







# Yuba Foothills Healthy Forest Project Project-Specific Analysis and Addendum to the PEIR

Prepared for:



Yuba County Water Agency

October 2020 CAL VTP ID 2020-9

## Yuba Foothills Healthy Forest Project

Project-Specific Analysis and Addendum to the PEIR

Prepared for:



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List of Abbreviations Ascent Environmental

### LIST OF ABBREVIATIONS

CAAQS California Ambient Air Quality Standards

CAL FIRE California Department of Forestry and Fire Protection

CalVTP California Vegetation Treatment Program

CEQA California Environmental Quality Act

CNDDB California Natural Diversity Database

CNPS California Native Plant Society

CRHR California Register of Historical Resources

dbh diameter at breast height

DPR California Department of Pesticide Regulation

EPA U.S. Environmental Protection Agency

FRAP Fire and Resource Assessment Program, California Department of Forestry and Fire Protection

FRAQMD Feather River Air Quality Management District

GHG greenhouse gases

NAAQS National Ambient Air Quality Standards
NAHC Native American Heritage Commission

NCIC North Central Information Center

NOA naturally-occurring asbestos

NRHP National Register of Historic Places

PEIR Program Environmental Impact Report

PSA Project-Specific Analysis
SENL single event noise levels
USGS U.S. Geological Survey
VMT vehicle miles travelled

WLPZ Watercourse and Lake Protection Zones

WUI Wildland-Urban Interface
YWA Yuba County Water Agency

Ascent Environmental Introduction

### 1 INTRODUCTION

### 1.1 PROJECT OVERVIEW AND DOCUMENT PURPOSE

In February 2020, the California Department of Forestry and Fire Protection (CAL FIRE) awarded Yuba County Water Agency (YWA) a Forest Health Grant for the Yuba Foothills Heathy Forest Project, which would entail conducting forest management actions within an approximately 6,787-acre area (grant area) to reduce wildfire risk and achieve other forest health benefits. CAL FIRE and YWA approved a grant agreement for the project on May 1, 2020.

### CEQA Lead Agency and Proposed Project

Serving as the lead agency under the California Environmental Quality Act (CEQA), YWA would administer the grant and allocate funds to several landowners within the grant area (referred to as project partners) to implement vegetation treatments and related work. Project partners under the grant are YWA, CHY, Boy Scouts, Doner, Ingersoll, Sillers, Soper, Stocker, and U.S. Forest Service (for Plumas National Forest). Vegetation treatments comprise both treatments conducted accessory to commercial projects (2,732 acres) and treatments associated solely with non-commercial wildfire risk reduction and forest health improvement (4,055 acres). Treatments accessory to commercial projects are subject to the Forest Practice Act; compliance with this law and associated Forest Practice Rules is achieved through the preparation of timber harvest plans, non-industrial timber management plans, or Forest Practice Rule exemptions. These environmental documents are existing or in preparation by project partners for commercial projects, including the accessory treatments; they are prepared in accordance CAL FIRE's certified regulatory program, which is a functional equivalent to CEQA compliance.

Before proceeding with or authorizing project treatments not associated with commercial projects and funded by the grant (covering approximately 4,055 acres), YWA must comply with CEQA. YWA has evaluated these treatments for CEQA compliance as later activities covered by the 2019 CAL FIRE Program Environmental Impact Report (PEIR) for the California Vegetation Treatment Program (CalVTP), using its Project-Specific Analysis (PSA) checklist. The PEIR is available for public review at https://bof.fire.ca.gov/projects-and-programs/calvtp/peir-certification/. Because these proposed treatments are consistent with the treatment types and treatment activities in the CalVTP (as demonstrated in Section 2, "Treatment Description"), they are referred to herein as CalVTP treatments or the proposed project. Vegetation treatments occurring as part of a commercial project (i.e., the work on 2,732 acres) are outside of the scope of the CalVTP and this PSA/Addendum, and instead are covered by other, CEQA functional-equivalent, environmental documents. Additionally, these commercial project-associated treatments would be implemented independently of CalVTP treatments; in other words, their implementation has independent utility and they do not rely on the CalVTP treatments to be implemented and vice versa. Therefore, commercial project-associated treatments funded by the grant are not part of the proposed project for purposes of this PSA/Addendum and are not addressed in this analysis.

Vegetation treatments associated with commercial timber harvesting on federal and non-federal lands, such as those funded by the grant, could contribute to cumulative impacts relevant to the proposed project. These treatments are incorporated into the related projects addressed in the cumulative effects analysis of the CalVTP PEIR (refer to Chapter 4, "Cumulative Effects Analysis" in Volume 2 of the CalVTP PEIR), so they are within the scope of the PEIR and need not be discussed further in this PSA.

### Purpose of the PSA/Addendum

This document serves as a PSA to evaluate if the proposed CalVTP treatments are within the scope of the CalVTP PEIR. As described above, the treatment types and treatment activities are consistent with the CalVTP. Among the other criteria for determining whether a treatment project is within the scope of the CalVTP PEIR is whether it is within the CalVTP treatable landscape (i.e., the geographic extent of analysis covered in the PEIR). If a proposed

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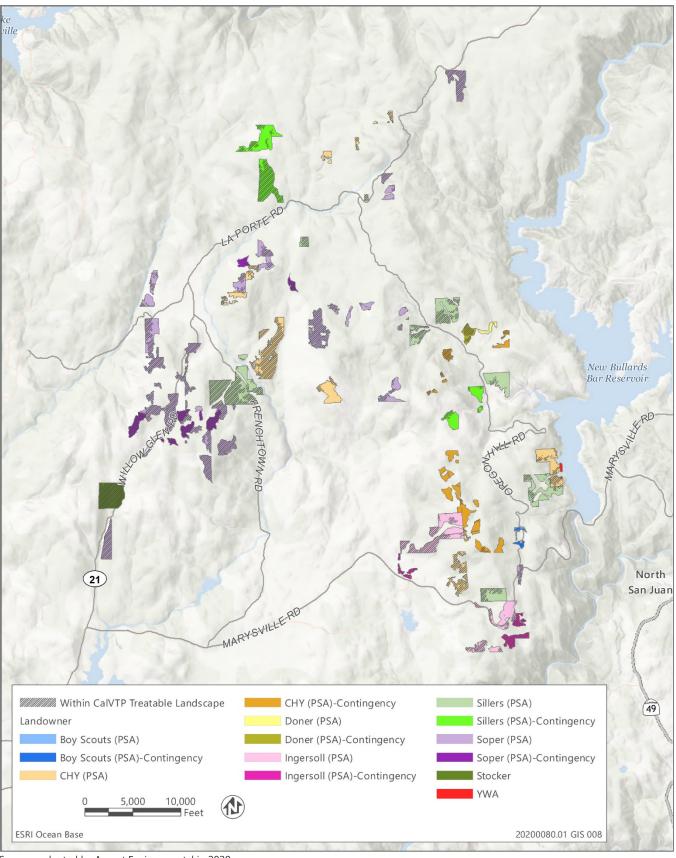
vegetation treatment project is covered by the evaluation of environmental effects in the PEIR, it may be approved using a finding that the project is within the scope of the PEIR for its CEQA compliance, consistent with CEQA Guidelines Section 15168(c)(2).

Portions of the project treatment areas extend outside of the treatable landscape described in the CalVTP PEIR. In total, these areas encompass approximately 1,512 acres; however, they are dispersed in small sections of treatment areas (refer to Figure 1-1). The scattered array of acres outside of the CalVTP treatable landscape is due to the method by which the CalVTP treatable landscape was digitally developed and the resultant degree of mapping resolution. Using desktop applications to apply buffers around geographic and topographic features and demarcate jurisdictional boundaries (i.e., State Responsibility Area or SRA and Local Responsibility Area or LRA), the method resulted in some treatable landscape areas that are shown on maps to be disjoined and scattered and some that are inheld LRA areas surrounded by SRA. If the areas of the proposed project outside of the CalVTP treatable landscape have essentially the same, or at least substantially similar, landscape conditions as the adjacent areas within the treatable landscape, the environmental analysis in the PEIR would be applicable.

An Addendum to an EIR would be appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts, consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In this case, there are no changed circumstances, but the proposed revision or change in the project, compared to the PEIR, is the inclusion of areas outside of the CalVTP treatable landscape. The PSA checklist (refer to Section 4, "Project-Specific Analysis") includes the criteria to support an Addendum to the CalVTP Program EIR for the inclusion of proposed treatment areas outside the CalVTP treatable landscape. The checklist evaluates each resource in terms of whether the later treatment project, including the "changed condition" of additional geographic area, would result in significant impacts that would be substantially more severe than those covered in the Program EIR and/or would result in any new impacts that were not covered in the Program EIR.

This document serves as both a PSA and an Addendum to the CalVTP PEIR for YWA review and analysis under CEQA with regard to the proposed YWA CalVTP treatments within and outside the treatable landscape covered by the PEIR. It will provide environmental information to YWA in its consideration of approval of subgrant funding allocations for treatments proposed to be implemented using the CAL FIRE grant and for a small portion of the project work to be performed by YWA on its own property. The project-specific mitigation monitoring and reporting program, which identifies the CalVTP standard project requirements (SPRs) and mitigation measures applicable to the proposed project is presented in the Mitigation Monitoring and Reporting Program for the Yuba Foothills Healthy Forest Project, attached as Attachment A. The SPRs identified in the MMRP have been incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation.

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Sources: adapted by Ascent Environmental in 2020

Figure 1-1 CalVTP Treatment Areas

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Ascent Environmental Treatment Description

### 2 TREATMENT DESCRIPTION

The proposed project consists of non-commercial wildfire risk reduction and forest health improvement vegetation treatments undertaken by multiple landowners, as described in Section 1.1, "Project Overview," and referred to as project partners. The project partners would receive funding allocations approved by YWA from the CAL FIRE grant awarded to YWA. The funding allocations would support implementation of proposed vegetation treatments consistent with the California Vegetation Treatment Program (CalVTP). CalVTP treatments are proposed within a 4,055-acre area, which comprises 3,095 acres identified for the proposed treatments, as well as 960 acres of contingency areas. Contingency areas are where treatments could be implemented if the entire planned 3,095 acres are not able to be treated because of operational considerations, economic infeasibility, or avoidance of sensitive resources, including: buffers for cultural sites, presence of sensitive species or habitat, excessive slopes, and road limitations. These contingency areas have been defined to provide sufficient treatment areas to make full use of grant funding for maximizing achievement of wildfire risk reduction goals. This section describes treatments on proposed and contingency areas collectively, which are referred to as the proposed "project area" unless a distinction is necessary.

Treatment types that would be implemented in the proposed project area are wildland-urban interface (WUI) fuel reduction, fuel breaks, and ecological restoration. Proposed treatment activities include manual and mechanical treatments, prescribed burning, and herbicide application. Treatment types (within the project areas and contingency areas) are shown in Figure 2-1. Table 2-1 provides a summary of treatments by project partner.

### 2.1 PROPOSED TREATMENTS

The proposed project comprises three treatment types: WUI fuel reduction, fuel breaks, and ecological restoration. The vegetation treatment activities proposed to implement each of these treatment types are prescribed burning, manual treatment, mechanical treatment, and targeted ground application of herbicides. The treatment types and treatment activities are described below.

### **Treatment Types**

Proposed treatment types consist of WUI fuel reduction, fuel breaks, and ecological restoration. Each treatment type is described in more detail below.

### WILDLAND-URBAN INTERFACE FUEL REDUCTION

Located in Wildland-Urban-Interface- (WUI) designated areas, the focus of these fuel reduction treatments would be to strategically reduce vegetation density and remove fuel to directly protect communities and assets at risk from potential damage from wildfires originating in the adjacent wildlands, as well as to protect the wildlands from fires starting in or near development. WUI fuel reduction treatments also serve as emergency access points and staging areas for firefighters and equipment and reduce flammable vegetation along emergency evacuation routes for the community. WUI treatments are proposed on the CHY, Boy Scouts, Ingersoll, Sillers, Soper, and Stocker properties.

#### **FUEL BREAKS**

In strategic locations, fuel breaks create zones of vegetation removal, often in a linear layout, that reduce wildfire risk and support fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. Only shaded fuel breaks would be implemented within the treatment areas. In forested areas, the tree canopy would be thinned to reduce the potential for a crown fire to move through the canopy; however, larger trees would remain. The shade of the retained canopy also helps reduce the potential for rapid re-growth of shrubs and sprouting hardwoods and can reduce rill and gully erosion.

Treatment Description Ascent Environmental

Fuel breaks would be established along strategic topographic locations and adjacent to roads but could also occur next to areas naturally low in fuel (e.g., rocky outcrops) or high moisture vegetation (e.g., drainages). Fuel break treatments are proposed on the CHY, Ingersoll, and Soper properties.

### **ECOLOGICAL RESTORATION**

Ecological restoration treatments would be implemented outside of the WUI treatment areas and shaded fuel break treatment areas. Treatments would seek to return the landscape closer to native conditions where natural fire processes can be reestablished and habitat quality can be improved, including controlling and eliminating non-native, invasive plants and excess fire fuel buildup from fire exclusion practices. Ecological restoration treatments are proposed on the Yuba Water Agency, CHY, Doner, Ingersoll, and Sillers properties. Specific restoration objectives include: reduce extremely dense cover of invasive species that have adapted to readily occupy sites following wildfire; reforest burned areas with conifer species; and promote forest health by reducing the percent cover of understory brush, hardwoods, and suppressed conifers, raising the average (i.e., quadratic mean) diameter of stands by removing smaller trees and brush, increasing the average height to the bottom of live crowns, and increasing the spacing between canopy trees.

### Treatment Activities

The proposed vegetation treatment activities are prescribed burning, mechanical treatment, manual treatment, and targeted ground application of herbicides. Each of these treatment activities is described in more detail below and consistent with the treatment activities described in CalVTP.

### PRESCRIBED BURNING

Prescribed burning consists of two general types, broadcast burning (underburning) or pile burning. Underburning uses low intensity surface fires that would be broadcast in specific areas to control vegetation, reduce fuel loads, and enhance the growth or vigor of the residual trees. Underburning has been prescribed for units that are located within a WUI to reduce surface and ladder fuels.

Project partners would implement an understory burn using patterned lighting techniques and timing the fires during periods of high humidity and high fuel moisture content to partially remove understory and groundcover vegetation. The goal is to conduct a low intensity burn that only burns targeted ground and litter fuels. Up to 70 percent of the existing groundcover and understory vegetation would be partially retained in a mosaic pattern.

Prescribed burning would require the construction of control lines using manual or mechanical treatments. Dense patched of shrubs or mature shrubs may be trimmed or removed manually by hand crews or by mechanical equipment in advance of burning, or vegetation may be pretreated with herbicides to kill the aboveground portions and cause them to dry, so that they would be better consumed by prescribed burning. Prescribed burning would require between 10 and 20 crew members, and equipment would include water trucks and excavators or dozers to clear control lines.

Pile burning consists of igniting biomass piles constructed either manually by hand-cut and hand-pile or mechanically with a dozer or excavator. Typically, dozers are equipped with a brush rake to reduce soil displacement and create "clean" piles. Pile burning can take place in an understory or in areas with little to no live overstory, including areas that have experienced previous wildfire.

