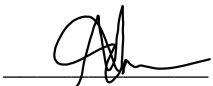


Project Specific Analysis and Addendum to the CalVTP PEIR  
**Healdsburg Open Space and Surrounding Community Fuels  
Reduction Project**



Prepared for:  
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## Common Terms and Acronyms Key:

RPF: Registered Professional Forester.

Dead and Down: Vegetation that is dead and either in contact with the forest floor or standing.

Percent Canopy Cover: An average percentage of the sky that is covered by overstory or understory canopy as measured with a densitometer utilizing random plot survey methods.

Lop and Scatter: Vegetation treatment technique where removed branches, shrubs, and trees are cut into manageable pieces and scattered around a treatment area to slowly break down into the ground over time. The total height of resulting scattered vegetation, shall not exceed 18” above the ground.

FMOSP: Fitch Mountain Open Space Preserve.

HROSP: Healdsburg Ridge Open Space Preserve.

SPR: Standard Project Requirement

PSA: Project Specific Analysis

PEIR: Program Environmental Impact Report

MMRP: Mitigation monitoring and reporting program

MM: Mitigation measures

CalVTP: California Vegetation Treatment Program

CNDDB: California Natural Diversity Database

CNPS: California Native Plant Society

DBH: Diameter at Breast Height

SRA: State Responsibility Area

LRA: Local Responsibility Area

# INTRODUCTION

## PROJECT OVERVIEW

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

The City of Healdsburg Fire Department has assessed the wildfire hazard throughout the 725 acres shown on the project maps in attachment C. The project proponent has developed the proposed vegetation treatments aimed at reducing the fuel loading and encouraging a more fire resilient ecosystem.

The proposed treatment areas include The Healdsburg Ridge Open Space Preserve (HROSP), the Fitch Mountain Open Space Preserve (FMOSP), and the Callahan property which are currently managed under conservation easements. There is also an Arundo treatment unit along a 5 mile stretch of the Russian river within the city of Healdsburg ownership. Included with this PSA analysis are approximately 30 small properties which border the FMOSP, in which vegetation treatments may occur.

## CEQA LEAD AGENCY AND PROPOSED PROJECT

The City of Healdsburg will function as the lead agency and project proponent for this CalVTP. The project proponent is solely responsible for the prescription of all vegetation treatments proposed, including the implementation, and monitoring of the vegetation treatments, mitigation measures, and SPRs shown in attachment A. The project proponent (the City of Healdsburg) is also responsible for making the final determination regarding this proposed projects CEQA compliance and the necessity or lack thereof for further environmental review.

The following PSA, and corresponding attachments, were prepared by Frontier Resource Management, following the guidelines laid out by the CalVTP. The treatment activities and treatment types were selected by the project proponent for inclusion in this PSA. Frontier Resource Management does not make the determination that the proposed treatment activities are within the scope of the PEIR, but rather provides the evaluation, surveys, and documentation required by CEQA for consideration by the project proponent. The project proponent is responsible for determining if the proposed treatments, are within the scope of the PEIR, based on the information contained in this PSA and supporting attachments.

The treatment types proposed by the City of Healdsburg are ecological restoration, Fuel breaks, and Wild-land urban interface fuels reduction. The treatment activities proposed by the City of Healdsburg will include: Manual, mechanical, herbicide, prescribed burning, and prescribed herbivory. Ongoing maintenance will involve the same treatment types as the initial treatments.

## STATEMENT OF PURPOSE

This document serves as the PSA to determine if the project as proposed is within the scope of the CalVTP PEIR. There are approximately 226 acres outside of the treatable landscape, which represents the geographic extent of the PEIR, for which the impacts were examined.

A majority of the Russian river treatment unit as well as a 26 acre area to the northwest of the Callahan property make up this 226 acre area. This area is located outside of the CalVTP treatable landscape because the boundary was digitally developed at a large scale, which did not allow for high resolution mapping. For instance, areas around the Russian river were dis-included, even though that vegetation is very similar to the surrounding vegetation included in the treatable landscapes. Also, areas represented by oak woodlands which function as transition zones between grasslands and forested landscapes were mostly dis-included. These areas need

treatment, as they provide fuel ignition and transfer fire to these “treatable landscapes”. The invasion of grasses into oak woodlands and oak savannahs, has moved these areas into extreme fire danger.

Because these areas outside of the treatable landscapes are so similar, the environmental analysis in the PEIR is applicable. An addendum to an EIR is appropriate when 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 a substantially more severe significant environmental impact, consistent with CEQA section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In this case there are no revisions, only a change to the geographic extent represented by the PEIR. This PSA and Addendum evaluates whether the vegetation treatment proposed is within the scope of the PEIR for each resource subject and whether the change to the geographic extent would result in significant impacts that would be substantially more severe than those covered in the CalVTP PEIR.

This document serves as both the PSA and the Addendum to the CalVTP PEIR to provide CEQA compliance for the proposed vegetation treatments. The MMRP, which identifies the SPRs and MMs applicable to the project can be located in attachment A. Attachment B contains the biological assessment, including a botany report and soils analysis. Attachment C includes all project maps. Attachment D contains the confidential archaeology report prepared by ALTA Archaeological consulting.

## VEGETATION TREATMENT PROJECT INFORMATION

- 1. Project Title:** Healdsburg Open Space and Surrounding Community Fuels Reduction Project
- 2. Project Proponent Name and Address:** The City of Healdsburg: 401 Grove St. Healdsburg, CA 95448
- 3. Contact Person Information and Phone Number:** Linda Collister (707) 431-3125
- 4. Project Location:** Healdsburg, CA, Sonoma County. Sections 9, 14, 15, 16, 21, 22, 23, & 28 T9N, R9W MDBM. Jimtown & Healdsburg USGS 7.5 Minute Quadrangle.

The Project includes four treatment areas. The Healdsburg Ridge Open Space Preserve (HROSP), the Callahan property, The Fitch Mountain Open Space Preserve (FMOSP), and a treatment area along a five mile stretch of the Russian River (Russian River Treatment Area (RRTA)).

- 5. Total Area to be Treated (acres)** 725 Acres.
- 6. Description of Project:**

- Initial Treatment**

The Healdsburg Open Space and Surrounding Community Fuels Reduction Project is proposed by the project proponent (the City of Healdsburg) to improve forest health, increase fire resilience, and reduce the risk of wildfire to the surrounding community residents. The long-term objectives for these vegetation treatments are:

- Increase tree spacing.
- Reduce fuel loading and insect/disease infestation.
- Improve wildlife habitat and continuity.
- Reduce and control invasive non-native species.
- Increase forest resiliency to changes in climate and natural disturbances.

The project proponent proposes the following treatment types: fuel break, wildland urban interface fuels reduction, and ecological restoration. The treatment activities will include mechanical, manual, herbicide application, prescribed burning (Broadcast and Pile), and prescribed herbivory. Herbicide use will be limited to ground application (back pack spraying, hack and squirt, or painting stumps). No aerial application methods will be used.

The following equipment may be used to carry out the treatments:

- Mastication: Tracked loaders, excavators, tracked or rubber tire equipped skidders, may be used. The equipment will utilize a masticator head to break down trees and shrubs on areas accessible by heavy equipment.
- Pile burn: An excavator with rack and thumb as well as a dozer with a blade and grapple may be used.
- Prescribed burn: A loader, excavator, dozer, or skidder may be utilized to control fire lines where hand lines are not sufficient and where mechanical treatment activities are permitted according to the PEIR. These areas are shown in attachment C.

The Project proponents initial treatments will entail a crew of 10-20 laborers, between 150-230 goats/sheep, and at least one piece of heavy equipment. Manual treatments will focus on lop and scatter techniques or pile and burn, to reduce the continuity of fuels. The biomass will be chipped or burned.

