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Project Specific Analysis and Addendum to the CalVTP PEIR

Project-Specific Analysis

Tenmile Creek Watershed Forest Health Project

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Tenmile Creek Watershed Forest Health Project
Project-Specific Analysis and Addendum

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Resource Conservation District
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Table of Contents

LIST OF ABBREVIATIONS 3
1.0 PROJECT-SPECIFIC ANALYSIS 5
1.1 Introduction 5
1.2 CEQA and Document Purpose 6
1.3 Project Location 8
1.4 Ecosystem Conditions 14
2.0 PROJECT DESCRIPTION 14
2.1 Treatment Specifications 15
2.2 Project Justification 16
2.3.1 Treatment Types 17
2.3.2 Treatment Activities 18
2.3.3 Prescribed Fire and Cultural Fire 18
2.3.4 Forest Fuels Reduction (Thinning) 20
2.3.5 Invasive Plant Removal 21
3.0 ENVIRONMENTAL CHECKLIST (EC) 26
4.0 PROJECT-SPECIFIC ANALYSIS/ADDENDUM 31
4.1 EC-Aesthetics and Visual Resources 33
4.2 EC-Agriculture and Forestry Resources 36
4.3 EC-Air Quality 38
4.4 EC-Archaeological, Historical, and Tribal Cultural Resources 43
4.5 EC-Biological Resources 47
4.6 EC-Geology, Soils, Paleontology, and Mineral Resources 77
4.7 EC-Greenhouse Gases Emissions 81
4.8 EC-Energy Resources 84
4.9 EC-Hazardous Materials, Public Health and Safety 86
4.10 EC-Hydrology and Water Quality 88
4.11 EC-Land Use and Planning, Population and Housing 94
4.12 EC-Noise 96
4.13 EC-Recreation 99
4.14 EC-Transportation 101
4.15 EC-Public Services, Utilities and Service Systems 103
4.16 EC-Wildfire 105
5. LIST OF PREPARERS 107
6. REFERENCES 108

List of Appendices

Appendix A- Mitigation Monitoring Program
Appendix B- Biological Resources Report
Appendix C- Cultural Resources Report
Appendix D- Ecological Restoration Treatment (Channel Wood Augmentation)

List of Figures

Figure 1: Regional vicinity map of Tenmile Creek Watershed, located in Mendocino County near Laytonville, California 9
Figure 2: USGS project area map of Tenmile Creek Forest Health Project, located in Mendocino County near Laytonville, California 10
Figure 3: Phase II Cahto Ranch / Varnhagen Property 11
Figure 4: Phase II Black Oak Ranch Property near Laytonville, California 12
Figure 5: Phase II Reyes Property near Laytonville, California 13
Figure 6: Pile burning examples, Scott River (Left) Ruth Lake, CA (right) 20
Figure 7: Tenmile Creek. Untreated dense timber stand on the left. Treated (thinned) area on right. proposed for thinning. 22
Figure 8: Examples of hand crews conducting manual vegetation removal. 23
Figure 9: Examples of Mechanized Equipment – Fecon FTX 128 Series compact track loader with masticating head attachment (left). Morbark Beever M15R tracked chipper (right) 24
Figure 10: Example of Mechanized Equipment – Link-Belt 145 x 4 excavator with masticating head attachment. 24
Figure 11: Tenmile Forest Health Project Phase I and Phase II treatment acres by Calwatershed units. 90
Figure 12: Location of gullies and or Class III watercourse locations for gully stabilization using thinning biomass. 93

List of Tables

Table 1: CalVTP Treatable Landscape Acreage 6
Table 2: Watercourse and Lake Protection Zones 16
Table 3: Project area by Cal Watershed Planning Unit Version 2.21 27
Table 4: California Wildlife Habitat Relationship types in the Project Area. 49
Table 5: Special-status wildlife evaluated with the potential to occur within the Project Area and potential Project effects. 52

List of Abbreviations

ACB	Air Curtain Burner
ASR	Archaeological Survey Report
CAL FIRE	California Department of Forestry and Fire Protection
CalVTP	California Vegetation Treatment Program
CCC	California Coastal Commission
CDFW	California Department of Fish and Wildlife
CE	Candidate Endangered
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRPR	California Rare Plant Rank
CT	Candidate Threatened
CVTS	Coastal Vegetation Treatment Standards
CWHR	California Wildlife Habitat Relationships
DBH	Diameter at Breast Height
ERRP	Eel River Recovery Project
E	Endangered
EPA	Environmental Protection Agency
ESA	Endangered Species Act
ESHA	Environmentally Sensitive Habitat Area
ERA	Ecological Restoration Treatment Area
FRAP	CAL FIRE's Fire and Resource Assessment Program
GHG	Greenhouse Gas
GIS	Geographic Information Systems
HCP	Habitat Conservation Plan
QMD	Quadratic Mean Diameter
IPC	Invasive Plant Council
LTS	Less than significant
LTSM	Less than significant without mitigation incorporated
MCV	Manual of California Vegetation
MCAQMD	Mendocino County Air Quality Management District
MCRCD	Mendocino County Resource Conservation District
MIST	Minimum Impact Suppression Tactics
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MND	Mitigated Negative Declaration
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NOA	Naturally Occurring Asbestos
ND	Negative Declaration
PEIR	Programmatic Environmental Impact Report
PPE	Personal Protective Equipment
PRC	Public Resources Code
PS	Potentially Significant

PSA	Project Specific Analysis
RM	Resource Management
RPF	Registered Professional Forester
RWQCB	Regional Water Quality Control Board
SENL	Single Event Noise Level
SOD	Sudden Oak Death
SPR	Standard Project Requirements
SRA	State Responsibility Area
SSC	Species of Special Concern
TMP	Traffic Management Plan
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VMT	Vehicle Miles Traveled
WDR	Waste Discharge Requirements
WL	Watch List
WLPZ	Watercourse and Lake Protection Zone
WUI	Wildland Urban Interface

1.0 Project-Specific Analysis

1.1 Introduction

Over the past couple of centuries, wildland ecosystems in the western United States, particularly in California, have experienced significant changes due to shifts in land management and climate conditions. These changes have resulted in larger, more costly, and catastrophic wildfires, impacting communities and increasing the urgency to manage forests for resiliency and health (CALFIRE 2018). Experts agree that California's forests are overstocked and undermanaged, with altered disturbance regimes creating more fire-prone and less fire-tolerant vegetative communities (Newcomer et al. 2019).

In Mendocino County, a history of fire suppression coupled with a warmer, drier climate has degraded forest health and biodiversity. Forests and grasslands in the Tenmile Creek watershed are particularly in poor ecological health, which results in high risk of uncharacteristic large high intensity wildfire, loss of biodiversity, decreased stream baseflows, and soil erosion that causes water quality degradation (ERRP 2020). Douglas fir, and to a lesser extent Ponderosa pine, have spread widely since the cessation of Native American burning and are causing the loss of oak forests. Post-World War II logging removed larger conifers, opening up light gaps that grew back thick with conifers, hardwoods, and brush species. Grazing in the mid- to late 19th Century caused a loss of native grass species that were deep-rooted and perennial that were replaced by European annual species that lessened meadow water storage and posed much greater fire risk. Grasslands further deteriorated with the spread of star thistle. With recent severe droughts and increased air temperatures, the stage is set for uncharacteristic high intensity wildfire.

To address these issues, environmentally sensitive, landscape-level treatments are necessary to restore ecosystem resistance and resilience. The Mendocino County Resource Conservation District (MCRCD) seeks to do this through the *Tenmile Creek Watershed Forest Health Project*, which is a grant awarded to the Eel River Recovery Project (ERRP) by CAL FIRE from their Climate Change Investments (CCI) fund. This project includes two main categories of work: Plan A, comprised of 910 acres of private non-industrial lands on 24 privately-owned properties;, and Plan B that involves the Cahto Tribe of the Laytonville Rancheria (109 acres). The latter is part of a separate NEPA process and is not part of this CalVTP PSA. Three additional landowners are covered under CalVTP CEQA planning but are not operational Phase II planning comprising 998 acres. Therefore, the scope of the PSA is 1,908 acres. The project spans various landowners and boundaries to optimize landscape-scale forest health improvements and protect terrestrial carbon stocks. It emphasizes local workforce development and utilization to enhance local socio-economic benefits and reinforce community involvement in restoration efforts. The focus includes fuel thinning and prescribed fire to optimize efficiency and ecological benefits.

The *Tenmile Creek Watershed Forest Health Project* aims to:

- Reduce fuel loads
- Restore oak woodlands
- Enhance soil moisture and fertility
- Restore native grasses and plants
- Restore hydrologic function
- Promote ecosystem health and carbon storage
- Protect rural communities
- Create local jobs

1.2 CEQA and Document Purpose

The California Vegetation Treatment Program (CalVTP) is a statewide program by which public agencies perform vegetation treatment activities for the purposes of preventing catastrophic wildfire. The CalVTP Programmatic Environmental Impact Report (PEIR) provides a powerful tool to enable expedited environmental review for projects that both follow the CalVTP treatment guidelines and implement an array of carefully crafted avoidance, minimization, and mitigation actions to ensure that implementation does not result in significant impacts to natural resources. The PEIR was certified in 2019 as a document compliant with the California Environmental Quality Act (CEQA). This PEIR offers an array of permissible vegetation treatments that allow for ecological restoration, forest health treatments, and other vegetation treatments aimed at reducing the risk of wildfire and increasing ecological resilience. Compliance with the PEIR requires preparation and submission of a Project Specific Analysis (PSA).