Most pile burns are designed to reforest areas that were previously burned in wildfires. These units would be planted following site preparation and burning. Prescribed burning would also be used to thin out very dense hardwood and brush vegetation that, because of steep and rocky slopes, cannot be treated by mechanical methods.

Prescribed burning is proposed within the Ingersoll (108 acres), Soper (71 acres), and Stocker (20 acres) properties.

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#### MECHANICAL VEGETATION TREATMENT

Mechanical treatments may include mowing, masticating, piling, and ripping. These treatments would require between two and 10 crew members and may use skid steers, excavators, dozers, and masticators.

Mechanical treatment activities include three categories of mastication: extreme, heavy, and light. Extreme mastication typically includes dense hardwoods and/or conifers that are large in height and diameter (i.e., up to 10 inches diameter at breast height [dbh]). Heavy mastication includes treating brush, small hardwoods (i.e., up to 6 inches dbh), and small saplings that are overstocked and need thinning. Light mastication typically occurs in areas previously treated, and the vegetation being removed includes small diameter trees, grass, or brush.

To maintain habitat function for special-status wildlife, the following features would be retained within all treatment areas:

- ► Hardwoods (e.g., black oak [*Quercus kelloggii*], tanoak [*Notholithocarpus densiflorus*], madrone [*Arbutus menziesii*], big-leaf maple [*Acer macrophyllum*], blue oak [*Quercus douglasii*]) greater than 12 inches DBH, with basal hollows, or with other complex structural features;
- Conifers greater than 12 inches dbh;
- ▶ Snags greater than 12 inches dbh; and
- ▶ Downed woody debris such that the forest floor is not completely bare.

In addition, tractor piling would use track dozers with brush rakes to pile residual surface fuels, brush, understory hardwoods, and suppressed conifers as appropriate. This work would help prepare areas for subsequent burning of the piles and planting of 1-year old conifer seedlings. Project partners may choose to rip the planting sites if the soil has been significantly compacted.

Mechanical vegetation treatments are proposed on Yuba Water Agency (6 acres), CHY (439 acres), Boy Scouts (21 acres), Doner (37 acres), Ingersoll (422 acres), Sillers (298 acres), and Soper (362 acres) properties.

### MANUAL VEGETATION TREATMENT

Manual treatment would be implemented using hand tools and hand-operated power tools to cut, clear, or prune herbaceous and woody species. Activities would include:

- thinning trees with chainsaws, loppers, or pruners;
- cutting undesired competing brush species above ground level to favor desirable species and spacing;
- pulling, grubbing, or digging out root systems of undesired plants to prevent sprouting and regrowth;
- planting desirable species by hand (hand planting); and
- placing mulch around desired vegetation to limit competitive growth.

Manual treatments would be implemented using a 10-person hand crew and chainsaws. Hand-cutting and piling as well as selective thinning are the two specific treatments that are being proposed. The same features would be retained to maintain habitat function for special-status wildlife as described above for mechanical treatments.

A hand-held, drip torch would likely be used for igniting burn piles. Pile burning is discussed above.

Manual vegetation treatments are proposed on parcels owned by CHY (200 acres), Ingersoll (24 acres), Sillers (38 acres), Soper (8 acres), and Stocker (20 acres).

#### **HERBICIDE**

Herbicide application would comply with the U.S. Environmental Protection Agency label directions, as well as California Environmental Protection Agency and California Department of Pesticide Regulation (DPR) label standards. Only ground-level application would occur. Several herbicide application methods are available for use by on-the-ground personnel, including as paint-on stems, backpack hand-applicator, or hack and squirt. It is anticipated that a foliar

Treatment Description Ascent Environmental

application approximately 6 to 12 months following vegetation cutting would be the most common treatment. Herbicide treatments would typically use one 10-person crew, a batch truck, a passenger vehicle to transport crew, and backpack sprayers. It is possible that hack and squirt application may occur at least 3 months prior to cutting of hardwoods. Stump painting immediately following cutting of hardwoods may also be implemented. The application method chosen would depend on the written recommendations of an independent Pest Control Advisor licensed by DPR.

The application of herbicides is widely and effectively used in project area forests to help maintain a manageable understory for fuel breaks or reduce ladder fuels within WUIs. It can also improve the health and vigor of designated vegetation, such as young seedlings and saplings. It is infeasible to accomplish treatment goals without the use of herbicides, because of the extremely fertile soils, favorable climate, and predominance of fast-growing brush species and sprouting hardwoods. Herbicides would also help to reduce the spread of invasive species, particularly broom species.

Herbicides that may be applied include those listed below, which are consistent with those considered for use in the CalVTP:

- Clopyralid (monoethanolamine salt);
- ▶ Glyphosate (isopropylamine salt, potassium salt, dimethylamine salt & diammonium salt);
- Hexazinone;
- Imazapyr (isopropylamine salt);
- Sulfometuron Methyl;
- Triclopyr (butoxyethyl ester & triethylamine salt);
- ▶ Nonylphenol 9 Ethoxylates (NP9E);
- Cleantraxx (penoxsulam & oxyfluorfen); and
- ► Velpar (hexazinone).

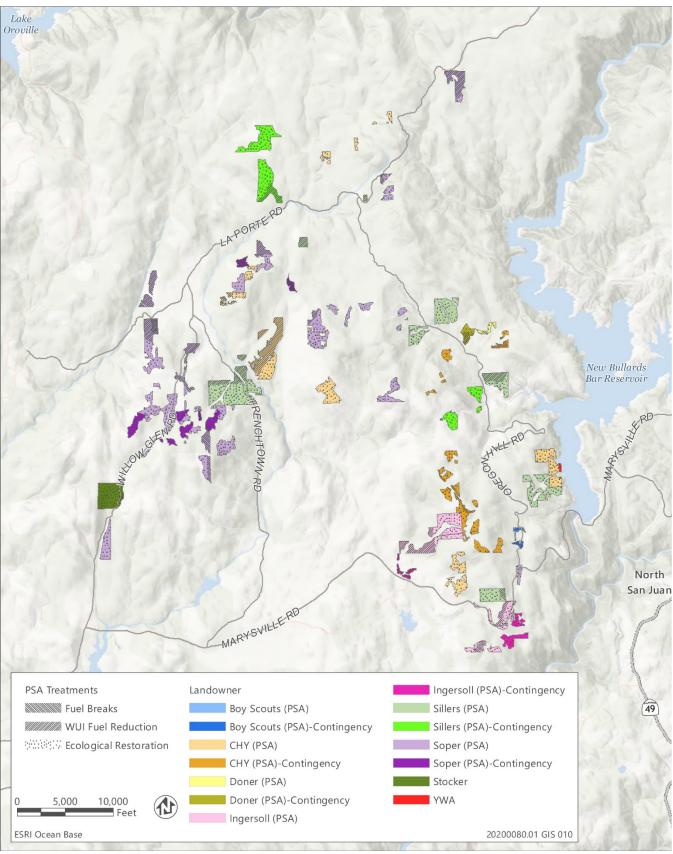
Herbicide treatments are proposed on Yuba Water Agency (6 acres), CHY (501 acres), Boy Scouts (21 acres), Doner (37 acres), Sillers (1,131 acres), Soper (1,286 acres), and Stocker (155 acres) properties.

#### **BIOMASS DISPOSAL**

The biomass generated from CalVTP vegetation treatments would primarily be disposed by pile burning; however, it may also be disposed by the following measures:

- ▶ lopping and scattering within treatment boundaries;
- leaving unburned piles for wildlife habitat; or
- chips blown onto the ground as mulch.

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Source: Adapted by Ascent Environmental in 2020

Figure 2-1 CalVTP Treatment Types

Treatment Description Ascent Environmental

Table 2-1 Proposed and Contingency Treatments Organized by Project Partner

Proje	ect Information		CalVTP Treatments			
Project Partner/ Landowner	Acreage	CalVTP Treatment Types (fuel break, WUI, ecological restoration)	Treatments Activities Seeking Coverage Under the CalVTP Program EIR using the PSA	Equipment used for Treatments	Timing of CalVTP Treatments	
Yuba Water Agency	9.4 (Proposed)	Ecological restoration	Mechanical, herbicide	Track masticator; backpack sprayers	10/2020 – 3/2022	
CHY	596.0 (Proposed)	WUI and ecological restoration	Mechanical, manual, herbicide	Track masticator; dozer with brush rake, chainsaw, backpack sprayer	10/2020 – 8/2023	
	260.2 (Contingency)	WUI, fuel break, and ecological restoration	Mechanical, herbicide	Track masticator; backpack sprayers	10/2020 – 8/2023	
Boy Scouts	6.4 (Proposed)	WUI	Mechanical, herbicide	Track masticator; backpack sprayers	10/2020 – 7/2022	
	14.9 (Contingency)	WUI	Mechanical, herbicide	Track masticator; backpack sprayers	10/2020 – 7/2022	
Doner	17.2 (Proposed)	Ecological restoration	Mechanical, herbicide	Track masticator; backpack sprayers	10/2020-7/2022	
	37.2 (Contingency)	Ecological restoration	Mechanical, herbicide	Track masticator; backpack sprayers	10/2021 – 10/2023	
Ingersoll	351.8 (Proposed)	WUI, fuel break, ecological restoration	Mechanical, manual	Track masticator; dozer with brush rake, chainsaw, backpack sprayer	10/2020 – 3/2022	
	94.8 (Contingency)	WUI and ecological restoration	Mechanical, manual		10/2021 – 12/2023	
Sillers	795.8 (Proposed)	WUI	Mechanical, manual, herbicide	Track masticator; chainsaw, backpack sprayer	10/2020 – 10/2022	
	359.6 (Contingency)	WUI and ecological restoration	Mechanical, herbicide	Backpack sprayer	4/2021 – 10/2023	
Soper	1,166.1 (Proposed)	WUI (1,327 ac.) and fuel break (shaded) (105ac.)	Mechanical, prescribed burning, herbicide	Track masticator; Backpack sprayers, drip torch	8/2020 – 10/2023	
	193.7(Contingency)	WUI	Mechanical, herbicide	Backpack sprayer	8/2020 – 10/2023	
Stocker	1,54.9	WUI	Manual, herbicide	Chainsaw, backpack sprayer	10/2020 – 10/2022	
Total Acres	4,055 acres (Proposed: 3,095 acres; Contingency: 960 acres)					

Ascent Environmental Treatment Description

### Proposed Treatments by Project Partner

### YUBA WATER AGENCY

On Yuba Water Agency property, extreme mastication treatments would be implemented followed by herbicide treatment and planting. These treatments are planned to occur between October 2020 and March 2022. Once mastication is completed, targeted ground application of herbicides would treat understory vegetation. Only ground-level herbicide application would occur by backpack hand-applicator. These areas would be planted with coniferous seedlings following treatment. Plantings would primarily be Douglas-fir, with some incense-cedar, white fir, sugar pine, and Ponderosa pine. Approximately 220 to 250 trees would be planted per acre.

#### CHY

Treatments implemented on CHY property would include extreme mastication followed by herbicide treatment, and in some cases planting. In addition, heavy mastication treatments would be implemented on CHY property for removal of brush, small hardwoods, and saplings. Once areas are treated by heavy mastication, targeted ground application of herbicides would treat understory vegetation. Light mastication would also occur within some areas of CHY property for removal of small diameter trees, grass, or brush. The areas of light mastication would also be treated with herbicides. Treatments within CHY contingency areas would include heavy mastication followed by herbicide treatment, light mastication, and selective thinning.

Some areas would be selectively thinned. Plantations approximately 5 to 10 years old would be thinned by use of hand crews with chain saws. The current density of these stands was dictated by past Forest Practice Rules, which required 300 trees per acre in planted units. This density is too high for forest health. By thinning these saplings at an early stage, genetically superior trees can be selected for retention. In addition, thinning is an opportunity to alter the species mix of the trees. Smaller trees may also be retained to increase the stand percent of Douglas-fir, incensecedar, white fir, and sugar pine. Cut material would be lopped and scattered.

All treatments are planned to occur between October 2020 and August 2023.

### **BOY SCOUTS**

Treatments implemented on Boy Scouts property would include extreme mastication and herbicide treatments on 6.4 acres. Treatments would be conducted between October 2020 and July 2022. Mastication and herbicide treatments would be similar to those described above.

Boy Scouts contingency lands would be treated with extreme mastication and herbicide treatments, in the event the proposed treatments above are not completed. Treatments within the contingency parcels, if needed, are planned to occur between October 2020 and July 2022.

#### DONER

Treatment proposed on Doner property comprises heavy mastication with herbicide treatment. This treatment is planned to be conducted between October 2020 and July 2022. Herbicide treatments would control sprouting.

Extreme mastication with herbicide treatment could occur if needed within Doner contingency treatment areas. Treatments within the contingency area, if needed, are planned to occur between October 2021 and October 2023.

#### **INGERSOLL**

Treatments proposed on Ingersoll property include extreme mastication, heavy mastication, and light mastication. In addition, some areas of the Ingersoll property would be treated manually using hand tools followed by pile burning. In some areas, a tractor would be used to pile fuels to be burned. These treatments would be followed by planting. All treatments are planned to occur between October 2020 and March 2022, extending to December 2023 if any contingency areas would be treated.

Treatment Description Ascent Environmental

Treatments within Ingersoll contingency areas would include extreme mastication, heavy mastication, light mastication, manual treatment followed by pile burning, and selective thinning. Treatment of the contingency areas, if needed, are planned to occur between October 2021 and December 2023.

#### **SILLERS**

Treatments proposed on Sillers property include heavy mastication followed by herbicide treatment, areas of herbicide treatment only, and selective thinning treatments. All treatments are planned to occur between October 2020 and October 2022.

Herbicide treatments could also occur within Sillers contingency treatment areas, if needed. These treatments, if needed, are planned to occur between April 2021 and October 2023.

### **SOPER**

Treatments proposed on Soper property include heavy mastication followed by herbicide treatment and sometimes planting, herbicide only treatments, herbicide treatment followed by planting, and light mastication followed by herbicide treatment, and selective thinning. A portion of the Soper property would also be treated with prescribed burning, which would apply low intensity surface fire to consume targeted fuel types (i.e., ground and litter fuels). Treatments are planned to occur between August 2020 and October 2023.

Herbicides, applied by backpack sprayers are planned for Soper contingency units, if needed. This work is planned to occur between October 2021 and October 2023.

#### **STOCKER**

Treatments proposed on Stocker property include manual treatments (hand-cut/pile) followed by pile burning and herbicide treatment. A ground-application of herbicides is also planned for this property. Treatments are planned to occur between October 2020 and October 2022.

### 2.2 TREATMENT MAINTENANCE

The grant does not cover treatment maintenance; therefore, it is not included in the proposed project. Each of the project partners has committed to maintaining healthy, vigorous forests, but treatment maintenance is not addressed in this PSA/Addendum. If required, separate CEQA review would be conducted for treatment maintenance.