### Treatment types:

**Wildland-Urban Interface Fuels Reduction:** These treatments will reduce the fuel load and fire danger in communities within the WUI. This project has multiple communities located adjacent to the Healdsburg Ridge, Fitch Mountain, and Callahan open space preserves. The vegetation removal will be most aggressive within 100 ft of houses and communities to create a calming zone, aiding in fire-fighter suppression activities during a wildfire.

Shrubs under 4 ft will be targeted with grazing, while trees under 10" DBH will be thinned by mechanical and manual techniques to achieve a 30' or greater target spacing. 50-75 percent canopy cover will be targeted within these treatment areas. This will significantly reduce the aerial fuels reducing the potential for a crown fire to transfer from the wildland to the surrounding community structures. Grasses will be burned or grazed. 90% or more of "dead and down" within this treatment type will be removed, chipped, or burned. Lop and scatter shall not occur within 100 ft of structures designed for human habitation.

The treatment activities within these areas will include prescribed burning, manual and mechanical treatments, and prescribed herbivory.

#### Fuel Breaks:

Zones of vegetation removal and ongoing maintenance, often along ridges or existing roads. These treatments will provide staging areas to support fire-fighting as well as emergency evacuation routes for community members. Shaded fuel breaks will be the only type of fuel breaks maintained.

Shaded fuel breaks will be developed and maintained within 100 ft of all roads and structures. The shaded fuel breaks will remove most of the understory vegetation while retaining a high degree of canopy cover to prevent re-initiation of the understory. 75-85 percent canopy cover will be targeted for shaded fuel breaks. 90% or more of "dead and down" within this treatment type will be treated. In chaparral ecosystems, 50-60% of vegetation shall be targeted for removal within these fuel breaks.

- Fitch Mountain: There are approximately 4 miles of existing road system proposed for treatment in this way. Riverview Dr, Hilltop Rd, Madrone Ave, and the Butterfly Loop Trail. See the treatment map. Many people live along Riverview Dr and Madrone Ave while Hilltop Rd and Butterfly loop Rd are hiked often for recreation. Because of this Fitch Mountain is at an extreme risk for fire ignitions. Creating a shaded fuel break in these areas will greatly reduce the risk of human caused ignitions.
- Callahan: There are approximately 2 miles of un-named roads within this property proposed for shaded fuel break treatment. See treatment map.

Once cut, all vegetation will be chipped, burned (piled or broadcast), or lopped and scattered to a depth not to exceed 18" above the ground.

#### Ecological Restoration:

Ecological restoration treatments are designed to restore an ecosystem to a historical state. These conditions vary depending on the degree and extent of disturbance the ecosystem is adapted to. Due to the exclusion of fire from California's fire-adapted forests over the last 150-200 years, the forest has become overgrown with small unhealthy trees. Restoration activities will focus on reducing densities of trees, shrubs, and invasive species. The treatments will mimic fire by removing non-fire resilient species and ladder fuels. By removing vegetation in this way, trees will be allowed to re-establish in areas that have been overtaken by invasive species over the last 100 years.

Prescribed herbivory, manual, mechanical, and prescribed burning treatments will be utilized throughout Callahan, Healdsburg Ridge, and Fitch mountain open space preserves. Treatments in these areas will be focused on removing enough ground and ladder fuels to allow broadcast burning without threatening the larger trees and overall canopy health. The main goal will be to return the stands to a historical stocking level, allowing burning as a maintenance practice.

Herbicide application is proposed along the Russian river treatment unit to eradicate the Arundo infestation. The width of the Russian river, adjacent to the project area, ranges from 50- 500 ft. Spraying will not occur within the active channel of the river. The treatment unit was determined by approximating 100 ft from the outside edge of the river and/or its flood zone. Additional areas further than 100 ft were added where the Arundo infestation was determined to be extensive. See attachment C, depicting the treatment areas.

- By removing this invasive non-native species, the native flora will be allowed to re-establish in these areas. There will also be a significant decrease in the fuel loading on site. Arundo will be either foliar sprayed or cut and stump sprayed. Once dead, the vegetation will be burned.

- ❖ ***For all treatment types:** Trees determined by an RPF to die within 5 years will be marked by an RPF or supervised designee. These marked trees may be removed via manual or mechanical treatments. These dead or dying trees include all species, sizes, and age classes of trees.*
- ❖ ***For all treatment activities:** The project proponent is responsible for prescribing and implementing these treatment activities including the mitigations and monitoring described in this PSA and attachment A. Containment of any fire used for vegetation treatment is the responsibility of the project proponent.*

#### **Treatment Types**

- Wildland-Urban Interface Fuel Reduction
- Fuel Break
- Ecological Restoration

#### **Treatment Activities**

- Prescribed Burning (Broadcast), 543 acres
- Prescribed Burning (Pile Burning) 725 Acres
- Mechanical Treatment, 234 acres
- Manual Treatment, 543 acres
- Prescribed Herbivory, 725 acres
- Herbicide Application, 201 acres

*Note: Multiple treatment activities will be applied in some areas*

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

- Grass Fuel Type
- Shrub Fuel Type
- Tree Fuel Type

#### **b. Treatment Maintenance**

- ❖ *Estimated treatment maintenance is based on each initial treatment completed. It is not anticipated that the initial treatment shall be completed on the entire project within 5 years of project approval.*

##### **Wildland Urban Interface Fuels Reduction Maintenance:**

Treatments within the WUI will reoccur every 1-5 years depending on how quickly the post treatment vegetation is regenerating. This will mainly depend on the level of vegetation removed during the initial treatment and the treatment activities utilized. It is anticipated that the WUI treatments will require maintenance treatments often due to the 50%-75% canopy closure.

##### **Fuel Break Maintenance:**

Treatments within the Fuel Break areas will reoccur every 1-10 years depending on the effectiveness of the initial treatments and the level of vegetation regeneration. Due to the greater than 75 percent canopy cover, it is anticipated that understory vegetation will be slower to regenerate within these zones.

##### **Ecological Restoration Maintenance:**



The goal within these treatment types, is to maintain the overall canopy closure at 80%, resulting in slow regeneration of the understory. It is estimated that treatment maintenance within these areas shall occur every 5-15 years, focusing mainly on treating dead and down.

- ❖ *For maintenance of all treatment types: An assessment will be made by the project proponent which will determine when maintenance treatments shall occur. This will be based on regenerated vegetation and fuel loading assessments. The project proponent is responsible for maintaining the initial treatment areas.*

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

- Wildland-Urban Interface Fuel Reduction
- Fuel Break
- Ecological Restoration

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

- Prescribed Burning (Broadcast), 543 acres
- Prescribed Burning (Pile Burning) 725 Acres
- Mechanical Treatment, 234 acres
- Manual Treatment, 543 acres
- Prescribed Herbivory, 725 acres
- Herbicide Application, 201 acres

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

- Grass Fuel Type
- Shrub Fuel Type
- Tree Fuel Type

#### Use of the PSA for Treatment Maintenance

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

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

- 7. Regional Setting and Surrounding Land Uses:** The project area is within Sonoma county near the Russian River. The property is a mix of city owned and privately owned parcels. There are conservation easements on a portion of the area, which are overseen by Ag and Open Space. The main land use within these areas is recreational: hiking, jogging, mountain biking, and bird watching.

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

- Smoke management plan will be prepared for NSCAPCD.
- Burn Permit will be obtained from CALFIRE.
- Pesticide application permit through the Sonoma County CAL Ag permit.