For purposes of CEQA, the MCRCD is the project proponent and acting as the lead agency for the preparation of the PSA/Addendum. The MCRCD is responsible for both reviewing and approving the PSA. Once reviewed, the MCRCD Board of Directors must pass a formal resolution approving the document and the project. This document serves as both the PSA and the Addendum to the CalVTP PEIR for MCRCD review and approval under CEQA for the proposed treatments. The PSA must demonstrate how the project will comply with Standard Project Requirements (SPRs) and Mitigation Measures (MMs) from the PEIR. If a proposed vegetation treatment is covered by the evaluation of environmental effects in the PEIR, it may be approved by a lead or responsible agency using a finding that the project is within the scope of the PEIR for its CEQA compliance, consistent with CEQA Guidelines Section 15168(c)(2).

CalVTP Treatable Landscape Acreage by Treatment Area Footprint			
	Acres Within the CalVTP Treatable Landscape	Acres Outside of the CalVTP Treatable Landscape	Total Acreage
Treatment Area Footprint	1768	140	1,908
Cal VTP Treatable Acreage by Treatment Activity			
Treatment Activity	Acres Within the CalVTP Treatable Landscape	Acres Outside of the CalVTP Treatable Landscape	Total Acreages
Rx Burn	847	0	847
Mechanical	40	0	40
Handwork	1728	140	1868
Total Activity Acreages	2,615	140	2,755

Table 1: CalVTP Treatable Landscape Acreage

Among the other criteria for determining whether a project is within the scope of the CalVTP PEIR is whether it is within the CalVTP 'treatable landscape' (i.e., the geographic extent of analysis covered in the PEIR), it may be approved using a finding that the project is within the scope of the PEIR for its CEQA compliance. Per the PEIR, if areas of the proposed project lie outside of the CalVTP treatable landscape, but have essentially the same, or substantially similar, landscape conditions as the treatable landscape, the environmental analysis of the PEIR would still be applicable. Here, 140 acres of the proposed project treatment area extend outside of the CalVTP treatable landscape; however, these areas are essentially the same or substantially similar to those within the treatable landscapes, and so the PEIR would still apply under CEQA guidelines. The project-specific mitigation

monitoring and reporting program, which identifies the CalVTP SPR and MM's applicable to the proposed project, is provided in the Mitigation Monitoring Plan (Appendix A.

Consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163,15164, and 15168, an Addendum to an EIR is appropriate when the previously certified EIR has been prepared and changes or revisions to the project are proposed, or the circumstances surrounding the project have changed. This is valid as long as those changes or revisions do not result in any new or substantially more severe environmental impacts than were covered in the PEIR. This PSA proposes the inclusion of areas outside of the CalVTP treatable landscape, which constitutes a proposed change or revision to the originally certified PEIR. Each impact analysis in the PSA includes additional specific justification for inclusion of areas outside of the treatable landscape, which support an Addendum to the CalVTP PEIR. The impact analyses evaluate whether the later treatment project (project proposed for inclusion under the CalVTP PEIR), including an addition of geographic area, would result in significant impacts that would be substantially more severe than those covered in the CalVTP PEIR, or would result in any new impacts that were not analyzed in the PEIR.

In this case, the only change compared to the PEIR, is the inclusion of areas outside of the CalVTP treatable landscape. The PSA checklist (refer to Section 4, "Project-Specific Analysis") includes the criteria to support an Addendum to the CalVTP PEIR for the inclusion of these changes. The checklist evaluates each resource in terms of whether the project, including the "changed condition" of additional geographic area, would result in significant impacts that would be substantially more severe than those covered in the PEIR and/or would result in any new impacts that were not covered in the PEIR.

This PSA/Addendum and attachments together support the finding that the proposed project is within the scope of the CalVTP PEIR. Each resource topic below includes a discussion of impacts related to that resource area followed by discussions of SPRs and MMs that are applicable for avoiding, minimizing, and mitigating impacts for that resource area. Supplemental analysis and information supporting the impact discussions can be found in the corresponding attachments. A finding that a project is within the scope of the PEIR requires the following components:

- Description of the impact of the proposed treatment project
- Summary of the impact in the CalVTP PEIR
- Evidence the project impact is addressed by the PEIR
- CalVTP SPRs and MMs applicable to the proposed project
- Conclusion regarding consistency with the PEIR

This PSA includes a mitigation monitoring and reporting program (MMRP) (Appendix A) in accordance with CEQA and the State CEQA Guidelines (Public Resources Code Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097). A MMRP is required for approval of the proposed project because this PSA identifies potential significant adverse impacts and all feasible mitigation measures have been adopted. SPRs, environmental protection features included as part of the project description, have been incorporated into this project to avoid or minimize adverse effects. Where potentially significant impacts remain after application of SPRs, mitigation measures have been identified to further reduce and/or compensate for those impacts. The numbering of SPRs and mitigation measures follows the numbering used in the PEIR. The MMRP requirements covered in this PSA are described below.

- SPRs and MMs – Brief discussions indicating whether an SPR or MM is applicable to this project are included under each resource section below.
- Implementing Entity and Timing of Implementation – This identifies the agency responsible for implementing the measure and time frame in which the SPR or MM will be implemented for each applicable SPR/MM.

- Verifying/Monitoring Entity – This column identifies the party responsible for verifying and monitoring implementation of the SPR or MM.

The MMRP will be adopted by the MCRCD with regard to its discretionary approval of the proposed project. As this PSA is used for CEQA compliance of future discretionary approvals by other state and local agencies related to treatments in the project area, those agencies will adopt separate MMRPs that specify the SPRs and MM relevant to their approval and within their jurisdiction. The MCRCD will document and describe the compliance of the project treatment work with the required SPRs and MMs either by adopting a project-specific MMRP table or preparing a separate post-project implementation report pursuant to the requirements of SPR AD-7.

1.3 Project Location

The Tenmile Creek Watershed Forest Health Project is located in Mendocino County near Laytonville, CA. The total project area evaluated in the CalVTP PSA encompasses 1908 acres, however, initial and maintenance treatments (Phase I) are proposed to occur over 910 acres on 24 private parcels and one school district property. Phase II areas (987 acres) are planning only on three separate private ownerships and future treatments area anticipated on those areas when funding becomes available. As future funding becomes available, additional treatment areas may be proposed and amended through subsequent PSA approvals.

The project is located within the Cahto Peak, Laytonville, and Tan Oak Park USGS 7.5" quadrangles. It encompasses parts of Sections 3, 10, 13, 14, 15, 21, 22 in T21 N R15 W of the Mount Diablo Meridian (MDM); Sections 8, 9, 18, 19, 21, 22, 23, 33, 34 in T22 N R15 W of the MDM; and Sections 14, 15, 21, 22 in T22 N R16 W of the MDM.

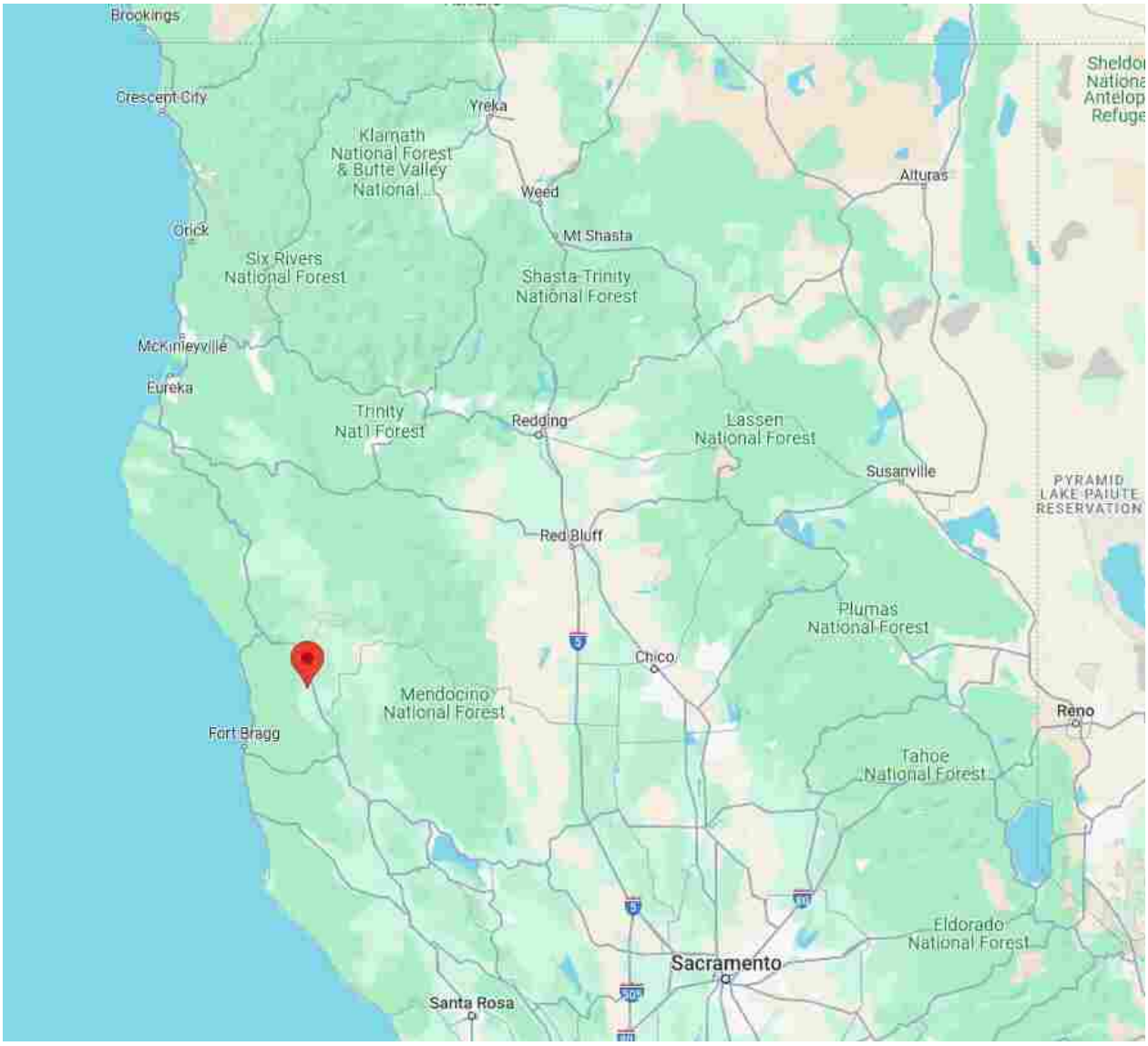

Figure 1: Regional vicinity map of Tenmile Creek Watershed, located in Mendocino County near Laytonville, California