Ascent Environmental Environmental Environmental Checklist

### 3 ENVIRONMENTAL CHECKLIST

### **VEGETATION TREATMENT PROJECT INFORMATION**

1.	Project Title:	Yuba Foothills Healthy Forest Project
2.	Project Proponent's Name and Address:	Yuba County Water Agency P.O. Box 966 Marysville, CA 95901
3.	Contact Person Information and Phone Number:	Steve Andrews (530) 913-6455 andrews.forestry@gmail.com
4.	Project Location:	Yuba County (See Section 1.2 and Figure 2-1 above)
5.	Total Area to be Treated (acres)	4,055 acres
6.	Description of Project:	
	a. <u>Initial Treatment</u> Treatments would include manual ar application. See Section 2.1 above fo	nd mechanical treatments, prescribed burning, and herbicide r additional details.
	Treatment Types	
	⊠ Wildland-Urban Interface Fuel Reduc	ction
	∑ Fuel Break	
	Treatment Activities	
	Prescribed Burning (Broadcast),19	<u>99</u> acres
	Prescribed Burning (Pile Burning)	
	Mechanical Treatment, 1,585 ac	cres
	Manual Treatment, <u>290</u> acres	
	Prescribed Herbivory, acres	
	Herbicide Application, 3,137 ac	res
	Fuel Type	
	Grass Fuel Type	
	Shrub Fuel Type	
	☐ Tree Fuel Type	
		ntenance; therefore, it is not included in the proposed project. Each of aintaining healthy, vigorous forests, but treatment maintenance is not

addressed in this PSA/Addendum. If required, separate CEQA review would be conducted for treatment

maintenance.

Environmental Checklist Ascent Environmental

	Treatment Types	
	Wildland-Urban Interface Fuel Reduction	
	Fuel Break	
	Ecological Restoration	
	Treatment Activities	
	Prescribed Burning (Broadcast/Underburn	), acres
	Prescribed Burning (Pile Burning)	
	Mechanical Treatment, acres	
	Manual Treatment, acres	
	Prescribed Herbivory, acres	
	Herbicide Application, acres	
	Fuel Type	
	Grass Fuel Type	
	Shrub Fuel Type	
	Tree Fuel Type	
7.	Regional Setting and Surrounding Land Uses:	The project area is in Yuba County west of New Bullards Bar Reservoir, southeast of Lake Oroville, and north of Collins Lake. The area is rural with private industrial and nonindustrial timberlands, public lands, and some scattered residences. The area comprises natural areas and areas that have been harvested for forest products over many years as commercial operations. The project area is dominated by mixed conifer/hardwood forest including ponderosa pine, Douglas-fir, incense cedar. There are also some areas of oak woodland.
8.	Other Public Agencies Whose Approval is Req	uired: (e.g., permits)
Pes	sticide application permit from the Yuba County	Agricultural Commissioner
Bur	n permits from CAL FIRE and Feather River Air 0	Quality Management District
	Coastal Act Compliance	
	The proposed project is NOT within the Co	pastal Zone
	☐ The proposed project is within the Coastal	Zone (check one of the following boxes)
		applied for or obtained from the local Coastal Commission with a certified Local Coastal Plan, as applicable
		ct office or local government with a certified Local Coastal Plan stal Commission district office) has determined that a coastal

Ascent Environmental Environmental Environmental Checklist

9. Native American Consultation. For treatment projects that are covered by 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. For treatment projects with impacts not within the scope of the PEIR, pursuant to PRC Sections 21080.3.1, 21080.3.2, and 21082.3, project partners preparing a new negative declaration, mitigated negative declaration, or EIR must notify any California Native American tribe who has submitted written request for notification of a project in the area of the treatment site. Upon written request for consultation by a tribe, the project partners must begin consultation before the release of the environmental document and must follow the requirements of the cited PRC sections.

Pursuant to CalVTP SPR BIO-2, Native American contacts in Yuba County were contacted on August 19, 2020 and included Benjamin Clark, Chairperson, Mooretown Rancheria of Maidu Indians; Guy Taylor, Mooretown Rancheria of Maidu Indians; Grayson Coney, Cultural Director, Tsi Akim Maidu; Gene Whitehouse, Chairperson, United Auburn Indian Community of the Auburn Rancheria; Pamela Cubbler, Treasurer, Colfax-Todds Valley Consolidated Tribe; and Clyde Prout, Chairperson, Colfax-Todds Valley Consolidated Tribe. A response was received from United Auburn Indian Community of the Auburn Rancheria. The tribe requested some revisions to the mitigation measures to reflect tribal concerns and values, which have been incorporated in the mitigation measures set forth below.

Environmental Checklist Ascent Environmental

### **DETERMINATION**

	On the basis of this PSA and Addendum to t	the PEIR and the substantial evidence supporting it:
	all applicable Standard Project Requirement	project (a) have been covered in the CalVTP PEIR, and (b) s and mitigation measures identified in the CalVTP PEIR within the CalVTP treatable landscape is, therefore,
	changes in the project, no substantial chang information of substantial importance has be CalVTP treatable landscape will not result in None of the conditions described in State Cl	ee CalVTP treatable landscape do not result in substantial es in circumstances have occurred, and no new een identified. The inclusion of project areas outside the any new or substantially more severe significant impacts. EQA Guidelines Section 15162 calling for preparation of a is <b>ADDENDUM</b> is adopted to address the project areas PEIR.
		ects that were not covered in the CalVTP PEIR. These mitigation beyond what is already required pursuant to will be prepared.
	effects that are substantially more severe that effects may be significant in the absence of revisions to the proposed project or addition	ects that were not covered in the CalVTP PEIR or will have an those covered in the CalVTP PEIR. Although these additional mitigation beyond the CalVTP PEIR's measures, nal mitigation measures have been agreed to by the the effects so that clearly no significant effects would <b>N</b> will be prepared.
	not covered in the CalVTP PEIR and/or (b) su	nificant environmental effects that are (a) new and were abstantially more severe than those covered in the CalVTP ignificant and cannot be clearly mitigated to less than <b>PORT</b> will be prepared.
Signatu	ure	Date
Printed	Name	Title
Agency	<u> </u>	

### 4 PROJECT-SPECIFIC ANALYSIS/ADDENDUM

### 4.1 AESTHETICS AND VISUAL RESOURCES

Impact in t	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, including consideration of the project change, 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	AES-2, AQ-2, AQ-3	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	AES-2, AD-4	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	NA	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.

<b>New Aesthetic and Visual Resource Impacts</b> : Would the treatment result in other impacts to aesthetics and visual resources that are not evaluated in the CalVTP PEIR?	Y	es	⊠N	0		olete row(s) below discussion
			otentially gnificant	Signi Mi	ess Than ficant with itigation orporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]						

### Discussion

#### **IMPACT AES-1**

Treatments would include mechanical treatments, manual treatments, herbicides, and prescribed burning. The potential for these treatment activities to result in short-term degradation of the visual character was examined in the PEIR. The proposed treatments would occur on properties that do not provide public viewpoints. In addition, there are no eligible or designated scenic highways with views of the project area (Caltrans 2019). However, many of the treatment areas are adjacent to public lands that may provide public views of the treatment areas. Smoke from prescribed burning could also be visible from public viewpoints. The potential for the project to result in short-term substantial degradation of the visual character the project area is within the scope of the PEIR, because scenic resources are essentially the same within and outside the treatable landscape and the proposed treatment activities are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the short-term aesthetic impact is also the same, as described above. SPRs applicable to the proposed treatments are AES-2, AQ-2, and AQ-3. 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 AES-2**

Treatments would include WUI fuel reduction, ecological restoration, and shaded fuel break treatment types. The potential for these treatment types to result in long-term degradation of the visual character of an area was examined in the PEIR. The treatment areas are on properties that do not have public viewpoints and are not visible from any scenic highways. However, treatment areas adjacent to public lands could provide public views of the treatment areas, although the existing views of treatment areas are of forest lands managed for timber operations. The potential for the project to result in long-term substantial degradation of the visual character the project area is within the scope of the PEIR, because scenic resources are essentially the same within and outside the treatable landscape and the proposed treatment activities are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the long-term aesthetic impact is also the same, as described above. SPRs applicable to the proposed treatments are AES-2, and AD-4. 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 AES-3**

This impact does not apply to the proposed project because no non-shaded fuel breaks are proposed.

### NEW AESTHETIC AND VISUAL RESOURCE IMPACTS

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project partners have considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.2.1, "Environmental Setting," and Section 3.2.2, "Regulatory Setting," in Volume II of the Final PEIR). The project partners have also determined that 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 environmental conditions pertinent to aesthetics and visual resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impact related to aesthetics and visual resources would occur that is not covered in the PEIR.

### 4.2 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
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	Yes	NA	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.

<b>New Agriculture and Forestry Resource Impacts</b> : Would the treatment result in other impacts to agriculture and forestry resources that are not evaluated in the CalVTP PEIR?	Ye	S	⊠ No		te row(s) below scussion
			Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]					

### Discussion

### **IMPACT AG-1**

Treatments would include WUI fuel reduction, fuel breaks, and ecological restoration through use of prescribed burning, mechanical treatment, manual treatment, and targeted ground application of herbicides. The project area includes oak woodland and conifer forest. Mechanical treatment may include the removal of trees that are up to 12 inches in diameter at breast height. Vegetation remaining after treatment would be consistent with the definition of forest land as defined in Public Resources Code 12220(g). Treatments would include the removal of trees in the overstory and mid-level canopy to improve forest health and reduce wildfire risk. Treatments would not affect the forest stand conditions directly or indirectly in a way that could result in conversion to a non-forest use. Vegetation management has the potential to improve the forest stand conditions by removing competitive vegetation and scarifying the forest floor conditions allowing for natural seeding of tree species. The potential for proposed treatment activities to result in loss or conversion of forest land was examined in the PEIR. This impact is within the scope of the PEIR. because the composition of forested land as defined in Public Resources Code 12220(g) is essentially the same within and outside the treatable landscape and treatment activities and intensity are consistent with those analyzed 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 conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impact to forest land is also the same, as described above. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

#### NEW AGRICULTURE AND FORESTRY RESOURCE IMPACTS

The proposed project is consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.3.1, "Environmental Setting," and Section 3.3.2, "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has also determined that 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 environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to agriculture and forestry resources would occur that is not covered in the PEIR.

### 4.3 AIR QUALITY

Impact in the PEIR			Project-Sp	pecific Check	dist			
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	AD-4, AQ-1 - AQ-6	NA (No feasible mitigation available)	SU	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	HAZ-1, NOI- 4, & NOI-5	NA	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	Yes	AQ-5	NA	LTS	No	Yes
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	AD-4, AQ-2, AQ-3 & AQ-6	NA (No feasible mitigation available)	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	HAZ-1, NOI- 4, & NOI-5	NA	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	AD-4, AQ-2, AQ-3 & AQ-6	NA (No feasible mitigation available)	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.

<b>New Air Quality Impacts</b> : Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP PEIR?	☐ Ye	es	⊠N	0		olete row(s) below discussion
			otentially gnificant	Signi Mi	ss Than ficant with tigation prporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]						

### Discussion

### **IMPACT AQ-1**

Use of vehicles, mechanical equipment, and prescribed burning during treatments would result in emissions of criteria pollutants that could exceed California ambient air quality standards (CAAQS) or national ambient air quality standards (NAAQS) thresholds. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was examined in the PEIR. Emissions of criteria air pollutants related to the proposed treatment are within the scope of the PEIR, because, within the boundary of the project area, air quality conditions are essentially the same within and outside the CalVTP treatable landscape and the proposed activities, as well as the associated equipment and duration of use, are consistent with those analyzed in the PEIR. The SPRs applicable to this treatment project are AD-4, AQ-1 through AQ-6. Most of the treatment areas are not located on soil types where naturally-occurring asbestos (NOA) would be present; however, small areas of the CHY and Sillers properties are underlain by serpentine soils, which may contain NOA. In accordance with SPR AQ-5, no treatments would occur in these areas. Emission reduction techniques included Mitigation measure AQ-1 would be infeasible for the project partners to implement. Because the treatments would be implemented by private landowners and/or small private companies, it is cost prohibitive to use equipment meeting the latest efficiency standards including meeting U.S. Environmental Protection Agency's (EPA) Tier 4 emission standards, using renewable diesel fuel, using electric- and gasoline-powered equipment, and using equipment with Best Available Control Technology. In addition, crew sizes would be small and are not expected to all be employed with the same company. Therefore, carpooling may not be feasible to implement for most of the workers or recommended during an active COVID-19 outbreak. For these reasons, and as explained in the PEIR, this impact would remain significant and unavoidable.

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 environmental conditions present 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 PEIR.

#### **IMPACT AQ-2**

Use of vehicles and mechanical equipment during treatments could expose people to diesel particulate matter emissions. The potential to expose people to diesel particulate matter emissions was examined in the PEIR. Diesel particulate matter emissions from the proposed treatments are within the scope of the PEIR, because within the boundary of the project area, the exposure potential is essentially the same within and outside the treatable landscape and the types and amount of equipment that would be used, as well as the duration of use, during proposed treatments are consistent with those analyzed 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 environmental conditions present 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. SPRs applicable to this treatment are HAZ-1, NOI-4, and NOI-5. 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 AQ-3

Use of vehicles, mechanical equipment, and prescribed burning during treatments would involve ground disturbing activities. The potential to expose people to NOA-containing fugitive dust emissions was examined in the PEIR. As discussed above, most of the treatment areas are not located on soil types where NOA would be present; however, small areas of the CHY and Sillers properties are underlain by serpentine soils. In accordance with SPR AQ-5, no treatments would occur in these areas. Potential NOA exposure from the proposed treatments is within the scope of the activities and impacts addressed in the PEIR, because within the boundary of the project area, the exposure potential is essentially the same within and outside the treatable landscape and avoidance of treatments in NOA

containing areas is consistent with the impacts analyzed 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 environmental conditions present 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 PEIR.

### **IMPACT AQ-4**

Prescribed burning during treatments could expose people to toxic air contaminants. The potential to expose people to toxic air contaminants from prescribed burning was examined in the PEIR. The duration and parameters of the prescribed burns are within the scope of the activities addressed in the PEIR, and, within the boundary of the project area, air quality conditions are essentially the same within and outside the CalVTP treatable landscape; therefore, the potential for exposure to toxic air contaminants is also within the scope the PEIR. SPRs applicable to these treatment activities are AD-4, AQ-2, AQ-3, and AQ-6. 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 significant and unavoidable, as explained 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 environmental conditions present 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 PEIR.

### **IMPACT AQ-5**

Use of vehicles and mechanical equipment during treatments could expose people to objectionable odors from diesel exhaust. The potential to expose people to objectionable odors from diesel exhaust was examined in the PEIR. This impact is within the scope of the PEIR, because, within the boundary of the project area, the exposure potential is essentially the same within and outside the CalVTP treatable landscape and the proposed activities, as well as the associated equipment and duration of use, are consistent with those analyzed 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 environmental conditions present 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. SPRs applicable to this treatment are HAZ-1, NOI-4 and NOI-5. 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 AO-6

Prescribed burning during treatments could expose people to objectionable odors. The potential to expose people to objectionable odors from prescribed burning was examined in the PEIR. The duration and parameters of the prescribed burn are consistent with the activities addressed in the PEIR, and, within the boundary of the project area, the exposure potential is essentially the same within and outside the CalVTP treatable landscape; therefore, the resultant potential for exposure to objectionable odors from smoke is also within the scope of impacts covered in the PEIR. SPRs that are applicable to this treatment project are AD-4, AQ-2, AQ-3, and AQ-6. 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 significant and unavoidable, as explained 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 environmental conditions present 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 PEIR.

#### **NEW AIR QUALITY IMPACTS**

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project partners have covered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.4.1, "Regulatory Setting," and Section 3.4.2, "Environmental Setting," in Volume II of the Final PEIR). The project partners have also determined that 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 environmental and regulatory conditions pertinent to air quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impact related to air quality would occur that is not covered in the PEIR.