**Coastal Act Compliance**


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

- 9. Native American Consultation.** *For treatment projects that are within the scope of the CalVTP PEIR, AB 52 consultation for AB 52 compliance has been completed. The Board of Forestry and Fire Protection conducted consultation pursuant to Public Resources Code section 21080.3.1 during preparation of the PEIR.*
- Pursuant to CalVTP SPR CUL-2, Native American contacts in Sonoma County were contacted on July 6<sup>th</sup>, 2021 by ALTA Archaeological Consulting. Results of these consultations are included in attachment D which is maintained as a confidential document.

## DETERMINATION (To be completed by the project proponent)

On the basis of this PSA and the substantial evidence supporting it:

- I find that all of the effects of the proposed project (a) have been covered in the CalVTP PEIR, and (b) all applicable Standard Project Requirements and mitigation measures identified in the CalVTP PEIR will be implemented. The proposed project is, therefore, **WITHIN THE SCOPE** of the CalVTP PEIR. **NO ADDITIONAL CEQA DOCUMENTATION** is required.
- I find that treatments in proposed project areas outside the CalVTP treatable landscape do not result in substantial changes in the project, no substantial changes in circumstances have occurred, and no new information of substantial importance has been identified. The inclusion of project areas outside the CalVTP treatable landscape will not result in any new or substantially more severe significant impacts. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred; therefore, this **ADDENDUM** is adopted to address the project areas outside geographic extent presented in the PEIR.
- I find that the proposed project will have effects that were not covered in the CalVTP PEIR. These effects are less than significant without any mitigation beyond what is already required pursuant to the CalVTP PEIR. A **NEGATIVE DECLARATION** will be prepared.
- I find that the proposed project will have effects that were not covered in the CalVTP PEIR or will have effects that are substantially more severe than those covered in the CalVTP PEIR. Although these effects may be significant in the absence of additional mitigation beyond the CalVTP PEIR's measures, revisions to the proposed project or additional mitigation measures have been agreed to by the project proponent that would avoid or reduce the effects so that clearly no significant effects would occur. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- I find that the proposed project will have significant environmental effects that are (a) new and were not covered in the CalVTP PEIR and/or (b) substantially more severe than those covered in the CalVTP PEIR. Because one or more effects may be significant and cannot be clearly mitigated to less than significant, an **ENVIRONMENTAL IMPACT REPORT** will be prepared.

  
\_\_\_\_\_  
Signature

November 17, 2021  
\_\_\_\_\_  
Date

Jeffrey Kay  
\_\_\_\_\_  
Printed Name

City Manager  
\_\_\_\_\_  
Title

City of Healdsburg  
\_\_\_\_\_  
Agency

## PROJECT SPECIFIC ANALYSIS/ADDENDUM

### AESTHETICS AND VISUAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
<b>Would the project:</b>								
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	No	NA	NA	NA	NA	NA
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	NA	NA

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

LTS: Less than Significant; SU: Significant and unavoidable.

<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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	<b>Potentially Significant</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less than Significant</b>
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

### Impact AES-1

Initial and maintenance treatments would include mechanical, manual, herbicide, and prescribed burning treatments. The potential for these treatment activities to result in short-term degradation of the visual character was examined in the PEIR. The proposed treatments will occur within public and private owned land which is viewable by the public. The project cannot be viewed from a state scenic highway. The potential for the project to result in a short term impact to this resource area is within the scope of the PEIR because the treatment activities are consistent with those analyzed in the PEIR. Through the inclusion of the SPRs, were feasible, as outlined in the PEIR the impact will be mitigated.

Where machinery cannot be hidden from scenic views due to topographic restrictions, there will be an unavoidable temporary visual impact. On the Fitch Mountain Open Space project, there is very limited access to the work locations due to the steep topography. While working on this project it is highly unlikely that equipment will be hidden from public view, since the equipment access roads are limited to the same roads used by the community for recreation. During this project the minimum pieces of equipment necessary will be utilized to lessen this impact. With the inclusion of SPRs AQ-2 and AQ-3, the impact will be minimized. Because the impact on the visual resource is less than what would occur during a catastrophic wildfire, particularly in the long term, this subject is negligible. The inclusion of land that is outside of the treatable landscape presented in the PEIR, is geographically and visually the same as that included in the PEIR, therefore, the impact will be the same and is within the scope of this PEIR.

### Impact AES-2

This impact does not apply to the proposed project because no complete fuel breaks are proposed.

### Impact AES-3

This impact does not apply to the proposed project because no complete fuel breaks are proposed.

### New Aesthetic and Visual Resource Impacts

None. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the environmental and regulatory conditions presented in the CalVTP PEIR. Furthermore, the project proponent has 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, the viewshed and treatment impacts are consistent with those examined in the PEIR and would therefore not create any new significant impacts.

## PD-3.2: 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 the PEIR?
<b>Would the project:</b>								
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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[Identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

#### Impact AG-1

Initial and maintenance treatments would include mechanical, manual, herbicide, and prescribed burning treatments. These treatments will encourage a healthier forest condition by removing competing vegetation and in some cases scarifying the ground, allowing for desirable tree species to seed in. The project area exists within various forest types. Mixed conifer (Douglas-fir and Redwood), oak woodland, oak savannah, and Riparian forest land. The project will focus on removing trees less than 10" DBH, and brush species, which will not have a significant negative effect on the forest structure. In fact, the treatments will protect this forest from a stand replacing wildfire, which would have the potential to convert the forest land into a brush dominated pioneer species structure. This would have the potential to initiate a cycle of high intensity wildfires which could create an adaptation towards stand replacing wildfires. After assessing the proposed treatments and their effect on the potential for converting forest land within the project area, the project proponent has determined that the treatments will in fact protect forest resources from conversion.

#### New Agriculture and Forestry Resource Impacts

None. The project proponent has considered the site specific characteristics of the proposed treatment project and determined they are consistent with the environmental and regulatory conditions presented in the CalVTP PEIR. Furthermore, the project proponent has 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, the composition of forestland as defined in public resources code section 12220(g) is essentially the same within and outside the treatable landscapes and therefore the impact to forest land is the same as described above.

### PD-3.3: AIR QUALITY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
<b>Would the project:</b>								
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-4, AQ-6	None	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	No	None	NA	NA	NA	NA
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	SU	Section 3.4.2; Impact AQ-4, pp. 3.4-35 – 3.4-37	Yes	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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion		
	<b>Potentially Significant</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less than Significant</b>		
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		



## Discussion

### Impact AQ-1

Emissions of criteria air pollutants related to the proposed treatment are within the scope of the PEIR because the associated equipment and duration of use are consistent with those analyzed in the PEIR. The applicable SPRs will be implemented during treatments. AQ-5 would not apply to this project because there are no known asbestos areas within the treatment areas.

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

### Impact AQ-2

Use of mechanical equipment during initial and maintenance treatments could expose people to diesel particulate matter emissions. This potential was examined within the PEIR. These types of emissions for the treatment activities are within the scope of the PEIR because they are the same, including types of equipment and duration of treatment.

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

### Impact AQ-3

NA: No naturally occurring asbestos is mapped in the treatment area.

### Impact AQ-4

Prescribed burning during initial and maintenance treatments could expose people to toxic air contaminants, which was examined in the PEIR. The duration and parameters of prescribed burns are the same as addressed in the PEIR, therefore the potential exposures are within the scope of the PEIR. All feasible mitigation measure for controlling smoke emissions are included in this PSA as well as the PEIR and no further mitigations are feasible. The impacts remain significant and unavoidable as identified in the PEIR.

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

### Impact AQ-5

The use of diesel equipment during operations could expose people to objectionable odors. This potential was examined in the PEIR. The potential impact from this project is within the scope because the duration, equipment used, and treatment activities are consistent with those analyzed in the PEIR.