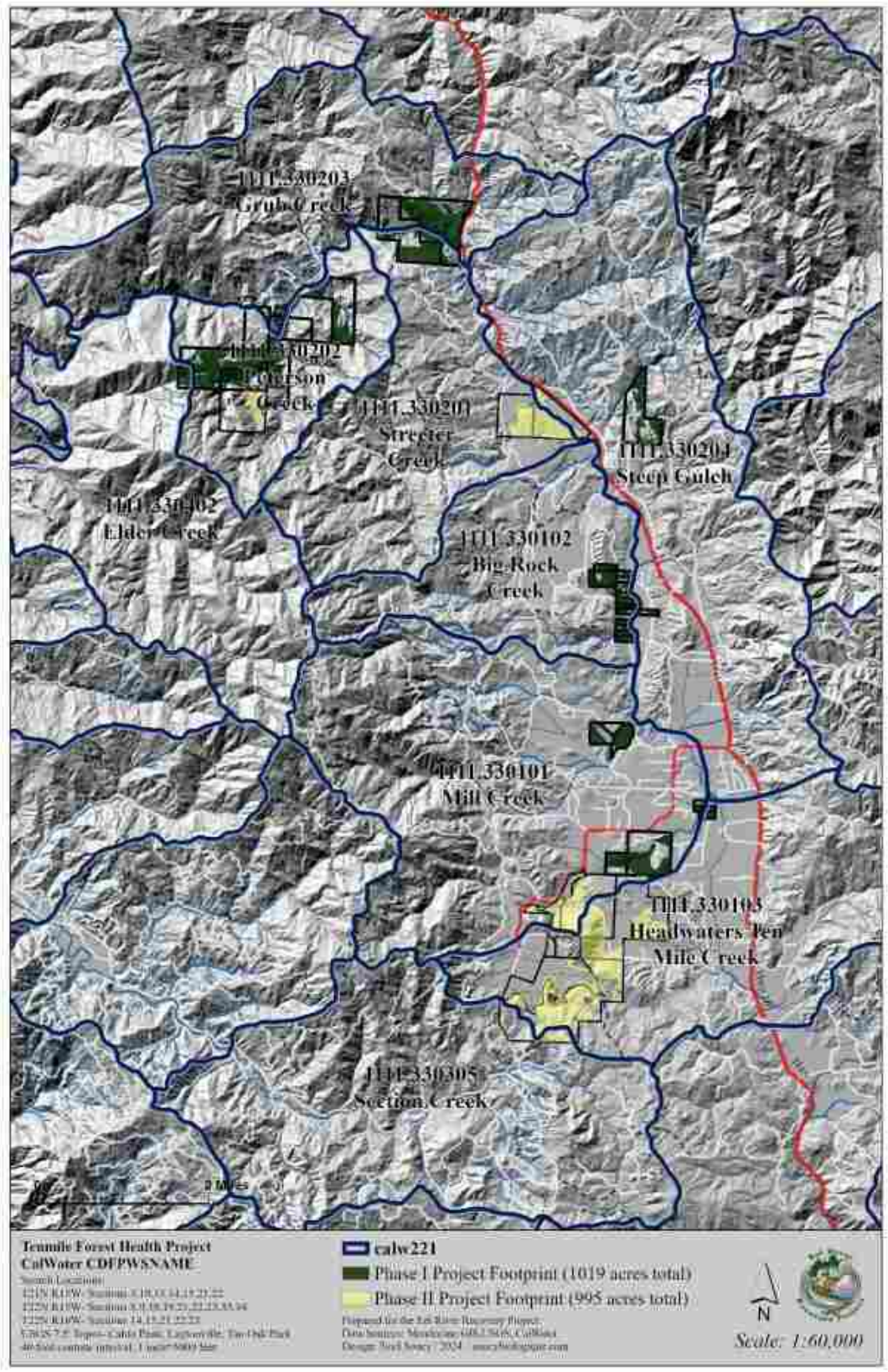

Figure 2: USGS project area map of Tenmile Creek Forest Health Project, located in Mendocino County near Laytonville, California

