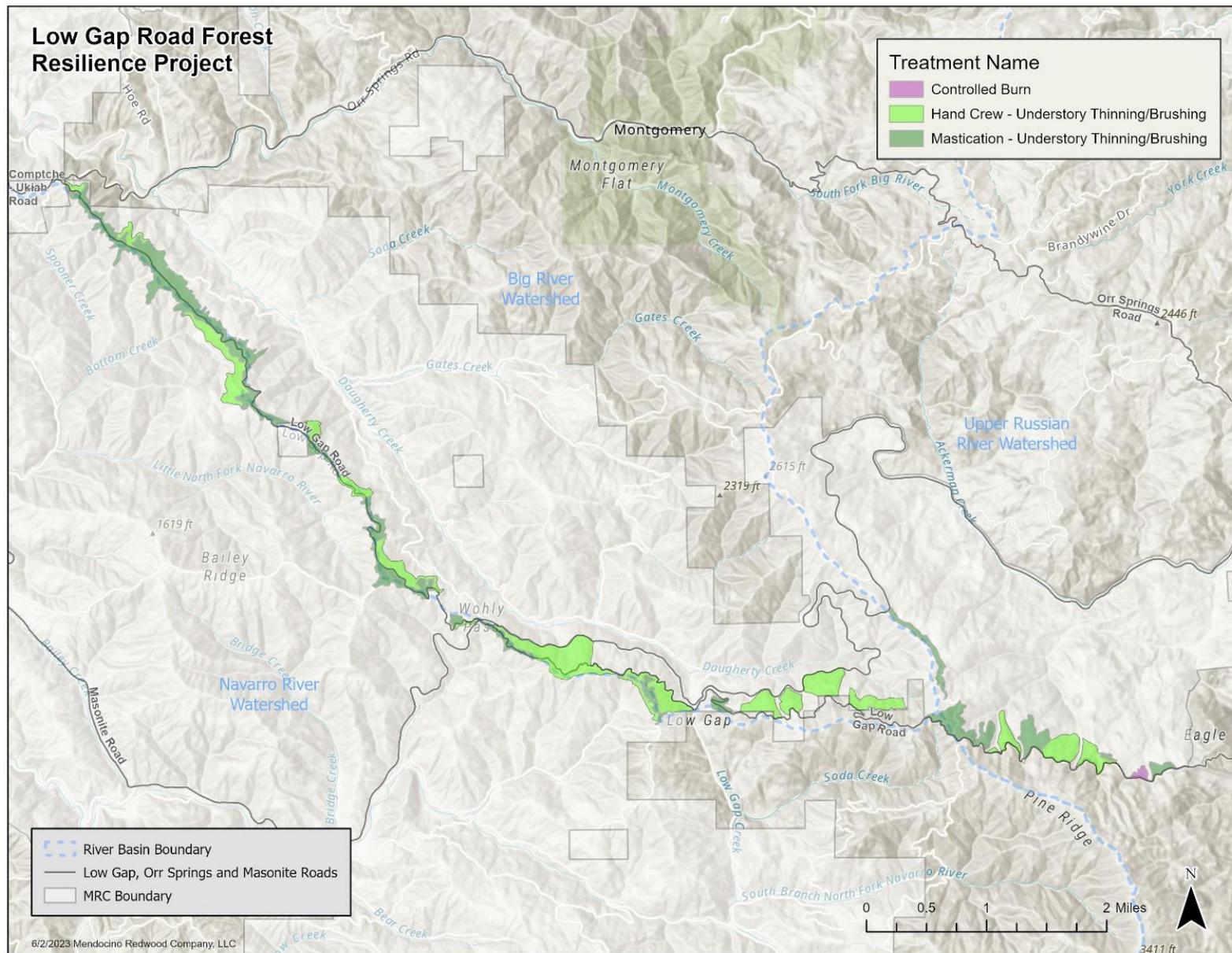
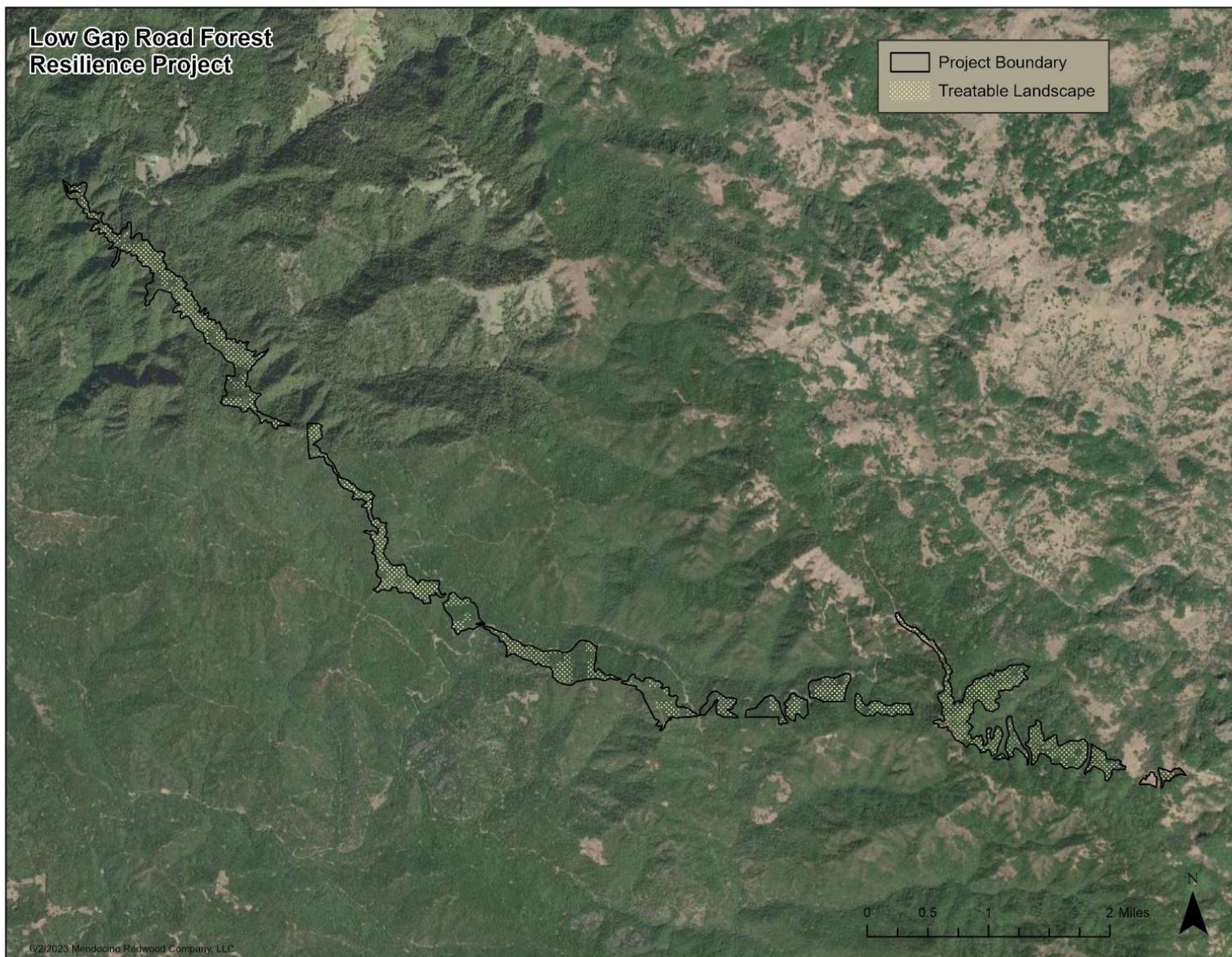


Figure 1. Overview map of project location in Mendocino County, California.