### 4.4 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

Impact in t		Ī	Project-Spe	cific Checkli	st			
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	CUL-1, CUL-7 & CUL-8	NA	LTS	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	CUL-1 – CUL-5 & CUL-8	CUL-2	SU	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	CUL-1 – CUL-6 & CUL-8	NA	LTS	No	Yes
Impact CUL-4: Disturb Human Remains	LTS	Impact CUL-4, p. 3.5-18	Yes	NA	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.

<b>New Archaeological, Historical, and Tribal Cultural Resource Impacts</b> : Would the treatment result in other impacts to archaeological, historical, and tribal cultural resources that are not evaluated in the CalVTP PEIR?	es 🛭 No		0	If yes, complete row(s) b and discussion		
		Potentially Significant		Less Than Significant with Mitigation Incorporated		Less than Significant
[identify new impact here, if applicable; add rows as needed]						

### Discussion

Consistent with SPR CUL-1, a records search of the 4,055-acre project area, including areas within and outside of the CalVTP treatable landscape, was performed by the North Central Information Center (NCIC) on August 3, 2020 (NCIC File No. YUB-20-28). The search revealed 37 archaeological sites and two historic features. The two historic features have been evaluated for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR); due lack of historic significance, these features are not eligible for listing and therefore not historical resources for the purposes of CEQA. The archaeological sites are predominantly historic period and consist of abandoned water conveyance systems, mine tailings, trash scatters, roadbeds, structure pads, and railroad grades. The three prehistoric archaeological sites contain bedrock milling features and lithic scatters.

Consistent with SPR CUL-2, an updated Native American contact list was obtained from the Native American Heritage Commission (NAHC). On August 19, 2020, letters inviting the tribes to consult were mailed to the six tribal representatives indicated by NAHC. A response was received from the United Auburn Indian Community (UAIC). No other tribe responded. A July 28, 2020 search of NAHC's sacred lands database returned negative results.

#### IMPACT CUL-1

Proposed treatment activities include mechanical treatments and prescribed burning, which could damage historical resources. Although the NCIC records search revealed no historical resources in the proposed project area, builtenvironment structures that have not yet been evaluated for historical significance could be present. Structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historical significance and are present in the treatment area will be avoided pursuant to SPR CUL-7. The potential for these treatment activities to result in disturbance, damage, or destruction of built-environment structures that have not yet been evaluated for historical significance was examined in the PEIR. This impact is within the scope of the PEIR, because the potential to encounter built-environment structures that have not yet been evaluated for historical significance is essentially the same within and outside the CalVTP treatable landscape and treatment activities and the intensity of ground disturbance of the treatment project are consistent with those analyzed 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 environmental conditions present in the 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. SPRs applicable to this impact are CUL-1, CUL-7, and CUL-8. 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 CUL-2**

Vegetation treatment would include mechanical treatments using heavy equipment that could churn up the surface of the ground during treatment as vegetation is removed; this may result in damage to known or previously unknown archaeological resources. The NCIC records search, which covered the entire project area, revealed 37 archaeological sites; however, none of these have been evaluated for eligibility for listing in the NRHP or CRHR. Therefore, it is not known whether these sites are considered resources under CEQA. A survey will be conducted prior to treatment pursuant to SPR CUL-4 to identify any previously unrecorded archeological resources and identified resources will be avoided according to the provisions of SPR CUL-5. The potential for these treatment activities to result in inadvertent discovery and subsequent damage of unique archaeological resources or subsurface historical resources during vegetation treatment was examined in the PEIR. This impact is within the scope of the PEIR, because the potential for discovery of archeological resources is essentially the same within and outside the CalVTP treatable landscape and treatment activities and intensity of ground disturbance of the treatment project are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to unique archaeological resources or subsurface historical resources is also the same, as described above. SPRs applicable to this treatment include CUL-1 through CUL-5 and CUL-8. Mitigation Measure CUL-2 would also apply to this treatment to protect any inadvertent discovery. 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 CUL-3

Native American contacts in Yuba County were contacted on August 19, 2020 and included Benjamin Clark, Chairperson, Mooretown Rancheria of Maidu Indians; Guy Taylor, Mooretown Rancheria of Maidu Indians; Grayson Coney, Cultural Director, Tsi Akim Maidu; Gene Whitehouse, Chairperson, United Auburn Indian Community of the Auburn Rancheria; Pamela Cubbler, Treasurer, Colfax-Todds Valley Consolidated Tribe; and Clyde Prout, Chairperson, Colfax-Todds Valley Consolidated Tribe. A response was received from UAIC notifying YWA of the possible presence of tribal cultural resources and recommending measures to avoid impacts to tribal cultural resources. No other tribes

responded. The potential for the proposed treatment activities to cause a substantial adverse change in the significance of a tribal cultural resource during vegetation treatment was examined in the PEIR. This impact is within the scope of the PEIR, because the potential for identification of tribal cultural resources is essentially the same within and outside the CalVTP treatable landscape and treatment activities and intensity of ground disturbance of the treatment project are consistent with those analyzed in the PEIR. As explained in the PEIR, while tribal cultural resources may be identified within the treatable landscape during development of later treatment projects, implementation of SPRs would avoid any substantial adverse change to any tribal cultural resource. Specifically, SPR-6 requires that the project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. Accordingly, UAIC's recommendations have been integrated into SPR CUL-6 and SPR CUL-8. 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 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. SPRs applicable to this treatment include CUL-1 through CUL-6 and CUL-8. 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 CUL-4**

Vegetation treatment activities would include mechanical treatments using heavy equipment; these treatments may use skid steers, excavators, dozers, and masticators, which could uncover human remains. The NCIC records search did not reveal any burials or sites containing human remains. The potential for treatment activities to uncover human remains was examined in the PEIR. This impact is within the scope of the PEIR, because the potential for uncovering human remains during implementation of the treatment project is essentially the same within and outside the CalVTP treatable landscape and treatment activities and intensity of ground disturbance are consistent with those analyzed in the PEIR. Additionally, consistent with the PEIR, the project would comply with California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097 in the event of a discovery. 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impact related to disturbance of human remains is also the same, as described above. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

# NEW ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCE IMPACTS

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a changed circumstance to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to archaeological, historical, or tribal cultural resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to archaeological, historical, or tribal cultural resources would occur that is not covered in the PEIR.

### 4.5 BIOLOGICAL RESOURCES

Impact in t	he 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	LTSM	Impact BIO- 1, pp 3.6- 131–3.6.138	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-6 SPR BIO-7 SPR GEO-1 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR HYD-4	MM BIO- 1a, MM BIO- 1b	LTSM	No	Yes			
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTSM (all wildlife species except bumble bees) S&U (bumble bees)	Impact BIO- 2, pp 3.6- 138–3.6-184	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-9 SPR BIO-10 SPR GEO-1 SPR HYD-4	MM BIO- 2a, MM BIO- 2b	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	LTSM	Impact BIO- 3, pp 3.6- 186–3.6-191	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-3 SPR BIO-6 SPR BIO-9 SPR GEO-1 SPR GEO-4 SPR GEO-5 SPR GEO-7	MM BIO- 3a	LTSM	No	Yes			
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTSM	Impact BIO- 4, pp 3.6- 191–3.6-192	Yes	SPR BIO-1 SPR BIO-2 SPR HYD-4	None	LTS	No	Yes			
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTSM	Impact BIO- 5, pp 3.6- 192–3.6-196	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-3 SPR HYD-4	None	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 SPR BIO-2 SPR BIO-12	NA	LTS	No	Yes			

Impact in t	he 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	
Would the project:	Would the project:								
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	No Impact	Impact BIO- 7, pp 3.6- 198–3.6-199	Yes	SPR BIO-1 SPR AD-3	NA	No Impact	No	Yes	
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	Yes	NA	NA	No Impact	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 Biological Resources Impacts: Would the treatment result in other impacts to biological resources that are not evaluated in the CalVTP PEIR?	☐ Ye	es	⊠ No		If yes, complete row(s) below and discussion	
			otentially gnificant	Sign M	ess Than ificant with itigation orporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]						

### Discussion

Pursuant to SPR BIO-1, Ascent biologists conducted a data review of project-specific biological resources and reconnaissance-level survey of the project area to identify and document sensitive biological resources and assess the suitability of habitat for special-status species.

CAL FIRE's Fire and Resource Assessment Program (FRAP) vegetation layer was used to identify the habitat/vegetation types within the treatment areas. The treatment areas comprise approximately 4,055 acres, and vegetation within the treatment areas includes: annual grassland, barren, blue oak woodland, blue oak-foothill pine, Douglas fir, evergreen orchard, freshwater emergent wetland, mixed chaparral, montane chaparral, montane hardwood, montane hardwood-conifer, Ponderosa pine, riverine, and Sierran mixed conifer habitats. A list of special-status plant and wildlife species with potential to occur within the treatment areas was compiled by completing a review of the California Natural Diversity Database (CNDDB) and California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California database search of the nine U.S. Geological Survey (USGS) quadrangles surrounding the treatment areas (CNDDB 2020, CNPS 2020), and reviewing Appendix BIO-3 (Table 14a, Table 14b, and Table 19) in the PEIR (Volume II) for special-status plants and wildlife that could occur in the Sierra Nevada Foothills ecoregion.

Reconnaissance surveys were conducted July 22 through 24 and July 31, 2020 to identify and document sensitive resources within the treatments areas (e.g., aquatic habitat, riparian habitat, sensitive natural communities) and to assess the suitability of habitat within the treatment areas for special-status plant and wildlife species. Vegetation communities, soil characteristics were identified, and incidental wildlife observations were recorded.

Based on implementation of SPR BIO-1, including review of occurrence data, species ranges, habitat requirements for each species, and habitat present within the treatment areas as assessed during reconnaissance surveys, a complete list of all species with potential to occur in the vicinity of the project was assembled (Attachment B). Fifteen of the special-status plants and 12 of the special-status wildlife from the complete list of species were determined to have potential to occur within the treatment areas (Table 4-1). These species are discussed in detail under Impact BIO-1 (special-status plants) and Impact BIO-2 (special-status wildlife).

Table 4-1 Special-Status Plant and Wildlife Species that May Occur in the Project Area

	Listing Status <sup>1</sup> Federal State CRPR				Potential for Occurrence		
Species				Habitat			
Special-Status Plants							
Dissected-leaved toothwort Cardamine pachystigma var. dissectifolia	-	l	1B.2	Serpentine outcrops and gravelly serpentine talus. 984–3,117 feet in elevation. Blooms February–May.	May occur. The treatment areas contain serpentine soils potentially suitable for this species.		
Sierra arching sedge Carex cyrtostachya	-	-	1B.2	Mesic sites. 1,985–4,560 feet in elevation. Blooms May–August.	May occur. This species may occur within wet areas (e.g., streams, wetlands, meadows) within treatment areas; however, treatment activities would include implementation of WLPZs, which would be designed to avoid these habitats.		
Chaparral sedge Carex xerophila	-	-	1B.2	Chaparral, cismontane woodland, lower montane coniferous forest. Serpentinite, gabbroic. 902–2,526 feet in elevation. Blooms March–June.	May occur. Habitat suitable for this species is present within treatment areas that contain gabbro soils and forest or forest edge habitat.		
White-stemmed clarkia Clarkia gracilis ssp. albicaulis	-	ı	1B.2	Dry, grassy openings in chaparral or foothill woodland. Sometimes on serpentine. 689–3,609 feet in elevation. Blooms May–July.	May occur. This species may occur within grassy woodland openings in the Stocker treatment area.		
Mosquin's clarkia Clarkia mosquinii	-	-	1B.1	Cismontane woodland, lower montane coniferous forest. Usually on steep, rocky cutbanks and slopes. 607–4,003 feet in elevation. Blooms May–July.	May occur. This species may occur within grassy woodland openings in the Stocker treatment area.		
Ahart's buckwheat Eriogonum umbellatum var. ahartii	_	-	1B.2	Cismontane woodland, chaparral. Serpentine soils. On slopes, in openings. 902–4,856 feet in elevation. Blooms June–September.	May occur. The treatment areas contain serpentine soils potentially suitable for this species.		
Minute pocket moss Fissidens pauperculus	-	1	1B.2	Moss growing on damp soil along the coast. In dry streambeds and on stream banks. 33–3,360 feet in elevation.	May occur. This species may occur within wet areas (e.g., streams, wetlands, meadows) within treatment areas; however, treatment activities would include implementation of WLPZs, which would be designed to avoid these habitats.		
Caribou coffeeberry Frangula purshiana ssp. ultramafica	-	I	1B.2	Lower montane coniferous forest, upper montane coniferous forest, chaparral, meadows, and seeps. Serpentine soils. 2,379– 6,004 feet in elevation. Blooms May–July.	May occur. The treatment areas contain serpentine soils potentially suitable for this species.		
Pine Hill flannelbush Fremontodendron decumbens	FE	SR	1B.2	Chaparral, cismontane woodland. Rocky ridges; gabbro or serpentine endemic; often among rocks and boulders. 1,394–2,510 feet in elevation. Blooms April–July.	May occur. Habitat suitable for this species is present within treatment areas that contain gabbro soils and forest or forest edge habitat.		
Cantelow's lewisia Lewisia cantelovii	_	-	1B.2	Mesic rock outcrops and wet cliffs, usually in moss or clubmoss; on granite or sometimes	May occur. This species may occur within wet areas (e.g., streams, wetlands, meadows) within treatment areas; however, treatment		