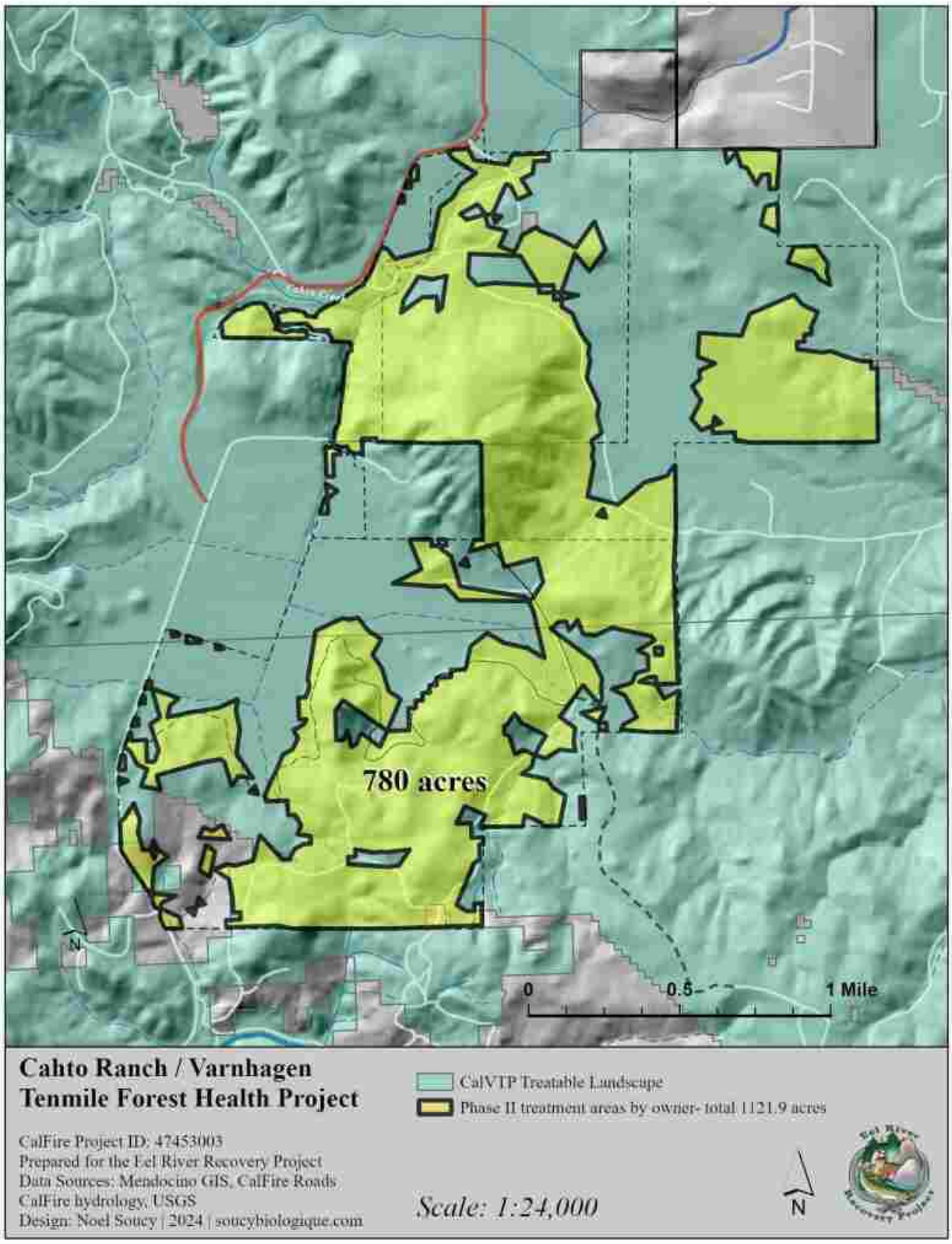

Figure 3: Phase II Cahto Ranch / Varnhagen Property

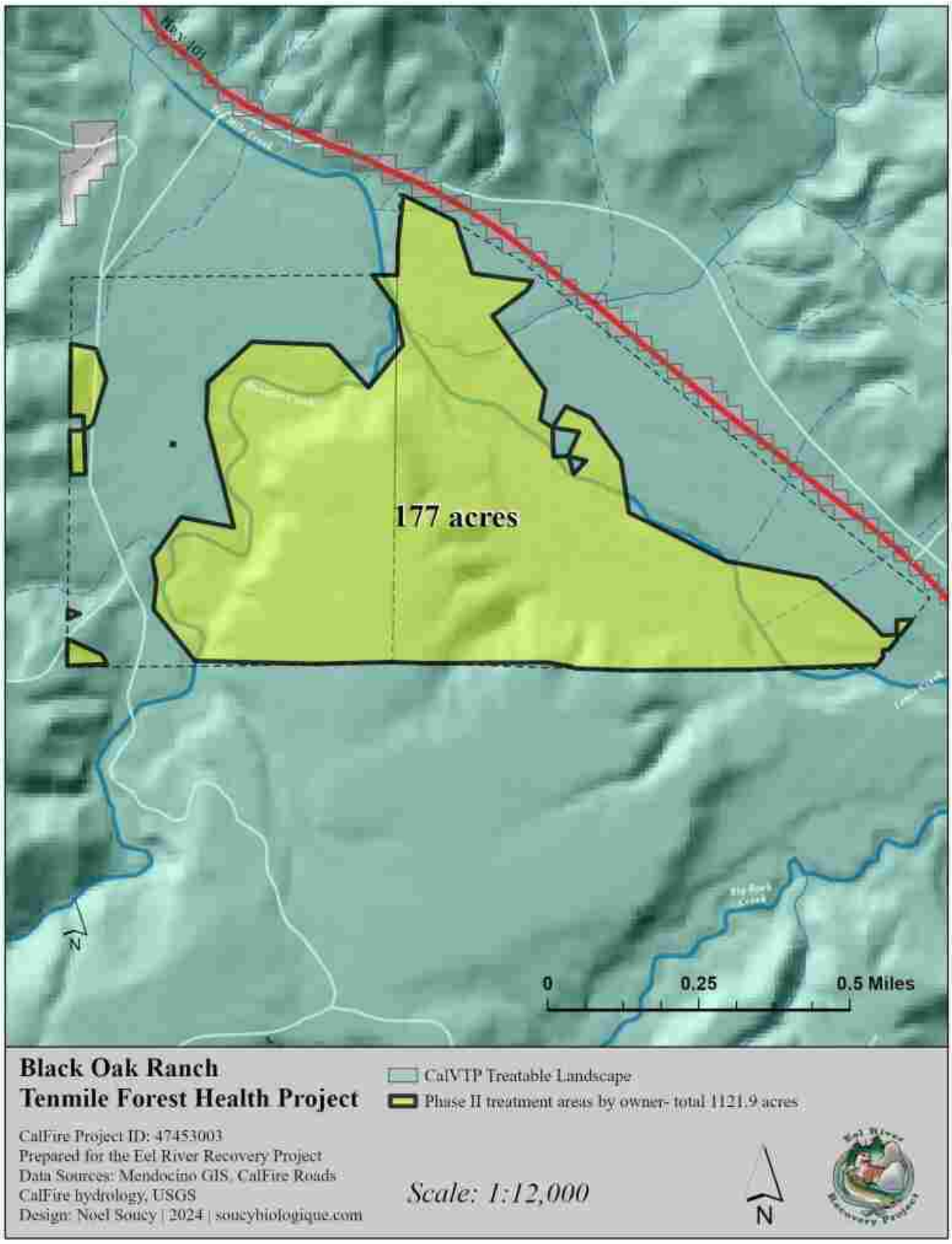

Figure 4: Phase II Black Oak Ranch Property near Laytonville, California

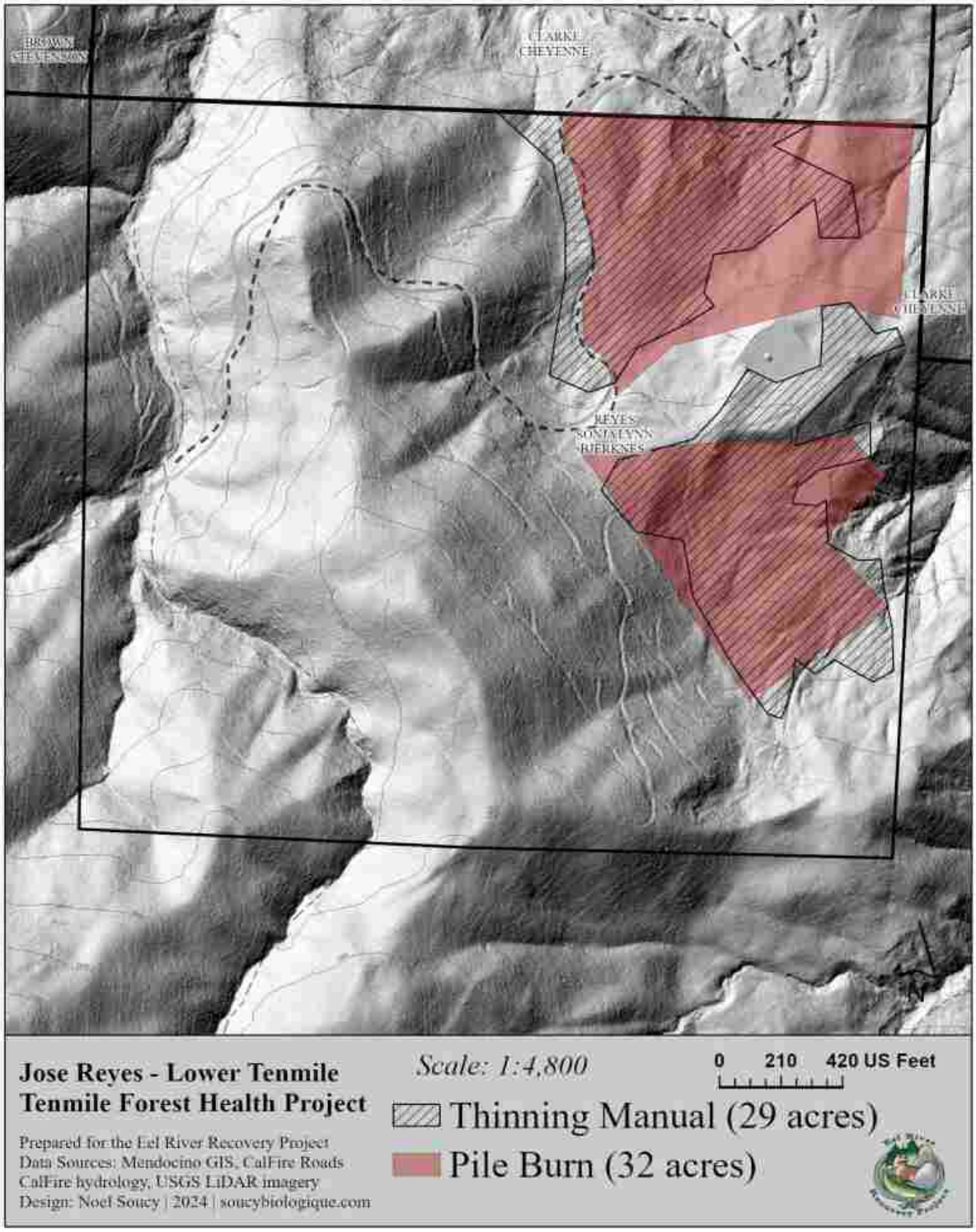

Figure 5: Phase II Reyes Property near Laytonville, California

1.4 Ecosystem Conditions

Project sites within the Tenmile Creek Watershed are located within the greater Eel River watershed, which is the ancestral lands of the Cahto People. The Cahto People likely heavily utilized the riparian corridor of Tenmile Creek for fishing and hunting, which runs through the area. They also likely managed upland areas to help oak woodlands and grasslands thrive to serve their cultural needs, maintaining them with fire and other traditional land management techniques. The area is now a combination of forested parcels with commercial conifers and hardwoods, grassland areas, and oak woodlands (Eel River Recovery Project, 2021a; Eel River Recovery Project, 2021b; Eel River Recovery Project, 2021c; Eel River Recovery Project, 2021d). Ground data collected in the West Tenmile parcels or Cahto Creek Trail parcels found that conifers are less than 160 years old; therefore, it is likely that Douglas fir and Ponderosa pine encroached on the area after cessation of burning and intensive early European and colonial American management (Eel River Recovery Project, 2021a).

The Project Area is dominated by forested habitats with developed areas and open grasslands mixed throughout. Forested portions of the project area consist of Montane Hardwood Conifer, Douglas-Fir, and Montane Riparian habitat types, as defined by the California Wildlife Habitat Relationships (CWHR) classification system. There are mature black oak and white oak trees in the forest within the Project Area. Some collaborating property owners have noticed major changes in vegetation over the past several years, including substantial expansion of Manzanita and conifer saplings and seedlings, mature trees showing signs of drought stress, and also increasing conifer mortality.

The project area is within the Sudden Oak Death (SOD) Zone of Infestation. SOD has been documented at the Triple Creek Ranch by Dr. Mike Jones, the University of California regional Forestry Advisor, during the course of this project. (Eel River Recovery Project, 2021c) This location is on the east side of the Tenmile Creek basin and only 7 miles from the Cahto Trail property. SOD is not known to exist elsewhere within the watershed although another positive detection was made in the Tenmile River area, 14 miles southwest of the Cahto Trail property (Eel River Recovery Project, 2021a). SOD presence was not observed during field work associated with the creation of the West Tenmile Forest Management Plan in 2021 (Eel River Recovery Project, 2021d). This does not mean it is absent, only that it was not observed in levels high enough to warrant notice. Tanoak is the most susceptible to SOD, but black oak is also susceptible. White oak trees are immune to SOD, while Madrone is susceptible generally to non-fatal foliage infection but can sometimes die from trunk cankers. California laurel is a foliar host, and noticeable symptoms beyond bleeding cankers include significant branch dieback.

2.0 Project Description

The Tenmile Creek Watershed Forest Health CalVTP Project covers 910 acres of non-industrial private and school district land, with the goal of enhancing forest health and ecological stability. Objectives include reducing fuel loads, restoring oak woodlands, enhancing soil moisture and fertility, restoring native grasses and hydrologic functions, and creating employment opportunities to provide local socio-economic benefits.

Key management actions include thinning overstocked forest areas, creating shaded fuel breaks, and applying pile and prescribed burns to reduce surface and ladder fuels (Agee and Skinner 2005), which will enhance ecosystem resilience and carbon storage. These efforts are designed to protect rural communities, promote biodiversity, and improve hydrological function. The project leverages local workforce for implementation, reinforcing community involvement and utilizing traditional ecological knowledge (TEK) from the Cahto Tribe to restore landscape health.