**Figure 2. Map of treatment activities.**



**Figure 3. Map of Cal VTP PEIR Treatable Areas within project boundaries.**

## TREATMENT TYPES

- ▶ **Fuel Breaks:** The project utilizes varying treatments suiting the topography and current stand conditions to create a contiguous and complete fuel break. The shaded fuel break by nature is designed to promote forest health by adapting to fire and mitigating severe effects rather than preventing it entirely; fire is an inevitability. When it occurs, strategic fuel breaks allow for suppression of fires burning at detrimental levels of intensity, while providing control and management opportunities for fires of productive intensity, whether they be prescribed or natural. The treatments are prescribed with the intent of moving stands towards more resilient conditions, which we define as the capacity to maintain equilibrium in the event of disturbance, namely fire.
- ▶ **Ecological Restoration:** Douglas-fir encroachment into Oregon white oak and California black oak woodlands will be addressed where suitable. Treatments within oak woodlands will retain all true oaks. This activity will occur during non-saturated soil conditions. (Note, true oaks and mature hardwoods shall be retained for their ecological value throughout the entire project area.)

An area of natural grassland will be broadcast burned for the purpose of introducing the ecosystem benefits of fire, namely, the removal of Douglas-fir seedlings and invasive European annual grasses in favor of native perennials. Mendocino Redwood Company (MRC) will consult with the Mendocino County Prescribed Burn Association (MCPBA) prior to conducting this burn.

## 2: VEGETATION TREATMENT PROJECT INFORMATION

1. **Project Title:** Low Gap Road Forest Resilience Project
2. **Project Proponent Name and Address:** Mendocino County Resource Conservation District  
410 Jones Street, Ste. C-3, Ukiah, CA 95482
3. **Contact Person Information and Phone Number:** Doug Turk; (707) 462-3664; doug@mrcrd.org
4. **Project Location:** Mendocino County, project centered at 39.1772, -123.4141; T15N R13W Sections 7, 16, 17 & 18; T15N R14W Sections 14, 5, 9, 11, 12, 8, 4, 10, 15; T16N R14W Sections 30, 19, 32, 31; T16N R15W Section 24 MDBM. Bailey Ridge & Orrs Springs USGS 7.5 Minute Quadrangles.
5. **Total Area to be Treated (acres)** 1,007
6. **Description of Project:**

### a. Initial Treatment

Mendocino Redwood Company will treat over 1000 acres of high-fire risk forest associated with the publicly accessible Low Gap Road on its Mendocino County timberlands west of Ukiah, creating a shaded fuel break on a strategic ridgeline. These treatments will slow the spread of wildfire between the upper reaches of the three river basins, promoting fire-resilience, ecosystem health, and carbon storage, while providing a safe access route for emergency personnel and rural communities. Brush and smaller (<10 inches dbh) trees will be thinned in the treatment area using mechanical or manual methods, depending on slope. Project generated slash height will be kept below 18 inches from ground level. A small area of grassland adjacent to oak woodland will be broadcast burned for fuels reduction and ecological benefits.

**Treatment Types** [see description in CalVTP PEIR Section 2.5.1, check every applicable category; provide detail in description of Initial Treatment]

- Wildland-Urban Interface Fuel Reduction
- Fuel Break

Ecological Restoration

**Treatment Activities** [see description in CalVTP PEIR Section 2.5.2, check every applicable category; include number of acres subject to each treatment activity, provide detail in description of Initial Treatment]

Prescribed Burning (Broadcast),   6   acres

Prescribed Burning (Pile Burning)

Mechanical Treatment,  542  acres

Manual Treatment,  462  acres

Prescribed Herbivory,        acres

Herbicide Application,        acres

**Fuel Type** [see description in CalVTP PEIR Section 2.4.1, check every applicable category; provide detail in description of Initial Treatment]

Grass Fuel Type

Shrub Fuel Type

Tree Fuel Type

**b. Treatment Maintenance**

Maintenance intervals are unknown at this time but would be triggered by visual assessment of small tree, shrub, and/or invasive plant density necessitating follow-up mechanical, manual, or prescribed fire treatments.

**Treatment Types** [see description in CalVTP PEIR Section 2.5.1, check every applicable category; provide detail in description of Treatment Maintenance]

Wildland-Urban Interface Fuel Reduction

Fuel Break

Ecological Restoration

**Treatment Activities** [see description in CalVTP PEIR Section 2.5.2, check every applicable category; include number of acres subject to each treatment activity, provide detail in description of Treatment Maintenance]

Prescribed Burning (Broadcast),   6   acres

Prescribed Burning (Pile Burning)

Mechanical Treatment,  542  acres

Manual Treatment,  462  acres

Prescribed Herbivory,        acres

Herbicide Application,        acres

**Fuel Type** [see description in CalVTP PEIR Section 2.4.1, check every applicable category; provide detail in description of Treatment Maintenance]

Grass Fuel Type

Shrub Fuel Type

Tree Fuel Type

### Use of the PSA for Treatment Maintenance

Prior to implementing a maintenance treatment, the project proponent will verify that the expected site conditions as described in the PSA are present in the treatment area. As time passes, the continued relevance of the PSA will be considered by the project proponent considering potentially changed conditions or circumstances. Where the project proponent determines the PSA is no longer sufficiently relevant, the project proponent will determine whether a new PSA or other environmental analysis is warranted.

In addition to verifying that the PSA continues to provide relevant CEQA coverage for treatment maintenance, the project proponent will update the PSA at the time a maintenance treatment is needed when more than 10 years have passed since the approval of the PSA or the latest PSA update. For example, the project proponent may conduct a reconnaissance survey to verify conditions are substantially similar to those anticipated in the PSA. Updated information shall be documented at the time these surveys are conducted.

**7. Regional Setting and Surrounding Land Uses:** (Briefly describe the project's surroundings)  
*[insert text here]*

The project is located in Mendocino County adjacent to Low Gap Road, a county-maintained, open-to-the-public unpaved road west of Ukiah, California. Low Gap Road connects Ukiah to Orr Springs Road, a paved county road. Low Gap Road experiences low traffic volumes but is used by the public for recreation (hiking, mountain biking, etc.) and to access privately owned parcels. The land surrounding the project area is primarily comprised of MRC timberlands. Other private parcels zoned as timber production, rangeland, and forestland share boundaries with the project along its southern border in the eastern third of the project area. There is no public land adjacent to the project area.

**8. Other Public Agencies Whose Approval is Required:** (e.g., permits)

A smoke management plan will be prepared for Mendocino County Air Quality Management District.

A burn permit will be obtained from CAL FIRE.

### Coastal Act Compliance

- The proposed project is NOT within the Coastal Zone
- The proposed project is within the Coastal Zone (*check one of the following boxes*)
- A coastal development permit been applied for or obtained from the local Coastal Commission district office or local government with a certified Local Coastal Plan, as applicable
- The local Coastal Commission district office or local government with a certified Local Coastal Plan (in consultation with the local Coastal Commission district office) has determined that a coastal development permit is not required

**9. Native American Consultation.** *For treatment projects that are within the scope of the CalVTP PEIR, AB 52 consultation for AB 52 compliance has been completed. The Board of Forestry and Fire Protection conducted consultation pursuant to Public Resources Code section 21080.3.1 during preparation of the PEIR.* Pursuant to CalVTP SPR CUL-2, Native American contacts in Mendocino County were contacted on June 6, 2023 and included \_The native American Heritage Commission, Coyote Valley Band of Pomo Indians, Guidiville Indian Rancheria, Yuki/Wailaki (Covelo, CA), Intertribal Sinkyone Wilderness Council, Cahto Tribe of Laytonville Rancheria, Manchester Point Arena Band of Pomo Indians, Noyo River Indian Community, Pinoleville Pomo Nation, Potter Valley Tribe, Redwood Valley Little River Band of Pomo Indians, Round Valley Reservation/Covelo Indian Community, Shebelna Band of Mendocino Coast Pomo Indians, Sherwood Valley Band of Pomo Indians, Wailaki Tribe, Yokayo Tribe, Hopland Band of Pomo Indians.