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

### Impact AQ-6

Prescribed burning during initial and maintenance treatments could expose people to objectionable odors. This potential was examined in the PEIR. The potential impact from this project is within the scope because the duration, equipment used, and treatment activities are consistent with those analyzed in the PEIR.

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

### New Air Quality Impacts

None. The inclusion of land that is outside of the treatable landscape presented in the PEIR, constitutes a change in the geographic extent presented in the PEIR. The air quality conditions as well as the exposure potential present in these areas are the same as those within the treatable landscape. Consequently, the impact will be the same and is within the scope of this PEIR for all of the above listed impacts.

## PD-3.4: ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
<b>Would the project:</b>								
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 through CUL-5, CUL-8	CUL-2	LTSM	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	No	NA	NA	NA	NA	NA
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?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	If yes, complete row(s) below and discussion		
			<b>Potentially Significant</b>	<b>Less Than Significant with Mitigation Incorporated</b>	<b>Less than Significant</b>
[identify new impact here, if applicable; add rows as needed]			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Discussion

ALTA Archaeological consulting conducted a survey and report to satisfy CEQA requirements regarding historical and prehistorical resources. See Attachment D for this report. The confidential attachments included in that report have been removed. One potential historical resource was discovered during the archaeologist surveys. This site will be protected from disturbance with a 100 ft no treatment area buffer.

### Impact CUL-1

The Proposed treatments include mechanical and prescribed burning, which could damage historical resources. One potential historical resource was discovered and will be avoided with a 100 ft no treatment buffer during these treatment activities. Herbicide, prescribed herbivory, and manual treatments may still be used. The potential for historical period resources to be damaged during these activities has been assessed in the PEIR. The impact of this

project is within the scope of the PEIR because the treatment activities are the same and protection measures have been designed by an archaeologist. See attachment D for the archaeological report.

**Impact CUL-2**

Vegetation treatments include mechanical treatments that could disturb the ground, potentially resulting in damage to unknown archaeological resources. The NWIC records search revealed sites within a quarter mile but none within the treatment area. A survey has been conducted by an archaeologist which discovered one potential historic period site. This site will be avoided with the provisions of SPR CUL-5. The potential for these activities to result in further undiscovered historic resources was examined in the PEIR. The impact of this project was determined to be the same as the PEIR because the treatment activities are the same and the potential resources are the same. As per Mitigation Measure CUL-2, any archaeological resource discovered during treatments will be given 100 ft avoidance, and the site will be reviewed by an archaeologist.

**Impact CUL-3**

NA. There were no tribal resources discovered. Native American groups were notified of the project and requested for information regarding cultural resources. See appendix D for the Archaeologist report.

**Impact CUL-4**

There is a potential for treatment activities to uncover human remains due to the nature of the treatment activities. The NWIC record search did not uncover any burial sites or prehistoric sites. 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 intensity of ground disturbance, the equipment used, and the duration of their use is the same as those analyzed in the PEIR.

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

The inclusion of land that is outside of the treatable landscapes constitutes a change to the geographic extent of the PEIR. However, the potential archaeological resources and the environmental conditions are consistent throughout the treatment area, both inside of the treatable landscapes and outside. Furthermore, the area outside of the treatable landscape was included in the archaeologist review conducted by ALTA. See attachment D for the full archaeology report.

## PD-3.5: BIOLOGICAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
<b>Would the project:</b>								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTS	Impact BIO-1, pp 3.6-131–3.6.138	Yes	BIO-1, BIO-2, BIO-6, BIO-7, BIO-9, GEO-1, GEO-3, GEO-4, GEO-5, GEO-7, HYD-4	BIO-1b	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTS (all wildlife species except bumble bees) S&U (bumble bees)	Impact BIO-2, pp 3.6-138–3.6-184	Yes	BIO-1, BIO-2, BIO-9, BIO-10, GEO-1, HYD-4	BIO-2a, 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	LTS	Impact BIO-3, pp 3.6-186–3.6-191	No	None	N/A	None	N/A	N/A
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTS	Impact BIO-4, pp 3.6-191–3.6-192	Yes	BIO-1, BIO-2, HYD-4	None	LTS	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTS	Impact BIO-5, pp 3.6-192–3.6-196	Yes	BIO-1, BIO-2, 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	BIO-1, BIO-2, BIO-12	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	No Impact	Impact BIO-7, pp 3.6-198–3.6-199	No	None	NA	NA	NA	NA
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community	No Impact	Impact BIO-8, pp 3.6-199–3.6-200	No	None	NA	NA	NA	NA

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?
<b>Would the project:</b>								
Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan								

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

**Discussion**

Pursuant to SPR BIO-1, an RPF from Frontier Resource Management conducted a data review of project-specific biological resources and a reconnaissance-level survey of the treatment areas. The main goal of these surveys was to determine the habitat suitability of the areas for these special status species and determine if there were any identifiable listed species present. This included a protocol-level, seasonally specific floristic survey.

Attachment B includes a compilation of special status species with potential to occur within the project area based on the SPR Bio-1 requirement for a data review of biological resources. It includes a 9 quad search of California Natural Diversity Database (CNDDDB) and the California Native Plant Society Inventory of Rare and Endangered Plants of California. Appendix Bio-3 (Table 13a, Table 13b, and Table 19) of the PEIR (Volume II) was reviewed for special-status plants and wildlife that could occur within the treatment areas. Species which clearly had no potential for occurrence (i.e. Crustaceans, or dune dwelling species) were excluded from considerations.

Frontier Resource Management conducted a reconnaissance-level survey on July 14<sup>th</sup> and August 10<sup>th</sup> of 2021, to identify and document sensitive resources within the treatment areas. This included aquatic habitat, riparian habitat, and sensitive natural communities. During these surveys, habitat suitability determinations were made for the potential special-status plant and wildlife species listed in attachment B. Below is the final list of special-status plant and wildlife species with potential to occur within the treatment area based on the data review and reconnaissance-level survey.

## Special-Status Plant and Wildlife Species That May Occur in the Treatment Area

### Birds

#### **Tricolored Blackbird** (*Agelaius tricolor*)

Status: SSC and California Threatened

Potential for Occurrence: There is a moderate to low potential for habitat within the project area. No individuals or nests were observed during reconnaissance.

#### **Great Blue Heron** (*Ardea herodias*)

Status: SSC

Potential for Occurrence: There is moderate potential for this species to occur; mainly along the Russian river. No individuals or their nest trees were observed during field reconnaissance.

#### **White-Tailed Kite** (*Elanus leucurus*)

Status: SSC, BFS

Potential for Occurrence: There is habitat potential for this species. A nest tree was observed in a Blue gum Eucalyptus according to the CNDDDB. The RPF relocated the potential nest, but no individuals were observed. The nest tree is greater than .5 miles from the project area. No protections are required.

#### **Osprey** (*Pandion haliaetus*)

Status: SSC, BFS

Potential for Occurrence: There is potential habitat within the Fitch Mountain Open Space Preserve. According to CNDDDB the following observations have been recorded: Two individuals observed foraging, recorded in the 1985. In 1978-79 there was an observation along the Russian River and presumed nest in a woodland there. In 1972 at least one young was observed and there was a record of a nest in a dead redwood. The location of the redwood was not described. No nest tree or observations were made during the reconnaissance survey.

#### **Purple Martin** (*Progne subis*)

Status: SSC

Potential for Occurrence: There is a moderate potential for habitat within the project area. No individuals were observed during reconnaissance surveys.

### Mammals

#### **Pallid Bat** (*Antrozous pallidus*)

Status: SSC

Potential for Occurrence: There is a moderate potential for occurrence within the treatment area. No individuals were located during field reconnaissance.