Mechanized treatments will occur predominantly on slopes less than 40% and averaging 30% throughout the project site. Operations may occur on slopes greater than 40% when traveling between treatment areas. Understory vegetation, brush, and shrubs that are under the drip lines of trees shall be cut and masticated,

leaving root systems intact for resprouting. All debris and material left by masticating equipment will be scattered throughout the treatment area. Manual treatment may include the use of chainsaws and/or other various hand mechanized or hand tools to prune trees and woody vegetation, buck (meaning to cut into smaller sizes and lengths) downed debris and materials, and to remove dead, dying, and diseased trees. Manual treatments may occur on slopes greater than 40% or where access of mechanized equipment is infeasible. Mechanized and hand treatments are planned to occur on 40 acres. As part of a CAL FIRE Forest Health Grant for the project, awarded in 2023, 38 acres of mechanized treatment and 881 acres of hand treatment are expected to occur between 2024 and 2028. The remaining areas of mechanized and hand treatment will occur as funding becomes available throughout the lifespan of this document and subsequent CEQA compliance approval. Additionally, prescribed broadcast burning and pile burning will be used to achieve similar treatment prescriptions, as described above. Broadcast burning will be used irrespective of localized-scale variations in slope and will aim to reimplement appropriate fire return intervals on 337 acres. Pile burning will also be utilized as a means of biomass removal or treatment on 510 acres.

2.1 Treatment Specifications

Fuel reduction treatments will be accomplished according to the following guidelines and specifications: All slash produced (branches, limbs, and treatment debris less than four inches in diameter) will be treated using one of the following methods:

- Chip or masticate adjacent (within 100') to roads, landings, building pads and other accessible portions of the treatment areas. Equipment includes power chippers, whereby material would be hand fed and chips would be blown onto the ground. Mastication involves reducing the size of residual down and dead material by grinding, shredding, or chopping material and leaving it on-site as mulch.
- Pile and burn: Pile and burn operations would occur where vehicle access is available. Piles will be placed on road sides and in appropriate locations throughout the units, utilizing existing openings and compacted ground as feasible. Piles will be created using hand crews.
- Lop and scatter: Lopping is the severing and spreading of slash so that no part of it remains more than 18 inches above the ground. Lop and scatter will be implemented by hand crews on steeper slopes and areas with limited access where chipping, mastication, and burning piles is not feasible.
- Pruning will reduce ladder fuels and improve wood quality. Prune residual trees by lopping low branches up to a minimum height of 8' (above the level of slash on the uphill side of the tree).
- Broadcast Burn: Understory burns would be implemented in accordance with a specific prescription and burn plan that defines the desired maximum flame lengths and fire spread rates based on the fuel types, weather, slopes, aspect, staffing levels, containment lines and strategies set out in a burn plan. Interior portions of prescribed fires may exceed the prescribed flame lengths planned at the control lines, but the overall prescription is designed to safely contain the fire within the planned fire perimeter. Burns could occur from January through December during which conditions would be conducive to burning targeted fuels. Broadcast burning may require the construction of new control lines or enhancement of existing control lines. This may include handlines, mow lines, and/or dozer lines.

Vegetation treatment work adjacent to defined watercourses will include the following Watercourse and Lake Protection Zones:

Water Class Characteristics or Key Indicator Beneficial Use	1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or 2) Fish always or seasonally present onsite, includes habitat to sustain fish migration and spawning.	1) Fish always or seasonally present offsite within 1000 feet downstream and/or 2) Aquatic habitat for non-fish aquatic species. 3) Excludes Class III waters that are tributary to Class I waters.	No aquatic life present, Watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high water flow conditions after completion of Timber Operations.
Water Class	Class I	Class II	Class III
Slope Class (%)	Buffer Zone Width (Feet)	Buffer Zone Width (Feet)	Buffer Zone Width (Feet)
<30	75	50	25
30-50	100	75	50
>50	150	100	75

Table 2: Watercourse and Lake Protection Zones

Plants and trees of cultural significance will not be removed. This includes Pacific yew, sugar pine and big leaf maple.

2.2 Project Justification

The Tenmile Creek watershed has been identified as a high-priority location for forest health treatments due to the local area forest health impairments and potential for restoration activities. Furthermore, due to drought, and past land-use practices, many locations throughout the project area contain forest, shrubland, and grassland ecosystems that are now vulnerable to changing climatic regimes and the subsequent variable forms of disturbance that follow, including uncharacteristic large and high-intensity wildfire, drought, and pest and pathogen infestations. The ecologically restorative treatments proposed for this project build upon the opportunity presented by many of the ownership's Forest Management Plans and federal and state forest improvement projects that have ecosystem-driven forest health goals. Related activities will promote a mosaic of vegetation types, increasing the health and development of large overstory trees and the species that rely on them, and ultimately promoting a landscape equipped to adapt and persist with a changing climate.

In order to reduce wildfire risk and improve overall forest health and resiliency against future disturbance, the Eel River Recovery Project (ERRP) identified, discussed, and prioritized a varied and comprehensive management scheme with the overarching goal of thinning overly dense vegetation, and reimplementing targeted prescribed fire in the project area. The *Tenmile Creek Watershed Forest Health Project* includes a group of private landowners, school district land and the Cahto Tribe Rancheria within a regional landscape of forest, grassland, and shrubland ecosystems that could benefit from restorative treatments.

In addition to providing ecological benefit, these treatments also create opportunities for CAL FIRE and other fire suppression agencies to make informed decisions on when, where, and how to employ firefighting tactics in the event of a wildfire. With preexisting control lines and locations with reduced fuel loads, fire suppression agencies will have an opportunity to minimize ground disturbing activities utilizing tractors and other heavy equipment during suppression operations. Instead, suppression personnel will be afforded the opportunity to utilize minimum impact suppression tactics (MIST), such as back burning or backfiring to reduce fuel loads through targeted application of low intensity fire in advance of the high intensity flaming front. MIST techniques are represented on a spectrum and depend highly on fire activity, fuel conditions, weather, personnel/equipment availability, as well as several other variables. In general, techniques such as hand lines and back burning operations will have less detrimental environmental effects compared to suppression techniques utilizing heavy equipment or fire retardant. Suppression agencies may be better able to implement

MIST techniques in a safe manner when prior forest health/fuel reduction activities have been completed. Furthermore, CAL FIRE will be able to incorporate the control lines or previously treated areas within this project for future fire suppression efforts in a timely and informed manner during a wildfire.

Numerous resource protection measures are outlined in this CalVTP PSA for the Tenmile Creek Forest Health Project. These measures provide opportunities for significant avoidance, minimization, and mitigations, and are thoroughly evaluated in this PSA to understand the full extent of CEQA-compliance. Key measures include: biological and botanical surveys prior to project implementation, nesting bird and bat maternity roost surveys (if operations occur from February 1st to August 31st), no road building, no mechanized operations on slopes greater than 40%, no heavy equipment operations or vegetation treatments in proximity to watercourses, canopy and native vegetation retention requirements, control of invasive exotic species, mitigations to reduce the spread of forest pests and pathogens, the protection of sensitive archaeological and cultural resources, requirements to follow local policies and public noticing, and a pre-operational meeting with contractors to educate and advise them of key natural resource issues.

2.3.1 Treatment Types

Proposed treatment types consist of ecological restoration, wildland urban interface (WUI) fuel reduction, and fuel breaks. Each treatment type is described in more detail below and consistent with the treatment types described in the CalVTP PEIR. Refer to Figure 2-1 for the location of each treatment type.

Fuel Breaks (shaded)

In strategic locations, fuel breaks create zones of vegetation removal, often in a linear layout, that reduce wildfire risk and support fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. They can also provide safe emergency egress during wildfires. Fuel breaks will be shaded, meaning that primarily the understory vegetation will be removed while leaving a relatively intact canopy. Fuel breaks would: thin ladder fuels (i.e., hardwoods and conifers) less than 12 inches DBH; remove most small diameter (i.e., less than 12 inches DBH) trees where larger (i.e., greater than or equal to 12 inches DBH) conifers and oaks exist;

- thin areas where only small diameter trees are present to an average of 24 feet between trees;
- reduce ground fuels to less than 5 tons per acre by prescribed fire, pile burning, chipping, lop and scatter or mastication;
- prune up lower branches of trees up to 8 feet;

Ecological Restoration

Ecological restoration treatments would be designed to reduce wildfire risk, enhance natural processes, and increase forest health. Ecological restoration treatments would occur in several vegetation types: conifer forest, hardwood forest and oak woodland. Species preference (i.e., tree species that would be retained) will vary, but in general will include black oak (*Quercus kelloggii*), incense cedar (*Calocedrus decurrens*), sugar pine (*Pinus lambertiana)*, and large ponderosa pine (Pinus ponderosa) and Douglas fir *(Pseudotsuga menziesii)*. Some excess woody material may be utilized for erosion control in mapped and designated active gullies or headwall swales, or Class III watercourses. A PSA addendum has been provided for this type of ecological restoration treatment.

Wildland-Urban Interface Fuel Reduction

WUI fuel reduction treatments would be designed to reduce wildfire risk, improve forest health, and encourage sustainable species mix. Activities implemented within the WUI fuel reduction treatment type would primarily occur outside of the 100-foot defensible space requirements described in Public Resources Code (PRC) 4291.

Treatments would vary slightly depending on the vegetation type being treated. WUI fuel reduction treatments would:

- thin ladder fuels (i.e., hardwoods and conifers) less than 12 inches DBH;
- remove all small diameter (i.e., less than 12 inches DBH) trees where larger (i.e., greater than 12 inches DBH) conifers and oaks exist;
- thin areas where only small diameter trees are present to an average of 24 feet between trees;
- preferentially remove trees with mistletoe infections, sooty mold, conks or other signs of rot, broken tops, or other damage;
- remove all down logs outside 100 feet but within 300 feet of homes;
- remove all shrubs outside 100 feet but within 300 feet of homes;
- reduce ground fuels to less than 5 tons per acre by prescribed fire, chipping, or mastication;
- prune up lower branches of trees up to 8 feet;

2.3.2 Treatment Activities

Hand thinning, mechanized thinning, prescribed broadcast, and pile burning techniques are all proposed to be utilized for this project. The proposed project also includes 1,908 acres of manual and mechanical vegetation treatments under the CalVTP Fuel Break Treatment Type. The various fuel break treatment types are described below and shown in Figures 2.