## DETERMINATION

**On the basis of this PSA and Addendum to the PEIR and the substantial evidence supporting it:**

- I find that all of the effects of the proposed project (a) have been covered in the CalVTP PEIR, and (b) all applicable Standard Project Requirements and mitigation measures identified in the CalVTP PEIR will be implemented. The proposed project is, therefore, **WITHIN THE SCOPE** of the CalVTP PEIR. **NO ADDITIONAL CEQA DOCUMENTATION** is required. For the proposed project areas outside of the CalVTP treatable landscape, no new circumstances have occurred, nor has any new information been identified requiring new analysis or verification. Project changes would not result in any new or substantially more severe significant impacts. **NO ADDITIONAL CEQA DOCUMENTAION** beyond this PSA and ADDENDUM to the PEIR is required.
  
- I find that treatments in proposed project areas outside the CalVTP treatable landscape to not result in substantial changes in the project, no substantial changes in circumstances have occurred, and no new information of substantial importance has been identified. The inclusion of project areas outside the CalVTP treatable landscape will not result in any new or substantially more sever significant impacts. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred; therefore, this **ADDENDUM** is adopted to address the project areas outside geographic extent presented in the PEIR.
  
- I find that the proposed project will have effects that were not covered in the CalVTP PEIR. These effects are less than significant without any mitigation beyond what is already required pursuant to the CalVTP PEIR. A **NEGATIVE DECLARATION** will be prepared.
  
- I find that the proposed project will have effects that were not covered in the CalVTP PEIR or will have effects that are substantially more severe than those covered in the CalVTP PEIR. Although these effects may be significant in the absence of additional mitigation beyond the CalVTP PEIR's measures, revisions to the proposed project or additional mitigation measures have been agreed to by the project proponent that would avoid or reduce the effects so that clearly no significant effects would occur. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
  
- I find that the proposed project will have significant environmental effects that are (a) new and were not covered in the CalVTP PEIR and/or (b) substantially more severe than those covered in the CalVTP PEIR. Because one or more effects may be significant and cannot be clearly mitigated to less than significant, an **ENVIRONMENTAL IMPACT REPORT** will be prepared.

  
\_\_\_\_\_  
Signature

August 7, 2023  
\_\_\_\_\_  
Date

Joe Scriven  
\_\_\_\_\_  
Printed Name

Assistant Executive Director  
\_\_\_\_\_  
Title

Mendocino County Resource Conservation District  
Agency

### 3: PROJECT SPECIFIC ANALYSIS/ADDENDUM

#### PD-3.3: Aesthetics and Visual Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities	LTS	Impact AES-1, pp. 3.2-16 – 3.2-19	Yes	SPR AES-2 SPR AQ-2, 3 SPR REC-1	NA	LTS	No	Yes
Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	LTS	Impact AES-2, pp. 3.2-20 – 3.2-25	Yes	SPR AES- 1 SPR AES- 3 SPR AD- 4 SPR REC- 1	NA	LTS	No	Yes
Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Non-Shaded Fuel Break Treatment Type	SU	Impact AES-3, pp. 3.2-25 – 3.2-27	No		None	NA	No	NA

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Aesthetic and Visual Resource Impacts: Would the treatment result in other impacts to aesthetics and visual resources that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## **Discussion**

### **Impact AES-1**

The project area is located on private lands and there are no scenic vistas, scenic resources, or state scenic highways near the areas where treatment activities will occur. Low Gap County Road is adjacent to the project area but does not receive frequent public traffic along the portions adjacent to the project area. A few private landowners use Low Gap County Road in the section where the project is located, who will benefit from the reduced fuel loads and associated reduction in wildfire risk. Pre-field work will be used to determine treatment types and boundaries, such as topographic features and vegetation types, with the intent to create heterogeneous structure throughout the project area. Work crews will stay within the established project boundaries.

The potential short-term impacts to visual character during implementation of the treatments are within the scope of the activities and impacts addressed in the PEIR analysis, and the long-term visual benefits of the project outweigh the temporary visual impacts. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing scenic resources are essentially the same within and outside of the treatable landscape; therefore, the short-term aesthetic impact is the same, as described above.

### **Impact AES-2**

The project area is located on private lands adjacent to Low Gap County Road. There are no scenic vistas or public viewpoints, and the project area is not visible from any scenic highways; therefore, there is no potential for the project activities to result in substantial degradation of visual character of the project location. The potential for these types of treatments to result in long-term degradation of the visual character of an area or areas was examined in the PEIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing scenic resources are essentially the same within and outside of the treatable landscape; therefore, the short-term aesthetic impact is the same, as described above.

### **Impact AES-3**

This impact does not apply, as no non-Shaded Fuel Breaks are included in the proposed project.

### **New Aesthetic and Visual Resource Impacts**

None. The project proponent has evaluated the site-specific characteristics of the proposed project and ensured their alignment with the environmental and regulatory conditions outlined in the CalVTP PEIR. Although there is some inclusion of land outside the CalVTP treatable landscape in the proposed treatment area, the viewshed and treatment impacts remain consistent with those assessed in the PEIR and would therefore not create any new significant impacts.

## PD-3.4: Agriculture and Forestry Resources

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AG-1: Directly Result in the Loss of Forest Land or Conversion of Forest Land to a Non-Forest Use or Involve Other Changes in the Existing Environment Which, Due to Their Location or Nature, Could Result in Conversion of Forest Land to Non-Forest Use	LTS	Impact AG-1, pp. 3.3-7 – 3.3-8	No	NA	NA	NA	No	Yes

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Agriculture and Forestry Resource Impacts: Would the treatment result in other impacts to aesthetics and visual resources that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

#### Impact AG-1

This impact does not apply, as no conversion of forest land to non-forest land will result from the proposed project.

#### New Aesthetic and Visual Resource Impacts

None. The project proponent has evaluated the site-specific characteristics of the proposed project and ensured their alignment with the environmental and regulatory conditions outlined in the CalVTP PEIR. Although there is some inclusion of land outside the CalVTP treatable landscape in the proposed treatment area, these forest and woodland landscapes are consistent with other areas within the CalVTP treatable landscape and assessed in the PEIR, and would therefore not create any new significant impacts.

## PD-3.5: Air Quality

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	SU	Table 3.4-1; Impact AQ-1, pp. 3.4-26 – 3.4-32; Appendix AQ-1	Yes	SPR AD- 4 SPR AQ-1, 2, 3, 6	MM AQ- 1	LTSM	No	Yes
Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk	LTS	Table 3.4-6; Impact AQ-2 pp. 3.4-33 – 3.4-34; Appendix AQ-1	Yes	SPR HAZ- 1 SPR NOI- 4 SPR NOI- 5		LTS	No	Yes
Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	LTS	Section 3.4.2; Impact AQ-3, pp. 3.4-34 – 3.4-35	No	None	NA	NA	NA	NA
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	SU	Section 3.4.2; Impact AQ-4, pp. 3.4-35 – 3.4-37	Yes	SPR AD- 4 SPR AQ-2, 6		SU	No	Yes
Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust	LTS	Impact AQ-5, pp. 3.4-37 – 3.4-38	Yes	SPR HAZ- 1 SPR NOI-4, 5		LTS	No	Yes
Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	SU	Section 2.5.2; Impact AQ-6; pp. 3.4-38	Yes	SPR AD- 4 SPR AQ-2, 6		SU	No	Yes

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Air Quality Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## **Discussion**

### **Impact AQ-1**

Use of vehicles, mechanical equipment, and prescribed burning during treatments would result in emissions of criteria pollutants that could exceed CAAQS or NAAQS thresholds. To the extent possible, project-related vehicle traffic will access the project site via the private Masonite Industrial Road to lessen air quality impacts on local residents. Emissions of criteria air pollutants related to the proposed treatment are within the scope of the impacts addressed in the PEIR because the proposed activities, as well as the associated equipment and duration of use, are consistent with those analyzed in the PEIR. The components of mitigation measure AQ-1 that have been determined by CAL FIRE to be feasible and would be implemented to reduce emissions, include the use of gasoline-powered equipment, encouraging carpooling to the project site, turning off vehicle engines when not in use, and using Best Available Control Technology for emission reductions of nitrogen oxides and particulate matter on equipment. Equipment meeting Tier-4 emission standards, and the use of renewable fuel, would be implemented to the extent feasible.