**Sonoma Tree Vole (*Arborimus pomo*)**

Status: SSC

Potential for Occurrence: The THP does contain potential habitat for the Sonoma Tree Vole. A visual search of the canopy for stick nests and the forest floor for discarded resin ducts, which accumulate below vole nests was conducted. Resin ducts or nests were not observed above in the trees; however, they could be hidden up in the canopy.

**Hoary Bat (*Lasiurus cinereus*)**

Status: SSC

Potential for Occurrence: There is moderate potential for this species to occur within the treatment units. No individuals nor suitable nest sites were observed during field reconnaissance.

**Fringed myotis (*Myotis thysanodes*)**

Status: BFS

Potential for Occurrence: There is moderate potential for this species to occur within the treatment units. No individuals nor suitable nest sites were observed during field reconnaissance.

**North American Porcupine (*Erethizon dorsatum*)**

Status: SSC

Potential for Occurrence: There is a moderate potential for this species to occur within the treatment units. No individuals were observed during field reconnaissance.

**American Badger (*Taxidea taxus*)**

Status: SSC

Potential for Occurrence: There is a very low potential for this species to occur within the treatment units. No individuals were observed during field reconnaissance.

**Amphibians and Reptiles**

**Western Pond Turtle (*Emys marmorata*)**

Status: SP, SSC

Potential for Occurrence: There is a high potential for occurrence along the Russian river, and near fox pond in the Healdsburg Ridge Open Space Preserve. There are many observations recorded from 1995 to 2004 of many individuals basking on logs along the Russian river within the proposed Russian river treatment unit. No individuals were observed during field reconnaissance.

**California Giant Salamander (*Dicamptodon ensatus*)**

Status: SSC

This species occurs in wet coastal forests in or near clear, cold permanent and semi-permanent streams and seepages.

Potential for Occurrence: There is potential for this species to exist within the project area. No individuals were observed.

**California tiger salamander** (*Ambystoma californiense*)

Status: FT, SSC

Potential for Occurrence: There is a low to moderate potential for this species to occur within the treatment areas around vernal pools and water sources.

**Foothill Yellow-Legged Frog** (*Rana boylei*)

Status: California Endangered; SSC

Potential for Occurrence: There is a high potential for this species and habitat to exist within the treatment areas. No individuals were encountered during field reconnaissance.

**California Red-Legged Frog** (*Rana draytonii*)

Status: FT, SSC

Potential for Occurrence: There is a high potential for individuals to occur within the treatment areas near ponds and class II or greater watercourses. No individuals were encountered during field reconnaissance.

**Red-Bellied Newt** (*Taricha rivularis*)

Status: SSC

Potential for Occurrence: There is a high potential for individuals to occur within the treatment areas near ponds and class II or greater watercourses. No individuals were encountered during field reconnaissance.

**Fish**

**Navarro roach** (*Lavinia symmetricus navarroensis*)

Status: SSC

Potential for Occurrence: High. There were two documented collections of adults from just under the Russian River bridge in the 1990's. No individuals were observed during field reconnaissance.

**Hardhead** (*Mylopharodon conocephalus*)

Status: SSC

Potential for Occurrence: There is a low potential for this species to occur within the project area. The highest probability for occurrence would be at fox pond or the associated class II watercourse.

**Russian River tule perch** (*Hysterocarpus traskii pomo*)

Status: SSC

Potential for occurrence: There is a high potential within the Russian River. There are no known occurrences near or within the project area.

**Coho salmon** (*Oncorhynchus kisutch*) Central California Coast ESU

Status: State and Federally Endangered.

Potential for Occurrence: There is a high potential for occurrence within the Russian River.

**Steelhead** (*Oncorhynchus mykiss*) Central California Coast DPS

Status: Federally Threatened/Species of Special Concern.

Potential for Occurrence: High potential within the Russian River. A fairly large school of steelhead (approximately 20-30) was observed within a pool during field reconnaissance.



## **Insects**

### **Obscure bumblebee (*Bombus califinosus*)**

Status: SSC

**Habitat Requirements:** The obscure bumble bee is a species of bumblebee native to the west coast of the United States, where its distribution extends from Washington through to Southern California. The workers are most often seen on Fabaceae, the legume family, while queens are most often seen on Ericaceae, the heath family, and males have been observed most often on Asteraceae, the aster family. Common plants visited by the workers include ceanothus, thistles, sweet peas, lupines, rhododendrons, Rubus, willows, and clovers.

**Potential for Occurrence:** There is moderate potential for habitat. No sightings occurred during field reconnaissance.

### **Western bumblebee (*Bombus occidentalis*)**

Status: SSC

**Habitat Requirements:** The western bumble bee was once very common in the western United States and western Canada. This species will visit a range of different plant species and are considered generalist pollinators of a wide variety of flowering plants and crops (Goulsen 2003a; Heinrich 2004). This genus is most commonly encountered along stream banks, in meadows, recently burned or logged areas, or on flowers by roadsides.

**Potential for Occurrence:** There is moderate potential for habitat. No sightings occurred during field reconnaissance.

## **Special Status Plants With a High likelihood of Occurrence within the Treatment Area**

- *The following plants are those from the list in attachment B with a high likelihood of occurring. They were either located during the botanical survey, have an early season blooming period which was not covered during the 2021 surveys, or were described in the previous botanical surveys from 2013.*

### **Napa False Indigo (*Amorpha californica* var. *napensis*)**

Status: None

**Habitat requirements and description:** This species is prevalent in Sonoma and Napa county. It thrives on cooler sites within mixed conifer and mixed oak woodland ecosystems. Growing to between 1 and 6 ft tall, its leaves are approximately 1 inch long and oppositely arranged. The inflorescence is purple and uniquely arranged vertically from the plant usually between 6 " to 1 foot long.

**Potential for Occurrence:** This species exists throughout the north and eastern half of Fitch Mountain Open Space Preserve. It is exclusively located on north facing slopes where it exists in great numbers.

### **Narrow-anthered brodiaea (*Brodiaea leptandra*)**

Status: None

**Habitat requirements and description:** A small blueish purple star shaped flower occurring within chaparral, and oak woodland ecotypes.

**Potential for Occurrence:** This species was recorded in CNDDDB at the southern end of the treatment area. The exact location was unknown but the circle used to describe its location encompasses the South end of the Russian river treatment unit. The potential for occurrence within that part of the treatment area is unlikely due to non-existence of required habitat. No individuals were observed during FRM's 2021 botanical survey.

**Holly-leaved ceanothus** (*Ceanothus purpureus*)

Status: None

Habitat requirements and description: Endemic to northern California where it occurs in woodland and chaparral habitat, mostly on rocky and volcanic soils. There are a large number of individuals known to exist in Napa and Sonoma counties. It reaches 2 meters in height with a toothed leaf margin approximately 2.5 cm long. The inflorescence is a small cluster of blue or purple flowers.

Potential for Occurrence: The 2013 botanical report by PCI indicated that the 2007 survey identified it in the serpentine soils area of HROSP. However, during the 2013 survey, Dr. Wilken suggested that this population is Jepson's Ceanothus and not the rare Holly-leaved variety. This species was not identified during 2021 botanical surveys performed by FRM's RPF.

**Baker's Manzanita** (*Arctostaphylos bakeri*)

Status: SR

Habitat requirements and description: Baker's manzanita occurs in chaparral and mixed evergreen forests and is endemic to Sonoma county. It is known to occur in serpentine soils. It grows up to 3 meters in height with small hairy oval shaped leaves approximately 3 cm long. The flowers are a whitish-pink urn shaped inflorescence that hang down from the branches.