2.3.3 Prescribed Fire and Cultural Fire

Prescribed burning, including pile burning and broadcast burning, is proposed for approximately 847 acres of the private land within the Project area. Prescribed fire and cultural fire treatments include applying fire to the landscape to reduce fuel loads, create heterogeneous and diverse vegetated landscape, maintain cultural practices of indigenous communities, and/or promote healthy ecosystem processes, such as water storage and pest control. Distinguished from prescribed fire, cultural fire is the intentional application of fire to the land by an Indigenous person or cultural group (e.g., family unit, Tribe, clan/moiety, or society) to achieve cultural goals or objectives based on Tribal or Traditional Indigenous law (Lake and Long 2014). Cultural burns will take place on the Cahto Tribe Rancheria, but that is covered separately as part of a parallel NEPA process.

Prescribed burning will be strategically implemented under the supervision of a qualified Burn Boss across the most vulnerable stands to diminish surface and ladder fuels while enhancing the resilience of individual stems and the broader ecosystem. This process will be governed by detailed burn plans crafted by the Burn Boss, including a Smoke Management Plan coordinated with the North Coast Unified Air Quality Management District and local CAL FIRE unit permits. Burn units will be delineated by natural landscape features such as roads and watercourses, optimizing control efforts and managing smoke dispersion based on daily conditions. Both broadcast and pile burning techniques will be employed when environmental conditions align with our resource management objectives outlined in the burn plan. These controlled burns aim to decrease surface fuel loading by 25-85% and reduce understory woody vegetative cover by 15-65%, relative to pre-burn levels. The overarching goals of our prescribed burning activities are to lower the risk of high-intensity wildfires, promote the growth of woody shrubs, oaks, and conifers, enhance water yields, and support the restoration of meadows and oak habitats. Additionally, these efforts will focus on the revival of native grasses by curbing invasive, non-native species, and mitigating conifer encroachment into oak woodlands and grasslands (Cocking et al. 2012). Proposed treatments would occur predominantly in tree fuel types with a shrub fuel type component in the understory, as described in the CalVTP Final PEIR Section 2.4.1.

Pile Burning

This project proposes to implement pile burning as described in the PEIR (CalVTP Final PEIR Volume II Section 2.5.2, page 18) on 461 acres. Piling is the placing, laying, heaping or stacking of slash into piles for later burning during appropriate environmental conditions. Pile burning can be used as a means of reducing fuel load, as well as to restore and maintain appropriate fire regimes. The project proposes to utilize pile burning in locations where access to mechanical equipment is infeasible or as an alternative to mechanical removal of biomass.

Prescribed pile burning will be conducted according to precise specifications to ensure environmental compliance and safety. Biomass resulting from manual treatments will be gathered by hand crews and organized into piles for burning in designated areas that typically lack a live overstory and are outside of Watercourse and Lake Protection Zones (WLPZs). To minimize disruption and ensure safety, all piles will be strategically placed within the boundaries of the treatment units, away from roadways, critical control areas, standing snags, large downed logs, private property boundaries, and power lines, maintaining a minimum distance of 15 feet where applicable. Additionally, no piles will be constructed in stream exclusion zones.

To prepare for burning, each pile will be compacted to minimize air spaces, with limbs, stems, and other debris laid tightly together. The piles will be covered with waxed paper tarps provided by the district to protect against moisture and ensure a controlled burn. These tarps will cover at least one-third of the pile's surface area and be anchored securely to prevent displacement by wind. Care will be taken to ensure that the material does not protrude from the pile's general contour, with any excess being trimmed and returned to the pile. The spacing between piles will be maintained at one and a half times the height of the pile to further enhance safety and control during the burning process. Special caution will be exercised near power and phone lines to avoid the risk of interference with utility services.

Broadcast Burning

This project proposes to utilize broadcast burning as described in CalVTP PEIR Section 2.5.2 on 386 acres. Broadcast burning will be utilized to reduce fuels over a large area, irrespective of equipment access, slopes, or other factors prohibiting the use of other methods. The general goals for broadcast burning will be to reimplement appropriate fire regimes, reduce the continuity of dead, downed, and overly dense fuels, raise the canopy of mid and overstory trees to decrease vertical fuel continuity, reduce duff and litter depths, improve habitat for native perennial bunchgrass, and reduce conifer encroachment in oak woodlands.

Understory burns would be implemented in accordance with a specific prescription that defines the desired maximum flame lengths and fire spread rates based on the fuel types, weather, slopes, aspect, staffing levels and containment lines and strategies set out in a burn plan. Interior portions of prescribed fires may exceed the prescribed flame lengths planned at the control lines, but the overall prescription is designed to safely contain the fire within the planned fire perimeter. Burns could occur from January through December during which conditions would be conducive to burning targeted fuels. Broadcast burning may require the construction of new control lines or enhancement of existing control lines, which may include handlines, mow lines, and/or dozer lines.

Broadcast burning will be overseen by a qualified Burn Boss and ignition will be conducted with handheld devices such as drip torches, fusees, and flare guns). Broadcast burning would require between 5 and 50 crew members, depending on size and site characteristics of the burn unit. Typically, each burn would last 1 day to 2 weeks. Equipment could include water trucks, fire engines, water pumps, dozers, all-terrain vehicles (ATVs), utility terrain vehicles (UTVs), hand tools, leaf blowers, weed trimmers, drip torches, and chainsaws. All burning will occur in accordance with regulations regarding the use of prescribed burning. This would include the preparation and implementation of a burn plan that includes a smoke management plan, where applicable. More detailed information on pile and broadcast burning can be found in the Environmental Checklist below.

Figure 6: Pile burning examples, Scott River (Left) Ruth Lake, CA (right)

2.3.4 Forest Fuels Reduction (Thinning)

Forest fuels reduction is proposed for approximately 1,908 acres of the Project area. Forest fuels reduction consists of treating understory trees and brush with the goals of reducing fire hazards, improving tree growth, stabilizing carbon in retained trees, and increasing forest resilience to high intensity wildfire disturbances. Forest thinning activities can be manual or mechanical and must be designed to change stand structure to: 1) concentrate carbon storage in widely-spaced and larger trees that are more resilient to wildfire, drought, and pest outbreaks; 2) reduce the likelihood of wildfire transitioning into the forest canopy; and 3) provide co-benefits such as fish and wildlife habitat, increased biodiversity, increased stream base-flows and wildlife. Conifers that are overtopping deciduous oak trees may be girdled (to create a wildlife snag) instead of removal if removal or felling could damage to residual oak trees. Thinning stands will reduce tree stem density while increasing the quadratic mean diameter (QMD) of the remaining trees.

Fuel Break

This project proposes to include shaded fuel break treatment types in areas where flammable vegetation can be treated or modified to reduce fire spread to structures and natural resources, while providing strategic locations for firefighters to employ fire suppression techniques as defined by the PEIR (CalVTP Final PEIR Volume II Section 2.5.1, pages 11-14). Proposed activities will increase canopy height from the forest floor to the base of tree crowns by pruning branches, reduce the amount of woody debris directly below trees, and remove small trees and brush that could act as ladder fuels, carrying fire into the canopy. Fuel reduction treatments will be accomplished according to following guidelines:

- Saplings and seedlings will be removed adjacent to co-dominant and dominant trees to allow for additional growing space.
- Trees with the most desirable phenotypes will be retained, i.e. full crowns, fast growing, and disease-free.
- Trees preferred for removal will be those exhibiting signs of poor growth or containing disease.
- Dense shrub cover will be broken up for purposes of removing fuel continuity.
- In open areas, residual trees will be left for stocking, with a preference for retaining oak species.
- Residual trees will be pruned by lopping low branches up to a minimum height of 8’ (above the level of slash on the uphill side of the tree).

- All slash produced (branches, limbs, and treatment debris less than four inches in diameter) will be treated using one of the following methods:
  - Chip or masticate adjacent to roads and other accessible portions of the treatment areas. Care should be taken not to pile chipped material against the base of remaining trees. Equipment includes power chippers whereby material would be hand fed and chips would be blown into the forest understory. Mastication involves reducing the size of forest vegetation and downed material by grinding shredding or chopping material and leaving it on-site as mulch.
  - Pile and burn: slash piles for burning should be located away from residual trees and structures. Pile and burn operations would occur where vehicle access is available along existing ranch roads utilizing existing openings and compacted ground as feasible.
  - Lop and scatter: lopping is the severing and spreading of slash so that no part of it remains more than 18 inches above the ground. Hand crews will lop and scatter vegetation on steeper slopes and areas with limited access where chipping, mastication, and burning piles is not feasible.

During the creation of this PSA, CAL FIRE has changed its terminology and no longer recognizes Shaded Fuel Breaks as a treatment type. Therefore, ERRP reclassified Shaded Fuel Break areas into Forest Thinning and Oak Woodland Restoration. The latter is includes removing competing conifer species and other vegetation crowding oak trees and increasing fuel loads, but uses similar methods to Forest Thinning.

2.3.5 Invasive Plant Removal

Invasive plant removal is proposed for the project area where concentrations of invasive plants such as Scotch broom area are observed within coincident mapped forest health treatment areas (thinning, burning, etc.). The areas of invasive plant occurrence within the project area have not been measured. Invasive plant removal will be performed through manual and mechanical means.

Manual Treatment

Manual treatments may utilize chainsaws, loppers, pruners, or other hand-operated equipment to cut, or prune woody species as described in the CalVTP PEIR Section 2.5.2. An integrated pest management approach, using manual hand treatments to remove invasive species such as, but not limited to, Himalayan Blackberry, Scotch Broom, Spanish Broom, French Broom, and other non-native species occurring in the project area. Manual treatments include the use of hand tools and hand-operated power tools to cut, clear, or prune herbaceous or woody species. Manual activities may operate on slopes greater than 50% as needed and will adhere to the following specifications.