See new air quality impacts below for analysis of land outside of the treatable landscape.

### **Impact AQ-2**

The use of vehicles and mechanical equipment during the initial and maintenance treatments could expose people to diesel particulate matter emissions. Diesel particulate matter emissions from the proposed treatment project are within the scope of the of the activities and impacts addressed in the PEIR because the duration and exposure parameters of the proposed project are consistent with those analyzed in the PEIR.

See new air quality impacts below for analysis of land outside of the treatable landscape.

### **Impact AQ-3**

This impact does not apply to the project, as there are no known naturally occurring asbestos deposits within the treatment areas.

### **Impact AQ-4**

Prescribed burning during treatments could expose people to toxic air contaminants. The duration and parameters of the prescribed burn are within the scope of the activities addressed in the PEIR; therefore, the potential for exposure to toxic air contaminants is also within the scope of impacts covered in the PEIR. All feasible measures to prevent and minimize smoke emissions as well as exposure to smoke are included in SPRs. No additional mitigation measures are feasible, and this impact would remain potentially significant and unavoidable, as explained in the PEIR.

See new air quality impacts below for analysis of land outside of the treatable landscape.

### **Impact AQ-5**

The use of vehicles and mechanical equipment during treatments could expose people to objectionable odors from diesel exhaust. Objectionable odors from diesel exhaust during the proposed treatment project are within the scope of the impacts covered in the PEIR because the proposed activities, as well as the associated equipment and duration of use, are consistent with those analyzed in the PEIR.

See new air quality impacts below for analysis of land outside of the treatable landscape.

### **Impact AQ-6**

Prescribed burning during treatments could expose people to objectionable odors. The duration and parameters of the prescribed burn are within the scope of the activities addressed in the PEIR; therefore, the resultant potential for exposure to objectionable odors from smoke is also within the scope of impacts covered in the PEIR. All feasible measures to prevent and minimize smoke odors as well as exposure to smoke odors are included in SPRs. No additional mitigation measures are feasible, and this impact would remain potentially significant and unavoidable, as explained in the PEIR.

See new air quality impacts below for analysis of land outside of the treatable landscape.

**New Air Quality Impacts**

None. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions present and air basin in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIRs.

## PD-3.6: CULTURAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources	LTS	Impact CUL-1, pp. 3.5-14 – 3.5-15	Yes	SPR CUL-1, 7, 8		LTSM	No	Yes
Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources	SU	Impact CUL-2, pp. 3.5-15 – 3.5-16	Yes	SPR CUL-1, 2, 3, 4, 5, 8	MM CUL-2	LTS	No	Yes
Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	LTS	Impact CUL-3, p. 3.5-17	Yes	SPR CUL-1, 2, 3, 4, 5, 6, 8		LTS	No	Yes
Impact CUL-4: Disturb Human Remains	LTS	Impact CUL-4, p. 3.5-18	Yes	SPR CUL-1, 2, 3, 5, 6	MM CUL-2	LTS	No	Yes

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Archaeological, Historical, and Tribal Cultural Resource Impacts: Would the treatment result in other impacts to archaeological, historical, and tribal cultural resources that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

#### **Impact CUL-1**

Operations around All Built Historical Resources will be avoided by use of flagging buffers and felled trees will be directed away from any found/recorded site.

#### **Impact CUL-2**

Vegetation treatment may include mechanical treatments using heaving equipment. The potential for these treatment activities to result in inadvertent discovery of unique archaeological resources or subsurface historical resources was examined in the PEIR. Treatment activities and extent of ground disturbance of the treatment project are consistent with those analyzed in the PEIR and Mitigation Measure CUL-2 would apply to this treatment.

#### **Impact CUL-3**

Project treatments would include mechanical treatment, manual treatment, and prescribed burning. The potential for adverse effects to tribal cultural resources during implementation of the treatments is within the scope of the of the activities and impacts addressed in the PEIR because the treatment activities and extent of ground disturbance are

consistent with those analyzed in the PEIR. Native American contacts on the Mendocino County NA contact list were sent letters on June 5, 2023. No responses have been received from any Native American tribes regarding cultural resources.

**Impact CUL-4**

Vegetation treatment would include mechanical treatments using heavy equipment. The potential for uncovering human remains during implementation of the treatment project is within the scope of the activities and impacts addressed in the PEIR. Should human remains be discovered the project would comply with California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097.

**New Archaeological, Historical, and Tribal Cultural Resource Impacts**

None. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, the potential to encounter built-environment structures that have not yet been evaluated for historical significance in areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to historical resources is also the same, as described above. Additionally, the Tribal Cultural Affiliations present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to tribal cultural resources is also the same, as described above.

## PD-3.7: BIOLOGICAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTS	Impact BIO-1, pp 3.6-131-3.6.138	Yes	SPR BIO-1, 2, 6, 7, 9 SPR GEO-1, 3, 4, 5, 7 HYD-4	MM BIO-1a, 1b	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTS (all wildlife species except bumble bees) S&U (bumble bees)	Impact BIO-2, pp 3.6-138-3.6-184	Yes	SPR BIO-1, 2, 10 SPR HYD-4, 6?	MM BIO-2a, 2b, 2e, 2g	LTSM	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function	LTS	Impact BIO-3, pp 3.6-186-3.6-191	Yes	SPR BIO-1, 2, 3, 6, 9 SPR GEO-1, 4, 5, 7	MM BIO-3a	LTSM	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTS	Impact BIO-4, pp 3.6-191-3.6-192	Yes	BIO-1, 2 HYD-4	BIO-4	LTSM	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTS	Impact BIO-5, pp 3.6-192-3.6-196	Yes	SPR BIO-1, 3, 4, 10, 11 SPR HYD-1, 4	MM BIO-5	LTS	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197-3.6-198	Yes	SPR BIO-1, 2, 3, 4, 6, 7, 9, 10, 11, 12		LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	No Impact	Impact BIO-7, pp 3.6-198-3.6-199	No	NA	NA	NA	NA	NA
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	No Impact	Impact BIO-8, pp 3.6-199-3.6-200	No	NA	NA	NA	NA	NA

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Biological Resources Impacts: Would the treatment result in other impacts to biological resources that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

**Impact BIO-1**

Project treatments (prescribed burning, manual fuels reduction, and mechanical treatment) could result in direct or indirect adverse effects to special-status plant species. Eight special status plant species were identified as potentially occurring within the habitat available in the project area during the review and survey of the project-specific biological resources (SPR BIO-1). Two special status species (white-flowered rein-orchid and North Coast semaphore grass) are known to occur within the project area. Additional occurrences of these species or others may be found during pre-operation botanical surveys required by SPR BIO-7.

The appropriate measures to prevent and minimize potential impacts to special-status plant species are included in the applicable SPRs and MMs listed above and described below. The potential for treatment activities to result in adverse effects on special-status plants was examined in the PEIR. This impact on special-status plants is within the scope of the PEIR because the treatment activities and intensity of disturbance resulting from treatment activities are consistent with those analyzed in the PEIR. The project area includes land that falls outside the CalVTP treatable landscape presented in the PEIR; however, within the boundary of the treatment area, habitat characteristics are essentially the same within and outside the treatable landscape. Therefore, the potential impact on special-status plants wildlife outside the CalVTP treatable landscape is also the same as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

**Impact BIO-2**

Project treatments (prescribed burning, manual fuels reduction, and mechanical treatment) could result in direct or indirect adverse effects to special-status animal species. Thirty (30) special-status taxa were identified as potentially occurring within the habitat available in the project area during the review and survey of the project-specific biological resources (SPR BIO-1), which are listed in Attachment B (Biological Resources) and discussed below.