	List	ing Stat	us <sup>1</sup>		Detectal for Comments		
Species	Federal	State	CRPR	Habitat	Potential for Occurrence		
				on serpentine. 1,083–4,495 feet in elevation. Blooms May–October.	activities would include implementation of WLPZs, which would be designed to avoid these habitats.		
Shevock's copper moss Mielichhoferia shevockii	-	-	1B.2	Cismontane woodland. Moss on metamorphic rocks containing heavy metals; mesic sites. On rocks along roads. 2,461–4,593 feet in elevation.	May occur. This species may occur within wet areas (e.g., streams, wetlands, meadows) within treatment areas; however, treatment activities would include implementation of WLPZs, which would be designed to avoid these habitats.		
Layne's ragwort Packera layneae	FT	SR	1B.2	Chaparral, cismontane woodland. Ultramafic soil (serpentine or gabbro); occasionally along streams. 656–3,560 feet in elevation. Blooms April–August.	May occur. Habitat suitable for this species is present within treatment areas that contain gabbro soils and forest or forest edge habitat.		
Sierra blue grass Poa sierrae	_	-	1B.3	Lower montane coniferous forest. Shady, moist, rocky slopes. Often in canyons. 1,198– 4,921 feet in elevation. Blooms April–July.	May occur. This species may occur within moist areas (e.g., streams, wetlands, meadows) within treatment areas; however, treatment activities would include implementation of WLPZs, which would be designed to avoid these habitats.		
Flexuose threadmoss Pohlia flexuosa	-	-	2B.1	Lower montane coniferous forest. Roadsides, rocky seeps. 3,117–3,363 feet in elevation.	May occur. This species may occur within wet areas (e.g., seeps, streams, wetlands, meadows) within treatment areas; however, treatment activities would include implementation of WLPZs, which would be designed to avoid these habitats.		
Brownish beaked-rush Rhynchospora capitellata	-	-	2B.2	Lower montane coniferous forest, meadows and seeps, marshes and swamps, upper montane coniferous forest. Mesic sites. 148– 5,610 feet in elevation. Blooms July–August.	May occur. This species may occur within wet areas (e.g., streams, wetlands, meadows) within treatment areas; however, treatment activities would include implementation of WLPZs, which would be designed to avoid these habitats.		
Special-Status Wildlife							
California red-legged frog <i>Rana draytonii</i>	FT	SSC	NA	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.	May occur. There is one known occurrence of California red-legged frog in the project vicinity, within two spring-fed tailings ponds adjacent to Oregon Hill Road, near Bullards Bar Reservoir (CNDDB 2020). Habitat suitable for this species is not present elsewhere in the project area.		
Foothill yellow-legged frog Rana boylii	-	ST SSC	NA	Northeast/Northern Sierra Clade. Partly-shaded, shallow streams and riffles with a rocky substrate in a variety of habitats. Need at least some cobble-sized substrate for egglaying. Need at least 15 weeks to attain metamorphosis. Foothill yellow-legged frog is known to occur within upland habitat up to approximately 200 feet away, but typically no more than 50 to 70 feet away, from aquatic habitat (CDFW 2018).	May occur. Foothill yellow-legged frogs have been documented within two creeks in the vicinity of the treatment areas: Little Oregon Creek and Dry Creek (CNDDB 2020). Aquatic habitat suitable for this species within the project area is present only within perennial streams: Little Oregon Creek, Dry Creek, Prince Albert Creek, and Willow Glen Creek.		
Western pond turtle Actinemys marmorata	_	SSC	NA	An aquatic turtle of ponds, marshes, rivers, streams, and irrigation ditches, usually with	May occur. Aquatic habitat within the project area potentially suitable for western pond		

	List	ing Stat	us <sup>1</sup>	1110	D. L. W. L. C.
Species	Federal	State	CRPR	- Habitat	Potential for Occurrence
				aquatic vegetation, below 6,000 feet elevation. Need basking sites and suitable (sandy banks or grassy open fields) upland habitat up to approximately 0.3 mile from water for egg-laying.	turtle is present only within perennial streams: Little Oregon Creek, Dry Creek, Prince Albert Creek, and Willow Glen Creek.
American peregrine falcon Falco peregrinus anatum	FD	SD FP	NA	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site.	May occur. The project area is within the range of this species and there are several observations of the species in the vicinity of the project area (eBird 2020). Nesting habitat potentially suitable for peregrine falcons may be present in close proximity to the treatment areas on cliffs or human-made structures.
Bald eagle Haliaeetus leucocephalus	FD	SE FP	NA	Ocean shore, lake margins, and rivers for both nesting and wintering. Most nests within 1 mile of water. Nests in large, oldgrowth, or dominant live tree with open branches, especially ponderosa pine. Roosts communally in winter.	May occur. The project area is within the range of this species and there is one documented nest site near Bullards Bar Reservoir (CNDDB 2020). Nesting habitat potentially suitable for bald eagle is present in large trees within treatment areas approximately 1 mile from Bullards Bar Reservoir.
California spotted owl Strix occidentalis	-	SSC	NA	Mixed conifer forest, often with an understory of black oaks and other deciduous hardwoods. Optimal nesting habitat is typically characterized by forests with high canopy closure (i.e., greater than 40 percent), often in deep-shaded canyons, on north-facing slopes, and within 300 meters of water.	May occur. There are several documented California spotted owl nest sites within the vicinity of the project area, primarily within US Forest Service land (CNDDB 2020). Habitat potentially suitable for spotted owl nesting is present only within the Doner parcel.
Golden eagle Aquila chrysaetos	-	FP	NA	Rolling foothills, mountain areas, sage- juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.	May occur. The project area is within the range of this species and there are several observations of the species in the vicinity of the project area (eBird 2020). Nesting habitat potentially suitable for golden eagle is present in large trees within treatment areas.
Purple martin Progne subis	-	SSC	NA	Inhabits woodlands, low elevation coniferous forest of Douglas-fir, ponderosa pine, and Monterey pine. Nests in old woodpecker cavities mostly, also in human-made structures. Nest often located in tall, isolated tree/snag.	May occur. The project area is within the range of this species and there are several observations of the species in the vicinity of the project area (eBird 2020). Nesting habitat potentially suitable for purple martin is present in large trees or snags within treatment areas.
Pallid bat Antrozous pallidus	-	SSC	NA	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	May occur. Habitat potentially suitable for pallid bat is present within large trees or rocky areas within the project area.
Ringtail Bassariscus astutus	-	FP	NA	Suitable habitat for ringtails consists of a mixture of forest and shrubland in close association with rocky areas or riparian habitats. Hollow trees, logs, snags, cavities in	May occur. The project area is within the range of this species and contains habitat potentially suitable for ringtail, including forest, shrub, and riparian habitat.

Charina	List	ing Stat	us <sup>1</sup>	Habitat	Potential for Occurrence
Species	Federal	State	CRPR	Habitat	Potential for Occurrence
				talus and other rocky areas, and other recesses are used for cover. Usually found within 0.6 mile of a permanent water source.	
Townsend's big-eared bat Corynorhinus townsendii	-	SSC	NA	Throughout California in a wide variety of habitats. Most common in mesic sites. Roosts in the open, hanging from walls and ceilings. Roosting sites limiting. Extremely sensitive to human disturbance.	May occur. Habitat potentially suitable for Townsend's big-eared bat is present within large trees or human-made structures (e.g., bridges) within the project area.
Western red bat Lasiurus blossevillii	-	SSC	NA	Roosts primarily in trees, 2-40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.	May occur. Habitat potentially suitable for western red bat is present within large trees within the project area.

<sup>1.</sup> Legal Status Definitions:

#### California Rare Plant Ranks (CRPR):

1B Plant species rare or endangered in California and elsewhere (Not protected under ESA or CESA)

#### **CRPR Threat Ranks:**

- 0.1 Seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat)
- 0.2 Moderately threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat)

**State**: SR State Listed as Rare (legally protected by NPPA)

FP Fully Protected (legally protected)

SSC Species of Special Concern (no formal protection other than CEQA consideration)

SE State Listed as Endangered (legally protected)

ST State Listed as Threatened (legally protected)

SD State Delisted

Federal: FE Federally Listed as Endangered (legally protected)

FT Federally Listed as Threatened (legally protected)

FD Federally Delisted

WLPZ = Watercourse and Lake Protection Zone Sources: CNDDB 2020; CNPS 2020; eBird 2020

#### IMPACT BIO-1

Treatment activities could result in direct or indirect adverse effects to the 12 special-status plant species with suitable habitat within treatment areas. Seven of these species, Sierra arching sedge, minute pocket moss, Cantelow's lewisia, Shevock's copper moss, Sierra blue grass, flexulose threadmoss, and brownish beaked-rush, are associated with wet areas (e.g., seeps, streams, wetlands, meadows). Pursuant to SPR HYD-4, Watercourse and Lake Protection Zones (WLPZ) ranging from 50 to 150 feet adjacent to all aquatic habitat (i.e., wet areas) within the project area will be implemented, which would avoid adverse effects to these species.

Two of these species, Mosquin's clarkia and white-stemmed clarkia, may occur within open woodland habitat, which is only present in the treatment area on Stocker property. Three additional species, chaparral sedge, Pine Hill flannelbush, and Layne's ragwort, may be present within treatment areas that contain gabbro or serpentine soils, and three other species, Dissected-leaved toothwort, Ahart's buckwheat, and Caribou coffeeberry may be present within treatment areas that contain serpentine soils. Gabbro soils are present in many of the treatment areas. Serpentine soils have been mapped in the treatment area on Sillers property; however, treatments will not occur within any areas containing these soils pursuant to SPR AQ-5. Areas with serpentine soils requiring avoidance will be delineated using maps prepared by the Natural Resources Conservation Service in the *Distribution of Ultramafic Soils* (NRCS 2014), or by conducting site-specific surveys for serpentine soils within these areas. Site-specific surveys will be conducted by a qualified RPF or soil scientist and will include updated mapping of serpentine soils within the treatment area as well as documentation of diagnostic features of serpentine soils such as the presence or serpentinite rock fragments and

changes in the density, diversity, and productivity of vegetation. Because treatments within serpentine soil areas will be avoided, impacts on the three special-status plant species associated with these soils would not occur.

SPR BIO-7 would apply to all treatment activities. Pursuant to SPR BIO-7, protocol-level surveys for special-status plants will not be required if the target special-status plant species is a herbaceous annual, stump sprouting species, or geophyte species, and the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle provided the treatment will not alter habitat in a way that would make it unsuitable for the special-status plants to reestablish following treatment, or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts of special-status plants.

Two of the five special-status plant species (see Table BIO-1) are herbaceous annual species (Mosquin's clarkia and white-stemmed clarkia) that have potential to occur only within treatment areas on Stocker property. Impacts on these two *Clarkia* species would be avoided by implementing non-ground disturbing treatment activities (e.g., hand cut/pile/burn, herbicide application) during the dormant season (approximately September–March). If treatments cannot be completed in the dormant season and would be implemented during the growing period of these clarkia species, protocol surveys (per SPR BIO-7) and avoidance of any identified plants (per Mitigation Measures BIO-1a and BIO-1b) must be implemented, as described below.

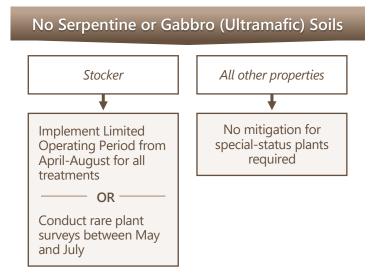
The remaining three of the five special-status plant species that have potential to occur within areas containing gabbro soils are not herbaceous annual species. One species is a perennial shrub (Pine Hill flannelbush), one is a perennial grass-like species (chaparral sedge), and one is a perennial herbaceous species (Layne's ragwort). These species could not be avoided in the same manner as herbaceous annual species; therefore, protocol-level surveys under SPR BIO-7 to identify them will be necessary prior to implementing treatment activities within areas that contain gabbro soils.

If protocol-level surveys are required (per SPR BIO-7) and special-status plants are identified during these surveys, Mitigation Measures BIO-1a and BIO-1b will be implemented to avoid loss of identified special-status plants. Per Mitigation Measures BIO-1a and BIO-1b, if special-status plants are identified during protocol-level surveys, a no-disturbance buffer of at least 50 feet will be established around the area occupied by the species within which mechanical treatment, manual treatment, herbicide application, and prescribed burning will not occur.

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, within the boundary of the project area, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on special-status plants is also the same, as described above. Biological resource SPRs that apply to project impacts under Impact BIO-1 are SPRs BIO-1, SPR BIO-2, SPR BIO-6, SPR BIO-7, SPR BIO-9, SPR GEO-1, SPR GEO-3, SPR GEO-4, SPR GEO-5, SPR GEO-7, and SPR HYD-4. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

## **Special-Status Plants**

# Serpentine Soils Gabbro Soils Exclude areas from treatments Conduct rare plant surveys; avoid occurrences



#### **IMPACT BIO-2**

Treatment activities could result in direct or indirect adverse effects to special-status wildlife species with suitable habitat within treatment areas, as described in the following sections.

#### Special-Status Amphibians

Two special-status amphibian species have potential to occur within the project area: California red-legged frog and foothill yellow-legged frog.

There is one known occurrence of California red-legged frog in the vicinity of the treatment areas. This occurrence is located within two mine tailings ponds along Little Oregon Creek east of Oregon Hill Road (CNDDB 2020). Studies have demonstrated that California red-legged frogs remain very close to breeding ponds during the nonbreeding season and typically do not move more than a few hundred feet into upland habitats. One of the treatment areas on Sillers property is located directly north of this occurrence and the treatment area boundary is approximately 350 feet north of the ponds. USFWS guidelines for avoiding injury or mortality of California red-legged frogs during timber harvest operations recommend that no harvest activities occur within 300 feet of a known occurrence of the species (USFWS 2008). Because vegetation treatment activities would not occur within 350 feet of the known occurrence along Little Oregon Creek, adverse effects on California red-legged frog as a result of these activities would not occur.

Foothill yellow-legged frogs have been documented within two creeks in the vicinity of the treatment areas: Little Oregon Creek and Dry Creek (CNDDB 2020). These creeks flow through or adjacent to several treatment areas. Foothill yellow-legged frog is known to occur within upland habitat up to approximately 200 feet away, but typically no more than 50 to 70 feet away, from aquatic habitat (CDFW 2018).

WLPZs ranging from 50 to 150 feet adjacent to all aquatic habitat within the project area will be implemented per SPR HYD-4; however, these measures may not result in full avoidance of foothill yellow-legged frogs, if frogs are present further than 150 feet from stream habitat. The potential for treatment activities to result in adverse effects on special-status amphibians was examined in the PEIR. Per SPR BIO-1, if it is determined that adverse effects on suitable habitat

can be clearly avoided by physically avoiding the suitable habitat, then further mitigation would not be required. To fully avoid potentially suitable habitat for foothill yellow-legged frog, a 200-foot buffer will be implemented prior to commencement of treatment activities by flagging along the two perennial streams that provide suitable habitat for the species: Little Oregon Creek and Dry Creek. Therefore, further mitigation is not required.

Habitat function for special-status amphibians would be maintained because treatment activities would not occur within aquatic habitat, riparian habitat, or within WLPZs adjacent to treatment areas. Disturbance or loss of special-status amphibians would be unlikely to occur with implementation of the WLPZs and the expanded buffer for foothill yellow-legged frog.

#### Western Pond Turtle

Habitat that may be marginally suitable for western pond turtle is present within perennial streams (e.g., Little Oregon Creek, Dry Creek, Prince Albert Creek, Willow Glen Creek). There are no documented occurrences of this species within the nine USGS quadrangles surrounding the project area (CNDDB 2020). High quality upland habitat (e.g., sandy banks, grassy open fields) is not present within the treatment areas adjacent to these streams. WLPZs ranging from 50 to 150 feet adjacent to all aquatic habitat within the project area will be implemented per SPR HYD-4, which would minimize or avoid impacts on western pond turtles, if present within aquatic habitats in the project area and would also maintain habitat function for the species.

#### California Spotted Owl

Most of the treatment areas do not contain suitable nesting habitat for California spotted owl, due to the long-term management of these parcels for commercial timber harvest. Treatment areas on Doner property contain potentially suitable nesting habitat for California spotted owl due to the age and composition of the stands within these treatment areas. Several California spotted owl nest sites have been documented outside, but within 0.25 mile, of the treatment areas; primarily within adjacent U.S. Forest Service land and concentrated in higher elevation areas in the eastern half of the project area (CNDDB 2020). Up to 0.25 mile is the widely-accepted distance within which the species could be disturbed by noise and human activity (U.S. Forest Service 1993).