Selection of Cut Trees and Treatment of Slash

In existing forest stands, thin dead, dying and diseased conifers and select live conifers <12" DBH will be selected for treatment. Healthy conifers selected for retention that are <12 inches DBH will achieve a 10 - 20 foot spacing from bole to bole and 100-200 trees per acre where feasible. Where stands are composed solely of conifers <12 inches DBH, these stands will be spaced approximately 25 feet apart from bole to bole.. Thinning conifers >12"DBH that are not shipped to a sawmill will be lopped and scattered to a depth of less than 18". Downed logs should have good contact with the soil to facilitate decomposition. Some conifers >16" DBH may be girdled within oak woodlands or adjacent to white oak and black oak trees, if the conifers are in direct competition with oaks or damage to oaks could potentially occur during conifer felling and removal. Some conifers >16" DBH in tanoak-dominated areas may be girdled to improve acorn production and habitat. After treatment, tree stump heights shall be no more than 12 inches high as measured on the uphill side or 4 inches above natural obstacles (i.e. logs, rocks).

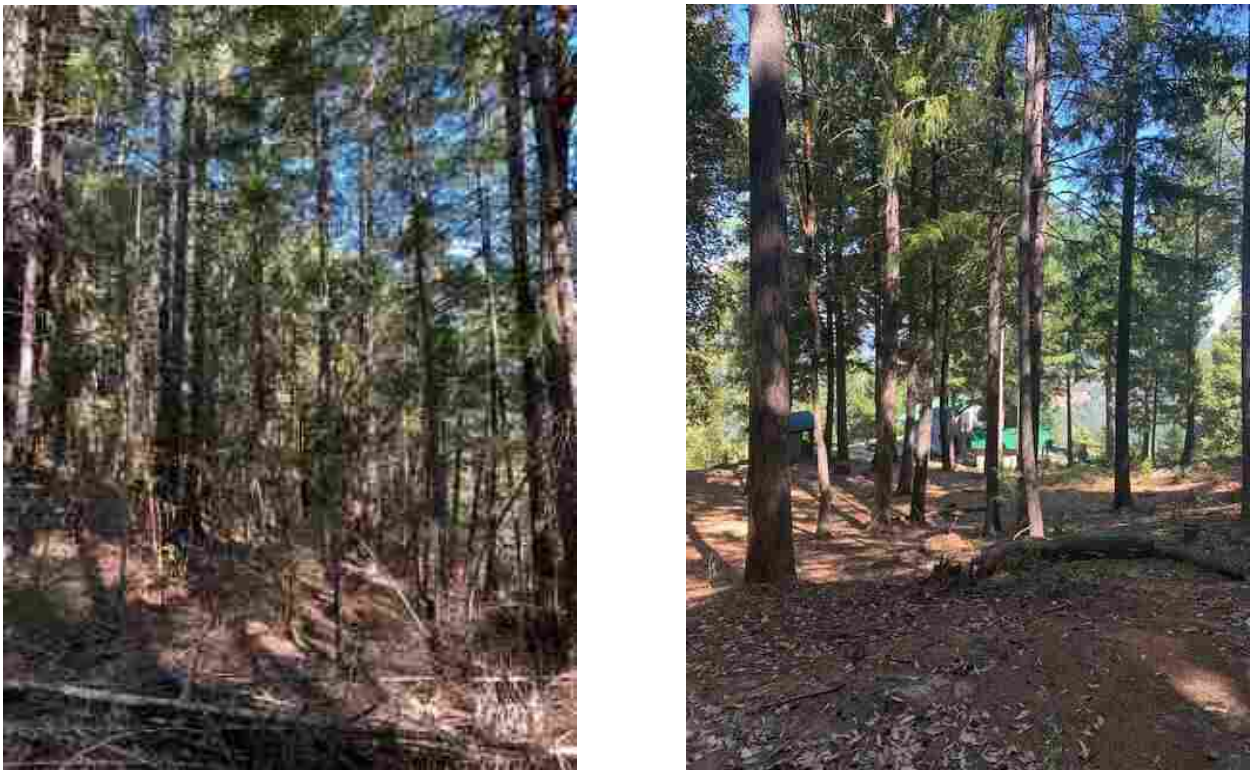

Figure 7: Tenmile Creek. Untreated dense timber stand on the left. Treated (thinned) area on right. proposed for thinning.

Treatment of Brush and Invasives

Approximately 70% of the understory brush will be cut and piled. Islands of brush may be left if they do not contribute to horizontal or vertical fuel continuity in an effort to provide habitat for wildlife. For the purpose of this project, oaks are NOT considered brush. All brush shall be cut within 4 inches of the ground or 4 inches of obstacle (i.e. rocks, down logs). Invasive exotic plants will be removed with hand tools.

Pruning

Remaining trees will be pruned to a height of at least 8 feet but never remove more than 30 percent of the crown. Pruned material will be hand piled or lopped and scattered.

Hand Piling

Material less than 10" diameters will be piled. Piles will be located outside the drip line of desirable trees. No piles will be constructed on slopes greater than 40%. Piles should be located outside the dripline of overstory trees where possible, and at least 20 feet from the edge of the project area. If piles cannot be located outside of drip line, then they must be at least 20 feet from the bole of any leave tree, and pile size may be decreased to prevent damage to residual stand (i.e. scorching). Where openings exist that will accommodate a larger pile, large piles are preferred. Piles size may not decrease to less than 4 feet in diameter. Piles shall be compact with a maximum diameter of 10 feet and maximum height of 6 feet. Piles will be constructed with boles and limbs laid parallel to slope to reduce roll-out and to maintain compactness. No material shall extend from the general perimeter of the pile more than 18 inches. No piles will be created within Watercourse Protection Zones.


Figure 8: Examples of hand crews conducting manual vegetation removal.

Trees, Shrubs and other Plants to Be Left Untreated

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

- Healthy, native hardwoods greater than 16" DBH and all riparian vegetation.
- Downed woody debris in strategic locations to maintain forest floor complexity while reducing fuel connectivity;
- Any activities conducted within a riparian corridor will be conducted to avoid alteration to a bed, channel, or bank of a waterway and all debris, including sawdust, chips, or other vegetative material, will be prevented from entering the bed, channel, or bank of a waterway.
- In forest habitats determined to be occupied by Northern spotted owls through implementation of surveys under SPR BIO-10, treatments would be designed to reduce canopy cover by no more than 20 percent from existing conditions, and a minimum of 60 percent canopy cover would be retained.
- Retain large snags up to two per acre beyond 300 feet from homes (with a preference for the largest snags that exhibit the form and decay characteristics favored by wildlife) unless the snags pose a hazard to implementation or personnel.

Mechanical Treatment

As stated in the CalVTP PEIR Section 2.5.2, mechanical treatments are designed to cut, uproot, crush/compact, or chop target vegetation. Additionally, the PEIR also states that mechanical treatments may be the best tool to restore a healthy forest canopy when a high level of control is required for the situation (CalVTP Final PEIR Volume II Section 2.5.2, page 23).

Mastication

Masticators are typically low-ground pressure tracked vehicles, such as a skid steer with a forward-mounted drum-like attachment with external masticating teeth used to cut and shred woody material and live vegetation. Excavators may also be employed, utilizing a smaller masticating head (drum or rotary), which attaches to the boom. Limited mastication within some treatment units would occur on slopes less than ~50 percent and where previous salvage logging has occurred. Cutting brush and small trees within road prisms cut and fill slopes greater than 35 percent may be accomplished by an excavator masticator (while positioned in the road) in lieu of cutting and chipping. Dead standing vegetation generally less than 12-inch DBH may be masticated to reduce ladder fuel and achieve desired tree spacing. Similarly, mastication may be applied to treat re-sprouting brush, regrowth, and fallen debris to maintain desired conditions. Masticator mechanical work is a treatment type considered within the scope of the PEIR.

Chipping

Roadside mechanical cutting and chipping of existing surface fuels and slash created from tree felling and yarding. Existing surface fuels, thinning and pruning residue, and cut brush would be pulled to forest roads and chipped into small pieces using a chipper. Chipping residue would be distributed back into the treatment unit, utilized for biomass, or utilized as a cover to reduce the risk of invasive plant establishment at landings and roads.

The project is within an area that the Board of Forestry and Fire Protection has declared a Zone of Infestation or Infection for sudden oak death (SOD) pursuant to Public Resources Code § 4716 (Lee 2009). Common SOD host species include Douglas-fir (*Pseudotsuga menziesii*), bay laurel (*Umbellaria californica*), huckleberry (*Vaccinium ovatum*), and big leaf maple (*Acer macrocphylum*), will not be removed from the regulated area unless appropriate state and federal permits are obtained. As described in the PEIR (CalVTP Final PEIR Volume II Section 2.5.2, pages 23-24), biomass will be disposed of utilizing a combination of methods.