State or federally listed wildlife:

Northern spotted owl (NSO) and marbled murrelet (MAMU) are ESA-listed birds with potential to occur within or near the treatment area. Neither species is known to occur within the project area, and suitable habitat is limited within those boundaries. No alteration of habitat suitability for these species will result from treatment activities, as larger trees (above 11" dbh) are not targeted for removal. Old growth/late seral nesting trees required for MAMU were not identified. Five known Northern spotted owl territories' activity centers occur within 1/2 mile of project boundaries and thus could be subject to adverse impacts of noise disturbance during sensitive nesting and breeding period (March 1 – August 15).

Raptors: Seven special status raptor species have some potential to occur in or near the project area. Northern goshawk, a forest-nesting hawk is less likely to occur as late seral/old growth stands are not present in or near the treatment area. Golden eagles may occur though with lower likelihood as they prefer open hunting habitat which is limited in the treatment area, and large prominent nesting structures which have not been identified in or near the treatment area. Long-eared owl is a potential species at the edge of conifer forest and grassland. Northern harrier is a possible but unlikely occurrence limited to open grassland and only during the non-breeding winter period. White-tailed kite may occur in portions of the project area as the species hunts in openings, but nests under forest canopy. Peregrine falcon may occur in the greater area (a known occurrence is recorded in Montgomery Woods); however, due to a lack of observed rocky outcrops, they are unlikely to breed within the project area. Bald eagle is an unlikely occupant of the

project area, with the nearest water body (Leonard Lake) 6 miles away. All raptor species discussed above are California fully protected species except long-eared owl and northern harrier, which are California species of special concern.

**Songbirds:** Eight special status songbird taxa have some potential to occur in or near the project area. Vaux' swift and purple martin are cavity-nesting birds that could use snags which may occur in the project area. Olive-sided flycatcher are commonly detected on the property at forest edges. Yellow-breasted chat and yellow warbler generally nest in the canopy of riparian forests and are therefore less likely to occur in the project area. Grasshopper sparrow and savanna sparrow (Belding's and Bryant's) use open grassland habitat, which is present in the eastern portion of the project area.

**Bats:** Three special status bat species have some potential to occur in or near the project area. Pallid bat, Townsend's big ear bat, western red bat could potentially utilize large cavities in trees and snags that may be present in the project area. No caves or anthropogenic habitat have been identified in the project area.

**Carnivores:** Three special status carnivore species have some potential to occur in or near the project area; all are fairly unlikely. Humboldt marten and pacific fisher are generally associated with old growth/late seral forest, which is not present in the project area. American badger is associated with open habitat, which is present in the eastern portion of the plan area.

**Other mammals:** Two additional special status mammals have the potential to occur in or near the project area. Sonoma tree vole and ringtail are known to occur on MRC property. Sonoma tree vole nests and discarded piles of Douglas-fir resin ducts have been observed in stands where Douglas-fir is prevalent, and ringtail were detected on a track-plate survey.

**Amphibians:** One special status amphibian species has potential to occur in or near the project area. Aquatic breeding habitat is not present in the treatment area; however, known occurrences of red-bellied newts are documented in creeks within ½ mile of the project area, and adult newts migrating overland could pass through treatment areas or appurtenant roads.

**Invertebrates:** Three invertebrate species have some potential to occur in or near the project area. Crotch's bumblebee and Western bumblebee may occur where floral resources are available, especially in the eastern end of the project area. Lotis blue butterfly is presumed extinct and is primarily associated with bog-like habitat, which is not known to occur in the project area; however, larval food source plant groups may be present in the project area.

The appropriate measures to prevent and minimize potential impacts to special-status wildlife species are included in the applicable SPRs and MMs listed above and described below. The potential for treatment activities to result in adverse effects on special-status wildlife species was examined in the PEIR. This impact on special-status wildlife is within the scope of the PEIR because the treatment activities and intensity of disturbance resulting from treatment activities are consistent with those analyzed in the PEIR. The project area includes land that falls outside the CalVTP treatable landscape presented in the PEIR; however, within the boundary of the treatment area, habitat characteristics are essentially the same within and outside the treatable landscape. Therefore, the potential impact on special-status wildlife outside the CalVTP treatable landscape is also the same as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

### **Impact BIO-3**

Project treatments (prescribed burning, manual fuels reduction, and mechanical treatment) could result in direct or indirect adverse effects to sensitive natural communities. Sensitive natural communities were identified as potentially occurring within the habitat available in the project area during the review and survey of the project-specific biological resources (SPR BIO-1). Based on MRC timber inventory data, the project area likely contains the following vegetation alliances that are designated sensitive based on a California State Rarity Ranking of S1 (critically imperiled), S2 (imperiled) or S3 (vulnerable): Douglas-fir – tanoak forest and woodland (S3), redwood forest and woodland (S3.2), tanoak forest (S3.2), Oregon white oak woodland and forest (S3). It should be noted that tanoak densities on MRC property are often the result of past timber management rather than historic species composition. No riparian vegetation is known in the project area (the project area contains Class III watercourses, and one small Class II). Other sensitive natural communities with potential to occur, based on review of company data and PEIR table 3.6-16 ("Vegetation and Habitat Types within the Treatable Landscape for the Northern California Coast Ecological Section") include California bay forest (S3), Western hemlock forest (S2), California buckeye grove (S3), grand fir forest (S2.1), California oat-grass grassland (S3), Idaho fescue grassland (S3), red fescue grassland (S3). More fine-scaled information on sensitive vegetation communities will be

provided by the botanical survey report to be completed prior to operations (SPR BIO-3 and SPR BIO-7), which may reveal additional sensitive natural communities that require mitigation measures.

Proposed treatments will maintain or enhance the existing forest communities by retaining current dominant species composition (except in the case of retarding Douglas-fir encroachment in oak woodland) and reducing stand-replacing fire risk. In oak woodland where Douglas-fir encroachment (a major threat to the true oak woodland communities in California) is occurring, treatments will reduce fire risk as well as future oak mortality resulting from overtopping by Douglas-fir.

The appropriate measures to prevent and minimize potential impacts to sensitive natural communities are included in the applicable SPRs and MMs listed above and described below. The potential for treatment activities to result in adverse effects on sensitive natural communities was examined in the PEIR. This impact on sensitive natural communities is within the scope of the PEIR because the treatment activities and intensity of disturbance resulting from treatment activities are consistent with those analyzed in the PEIR. The project area includes land that falls outside the CalVTP treatable landscape presented in the PEIR; however, within the boundary of the treatment area, habitat characteristics are essentially the same within and outside the treatable landscape. Therefore, the potential impact on sensitive natural communities outside the CalVTP treatable landscape is also the same as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

#### **Impact BIO-4**

Proposed treatments could result in direct or indirect adverse effects to state- or federally protected wetlands. Several Class III watercourses, and one small Class II watercourse is contained within the boundaries of treatment areas. Small wet areas such as seeps and springs may be present, but no waterbodies or wetlands are known to occur in the project area.