Potential for Occurrence: There is a high potential for occurrence within the serpentine soils located in the Healdsburg Ridge Open Space Preserve and the Callahan property. This serpentine area is limited to the northeast trending ridge line that spans through both properties. The 2013 botanical survey prepared by PCI did not locate this species, but reference a 2007 survey which located it in the serpentine area of the HROSP. During the botanical surveys conducted by FRM in May and July of 2021, this species was not located. It should be noted that this manzanita doesn't bloom during these times. Nevertheless, the manzanita observed was identified as common manzanita within the HROSP. Within the Callahan property, there were several individuals with similar phenotypical characteristics as Baker's manzanita observed. These individuals were flagged and will be surveyed during the blooming period of Baker's manzanita prior to being treated. For operations this year, any manzanita flagged with orange will be avoided and unharmed.

**Vine hill manzanita** (*Arctostaphylos densiflora*)

Status: SE

Habitat requirements and description: Vine hill manzanita occurs in chaparral and mixed evergreen forests. It grows up to 1 meter in height with slender pointed leaves approximately 3 cm long. The inflorescence is made up of small clusters of light to bright pink urn-shaped flowers. The only known occurrence is within the Vine hill preserve in Sonoma county.

Potential for occurrence: There is a low potential for occurrence within the Healdsburg ridge serpentine area, and along the Callahan ridge. This species would not have been in bloom during the botanical surveys during 2021 but no individuals were observed with similar leaf patterns.

**Impact BIO-1**

Initial and maintenance treatments could result in direct or indirect adverse effects to the 68 special status plants species with potential to occur within the treatment areas. See attachment B for the table of potential listed species. Of those species, only the 4 species listed above have a high potential of occurring within the treatment areas, and will be included in SPR BIO-2 (Required biological resource training for workers). Pursuant to SPR BIO-7, the city of Healdsburg commissioned a protocol-level survey for special-status plants on May 19<sup>th</sup>, and 20<sup>th</sup>; and July 9<sup>th</sup>, 10<sup>th</sup>, and 16<sup>th</sup> in 2021. During these surveys Napa False Indigo was the only species discovered. See above for specifics. Mitigation measure BIO-1b will be implemented to avoid loss of the special status plant.

Because the occurrence of this species is so prevalent within the Fitch Mountain Open Space, it is infeasible to flag a 50 ft buffer around every individual. Areas of greatest concentration will be identified by the RPF or qualified biologist

and flagged with a 50 ft buffer prior to treatment. These flagged STZs will exclude broadcast burning, herbicide use, and mechanical treatment. Since grazing and mechanical treatment will not harm the root structure, these treatments will not be excluded.

There is a potential for Holly-leaved ceanothus and Baker's manzanita to be located within the serpentine areas in Callahan and Healdsburg Ridge Open Space Preserve. There is also potential for Narrow-anthered brodiaea to be located within the southern end of the Russian river treatment area. These species were not identified during botanical surveys. If they are identified, they will be protected by the provisions of Mitigation Bio-1b. Many of the 68 plants with potential to occur are typically associated with wetland habitats. None of these species were identified, but if they exist will be protected by SPR HYD-4, Watercourse and Lake Protection Zones (WLPZs) ranging from 50-150 feet adjacent to all aquatic habitat (i.e. wet areas).

The treatment activities and their potential for adverse effects on special-status plants is within the scope of the PEIR. For the analysis of impacts on the land outside of the treatable landscapes, see the new biological resource impacts below.

### **Impact BIO-2**

Treatment activities could result in direct or indirect adverse effects to special status wildlife species with suitable habitat within the treatment area. All of the species listed above have the potential to occur within the treatment areas. With the implementation of the SPR's and mitigation measures listed in the table above, the potential impacts will be less than significant. Species listed above with a high potential for occurrence will be included in SPR BIO-2 training for workers. If a listed species is discovered during work activities, the RPF or qualified biologist will be notified and protection measures will be developed depending on the species, and time of year (i.e. nesting or critical breeding season).

The following species were observed within the treatment areas at some point in time and will be afforded specific mitigation measures:

### **Steelhead**

Steelhead were observed within a pool toward the north end of the Russian river during 2021 RPF field reconnaissance. These species and their habitat will be avoided per mitigation measure Bio 2a. There is no work planned within the river. Treatment activities are planned within the WLPZ of this habitat. SPR HYD-4 will provide adequate protection for this species and ensure high quality habitat is preserved. The planned treatment activities will remove *Arundo*, an invasive species. This plant not only threatens the surrounding forest with high intensity wildfire, it also reduces water level within the Russian River. By removing this plant within the treatment area, the steelhead habitat will be improved through the following ways: Conservation of water, and protection of canopy through the reduction of wildfire threats. This will in turn ensure temperature regulation throughout the year as well as prevent sediment transport into critical steelhead habitat.

### **Western pond turtle**

This species was not observed during field reconnaissance. Workers will be trained in identification of this species and its nest sites prior to implementing treatment activities. Because this species nests on the ground near the river, the main threat to this species during treatment activities would be nest trampling during herbicide application. This threat will be mitigated through the implementation of SPR BIO-2. If located Mitigation measures Bio 2a and Bio 2b will be implemented. Any identified nesting site will be protected with a 100 ft buffer and avoided until after the critical breeding season for this species (between March to August).

### **Osprey**

This species is known to occur within the Fitch Mountain treatment unit, somewhere along the east slope, facing the Russian river. However, no sightings of this species nor potential nest trees were discovered during field reconnaissance. Nevertheless, this species will not be impacted by the proposed treatment activities due to their scope and intensity. Large trees which would be suitable for an osprey nest will not be harmed by the treatment activities. If a sighting is made or a nest tree is discovered, the RPF or qualified biologist will be notified and mitigation measures Bio 2a and 2b will apply.

## **Conclusion**

The potential for treatment activities to result in adverse effects on special status species was examined in the PEIR. The impact is within the scope of the PEIR because the treatment activities and intensity are consistent with those analyzed in the PEIR.

### **Impact BIO-3**

There is no potential for the treatment activities to impact designated sensitive natural communities because there were no sensitive habitats within the project area. Northern hardpan vernal pools were the only sensitive community identified within the 9-quad. The closest occurrence was over 5 miles and this community wasn't identified within the treatment area.

### **Impact BIO-4**

The treatment activities have the potential to negatively impact wetlands and riparian habitats. With the inclusion of the SPR's listed in the table above, this impact will be less than significant. These SPRs include the development of slope dependent, watercourse and wet area protections. The treatment activities and their potential to impact wetlands was assessed in the PEIR and were found to be less than significant after the inclusion of the SPR's listed. The proposed treatment activities are therefore within the scope of the PEIR, because they are the same as those listed in the PEIR.

### **Impact BIO-5**

The treatment activities could result in direct or indirect adverse effects on wildlife corridors because suitable habitat is present in the treatment area. These impacts were found to be within the scope of the PEIR. These treatment activities are also within the scope because they are the same as those analyzed in the PEIR. In fact, it is expected that some wildlife corridors for certain species will ultimately be improved by the treatment activities. By protecting the forest ecosystem as a whole, the habitat corridors, while slightly degraded in the short term will be protected from high intensity wildfire in the future. This will conserve the corridors in the long run and promote a healthy fire resilient ecosystem. Furthermore, with the inclusion of the riparian zone protections, there will be areas of intact wildlife corridors which connect multiple treatment areas to untreated landscapes.