With the exception of treatments on Doner property, treatment activities would not result in adverse effects on California spotted owl nesting habitat, because suitable nesting habitat is not present for the species. However, treatment activities that include the use of heavy equipment, multiple vehicles, or loud hand tools (e.g., chain saws) could result in disturbance of nesting California spotted owls in adjacent suitable habitat, if these activities occur during the sensitive nesting season (March 1–August 15). The potential for treatment activities to result in adverse effects on special-status birds was examined in the PEIR. Per SPR BIO-1, if it is determined that adverse effects on suitable habitat for California spotted owl can be clearly avoided by conducting treatments outside of the season of sensitivity (i.e., nesting season), then further mitigation would not be required. To avoid impacts on California spotted owl, a limited operating period during the nesting season (March 1–August 15) will be implemented in parcels within 0.25 mile of a documented nesting site and within the Doner parcels for mechanical treatments, manual treatments, and prescribed burning activities. Herbicide application would not result in adverse effects on nesting spotted owls in adjacent suitable habitat because this activity would not involve the use of loud equipment or tools or visual disturbance stimuli (e.g., crews would typically include fewer than 10 people).

If the limited operating period is determined to be infeasible, then SPR BIO-10 would apply, and protocol-level surveys for California spotted owl would be conducted within a 0.25-mile buffer surrounding the treatment area prior to implementation of treatment activities. Surveys for California spotted owl will be conducted pursuant to the *Protocol for Surveying for Spotted Owls in Proposed Management Activity Areas and Habitat Conservation Areas* (US Forest Service 1993). If nesting California spotted owls are not identified during protocol-level surveys, then further mitigation for the species would not be required. If nesting California spotted owls are identified during protocol-level surveys, Mitigation Measure BIO-2b would be implemented.

Under Mitigation Measure BIO-2b, a no disturbance buffer of 0.25 mile would be established around active California spotted owl nests and no treatment activities would occur within this buffer. A no-disturbance buffer of 0.25 mile has been established for the species and is larger than the general no-disturbance buffer of 100 feet provided in

Mitigation Measure BIO-2b to provide adequate protection such that impacts would be maintained at less than significant, consistent with the PEIR.

Habitat function for California spotted owl would be maintained because treatment activities would not result in removal of trees (i.e., conifers, hardwoods) or snags greater than 12 inches diameter at breast height (dbh), which would be the most likely features to be used by this species due to the cover provided by larger trees.

#### Other Special-Status Birds

Four additional special-status bird species may occur within the project area: American peregrine falcon, bald eagle, golden eagle, and purple martin. Habitat potentially suitable for these species is present within and adjacent to the project area. Treatment activities, including mechanical treatments, manual treatments, prescribed burning, and herbicide application, conducted during the nesting bird season (February 1–August 31) could result in direct loss of active nests or disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chain saws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks. The potential for treatment activities to result in adverse effects on special-status birds was examined in the PEIR.

Focused surveys for special-status bird nests have not yet been conducted; thus, SPR BIO-10 would apply, and focused nesting bird surveys for American peregrine falcon, bald eagle, golden eagle, and purple martin will be conducted prior to treatment activities. If no active bird nests are observed during focused surveys, then additional mitigation for these species would not be required. If active special-status bird nests are observed during focused surveys, then Mitigation Measures BIO-2a (for American peregrine falcon, bald eagle, and golden eagle) and BIO-2b (for purple martin) would be implemented.

Under Mitigation Measure BIO-2a and BIO-2b, a no-disturbance buffer of at least 500 feet would be established around active American peregrine falcon, bald eagle, and golden eagle nests, and at least 100 feet around purple martin nests, and no treatment activities would occur within this buffer until the chicks have fledged as determined by a qualified RPF or biologist. Additionally, trees containing active or inactive bald eagle or golden eagle nests would not be removed pursuant to the Bald and Golden Eagle Protection Act.

Habitat function for special-status birds would be maintained because treatment activities would not result in removal of trees (i.e., conifers, hardwoods) or snags greater than 12 inches dbh, which would be the most likely features to be used by these species due to the cover provided by larger trees.

#### Special-Status Bats

Habitat potentially suitable for three special-status bat species, pallid bat, Townsend's big-eared bat, and western red bat, is present within forest habitat in the project area. Conifer plantations with trees 20 years and younger, which are present in some treatment areas, are not expected to provide habitat suitable for special-status bats, due to the relatively small size of the trees. Treatment activities, including mechanical treatments, manual treatments, prescribed burning, and herbicide application, conducted within habitat suitable for bats during the bat maternity season (April 1–August 31) could disturb active bat roosts from auditory and visual stimuli (e.g., heavy equipment, chain saws, vehicles, personnel) potentially resulting in abandonment of the roost and loss of young. The potential for treatment activities to result in adverse effects on special-status bats was examined in the PEIR.

Focused surveys for special-status bat roosts have not yet been conducted; thus, SPR BIO-10 would apply, and focused surveys for these species will be conducted within suitable habitat areas (e.g., excluding young plantations) prior to treatment activities. If special-status bat roosts are identified during focused surveys, Mitigation Measure BIO-2b for special-status bats would be implemented.

Under Mitigation Measure BIO-2b, a no-disturbance buffer of 250 feet would be established around active pallid bat, Townsend's big-eared bat, or western red bat roosts and mechanical and manual treatments would not occur within this buffer. A no-disturbance buffer of 250 feet is necessary to protect sensitive roosts; this buffer size was adjusted to be larger than the general no-disturbance buffer of 100 feet provided in Mitigation Measure BIO-2b in order to provide adequate protection such that impacts would be less than significant under CEQA. If special-status bat roosts are

identified in a treatment area where prescribed burning is planned, prescribed burning activities would be implemented outside of the bat breeding season, which is April 1–August 31 (California Department of Transportation 2004).

Habitat function for special-status bats would be maintained because treatment activities would not result in removal of trees (i.e., conifers, hardwoods) or snags greater than 12 inches dbh, which would be the most likely features to be used by these species due to the cover provided by larger trees.

#### Ringtail

Ringtail is primarily nocturnal, and typically occurs in riparian areas, forests (including stands of various ages), and shrub habitats within approximately 0.6 mile of a permanent water source (CDFW 2005). This species may occur within treatment areas that are within 0.6 mile of perennial streams or Bullards Bar Reservoir. Potential denning habitat includes rock outcrops, crevices, snags, large hardwoods, large conifers, and brush. Most of these habitats would be avoided, as trees and snags larger than 12 inches dbh will not be removed during treatment activities and because rocky areas would not be targeted for vegetation treatment; however, brush would be targeted for treatment and would not be avoided through implementation of other measures. Outside of the breeding season, resting ringtails would likely flee due to the presence of equipment, vehicles, or personnel, and injury or mortality would not be expected. However, treatment activities, including mechanical treatments and prescribed burning, conducted during the ringtail maternity season (i.e., the period during which young would be present in a den, approximately April 15–July 31) could result in destruction of active dens within brush habitat or disturbance to active dens potentially resulting in abandonment and loss of young, which may not yet be capable of fleeing.

Per SPR BIO-1, if it is determined that adverse effects on suitable habitat for ringtail can be clearly avoided by conducting treatments outside of the season of sensitivity (i.e., maternity season), then further mitigation would not be required. To avoid impacts on ringtail, a limited operating period during the maternity season (April 15–July 31) will be implemented in parcels within 0.6 mile of permanent aquatic habitat for mechanical treatments and prescribed burning activities, if feasible. Manual treatments and herbicide application are not expected to result in adverse effects on ringtail dens because personnel would conduct these activities on foot, and the likelihood of a den being inadvertently crushed or otherwise destroyed would be very low.

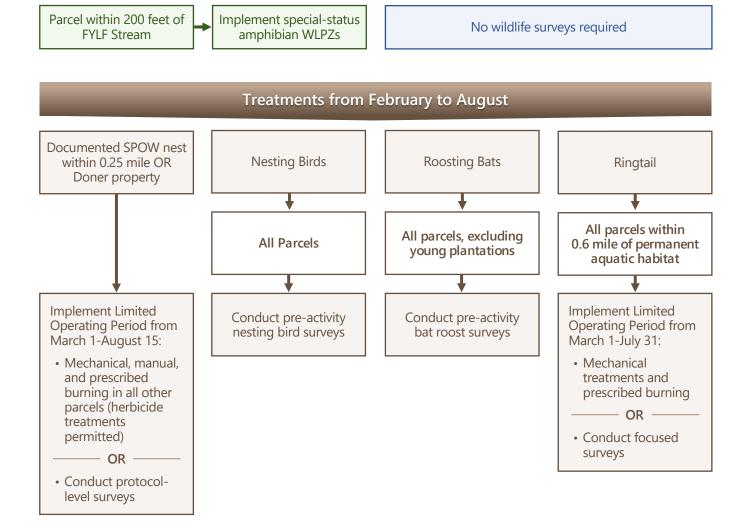
If this limited operating period is determined to be infeasible, then SPR BIO-10 would apply, and focused surveys for ringtail would be conducted within suitable habitat areas (i.e., within 0.6 mile of permanent aquatic habitat) prior to implementation of treatment activities. Surveys for ringtail will include the use of trail cameras, track plants, and other non-invasive survey methods to determine whether ringtails are present within the treatment area. If ringtails are not detected during focused surveys, then further mitigation for the species would not be required. If ringtails are detected during focused surveys, then additional surveys would be required to determine whether an active ringtail den is present within the treatment area. If an active den is identified by a qualified RPF or biologist, Mitigation Measure BIO-2a would be implemented. Under Mitigation Measure BIO-2a, a no disturbance buffer would be established around the den, the size of which would be determined through consultation with California Department of Fish and Wildlife. No treatment activities would occur within this buffer.

Habitat function for ringtail would be maintained because treatment activities would not result in removal of trees (i.e., conifers, hardwoods) or snags greater than 12 inches dbh, which would be the most likely features to be used by this species due to the cover provided by larger trees and because rocky areas would not be targeted for vegetation treatment.

**Year Round** 

Treatments from September to January

## **Special-Status Wildlife**



#### Conclusion

The potential for treatment activities to result in adverse effects on special-status wildlife was examined in the PEIR. This impact on special-status wildlife is within the scope of the PEIR, because, within the boundary of the project area, general habitat characteristics are essentially the same within and outside the CalVTP treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on special-status wildlife is also the same, as described above. Biological resource SPRs that apply to project impacts under Impact BIO-2 are SPR BIO-1, SPR BIO-2, SPR BIO-9, SPR BIO-10, SPR GEO-1, and SPR HYD-3. 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**

Treatments could result in direct or indirect adverse effects on sensitive habitats, including designated sensitive natural communities and oak woodlands.

Data review and reconnaissance surveys of project-specific biological resources were performed according to SPR BIO-1. Blue oak (*Quercus douglasii*) woodland habitat present within some of the treatment areas is a sensitive habitat. A list of additional sensitive natural communities with potential to occur within the treatment areas was compiled by completing a CNDDB search of the nine USGS quads surrounding the treatment areas (CNDDB 2020) and reviewing Table 3.6-24 (pages 3.6-88–3.6-90) in the PEIR (Volume II) for sensitive natural communities that could occur in the Sierra Nevada Foothills ecoregion. Upon review of occurrence data and habitat present, sensitive natural communities with potential to occur in the California Wildlife Habitat Relationships habitat types present in the treatment areas are bigleaf maple forest; California buckeye grove; bigcone Douglas fir forest; incense cedar forest; hoary, common, and Stanford manzanita chaparral; lone manzanita chaparral; tar plant field; needle spike rush stand; goldenaster patch; Fremont's goldfields – salt grass alkaline vernal pool; Fremont's goldfields – Downingia vernal pools; smooth goldfields vernal pool bottom, Fremont's tidy-tips – blow wives vernal pool; Monolopia – leafy-stemmed tickseed field; water blinks – annual checkerbloom vernal pool; white-tip clover swales; and *Darlingtonia* seep.

Bigcone Douglas fir, hoary manzanita (*Arctostaphylos canescens*), common manzanita (*Arctostaphylos manzanita*), and Stanford manzanita (*Arctostaphylos stanfordiana*) do not occur in Yuba County. Additionally, all of the sensitive natural communities associated with annual grassland habitat require mesic habitat or vernal pools, which are not present within the project area. However, three sensitive natural communities listed have potential to occur within forest habitat in the project area: bigleaf maple forest, California buckeye grove, and incense cedar forest. During reconnaissance-level surveys conducted pursuant to SPR BIO-1, bigleaf maple (*Acer macrophyllum*), California buckeye (*Aesculus californica*), and incense cedar (*Calocedrus decurrens*) were observed in many of the treatment areas; however, where present, these species were not dominant and did not make up a large percentage of the canopy. Additionally, the treatment areas that contain these species are consistently managed for timber harvest and it is unlikely that these species would become established as dominant canopy species. Therefore, adverse effects on sensitive natural communities is not expected to occur as a result of treatment activities.

Treatment activities, including mechanical treatment and herbicide application, are proposed to occur within habitat that has been mapped by CAL FIRE's FRAP vegetation layer as blue oak woodland or blue oak-foothill pine (*Pinus sabiniana*). It is likely that some of these mapped areas are not dominated by blue oak and would not be sensitive habitats. As required under SPR BIO-3, oak woodlands within the treatment areas will be mapped by an RPF or qualified biologist prior to treatment activities. Prior to implementing treatment activities, an RPF or qualified biologist will verify whether these mapped habitats are dominated by one or more species of oak and whether the habitats would actually qualify as oak woodlands.

Mitigation Measure BIO-3a would apply in areas determined to be dominated by blue oak. Under Mitigation Measure BIO-3a, if prescribed burning is proposed in field-verified blue oak woodland, the natural fire regime for the blue oak woodland habitat would be determined, and treatments within blue oak woodlands would be designed to restore this natural fire regime. Additionally, under Mitigation Measure BIO-3a, implementation of shaded fuel breaks would not remove more than 20 percent of the native vegetation relative cover in oak woodland habitat.

The potential for treatment activities to result in adverse effects on sensitive habitats, as described above, was examined in the PEIR. This impact on sensitive habitats is within the scope of the PEIR, because, within the boundary of the project area, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected on land outside the CalVTP treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on sensitive habitats is also the same, as described above. Biological resource SPRs that apply to

project impacts under Impact BIO-3 are SPR BIO-1, SPR BIO-2, SPR BIO-3, SPR BIO-6, SPR BIO-9, SPR GEO-1, SPR GEO-3, SPR GEO-4, SPR GEO-5, and SPR GEO-7. 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**

Treatments could result in direct or indirect adverse effects on state or federally protected wetlands. Most of the aquatic habitat in the vicinity of the treatment areas has been excluded during the design of the treatments. However, based on review and survey of project-specific biological resources (SPR BIO-1), some of the treatment areas contain portions of perennial, intermittent, and ephemeral streams, as well as portions of meadows and other wetland features. Under SPR HYD-4, WPLZs ranging from 50 to 150 feet will be established adjacent to all aquatic habitat within the project area.

The potential for treatment activities to result in adverse effects on state or federally protected wetlands was examined in the PEIR. This impact on wetlands is within the scope of the PEIR, because, within the boundary of the project area, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected on land outside the CalVTP treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on wetlands is also the same, as described above. Biological resource SPRs that apply to project impacts under Impact BIO-4 are SPR BIO-1, SPR BIO-2, SPR GEO-1, SPR GEO-3, SPR GEO-4, SPR GEO-5, SPR GEO-7, SPR HYD-1, and SPR HYD-4. 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**

Treatments could result in direct or indirect adverse effects on wildlife movement corridors and nurseries because suitable habitat is present in the project area. Based on review and survey of project-specific biological resources (SPR BIO-1), the project area does not contain any portion of a modeled essential connectivity area; however, the project area does contain some natural landscape blocks within forested areas (CDFW 2020). Due to the long-term management of the treatment areas for commercial timber harvest, implementation of treatment activities would not result in a substantial change in the existing conditions that facilitate wildlife movement in the treatment areas. Additionally, no known wildlife nursery sites or indications of nursery sites, such as deer fawning habitat or potential rookery trees with whitewash, were identified within treatment areas during implementation of SPR BIO-1. However, the natural habitat within the treatment areas may be used for movement (e.g., mule deer migration) and cover for common wildlife species.