The appropriate measures to prevent and minimize potential impacts on state- or federally protected wetlands are included in the applicable SPRs and MMs listed above and described below. The potential for treatment activities to result in adverse effects on state- or federally protected wetlands was examined in the PEIR. This impact on state- or federally protected wetlands is within the scope of the PEIR because the treatment activities and intensity of disturbance resulting from treatment activities are consistent with those analyzed in the PEIR. The project area includes land that falls outside the CalVTP treatable landscape presented in the PEIR; however, within the boundary of the treatment area, habitat characteristics are essentially the same within and outside the treatable landscape. Therefore, the potential impact on state- or federally protected wetlands outside the CalVTP treatable landscape is also the same as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

#### **Impact BIO-5**

Project treatments (prescribed burning, manual fuels reduction, and mechanical treatment) could result in direct or indirect adverse effects to wildlife movement corridors or nursery sites, because wildlife habitat is present in the treatment area. The project is not within the modeled Essential Connectivity Areas (CDFW 2020). The modeled Terrestrial Connectivity (CDFW 2019) rank is 1 (Limited Connectivity Opportunity) or 3 (Connections with Implementation Flexibility) depending on location within the project. Implementation of proposed treatments would not result in substantial change in present conditions, as the area is zoned for timber production and currently managed for timber harvest. Habitat function will not be significantly changed as a result of proposed treatments, as no trees greater than 10 inches dbh will be removed, canopy cover will be retained, and vegetation communities will be retained or enhanced. WLPZ areas will be implemented, providing additional wildlife movement corridors. No nursery sites are known to occur in the project area.

The appropriate measures to prevent and minimize potential impacts on wildlife movement corridors and nurseries are included in the applicable SPRs and MMs listed above and described below. The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the PEIR. This impact on wildlife

movement corridors and nurseries is within the scope of the PEIR because the treatment activities and intensity of disturbance resulting from treatment activities are consistent with those analyzed in the PEIR. The project area includes land that falls outside the CalVTP treatable landscape presented in the PEIR; however, within the boundary of the treatment area, habitat characteristics are essentially the same within and outside the treatable landscape. Therefore, the potential impact on wildlife movement corridors and nurseries outside the CalVTP treatable landscape is also the same as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

#### **Impact BIO-6**

Project treatments (prescribed burning, manual fuels reduction, and mechanical treatment) could result in direct or indirect adverse effects on common wildlife, including nesting birds, because suitable wildlife habitat is present throughout the treatment area. Treatment activities conducted during the nesting season (February 1- August 31) could result in direct loss of nests or indirect effects (e.g., nest abandonment) caused to auditory and visual disturbance.

The appropriate measures to prevent and minimize potential impacts on common wildlife, including focused surveys prior to operations, are included in the applicable SPRs listed above and described below. The potential for treatment activities to result in adverse effects on common wildlife was examined in the PEIR. This impact on common wildlife is within the scope of the PEIR because the treatment activities and intensity of disturbance resulting from treatment activities are consistent with those analyzed in the PEIR. The project area includes land that falls outside the CalVTP treatable landscape presented in the PEIR; however, within the boundary of the treatment area, habitat characteristics are essentially the same within and outside the treatable landscape. Therefore, the potential impact on common wildlife outside the CalVTP treatable landscape is also the same as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

#### **Impact BIO-7**

Project treatments (prescribed burning, manual fuels reduction, and mechanical treatment) will not result in conflict with local policies of ordinances protecting biological resources. The project is located in Mendocino County outside of city limits, on private land zoned for timber production. No pertinent local policies, ordinances or permitting procedures were identified.

The potential for projects activities to conflict with local policies was examined in PEIR and the potential for such conflict I within the scope of the PEIR because vegetation treatment projects implemented under the CalVTP that are subject to local policies would be required to comply with any applicable county, city, or other local policies, ordinances, and permitting procedures that protect biological resources. The project area includes land that falls outside the CalVTP treatable landscape presented in the PEIR; however, within the boundary of the treatment area, regulatory conditions and biological resources are essentially the same within and outside the treatable landscape. Therefore, the potential for conflict with local policies or ordinances outside the CalVTP treatable landscape is also the same as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

#### **Impact BIO-8**

There is no HCP/NCCP applicable to Mendocino Redwood Company (MRC) property, on which the project is located. At the time of publication of the VTP PEIR, MRC was listed as an existing HCP/NCCP (table 3.6-17 Conservation Plans Adopted or In Progress in the Treatable Landscape – Northern California Coast Section, p. 3.6-68). However, the MRC HCP/NCCP, which was then in-progress was not completed and is now non-existent.

## PD-3.8: GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	LTS	Impact GEO-1, pp. 3.7-26 – 3.7-29	Yes	SPR GEO-1, 2, 3, 4, 5, 6, 7, 8 SPR AQ-3 SPR HYD-4		LTSM	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	SPR GEO-1, 3, 4, 5, 7, 8 SPR AQ-3		LTSM	NO	Yes

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Geology, Soils, Paleontology, and Mineral Resource Impacts: Would the treatment result in other impacts to geology, soils, paleontology, and mineral resources that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

#### Impact GEO-1

The use of heavy equipment on all unstable features will be avoided. Heavy equipment use will be limited to gentler slopes (0-50%) and will not operate under saturated conditions (i.e., when surface runoff is likely to occur). Equipment will be used to open existing skid trails requiring only minimal soil disturbance. It is not anticipated that operations will change the natural water flow patterns or cause water to channel. Any dozer lines will be evaluated after use, and if necessary, water bars will be installed to maintain the natural flow of water. No exposure of 50% or more of soil is anticipated. For the areas within the project boundaries where mechanical, manual and or prescribed fire activities will occur; from November 1 through April 1 inspections shall be completed to ensure water breaks are functioning properly once a storm has produced 1.5 inches of rain within a 24-hr. period. Any areas where the inspection identifies that erosion could result in a substantial discharge will immediately be corrected and stabilized.

Burning will be limited to low intensity fire, resulting in mosaic burns consuming 60-90% of understory vegetation. Water breaks along control lines constructed by hand or mechanical means will have water breaks installed immediately if the control lines will not be used by vehicles and equipment during prescribed burning operations. If control lines need to be utilized by vehicles or equipment during the prescribed fire period, then water breaks will be installed between October 15th to November 15th and April 1st to May 1st if the National Weather Service forecast is a chance (30% or more of rain) within the next 24-hour period. Water breaks shall be installed diagonally as a trench at least 6-inches into a firm ground base with a minimum of a 6-inch berm on the downhill side so that water can be intercepted and directed away from the exposed control line surface. The exit area for the water must be free of blockages allowing for free flow of water. Water breaks shall be installed mid slope of control lines on slopes greater than 50% at 75 feet, 26-50% at 100 feet, 11-25% at 150 feet, and 10% or less at 200 feet. Where mechanical, manual, or prescribed fire treatment is

proposed no burn piles will exceed 20 feet in length, width or diameter except on landings, road surfaces or on contour to minimize the spatial extent of soil damage. Piles created may be chipped or burned. No piles will be constructed within the WLPZ.

Potential impacts related to soil erosion during implementation of the treatment project are within the scope of the of the activities and impacts addressed in the PEIR because the use of type of equipment, extent of vegetation removal, and intensity of prescribed burning proposed are consistent with those analyzed in the PEIR.

### **Impact GEO-2**

As proposed, this project will maintain constructed shaded fuel breaks on MRC properties adjacent to Low Gap County Road. No treatment activity will occur on unstable features. Steeper slopes (50% and over) within the project boundaries are associated with Class I and II watercourses and will be protected through the application of WLPZ that corresponds to WLPZ widths as identified in SPR HYD-4 (per California Forest Practice Rules 14 CCR §936.5). Heavy equipment may be used on slopes between 0 - 20% and this use will be minimized. Heavy equipment shall not operate when soils are saturated. Potential impacts related to landslides during implementation of the treatment project are within the scope of the of the activities and impacts addressed in the PEIR because the extent of vegetation removal, intensity of prescribed burning, and avoidance of steep slopes and areas of instability are consistent with those analyzed in the PEIR.

### **New Geology, Soils, Paleontology, and Mineral Resource Impacts**

None. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the soil characteristics of the project area are essentially the same within and outside the treatable landscape; therefore, the potential impact related to soil erosion is also the same, as described above.