### **Impact BIO-6**

The treatment activities have the potential to result in reduction of habitat or abundance of common wildlife, including nesting birds. This resulting reduction will be minimal compared to the long term benefits of carrying out the project as proposed. The consequences of a devastating wildfire would be catastrophic to wildlife and their habitat. By taking steps to reduce standing dead and down fuels and improve fire resiliency of existing habitat, the potential for such a wildfire occurring will be greatly reduced. Because of this, the project as proposed will have a temporary reduction in wildlife habitat and common wildlife and a long-term increase and net benefit to habitat and wildlife.

The treatment activities are consistent with those analyzed in the PEIR and will therefore be within the scope of the PEIR. With the incorporation of the SPRs listed in the table above, the impacts to BIO-6 will be less than significant. The implementation of BIO-12 will ensure that prior to mechanical, manual, and prescribed burning treatments, an

RPF or qualified biologist conducts nesting bird surveys, and identifies and develops protection measures for critical wildlife habitat in the treatment area.

**Impact BIO-7**

This impact does not apply to the treatment areas.

**Impact BIO-8**

This impact does not apply to the treatment areas.

**New Biological Resource Impacts**

None. The inclusion of land that is outside of the treatable landscape presented in the PEIR, constitutes a change in the geographic extent presented in the PEIR. The habitat conditions and characteristics as well as the biological resources present in these areas are the same as those within the treatable landscape. Consequently, the impact will be the same and is within the scope of this PEIR for all of the above listed impacts.

## PD-3.6: GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
<b>Would the project:</b>								
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 through 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.

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

### Discussion

#### Impact GEO-1

There is a potential for the treatment activities to cause erosion and loss of topsoil. This impact was examined in the PEIR and determined to be less than significant. The proposed project is within the scope of the PEIR because the treatment activities are the same as those examined in the PEIR. Furthermore, with the inclusion of SPR GEO-1-8, the impact will be reduced to a level of insignificance. By postponing ground disturbing operations during saturated soil conditions, and implementing the erosion control measures outlined in the SPRs the project proponent will ensure the topsoil is protected.

#### Impact GEO-2

The treatment activities would include vegetation removal from steep slopes. An RPF or geologist will assess the treatment area prior to operations on slopes over 50% to avoid unstable areas. There is one known historical unstable area within the treatment unit on Fitch Mountain. It is located on the northwest side of the property along the access road. There will be no operations on this unstable area and a professional geologist with PWA is in the process of developing mitigations for the road which is currently located on the toe of the slide. This report along with mitigation measures proposed by the Geologist will be amended to the document once completed. There are a group of potentially unstable areas along the southern face of the Fitch Mountain treatment area where slopes are

extreme and erosion hazard rating is high. They appear to be caused by an existing road along greater than 90% slopes. The cut bank is eroding. There will be no treatment activities besides, minimal grazing on these areas until they are reviewed by a geologist. See appendix C for a map of these potential unstable areas.

This impact is within the scope of the PEIR because the treatment activities are the same as those assessed in the PEIR.

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

The inclusion of land within the CalVTP that is outside of the treatable landscapes constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the geology and slopes are representatively the same as those in the treatable landscape, thus the impacts will be the same.

## PD-3.7: 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?
<b>Would the project:</b>								
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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion			
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant			
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			

### Discussion

#### Impact GHG-1

Use of vehicles/equipment and prescribed burning during treatment activities will result in greenhouse gas emissions. Conflicts with applicable plans, policy, and regulations aimed at reducing GHG emissions may occur due to this project. This was examined in the PEIR. These impacts associated with this project are within the scope of the PEIR because the treatment activities, types of equipment, and duration of use are the same as those analyzed in the PEIR. Furthermore, by carrying out the project in this way, the goal will be to reduce the likelihood of a catastrophic wildfire from occurring. This type of event would create a massive GHG emission at one time. The controlled release of GHG in small amounts during this project is less impactful than the, all at once, release which is likely to occur during a catastrophic wildfire. SPR GHG-1 is not applicable to the proposed project because the property is not a registered carbon offset property. As such, the requirement to inform reporting under the Board of Forestry and Fire Protection’s assembly bill 1504 Carbon Inventory Process does not apply.

#### Impact GHG-2

Use of vehicles/equipment and prescribed burning during treatment activities will result in greenhouse gas emissions. This was examined in the PEIR. These impacts associated with this project are within the scope of the PEIR because the treatment activities, types of equipment, and duration of use are the same as those analyzed in the PEIR. SPR GHG-1 is not applicable to the proposed project because the property is not a registered carbon offset property. As



such, the requirement to inform reporting under the Board of Forestry and Fire Protection's assembly bill 1504 Carbon Inventory Process does not apply.

**New Impacts Related to GHG Emissions**

The inclusion of land that is outside of the treatable landscapes constitutes a change to the geographic extent of the PEIR. However, the same plans policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape, as within it. Likewise, the climate condition are the same within the treatable landscape as they are just outside of it for this project. Because of this the GHG impacts listed above will be the same and the resulting within the scope finding is the same.

## PD-3.8: ENERGY RESOURCES

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

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

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

### Discussion

Impact ENG-1

N/A

New Energy Resource Impacts

N/A

## PD-3.9: 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?
<b>Would the project:</b>								
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 through 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	No	NA	NA	NA	NA	NA

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

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

### Discussion

#### Impact HAZ-1

The proposed treatment activities would require the use of fuels and related accelerants, which are hazardous materials. The potential for these treatment activities to cause a significant health hazard was examined in the PEIR. This impact is within the scope of the PEIR because the treatment activities, associated equipment, and types of hazardous materials used are the same as those analyzed in the PEIR.

#### Impact HAZ-2

Treatment activities within the Russian river unit propose to use herbicide to control Arundo (a highly invasive non-native plant). Herbicide application will be by ground methods only (no aerial spraying will occur). The target plant will be back pack sprayed or cut and stump painted. The potential for treatment activities to cause a significant health hazard was examined in the PEIR. This impact is within the scope of the PEIR because the types of herbicides

(i.e. glyphosate and imazapyr) and the application methods proposed are the same as those analyzed in the PEIR. With the implementation of SPRs HAZ-5 through HAZ-9, the impacts will be less than significant.

**Impact HAZ-3**

N/A

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

The inclusion of land that is outside of the treatable landscapes constitutes a change to the geographic extent presented in the PEIR. However, the hazardous materials used, the environmental conditions, and the exposure potential is the same as what was analyzed in the PEIR. Furthermore, the regulatory conditions and policies are the same. As a result, the land outside of the treatable landscape is within the scope of the PEIR.

## PD-3.10: 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?
<b>Would the project:</b>								
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-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	Yes	HYD-1, HYD-3, HYD-4, GEO-4, GEO-6,				
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 HYD-5: Substantially Alter the Existing Drainage	LTS	Impact HYD-5, p. 3.11-31	Yes	HYD-4, HYD-6, GEO-	NA	LTS	No	Yes

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?
<b>Would the project:</b>								
Pattern of a Treatment Site or Area				1, GEO-2, GEO-5				

<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 CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Discussion

### Impact HYD-1

Ash and debris from prescribed burning could be washed by runoff into drainages and streams. Treatment areas are designed to avoid streams and watercourses. WLPZs and C III watercourse protection measures will ensure adequate filter strips to avoid significant impacts from this treatment activity. See HYD-4 in the SPRs in attachment A. This impact was assessed in the PEIR and found to be less than significant with the implementation of the SPRs listed above. The treatment activity is within the scope of the PEIR because it is a low intensity prescribed burn, which is the same as what was analyzed in the PEIR.

### Impact HYD-2

Treatments would include mechanical and manual treatments. WLPZs and C III watercourse protection measures will ensure adequate filter strips to avoid significant impacts from this treatment activity. See HYD-4 in the SPRs in attachment A. This impact was assessed in the PEIR and found to be less than significant with the implementation of the SPRs listed above. The treatment activity is within the scope of the PEIR because it is the same as what was analyzed in the PEIR.