The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the PEIR. This impact is within the scope of the PEIR, because, within the boundary of the project area, general habitat characteristics are essentially the same within and outside the treatable landscape (e.g., no resource is affected on land outside the CalVTP treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on wildlife movement corridors is also the same, as described above. Habitat function within the treatment areas would be maintained because treatment activities would not result in removal of trees (i.e., conifers, hardwoods) or snags greater than 12 inches dbh. Additionally, WLPZs ranging from 50 to 150 feet will be implemented adjacent to all aquatic habitat in the treatment areas, which could function as wildlife movement corridors, pursuant to SPR HYD-4. SPR BIO-3 would be implemented and would prevent changes in habitat function

within blue oak woodland habitat in the treatment areas that acts as a wildlife movement corridor, 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**

Treatments could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds, because suitable habitat is present throughout the project area. Treatment activities, including mechanical treatments, manual treatments, prescribed burning, and herbicide application, conducted during the nesting bird season (February 1–August 31) could result in direct loss of active nests or disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chain saws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks.

Focused surveys for nesting birds have not yet been conducted; thus, SPR BIO-12 would apply, and for treatments implemented during the nesting bird season, a survey for common nesting birds will be conducted within the treatment area by a qualified RPF or biologist prior to treatment activities. If no active bird nests are observed during focused surveys, then additional mitigation would not be required. If active nests of common birds or raptors are observed during focused surveys, disturbance to the nests will be avoided by establishing an appropriate buffer around the nests, modifying treatments to avoid disturbance to the nests, or deferring treatment until the nests are no longer active as determined by a qualified RPF or biologist.

The potential for treatment activities to result in adverse effects on these resources was examined in the PEIR. The potential for adverse effects on common wildlife, including nesting birds, is within the scope of the PEIR, because, within the boundary of the project area, general habitat characteristics are essentially the same within and outside the CalVTP treatable landscape (e.g., no resource is affected on land outside the treatable landscape that would not also be similarly affected within the treatable landscape), and the treatment activities and extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on common wildlife, including nesting birds is also the same, as described above. Biological resource SPRs that apply to project impacts under Impact BIO-6 are SPR BIO-1, SPR BIO-2, SPR BIO-3, and SPR BIO-12. 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**

The only applicable local ordinance relevant to biological resources is the Yuba County General Plan Natural Resources Element, which contains an oak woodlands and tree preservation action (Action NR10.1). This action states that the County will adopt and implement a tree preservation and mitigation ordinance, which will implement state requirements for oak woodlands mitigation as required by Public Resources Code (PRC) Section 21083.4. The County has not adopted or implemented a tree preservation and mitigation ordinance. Additionally, PRC Section 21083.4 exempts conversion of oak woodlands on agricultural land, including land that is used to produce or process plant and animal products for commercial purposes; thus, any such ordinance would not apply to treatment activities on parcels where commercial timber activities occur.

Despite the fact that this ordinance has not been adopted, SPR BIO-1, SPR BIO-3, and Mitigation Measure BIO-3a would be implemented under Impact BIO-3, and these SPRs and measures would provide protection for blue oak woodland habitat within the treatment areas. There would be no conflict with local ordinances as a result of implementation of treatment activities.

The potential for treatment activities to result in conflict with local policies or ordinances was examined in the PEIR. The potential for the treatment project to conflict is within the scope of the PEIR because vegetation treatment projects implemented under the CalVTP that are subject to local policies or ordinances would be required to comply with any applicable county, city, or other local policies, ordinances, and permitting procedures related to protection

of biological resources, per SPR AD-3. 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 regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential for conflicts with local policies or ordinances 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**

Implementation of the proposed treatments would not result in a conflict with adopted habitat conservation plans (HCP) or natural community conservation plans (NCCP), because the treatment areas are not within the plan area of any adopted HCP or NCCP. 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 regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential for conflicts with an adopted HCP or NCCP 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.

#### NEW BIOLOGICAL RESOURCE IMPACTS

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined that they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.5.1, "Environmental Setting," and Section 3.5.2, "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has also determined that 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 environmental and regulatory conditions pertinent to biological resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those considered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to biological resources would occur that is not covered in the PEIR.

#### 4.6 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		
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	NA	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.

<b>New Energy Resource Impacts</b> : Would the treatment result in other impacts to energy resources that are not evaluated in the CalVTP PEIR?	☐ Ye	es	⊠ N	0		plete row(s) below discussion	
			otentially gnificant	Signit Mi	ss Than ficant with tigation rporated	Less than Significant	
[identify new impact here, if applicable; add rows as needed]							

#### Discussion

#### **IMPACT ENG-1**

Use of vehicles and mechanical equipment during treatment activities would result in the consumption of energy through the use of fossil fuels. The use of fossil fuels for equipment and vehicles was examined in the PEIR. The consumption of energy during implementation of the treatment project is within the scope of the PEIR because the existing energy consumption is essentially the same within and outside the CalVTP treatable landscape, and the types of activities, as well as the associated equipment and duration of proposed use are consistent with those analyzed 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, the existing conditions present outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the energy impact is also the same, as described above. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

#### **NEW ENERGY RESOURCE IMPACTS**

The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.9.1, "Regulatory Setting," and Section 3.9.2, "Environmental Setting," in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land outside the treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those considered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to energy resources would occur that is not covered in the PEIR.

# 4.7 GEOLOGY, SOILS, 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	GEO-1 – GEO-8, AQ-3, & AQ- 4	NA	LTS	No	Yes		
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO- 2, pp. 3.7-29 – 3.7-30	Yes	GEO-1, GEO- 4, GEO-7, GEO-8, & AQ-3	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 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?	Y	es	⊠N	0	,	omplete row(s) and discussion
			Potentially Significant		ss Than ficant with tigation proorated	Less than Significant
[identify new impact here, if applicable; add rows as needed]						

## Discussion

The project area is located in the Smartsville intrusive complex, a geologic unit formed by the rifting of an active volcanic arc. The complex is a mix of extrusive (materials from volcanic eruptions) and intrusive volcanics (materials formed from cooling magma). The complex also includes older ophiolitic rock such as gabbro, and diorite which form deep in the earth's crust and are driven to the surface by the collision of tectonic plates. Within the project area, granodiorite and mafic volcanics are generally found between east of Brownsville, with large areas of gabbro rock found between Brownsville and Rackerby and in the Dobbins area (CGS 1992).

Sites gravelly loam is the dominant soil type, comprising more than 70 percent of the project area. This soil type is well drained with moderate runoff. The Surnuf loam and Mildred cobbly loam together comprise 17 percent of the project area. These three soils are deep and well-drained loams with moderate runoff potential. The erosion hazard rating for landscape disturbance (where 50 to 75 percent of vegetation has been removed) is moderate to severe, indicating that erosion is likely under typical circumstances unless erosion control Best Management Practices are implemented (NRCS 2020).

#### **IMPACT GEO-1**

Treatments would include mechanical treatment, manual treatment, and prescribed burning. All of these activities would result in vegetation removal and soil disturbance. The potential for these treatment activities to cause substantial erosion or loss of topsoil was examined in the PEIR. This impact is within the scope of the PEIR because

the soil characteristics of the project area are essentially the same within and outside the CalVTP treatable landscape and the use of type of equipment, extent of vegetation removal, and intensity of prescribed burning are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact related to soil erosion is also the same, as described above. SPRs applicable to this treatment project are GEO-1 through GEO-8, AQ-3, and AQ-4. 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 GEO-2**

Treatments would include vegetation removal in areas with steep slopes. No historic or active landslides have been documented within the project area. In addition, the risk of deep-seated landslides is low in the project vicinity (Yuba County 2007). Two large landslides occurred near Bullards Bar in 1968 and 1972, however no other large slides have been documented within the area (Yuba County 2007). Along roadways, small slip outs and slumps are relatively common during severe winter storms. The potential for treatment activities to increase landslide risk was examined in the PEIR. This impact is within the scope of the PEIR because the extent of vegetation removal, intensity of prescribed burning, and required avoidance of steep slopes and areas of instability are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact related to landslide risk is also the same, as described above. SPRs applicable to this treatment project are GEO-1, GEO-4, GEO-7, GEO-8, and AQ-3. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

#### NEW GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES IMPACTS

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.7.1, "Environmental Setting," and Section 3.7.2, "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has also determined that 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 environmental and regulatory conditions pertinent to geology, soils, paleontology, and mineral resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to geology, soils, paleontology, or mineral resources would occur that is not covered in the PEIR.

## 4.8 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	None	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	AQ-3	GHG-2	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.

<b>New GHG Emissions Impacts</b> : Would the treatment result in other impacts to GHG emissions that are not evaluated in the CalVTP PEIR?	Y	es	⊠N	0	,	plete row(s) below discussion	
			otentially gnificant	Signi Mi	ss Than ficant with tigation orporated	Less than Significant	
[identify new impact here, if applicable; add rows as needed]							

## Discussion

#### **IMPACT GHG-1**

Use of vehicles and mechanical equipment and prescribed burning during treatments would result in greenhouse gases (GHG) emissions. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the PEIR. This impact is within the scope of the PEIR, because the regulatory conditions pertinent to GHG reductions are essentially the same within and outside the treatable landscape and the proposed activities, as well as the associated equipment and duration of use and resultant GHG emissions, are consistent with those analyzed 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 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. SPR GHG-1 is not applicable to the proposed project; YWA is not subject to providing information to inform reporting under the Board of Forestry and Fire Protection's AB 1504 Carbon Inventory Process because this project is not a registered offset project. 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 GHG-2**

Use of vehicles and mechanical equipment and prescribed burning during treatments would result in GHG emissions. The potential for treatments under the CalVTP to generate GHG emissions was examined in the PEIR. This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions related to wildfire are consistent with those analyzed in the PEIR. Mitigation Measure GHG-2 would be implemented and would reduce GHG emissions associated with the prescribed burning. However, emissions generated by the treatment would still contribute to the annual emissions generated by the CalVTP, and this impact would remain significant and unavoidable, consistent with the PEIR. SPR AQ-3 is also applicable to this treatment and will contain the description of feasible GHG reduction techniques implemented per Mitigation Measure GHG-2. 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 climate conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the GHG 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 PEIR.

#### NEW IMPACTS RELATED TO GHG EMISSIONS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project partners have considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.8.1, "Regulatory Setting," and Section 3.8.2, "Environmental Setting," in Volume II of the Final PEIR). The project partners have also determined that 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 environmental conditions pertinent to aesthetics and visual resources that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to GHG emissions would occur that is not covered in the PEIR.

## 4.9 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	HAZ-1	NA	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	Yes	HAZ-5 – HAZ-9	NA	LTS	No	Yes		
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	Yes	NA	HAZ-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 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?	Y	es	⊠N	0	-	omplete row(s) and discussion
			otentially gnificant	Signif Mit	ss Than ficant with tigation orporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]						

## Discussion

#### **IMPACT HAZ-1**

Treatments would include mechanical treatments, manual treatments, and prescribed burning. These treatment activities would require the use of fuels and related accelerants, which are hazardous materials. The potential for treatment activities to cause a significant health hazard from the use of hazardous materials was examined in the PEIR. This impact is within the scope of the PEIR, because within the boundary of the project area, the exposure potential is essentially the same within and outside the CalVTP treatable landscape and the types of treatments and associated equipment and types of hazardous materials that would be used are consistent with those analyzed 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 environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the hazard material impact is also the same, as described above. SPR HAZ-1 is applicable to this treatment. 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 HAZ-2**

Treatments would include herbicide application. The potential for treatment activities to cause a significant health hazard from the use of herbicides was examined in the PEIR. This impact is within the scope of the PEIR, because within the boundary of the project area, the exposure potential is essentially the same within and outside the CalVTP treatable landscape and the types of herbicides and application methods that would be used are consistent with those analyzed 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 environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the hazardous materials impact is also the same, as described above. SPRs HAZ-5 through HAZ-9 are applicable to this treatment. 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 HAZ-3**

Treatments would include soil disturbance and prescribed burning, which could expose workers or the environment to hazardous materials if a contaminated site is present within the project area. The potential for treatment activities to encounter contamination that could expose workers or the environment to hazardous materials was examined in the PEIR. The treatment areas are private property and the public does not have access to the treatment areas. This impact was identified as potentially significant in the PEIR because hazardous materials sites could be present within treatment sites, and soil disturbance or burning in those areas could expose people or the environment to hazards. As directed by Mitigation Measure HAZ-3, database searches for hazardous materials sites within the project area have been conducted. One leaking underground storage tank site at a former gas station is within 0.25-mile of the treatment areas (T0611500088). The site is under active investigation for cleanup (see Attachment C). However, no hazardous waste sites are identified within any of the treatment areas (CalEPA 2020, DTSC 2020, SWRCB 2020), and off-site contamination is not likely to pose a risk to workers within the treatment areas. Therefore, this impact is less than significant. 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 environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the hazardous materials impact is also the same, as described above. No SPRs are applicable to this impact and no additional mitigation is required. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

#### NEW HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY IMPACTS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project partners have considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.10.1, "Environmental Setting," and Section 3.10.2, "Regulatory Setting," in Volume II of the Final PEIR). The project partners have also determined that 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 environmental and regulatory conditions pertinent to hazardous materials that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to hazardous materials, public health, or safety would occur that is not covered in the PEIR.

# 4.10 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	HYD-1, HYD- 4, GEO-4, GEO-6, & AQ-3	NA	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	HYD-1, HYD- 2, HYD-4, HYD-5, HYD- 6, GEO-1 - GEO-4, GEO- 7, GEO-8, BIO-1, & HAZ-1	NA	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	No	Yes		
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	Yes	HYD-1, HYD- 5, BIO-4	NA	LTS	No	Yes		

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	cation of Impact Applicable to the Impact Impact Applicable to the Impact Applicable to the Treatment Impact Applicable to the Impact Impact Applicable to the Impact Impa		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		
Would the project:										
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD- 5, p. 3.11-31	Yes	HYD-1, HYD- 2, HYD-4, HYD-6, GEO- 1, GEO-2, GEO-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.

<b>New Hydrology and Water Quality Impacts</b> : Would the treatment result in other impacts to hydrology and water quality that are not evaluated in the CaIVTP PEIR?	Y	es	⊠ N		, ,	olete row(s) below discussion	
			otentially gnificant	Signi Mi	ss Than ficant with tigation orporated	Less than Significant	
[identify new impact here, if applicable; add rows as needed]							

## Discussion

The project area is mostly located in the northwestern portion of the Yuba River watershed with a small number of the most western treatment areas located in the South Honcut Creek/Feather River watershed. The climate in the project area is Mediterranean with cool, rainy winter months and a dry summer season. Most of the year's rain falls from late October through early April (Yuba County 2007). Significant hydrologic features in the project vicinity include New Bullard Bar Reservoir on the east side of the project area, and Collins Lake Reservoir approximately 1.3 miles south of the western edge of the project area, several small reservoirs, and the perennial portions of Little Oregon Creek and Dry Creek. Numerous intermittent and ephemeral drainages are scattered throughout the project area; these drainages capture winter and spring rains but stop flowing in the dry summer months.