## PD-3.9: GREENHOUSE GAS EMISSIONS

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs	LTS	Impact GHG-1, pp. 3.8-10 – 3.8-11	Yes	SPR GHG- 1	NA	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	PSU	Impact GHG-2, pp. 3.8-11 – 3.8-17	Yes	SPR AQ- 3	MM GHG- 2	LTSM	No	Yes

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New GHG Emissions Impacts: Would the treatment result in other impacts to GHG emissions that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

#### **Impact GHG-1**

Use of vehicles and mechanical equipment and prescribed burning would result in GHG emissions. The appropriate measures to prevent and minimize the possibility to conflict with a plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs, are included in the applicable SPR's associated with this impact.

#### **Impact GHG-2**

Use of vehicles and mechanical equipment and prescribed burning would result in GHG emissions. The appropriate measures to prevent and minimize the possibility to generate greenhouse gas emissions through treatment activities are included in the applicable SPR's and/or MMs addressed in this document.

#### **New Impacts Related to GHG Emissions**

None. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the same plans, policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape, as well as areas within the treatable landscape; therefore, the GHG impact is also the same, as described above.

## PD-3.10: ENERGY RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy	LTS	Impact ENG-1, pp. 3.9-7 – 3.9-8	Yes	SPR NOI-5	NA	LTS	No	Yes

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Energy Resource Impacts: Would the treatment result in other impacts to energy resources that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

#### **Impact ENG-1**

Use of vehicles and mechanical equipment during treatment would result in consumption of energy. This consumption will be short term and necessary to complete the practices associated with this project.

#### **New Energy Resource Impacts**

None. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing energy consumption is essentially the same within and outside the treatable landscape; therefore, the energy impact is also the same, as described above.

## PD-3.11: HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials	LTS	Impact HAZ-1, pp. 3.10-14 – 3.10-15	Yes	SPR HAZ- 1	None	LTS	No	Yes
Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	LTS	Impact HAZ-2, pp. 3.10-15 – 3.10-18	No	NA	NA	NA	NA	NA
Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites	PS	Impact HAZ-3, pp. 3.10-18 – 3.10-19	No	NA	NA	NA	NA	NA

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Hazardous Materials, Public Health and Safety Impacts: Would the treatment result in other impacts related to hazardous materials, public health and safety that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

#### **Impact HAZ-1**

Treatments (prescribed burning, manual fuels reduction, and mechanical treatment) would require the use of fuels and related accelerants, which are hazardous materials. All equipment and vehicles will be in good working order and free of leaks. If fueling equipment or firing devices is needed, they will be filled off-site, or on level ground away from WLPZ. The appropriate measures to prevent and minimize the possibility to create a significant health hazard from the use of hazardous materials are included in the applicable SPR addressed in this document.

#### **Impact HAZ-2**

No herbicide treatment activities proposed with this project. The impact is within the scope of the PEIR analysis and site-specific analysis.

#### **Impact HAZ-3**

This impact does not apply to the treatment project because there are no known hazardous material sites in the project area. The impact is within the scope of the PEIR analysis and site-specific analysis.

**New Hazardous Materials, Public Health and Safety Impacts**

None. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the exposure potential and regulatory conditions are essentially the same within and outside the treatable landscape; therefore, the hazard material impact is also the same, as described above.

## PD-3.12: HYDROLOGY AND WATER QUALITY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning	LTS	Impact HYD-1, pp. 3.11-25 – 3.11-27	Yes	SPR HYD- 1, 4 SPR AQ- 3 SPR BIO-4, 5 SPR GEO-3, 4, 6, 7, 8	MM Bio-3b	LTS	No	Yes
Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities	LTS	Impact HYD-2, pp. 3.11-27 – 3.11-29	Yes	SPR HYD-1, 4, SPR BIO- 1 SPR GEO-1, 2, 3, 4, 7, 8 SPR HAZ-1, 5		LTS	No	Yes
Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory	LTS	Impact HYD-3, p. 3.11-29	No	NA	NA	NA	NA	NA
Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides	LTS	Impact HYD-4, pp. 3.11-30 – 3.11-31	No	NA	NA	NA	NA	NA
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-31	Yes	SPR HYD-2, 4, 6 SPR GEO- 2, 5, 7, 8		LTS	No	Yes

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Hydrology and Water Quality Impacts: Would the treatment result in other impacts to hydrology and water quality that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

**Impact HYD-1**

No direct treatments are proposed adjacent to the watercourse within the project area. Equipment use will be excluded from watercourse and lake protection zones. Low intensity fire will be allowed to back into the watercourse’s protection zones. The impact is within the scope of the PEIR analysis and site-specific analysis.

**Impact HYD-2**

No direct treatments are proposed adjacent to the watercourse within the project area. Equipment use will be excluded from both watercourse and lake protection zones and equipment limitation zones. Low intensity fire will be allowed to back into the watercourse’s protection zones. The impact is within the scope of the PEIR analysis and site-specific analysis.

**Impact HYD-3**

This impact does not apply to the initial treatment because prescribed herbivory would not be used as a treatment activity on the project site.

**Impact HYD-4**

Herbicide use will not be used as a treatment activity in the project area.

**Impact HYD-5**

This project as proposed will maintain in place constructed shaded fuel breaks on MRC properties. All drainage facilities and structures are in place and installed/constructed as part of the past THP’s completed for each area. New road or trail construction is not anticipated. The impact is within the scope of the PEIR analysis and site-specific analysis. This impact to site drainage is within the scope of the PEIR because the types of treatments and treatment intensity are consistent with those analyzed in the PEIR.

**New Hydrology and Water Quality Impacts**

None. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, surface water conditions are essentially the same within and outside the treatable landscape; therefore, the impact related to alteration of site drainage patterns is also the same, as described above.

## PD-3.13: LAND USE AND PLANNING, POPULATION AND HOUSING

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation	LTS	Impact LU-1, pp. 3.12-13 – 3.12-14	Yes	SPR AD- 3, 6	NA	LTS	No	Yes
Impact LU-2: Induce Substantial Unplanned Population Growth	LTS	Impact LU-2, pp. 3.12-14 – 3.12-15	No	NA	NA	NA	NA	NA

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Land Use and Planning, Population and Housing Impacts: Would the treatment result in other impacts to land use and planning, population and housing that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

#### **Impact LU-1**

Treatments will occur on private property. Landowner objectives are to increase the forest resiliency to fire, protect the property and improvements from wildfire. Local county land use planning and regulation will be adhered to; treatment activities are consistent with local polices and regulations.

#### **Impact LU-2**

The project will not result in other impacts to hydrology and water quality that are not evaluated in the CalVTP PEIR.

#### **New Land Use and Planning, Population and Housing Impacts**

None. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent considered in the PEIR. However, land uses in the project area are essentially the same within and outside the treatable landscape; therefore, the land use impact is also the same, as described above.

## PD-3.14: NOISE

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation	LTS	Impact NOI-1, pp. 3.13-9 – 3.13-12; Appendix NOI-1	Yes	SPR NOI-1, 2, 3, 4, 5, 6 SPR AD- 3		LTS	No	Yes
Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities	LTS	Impact NOI-2, p. 3.13-12	Yes	SPR NOI- 1, 2, 3 SPR BIO-12		LTS	No	Yes

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Noise Impacts: Would the treatment result in other noise-related impacts that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

#### Impact NOI-1

Treatments will require both heavy equipment, chainsaws and vehicle use coming and going from treatment areas. This increased noise will be for a very short duration during a specified time of the year. To the extent possible, project-related vehicle traffic will access the project site via the private Masonite Industrial Road to lessen noise impacts on local residents. Although this is a relatively remote area, as per SPR NOI-1, noise-generating vegetation treatment activities will be limited to Monday – Saturday between 8:00 am to 5:00 pm, and Sunday and federal holidays 9:00 am to 5:00 pm. In addition, signage will be placed at access points to inform the public of the project, its benefits, funder, and who to contact in the event of a question or concern. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers’ recommendations. Engine shrouds will be closed during equipment operations and all motorized equipment will be shut down when not in use. Any increase in noise will occur on a landscape that has been subject to short duration increased levels of ambient noise for many decades. There are only a few residences nearby that may be subject to temporary increased noise levels from the planned treatments. Vehicle use coming and going from the treatment area would pass a very limited number of residences. It is common for these residences to hear background noise from timber production activities as MRC owns a majority of TPZ land adjacent to Low Gap County Road. The short- term increase in project equipment will be consistent with current equipment use in the area. The impact is within the scope of the PEIR analysis and site-specific analysis.