### Impact HYD-3

Prescribed herbivory does have the potential to violate water quality standards, but with the inclusion of the SPRs listed above, the impact will be less than significant. WLPZs and C III watercourse protection measures will ensure adequate filter strips to avoid significant impacts from this treatment activity. See HYD-4 in the SPRs in attachment A. This impact was assessed in the PEIR and found to be less than significant. The treatment activity is within the scope of the PEIR because it is the same as what was analyzed in the PEIR.

### Impact HYD-4

The use of herbicide has the potential to violate water quality standards and have the impact as listed in the table above. WLPZs and C III watercourse protection measures will ensure adequate filter strips to avoid significant impacts from this treatment activity. See HYD-4 in the SPRs in attachment A. This impact was assessed in the PEIR and found

to be less than significant with the implementation of the SPRs listed above. The treatment activity is within the scope of the PEIR because it is the same as what was analyzed in the PEIR.

**Impact HYD-5**

Treatment activities could cause ground disturbance and erosion, which could directly or indirectly modify existing drainage patterns. WLPZs and C III watercourse protection measures will ensure adequate filter strips to avoid significant impacts from these treatment activities. See HYD-4 in the SPRs in attachment A. This impact was assessed in the PEIR and found to be less than significant with the implementation of the SPRs listed above. The treatment activities are within the scope of the PEIR because they are the same as those analyzed in the PEIR.

**New Hydrology and Water Quality Impacts**

The inclusion of land that is outside of the treatable landscapes constitutes a change to the geographic extent presented in the PEIR. However, the hydrology, topography, and treatment methods are consistent with those analyzed in the PEIR, thus they are also within the scope of the PEIR. Furthermore the existing environmental and regulatory conditions pertinent to hydrology and water quality are also consistent within as well as outside of the treatable landscape included in this project area.

## PD-3.11: 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?
<b>Would the project:</b>								
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	No	NA	NA	NA	NA	NA
Impact LU-2: Induce Substantial Unplanned Population Growth	LTS	Impact LU-2, pp. 3.12-14 – 3.12-15	No	NA	NA	NA	NA	NA

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

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

### Discussion

#### Impact LU-1

NA

#### Impact LU-2

NA

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

NA



## PD-3.12: NOISE

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
<b>Would the project:</b>								
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-4, NOI-5	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	No	NA	NA	NA	NA	NA

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

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

### Discussion

#### Impact NOI-1

The treatment activities have the potential for short-term increase in ambient noise levels from the use of heavy equipment. This is an unavoidable part of accomplishing the goals of this and all holistic vegetation treatments. These impacts were examined in the PEIR and were found to be Less than significant. The impacts are within the scope of the PEIR because the treatment activities and methods are the same as those analyzed in the PEIR.

#### Impact NOI-2

This impact was examined under NOI-1. There is no need to re-examine it here and create a new category for something that is addressed in NOI-1.

#### New Noise Impacts

The inclusion of land that is outside of the treatable landscapes constitutes a change to the geographic extent presented in the PEIR. However, the treatment methods, sensitive receptor locations and frequency, and types of equipment are consistent with those analyzed in the PEIR, thus they are also within the scope of the PEIR. Furthermore, the existing environmental and regulatory conditions pertinent to noise levels are also consistent within as well as outside of the treatable landscape included in this project area.

## PD-3.13: RECREATION

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
<b>Would the project:</b>								
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	REC-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 Recreation Impacts:</b> Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP PEIR?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion		
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant		
[Identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

### Discussion

#### Impact REC-1

Treatment activities will occur within designated recreational areas on both Fitch Mountain Open Space Preserve and Healdsburg Ridge Open Space Preserve. The potential for treatment activities to disrupt recreational activities was examined in the PEIR. The impacts associated with this project are within the scope of the PEIR because the treatment activities and recreational uses are the same as those analyzed in the PEIR. Treatment activities will rarely cause closures of recreation areas, and those closures will be for a short time.

#### New Recreation Impacts

None. The inclusion of land that is outside of the treatable landscapes constitutes a change to the geographic extent presented in the PEIR. However, the land included doesn't contain areas used for recreation.

## PD-3.14: 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?
<b>Would the project:</b>								
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	No	NA	NA	NA	NA	NA
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-1, 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	No	NA	NA	NA	NA	NA

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

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

### Discussion

#### Impact TRAN-1

NA

#### Impact TRAN-2

Smoke generated during prescribed burning operations may necessitate the implementation of a Traffic Management Plan (TMP). The need for this will be assessed during the preparation of the prescribed burn based on weather, location of burn and orientation to local traffic patterns. This impact was assessed in the PEIR. The impact of this project is within the PEIR because the treatment activity is the same as what was covered in the PEIR.

#### Impact TRAN-3

NA

#### New Transportation Impacts

None. The inclusion of land that is outside of the treatable landscapes constitutes a change to the geographic extent presented in the PEIR. However, the land included doesn't contain new areas which when burned, will create significant smoke to cause a new impact not covered by the PEIR.

## PD-3.15: PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project <sup>1</sup>	List MMs Applicable to the Treatment Project <sup>1</sup>	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
<b>Would the project:</b>								
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	NA	NA
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	NA	NA

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

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

### Discussion

#### Impact UTIL-1

Treatments involve the use of prescribed burning, which may require water supply if the burn goes out of prescription. The potential increased demand for water was examined in the PEIR. The impact is within the scope of the PEIR because the activities scope and duration are the same as those analyzed in the PEIR. The amount of water potentially required was assessed in the PEIR and found to be less than significant.

#### Impact UTIL-2

NA

**Impact UTIL-3**

NA

**New Impacts to Public Services, Utilities and Service Systems**

The inclusion of land that is outside of the treatable landscapes constitutes a change to the geographic extent presented in the PEIR. However, the land included doesn't contain new areas which when burned, will require a significant increase in the required water used for prescribed fire mop up. Also, the environmental conditions are the same as those assessed within the treatable landscape. As a result, there are not expected to be any new impacts related to UTIL-1. The included areas are within the scope of the PEIR.

## PD-3.16: 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?
<b>Would the project:</b>								
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	HAZ-2 through 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-5, 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?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	If yes, complete row(s) below and discussion		
	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant		
[identify new impact here, if applicable; add rows as needed]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

### Discussion

#### Impact WIL-1

Treatment activities pose a risk of wildfire ignition as well as prescribed fire escaping its control lines. This potential risk was examined in the PEIR. This impact is within the scope of the PEIR because the treatment activities, types of equipment and duration/intensity are the same as those analyzed in the PEIR. The project proponent is responsible for maintaining control lines during all prescribed burning activities.

#### Impact WIL-2

There are steep slopes within the treatments areas, particularly within Fitch Mountain Open Space Preserve. The potential exposure for people or structures to post-fire landslides was examined in the PEIR. This impact is within the scope of the PEIR because the treatment activities, types of equipment and duration/intensity are the same as those analyzed in the PEIR. With the implementation of the above listed SPRs, the impact should be less than significant.

#### New Impacts to Wildfire

The inclusion of land that is outside of the treatable landscapes constitutes a change to the geographic extent presented in the PEIR. However, the land included doesn't contain new areas which when treated, will cause a significant increase in the impacts listed above. Also, the environmental conditions are the same as those assessed within the treatable landscape. The included areas outside the treatable landscape have the same environmental conditions, vegetation types, erosion hazard ratings, geology, and orientations to the public as within the treatable landscapes. As a result, there are not expected to be any new impacts outside the scope of the PEIR. Consequently, the included areas are within the scope of the PEIR.

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