#### IMPACT HYD-1

Treatments would include prescribed burning. Ash and debris from treatment areas could be washed by runoff into adjacent drainages and streams. Although most treatment areas have been designed to avoid streams and watercourses, WLPZs ranging from 50 to 150 feet will be implemented for any watercourses that are within treatment areas pursuant to SPR HYD-4. The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR, because the surface water conditions are essentially the same within and outside the CalVTP treatable landscape and the use of low intensity prescribed burns and associated impacts to water quality are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the water quality impact from prescribed burning is also the same, as described above. SPRs applicable to this treatment are HYD-1, HYD-4, GEO-4, GEO-6, and AQ-3. 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 HYD-2**

Initial treatment would include mechanical and manual treatments. Although most treatment areas have been designed to avoid streams and watercourses, WLPZs ranging from 50 to 150 feet will be implemented for any watercourses that are within treatment areas pursuant to SPR HYD-4. The potential for mechanical and manual treatment activities to violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR, because the surface water conditions are essentially the same within and outside the CalVTP treatable landscape and the use of heavy equipment and hand-held tools to remove vegetation and associated impacts to water quality are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the water quality impact from manual and mechanical treatments is also the same, as described above. SPRs applicable to this treatment are HYD-1, HYD-2, HYD-4 through HYD-6, GEO-1 -GEO-4, GEO-7, GEO-8, BIO-1, and HAZ-1. 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 HYD-3**

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

#### **IMPACT HYD-4**

Treatments would include the use of herbicides to manage understory growth. Herbicide application would be limited to ground-based methods such as a using a backpack sprayer or painting herbicide onto cut stems. All herbicide application would comply with EPA and California DPR label standards. The potential for the use of herbicides to violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR, because surface water conditions are essentially the same within and outside the CalVTP treatable landscape and the use of heavy equipment and hand-held tools to remove vegetation and associated impacts to water quality are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the water quality impact from use of herbicides is also the same, as described above. SPRs applicable to this treatment are HYD-1, HYD-5, and BIO-4. 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 HYD-5**

Treatments could cause ground disturbance and erosion, which could directly or indirectly modify existing drainage patterns. The potential for treatment activities to substantially alter the existing drainage pattern of a project site was examined in the PEIR. This impact to site drainage is within the scope of the PEIR, because surface water conditions are essentially the same within and outside the CalVTP treatable landscape and the types of treatments and treatment intensity are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impact related to alteration of site drainage patterns is also the same, as described above. SPRs applicable to this treatment are HYD-1, HYD-2, HYD-4, HYD-6, GEO-1, GEO-2, and GEO-5. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

#### NEW HYDROLOGY AND WATER QUALITY IMPACTS

The proposed treatment is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.11.1, "Environmental Setting," and Section 3.11.2, "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has also determined that 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 environmental and regulatory conditions pertinent to hydrology and water quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to hydrology and water quality would occur that is not covered in the PEIR.

# 4.11 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	NA	LTS	No	Yes			
Impact LU-2: Induce Substantial Unplanned Population Growth	LTS	Impact LU-2, pp. 3.12-14 – 3.12-15	Yes	NA	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 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?	Y	es	⊠N	0	•	omplete row(s) nd discussion
			otentially gnificant	Signi Mi	ss Than ficant with tigation rporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]						

## Discussion

## **IMPACT LU-1**

Treatment activities would occur on private property and YWA property. As a local agency, the project proponent is required to comply with local plans, policies, and regulations. The potential for vegetation treatment activities to cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation was examined in the PEIR. This impact is within the scope of the PEIR because the land uses of the project area are essentially the same within and outside the CalVTP treatable landscape and treatment types and activities are consistent with those analyzed 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 considered in the PEIR. However, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the land use impact is also the same, as described above. No conflict would occur because the project proponent would adhere to SPR AD-3. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

#### **IMPACT LU-2**

The potential for treatments to result in substantial population growth as a result of increases in demand for employees was examined in the PEIR. Impacts associated with short-term increases in the demand for workers during implementation of the treatment project are within the scope of the PEIR because population and housing

characteristics of the project area is essentially the same within and outside the CalVTP treatable landscape and the number of workers required for implementation of the treatments is consistent with (less than) the crew size analyzed in the PEIR for the types of treatments proposed (i.e., 10 to 20 workers for prescribed burns, 2 to 10 workers for mechanical treatments, and up to 10 workers for manual treatments). In addition, the proposed project would not require the hiring of new employees. 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the population and housing impact is also the same, as described above. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

#### NEW LAND USE AND PLANNING, POPULATION AND HOUSING IMPACTS

The proposed project is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.12.1, "Environmental Setting," and Section 3.12.2, "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing conditions that are pertinent to land use and planning, population and housing that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to land use and planning, population and housing would occur that is not covered in the PEIR.

#### **4.12 NOISE**

Impact in t	he 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	AD-3, NOI-1 - NOI-6	NA	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	NOI-1	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.

<b>New Noise Impacts</b> : Would the treatment result in other noise-related impacts that are not evaluated in the CalVTP PEIR?	☐ Y€	es	⊠ N	0		plete row(s) below discussion
			Significant Sign		ss Than ficant with tigation rporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]						

## Discussion

#### IMPACT NOI-1

Treatments would require heavy, noise-generating equipment. The potential for a substantial short-term increase in ambient noise levels from use of heavy equipment was examined in the PEIR. This impact is within the scope of the PEIR, because, within the boundary of the project area, the exposure potential is essentially the same within and outside the CalVTP treatable landscape and the number and types of equipment proposed, and the duration of equipment use are consistent with those analyzed in the PEIR. The proposed treatments would not require the use of helicopters, which was the loudest equipment evaluated in the PEIR. Yuba County Code identifies noise limits for construction activities, which would also apply to vegetation treatment activities. Noise limits under the code prohibit the use of construction devices between the hours of 10:00 p.m. and 7:00 a.m. The treatment activities would occur during daytime hours consistent with the Yuba County Code, which would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. SPRs applicable to this treatment are AD-3, NOI-1, and NOI-4 through NOI-5. There are no schools or hospitals within 1,500 feet of any of the treatment areas; however, there are rural residences scattered throughout the project area. For any properties where residences are within 1,500 feet of a treatment area, SPR NOI-6 would also apply. 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 environmental conditions

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. 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 NOI-2**

Treatments would involve large trucks hauling heavy equipment to the project area. 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). The potential for a substantial short-term increase in SENL was examined in the PEIR. This impact is within the scope of the PEIR, because within the boundary of the project area, the exposure potential is essentially the same within and outside the CalVTP treatable landscape and the number and types of equipment proposed are consistent with those analyzed in the PEIR. The haul trips associated with the treatment would occur during daytime hours, which avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. SPR NOI-1 is applicable to the proposed treatments. 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 environmental conditions 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. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

#### **NEW NOISE IMPACTS**

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project partners have considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.13.1, "Environmental Setting," and Section 3.13.2, "Regulatory Setting," in Volume II of the Final PEIR). The project partners have also determined that 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 environmental and regulatory conditions pertinent to noise that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to noise would occur that is not covered in the PEIR.

## 4.13 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>	to the	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	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	NA	None	NA	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	No	NA	NA	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 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?	П	es	⊠N		,	plete row(s) below discussion
			otentially gnificant	Signi Mi	ss Than ficant with tigation prporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]						

## Discussion

#### **IMPACT UTIL-1**

Treatments would include prescribed burning, which may require an on-site water supply if the burn goes out of prescription. If needed, water would be supplied from water trucks. The potential increased demand for water was examined in the PEIR. This impact is within the scope of the activities and impacts addressed in the PEIR because the size of the area proposed for prescribed burn treatments, amount of water required for prescribed burning, and water source type are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the water supply impact is also the same, as described above. No SPRs are applicable to this impact. 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 UTIL-2**

Treatments would generate biomass as a result of vegetation removal within the treatment areas. Biomass generated by mechanical and manual treatments would primarily be disposed of by pile burning; however, biomass may also be disposed of by lopping and scattering within treatment boundaries, leaving unburned piles for wildlife habitat, or chips blown onto the ground as mulch. 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, and this impact does not apply to the proposed project.

#### **IMPACT UTIL-3**

This impact does not apply to the proposed project because biomass generated from the proposed treatments would be disposed of on-site.

#### NEW IMPACTS TO PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project partners have considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.16.1, "Environmental Setting," and Section 3.16.2, "Regulatory Setting," in Volume II of the Final PEIR). The project partners have also determined that the circumstances under which the proposed treatments would be undertaken are also consistent with those covered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to public services, utilities, or service systems would occur that is not covered in the PEIR.

#### 4.14 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		
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	None	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 Recreation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP PEIR?	Y	es	⊠N	0	If yes, complete row(s) below and discussion		
			Significant Significa Mitiga		ss Than ficant with tigation rporated	Less than Significant	
[identify new impact here, if applicable; add rows as needed]							

### Discussion

#### **IMPACT REC-1**

There are no recreation trails or designated recreation areas within the proposed project area. Dispersed recreation occurs on the Plumas National Forest, adjacent to treatment areas. Treatment activities would not restrict access to or otherwise affect any nearby recreation areas. The potential for vegetation treatment activities to disrupt recreation activities was examined in the PEIR. The potential for the proposed treatment project to impact recreation is within the scope of the PEIR because the availability of recreational resources within the project area is essentially the same within and outside the CalVTP treatable landscape and the treatment activities and intensity are consistent with those analyzed 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, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impact to recreation 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 covered in the PEIR. No SPRs are applicable to this impact.

#### **NEW RECREATION IMPACTS**

The proposed project is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.12.1, "Environmental Setting," and Section 3.12.2, "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the

project area, the existing environmental conditions pertinent to recreation that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to recreation would occur that is not covered in the PEIR.

#### 4.15 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	AD-3 & TRAN-1	NA	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	AD-3, HYD- 2, & TRAN-1	NA	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	Yes	NA	None	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.

<b>New Transportation Impacts</b> : Would the treatment result in other impacts to transportation that are not evaluated in the CalVTP PEIR?	s to Yes No		0		olete row(s) below discussion	
			otentially gnificant	Signit Mi	ss Than ficant with tigation rporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]						

## Discussion

#### **IMPACT TRAN-1**

Treatments would temporarily increase vehicular traffic along several roads in the project area including La Porte Road, Frenchtown Road, Oregon Hill Road, Willow Glenn Road, and Marysville Road. 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 treatments would be short-term, and temporary increases in traffic related to treatments are within the scope of the PEIR because the treatment duration and limited number of vehicles (i.e., fire engine, water tender, masticator transport, crew vehicles for crew members) associated with the proposed treatments are consistent with those analyzed in the PEIR. In addition, the proposed treatments would not all occur concurrently and increases in vehicle trips associated with the treatments would be dispersed on multiple roadways. 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. SPRs applicable to this treatment are AD-3 and TRAN-1. 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 TRAN-2**

Treatments would not require the construction or alteration of any roadways. However, the proposed treatments would include prescribed burning, which would produce smoke and could potentially affect visibility along nearby roadways such that a transportation hazard could occur. The potential for smoke to affect visibility along roadways during implementation of the treatment project was examined in the PEIR. This impact is within the scope of the activities and impacts addressed in the PEIR because the burn duration is consistent with that analyzed 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 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. SPRs applicable to this treatment are AD-3, HYD-2, and TRAN-1. 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 TRAN-3

Treatments could temporarily increase vehicle miles travelled (VMT) above baseline conditions because the project area is in a remote location and would require vehicle trips to access the treatment areas. This impact was identified as potentially significant and unavoidable in the PEIR because implementation of the CalVTP would result in a net increase in VMT. However, as noted under Impact TRAN-3 in the PEIR, individual vegetation treatment projects under the CalVTP are likely to generate fewer than 110 trips per day, which is reasonably expected to cause a less-than-significant transportation impact for specific later activities, as described in the Technical Advisory on Evaluating Transportation Impacts published by the Governor's Office of Planning and Research (OPR 2018). Prescribed burn treatments are expected to require 10 to 20 workers, mechanical treatments would require 2 to 10 workers, herbicide treatments would require a maximum of 10 workers, and manual treatments would require 10 workers. Therefore, even if multiple treatments occur simultaneously, the crew sizes are sufficiently small that the total increase in VMT would not exceed 110 trips per day. In addition, as mentioned above, the increase in vehicle trips would be dispersed to multiple roadways. Temporary increases in VMT is within the scope of the activities and impacts addressed in the PEIR because the number and duration of increased vehicle trips is consistent with that analyzed in the PEIR. This impact would be less than significant and Mitigation Measure AQ-1 would not be required for the proposed treatment project.

#### NEW IMPACTS TO TRANSPORTATION

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project partners have considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.15.1, "Environmental Setting," and Section 3.15.2, "Regulatory Setting," in Volume II of the Final PEIR). The project partners have also determined that 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 environmental and regulatory conditions pertinent to transportation that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to transportation would occur that is not covered in the PEIR.

#### 4.16 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 AD-3, HAZ-2, SPR HAZ-3, SPR HAZ-4	NA	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	Yes	AQ-3, GEO-1 through GEO-8	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.

<b>New Wildfire Impacts</b> : Would the treatment result in other impacts related to wildfire that are not evaluated in the CalVTP PEIR?	Yes		⊠ No		If yes, complete row(s) below and discussion	
			otentially gnificant	Signi Mi	ss Than ficant with tigation prporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]						

## Discussion

#### IMPACT WIL-1

Treatments would include prescribed burning and mechanical treatments using heavy equipment, which could pose a risk of fire ignition or risk of a prescribed fire that could escape its control lines. The potential increase in exposure to wildfire during implementation of treatments was examined in the PEIR. Increased wildfire risk associated with prescribed burning and use of heavy equipment in vegetated areas are within the scope of the PEIR, because the wildfire risk of the project area is essentially the same within and outside the CalVTP treatable landscape and the types of equipment and treatment duration of the proposed project are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the wildfire impact is also the same, as described above. SPRs applicable to this treatment are HAZ-2, HAZ-3, and HAZ-4. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

#### **IMPACT WIL-2**

Treatments would include prescribed burning, and steep slopes exist within the treatment area. The potential for post-fire landslides was examined in the PEIR. Potential exposure of people or structures to post-fire landslides are within the PEIR, because the post-fire landslide risk of the project area is essentially the same within and outside the

CalVTP treatable landscape and the severity and duration of the proposed prescribed burn are consistent with those analyzed 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 environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the wildfire impact is also the same, as described above. SPRs applicable to this impact are AQ-3, GEO-2, GEO-3, GEO-4, GEO-5, and GEO-8. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

#### **NEW WILDFIRE IMPACTS**

The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (refer to Section 3.9.1, "Regulatory Setting," and Section 3.9.2, "Environmental Setting," in Volume II of the Final PEIR). The project proponent has also determined that 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 environmental and regulatory conditions pertinent to wildfire that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts not addressed in the PEIR. Therefore, no new impact related to wildfire risk would occur that is not covered in the PEIR.

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