### **Impact NOI-2**

Treatments would involve large trucks hauling heavy equipment and crews to the project site. These haul truck trips would pass by residential receptors and the event of each truck passing by could increase the single event noise levels (SENL), although a majority of truck travel will be on MRC Private lands. Haul trips associated with the treatment would occur during daytime hours, which avoids the potential to cause sleep disturbance to residents during the more noise sensitive evening and nighttime hours. It is common for heavy equipment to travel in the area from timber production activities. A short-term increase in project equipment will be consistent with current equipment use in the area. The impact is within the scope of the PEIR analysis and site-specific analysis.

### **New Noise Impacts**

None. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the exposure potential (i.e., lack of sensitive receptors) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the noise impact is also the same, as described above.

## PD-3.15: RECREATION

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas	LTS	Impact REC-1 pp. 3.14-6 – 3.14-7	Yes	SPR REC- 1		LTS	No	Yes

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Recreation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

#### **Impact REC-1**

The project is located within private property adjacent to Low Gap County Road. No designated recreation areas occur in or adjacent to the project area, however recreational use of the road does occur (e.g., mountain biking). Recreational users may be affected by the treatment during moving of equipment and adjacent operations associated with the project.

#### **New Recreation Impacts**

None. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the availability of recreational resources within the project area is essentially the same within and outside the treatable landscape; therefore, the impact to recreation is also the same, as described above.

## PD-3.16: TRANSPORTATION

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures	LTS	Section 3.15.2; Impact TRAN-1 pp. 3.15-9 – 3.15-10	Yes	SPR TRAN-1, SPR AD-3		LTS	No	Yes
Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses	LTS	Impact TRAN-2 pp. 3.15-10 – 3.15-11	Yes	SPR TRAN-1 SPR AD-3, 4		LTS	No	Yes
Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP	PSU	Impact TRAN-3 pp. 3.15-11 – 3.15-13	No	NA	NA	NA	NA	NA

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Transportation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

#### Impact TRAN-1

Treatments may temporarily increase vehicular traffic along Low Gap County Road. At each access point, visibility to vehicles entering and exiting is not a hindrance to driver safety. During prescribed burning operations, signs will be placed along the roadways to advise drivers of smoke conditions. Prescribed burning requires the use of water as a controlling factor. Fire equipment will come equipped with water prior to entering the project location. Additional water, if needed, will be obtained from nearby drafting sites. The potential for a temporary increase in traffic to conflict with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures was examined in the PEIR. The proposed treatment project would be short-term, and temporary increases in traffic related to treatments are within the scope of the activities and impacts addressed in the PEIR. The impact is within the scope of the PEIR analysis and site-specific analysis.

#### Impact TRAN-2

Treatments would not require the construction or alteration of any roadways. However, the staging of heavy equipment, and the smoke generated during burning operations, could cause potential traffic delays and affect visibility along roadways for short periods of time. Signs will be posted along Low Gap Road to alert motorists to the potential for delays and the possibility of smoke from

burning activities. In addition, the smoke management plan includes mitigation requiring the project manager to monitor impact the roadway to ensure those impacts are minimal. The impact is within the scope of the PEIR analysis and site-specific analysis.

**Impact TRAN-3**

Treatments could temporarily increase vehicle miles travelled for a short period as equipment enters the project location. The project is in an area utilized for timber production; vehicle miles traveled (VMT) will not be greater than what the area experiences from this type of use. The amount of traffic increase will not be above what already occurs in the area. This impact was identified as potentially significant and unavoidable in the PEIR because implementation of the CalVTP could result in a net increase in VMT. The impact is within the scope of the PEIR analysis and site-specific analysis.

**New Transportation Impacts**

None. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing transportation conditions (e.g., roadways and road use) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the transportation impact is also the same, as described above.

## PD-3.17: PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs	LTS	Section 3.16.1 pp. 3.16-2 – 3.16-3; Impact UTIL-1 p. 3.16-9	Yes	NA		LTS	No	Yes
Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	PSU	Section 3.16.1 pp. 3.16-3 - 3.16-5; Impact UTIL-2 pp. 3.16-10 – 3.16-12	No	SPR UTIL- 1		SU	No	Yes
Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste	LTS	Section 3.16.2 pp. 3.16-6 – 3.16-7; Impact UTIL-2 p. 3.16-12	Yes	SPR UTIL- 1		LTS	No	Yes

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Public Services, Utilities and Service System Impacts: Would the treatment result in other impacts to public services, utilities and service systems that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

#### **Impact UTIL-1**

Prescribed burning requires the use of water as a controlling factor. Fire equipment will come equipped with water prior to entering the project location. Additional water, if needed, will be obtained from nearby drafting sites.

#### **Impact UTIL-2**

Vegetation treatments would generate biomass within the project location. Biomass generated by mechanical and manual treatments would be lopped and scattered or piled for burning. This impact was identified as potentially significant and unavoidable in the PEIR because biomass hauled offsite could exceed the capacity of existing infrastructure for handling biomass. For the proposed treatment project, no biomass would be hauled off-site; therefore, there is no potential to exceed the capacity of existing infrastructure. The impact is within the scope of the PEIR analysis and site-specific analysis.

**Impact UTIL-3**

Vegetation treatments would generate biomass within the project location. Biomass generated from the proposed treatment will be treated on-site. Compliance with federal, state, and local management and reduction goals, statutes, and regulations related to solid waste was examined in the PEIR. The impact is within the scope of the PEIR analysis and site-specific analysis.

**New Transportation Impacts**

None. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the project boundary, the treatable landscape is essentially the same as that of the treatable landscape; therefore, the impact to public services, utilities and service systems is also the same as described above.

## PD-3.18: WILDFIRE

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Section 3.17.1; Impact WIL-1 pp. 3.17-14 – 3.17-15	Yes	SPR HAZ-2, 3, 4		LTS	No	Yes
Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides	LTS	Section 3.17.1; Impact WIL-2 pp. 3.17-15 – 3.17-16	No	NA	NA	NA	NA	NA

<sup>1</sup>NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Public Services, Utilities and Service System Impacts: Would the treatment result in other impacts to public services, utilities and service systems that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[Identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

#### Impact WIL-1

One of the main objectives of the project is to reduce the severity of wildfire. The appropriate measures to prevent and minimize the possibility to substantially exacerbate fire risk and expose people to uncontrolled spread of wildfire are included in the applicable SPR's addressed in this document. Increased wildfire risk associated with prescribed burning and use of heavy equipment in vegetated areas are within the scope of the PEIR because the types of equipment and treatment duration of the proposed project are consistent with those analyzed in the PEIR.

#### Impact WIL-2

This project will not alter a watercourse or increase the amount of surface runoff that would result in flooding. Prescribed fire will be low-high intensity, but vegetation will remain on site post fire that will minimize surface runoff. A buffer strip of vegetation will capture any potential runoff from entering a watercourse. Any use of fire lines, hand or mechanically created, will have water bars installed to assure that they are hydrologically disconnected from drainage areas or watercourses. The potential for post-fire landslides was examined in the PEIR. Potential exposure of people or structures to post-fire landslides is also examined within the PEIR because the severity and duration of the proposed prescribed burn are consistent with those analyzed in the PEIR.

**New Impacts to Wildfire**

None. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the wildfire risk of the project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above.