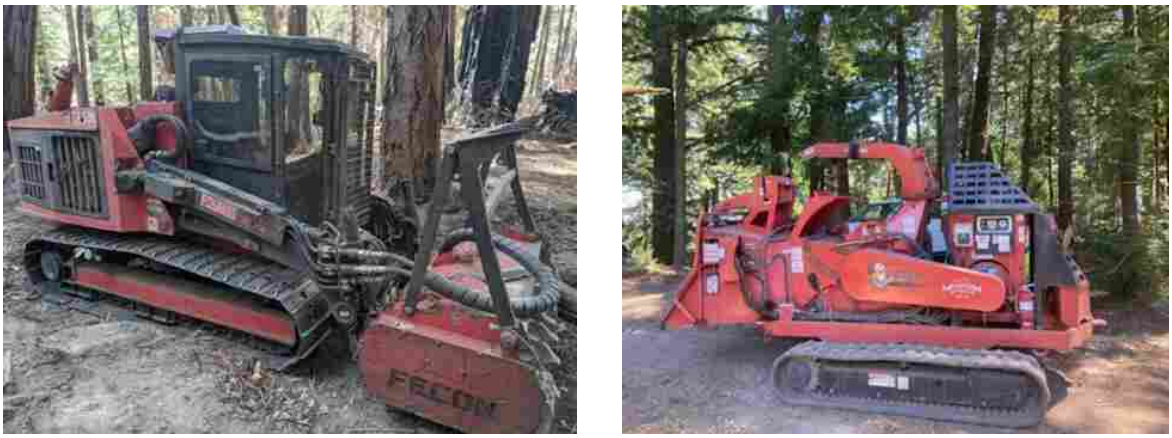

Figure 9: Examples of Mechanized Equipment – Fecon FTX 128 Series compact track loader with masticating head attachment (left). Morbark Beever M15R tracked chipper (right)

Figure 10: Example of Mechanized Equipment – Link-Belt 145 x 4 excavator with masticating head attachment.

Treatment Maintenance

Maintenance, or retreatment, of the areas treated under the proposed project could include the same treatment types (i.e., ecological restoration, WUI fuel reduction, shaded fuel breaks) and treatment activities (i.e., prescribed burning, mechanical treatments, manual treatments) as described above for the initial treatments. Retreatment would be dependent on regrowth conditions and would differ by location. However, retreatment is anticipated to occur between 5 and 10 years. ERRP is helping organize volunteers to assist with prescribed burns in the hope that there will be on-going stewardship with community participation into the future.

Prior to implementing a maintenance treatment, the project proponent will verify that the expected site conditions as described in the PSA/Addendum are present in the treatment area. As time passes, the continued relevance of the PSA/Addendum will be considered by the project proponent in light of potentially changed conditions or circumstances. If environmental conditions evolve or project approaches change to the degree that the project proponent finds new or substantially more severe impacts may occur, the project proponent will determine whether a new PSA/Addendum or other environmental analysis is warranted.

In addition to verifying that the PSA/Addendum 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/Addendum or the latest PSA/Addendum update. For example, the project proponent may conduct a reconnaissance survey to verify conditions are substantially similar to those anticipated in the PSA/Addendum. Updated information should be documented.

3.0 ENVIRONMENTAL CHECKLIST (EC)

VEGETATION TREATMENT PROJECT INFORMATION

1. **Project Title:** Tenmile Creek Watershed Forest Health Project

2. **Project Proponent Name and Address:** Mendocino County Resource Conservation District

   410 Jones Street Ste C-3 Ukiah, CA 95482

3. **Contact Person Information and Phone Number:** Joe Scriven, MCRCD
   joe.scriven@mcrcd.org
   (707) 245-2314
   Pat Higgins Eel River Recovery Project
   phiggin@sonic.net
   (707) 839-4887

4. **Project Location:** The project is located in Tenmile Creek watershed
   Approximately 2 miles west of Laytonville, CA
   Cahto Peak, Laytonville, and Tan Oak Park USGS 7.5" quadrangle including portions of:
   3,10,13,14,15,21,22, T21N R15W- MDMB
   8,9,18.19.21,22,23,33,34 T22N R15W- MDMB
   14,15,21,22, T22N R16W- MDMB
   Latitude (Y): 39.770801 N
   Longitude (X): -123.554373
   Refer to Attachment X, maps X and X

   The project includes portions of the following CALWATER State Planning Watershed: Version 2.21.:

   - Big Rock Creek 1111.330102
   - Woodman Creek 1111.420102
   - Peterson Creek 1111.330202
   - Streeter Creek 1111.33020`
   - Grub Creek 1111.330101
   - Mill Creek 1111.330101
   - Headwaters Tenmile Creek 1111.330103

CDFPWSNAME	CALWNUM	watershed acreage	Phase I Treatment acreage	Phase II Treatment acreage
Big Rock Creek	1111.330102	3618	132	0
Elder Creek	1111.330402	6109	27	0
Grub Creek	1111.330203	5969	151	0
Headwaters Ten Mile Creek	1111.330103	7145	12	574
Mill Creek	1111.330101	8442	60	142
Peterson Creek	1111.330202	2834	340	38
Section Creek	1111.330305	8129	0	62
Steep Gulch	1111.330204	9113	79	32
Streeter Creek	1111.330201	4730	111	146

Table 3: Project area by Cal Watershed Planning Unit Version 2.21

5. Total Area to be Treated (acres): up to 1,908 acres

6. Description of Project:

The *Tenmile Creek Watershed Forest Health CalVTP Project* covers 1,908 acres of non-industrial private land with the goal of enhancing forest health and ecological stability. Objectives include reducing fuel loads, restoring oak woodlands, enhancing soil moisture and fertility, restoring native grasses and hydrologic functions, and creating employment opportunities to boost local socio-economic benefits.
Key management actions include thinning overstocked forest areas, creating shaded fuel breaks, and applying pile and prescribed burns to reduce surface and ladder fuels, while enhancing ecosystem resilience and carbon storage. These efforts are designed to protect rural communities, promote biodiversity, and improve water yields.

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

☒
Wildland-Urban Interface Fuel Reduction

☒ Fuel Break

☒ Ecological Restoration

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

☒ Prescribed Burning (Broadcast), ___386___ acres

☒ Prescribed Burning (Pile Burning) ___461___acres

☒ Mechanical Treatment, __38___ acres

☒ Manual Treatment, __1,908__ acres

☐ Prescribed Herbivory, _____ acres

☐ Herbicide Application, _____ acres

a. Treatment Maintenance

Treatment Types *[see description in CalVTP PEIR Section 2.5.1, check every applicable category; provide detail in description of 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 areas. Over time, the continued relevance of the PSA will be considered by the project proponent in consideration of potentially changed conditions or circumstances. Where the project proponent determines the PSA is no longer sufficiently relevant to the on the ground conditions, the project proponent or sponsor will determine whether a new PSA or other environmental analysis is warranted.

Geographic Scope

☐ The treatment area is entirely within the CalVTP treatable landscape

☒ The treatment area is NOT entirely within the CalVTP treatable landscape

The CalVTP Treatable Landscape boundary was digitally developed at a large scale, which did not allow for high resolution mapping. As a result, areas were dis-included from the treatable landscape, even though the vegetation is very similar to the surrounding vegetation within the treatable landscapes. The scattered acres outside of the CalVTP treatable landscape is due to the method by which the CalVTP treatable landscape was digitally developed and the resultant degree of mapping resolution. For this project, the surrounding areas that appear to be excluded from the treatable landscape due to the method by which they were grouped and excluded from the treatable landscape essentially have the same habitat types as those within the treatable landscapes. It is a logical conclusion that the environmental analysis in the PEIR areas need treatment, as they provide fuel ignition and transfer fire to the "treatable landscapes." Additionally, the entire project area is within the SRA and the vegetation is not a wet meadow, estuary, or other non-fire prone area excluded from the treatable landscape. Therefore, the environmental analysis in the PEIR is applicable to the entire project area due to the similarities of the areas within and outside of the treatable landscape.

Use of the PSA for Treatment Maintenance

Maintenance or retreatment of areas treated under the proposed project may involve the same methods and activities used in the initial treatments, including WUI fuel reduction, shaded fuel breaks, prescribed burning, mechanical treatments and manual treatments. Retreatment intervals, ranging from 5 to 10 years, will depend on regrowth conditions and vary by location. Before implementing maintenance treatments, the project proponent will confirm that the expected site conditions, as detailed in the PSA/Addendum, are present. As conditions change over time, the relevance of the PSA/Addendum will be reassessed. If environmental conditions or project approaches change significantly, potentially resulting in new or more severe impacts, the project proponent will evaluate the need for a new PSA/Addendum or additional environmental analysis.

7. Regional Setting and Surrounding Land Uses: (Briefly describe the project's surroundings)

Physical

The *Tenmile Creek Watershed Forest Health Project* is located in unincorporated Mendocino County near Laytonville, CA. Within the project site are a variety of private rangeland, remote residential, agricultural, and forest lands.

Vegetation

Forested portions of the project consist of Montane Hardwood Conifer, Douglas-Fir, and Montane Riparian CWHR habitat types. Tree species present within the project include tanoak, Douglas-fir (*Pseudotsuga menziesii*), Pacific madrone (*Arbutus menziesii*), California bay laurel (*Umbellularia californica*), canyon live oak (*Quercus chrysolepis*), ponderosa pine (*pinus ponderosa*), California black oak (*Quercus kelloggii)*, Oregon white oak (*Quercus garryana*), bigleaf maple (*Acer macrophyllum*), white alder (*Alnus rhombifolia*), and Oregon ash (*Fraxinus latifolia*). Species present within the shrub and herbaceous layer include poison oak (*Toxicodendron diversilobum*), evergreen huckleberry (*Vaccinium ovatum*), blue blossom (*Ceanothus thyrsiflorus*), whitethorne

(*Ceanothus incanus*), red-flowering currant (*Ribes sanguineum*), sword fern (*Polystichum munitum*), and California blackberry (*Rubus ursinus*). Forested areas are generally dominated by dense stands of tanoak and Douglas-fir, with intermittent Pacific madrone.

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

A qualified Burn Boss will prepare a smoke management plan will for the Mendocino County Air Quality Management District. The Burn Boss will also obtain permits from the California Department of Forestry and Fire Protection regional office.

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

Consistent with SPR CUL-2, Roscoe and Associates Cultural Resources Consultants (RA) obtained an updated Native American contact list from the Native American Heritage Commission (NAHC) on January 24, 2024. On February 05, 2024, letters inviting consultation regarding the proposed project were emailed or sent via the United States Postal Service to the 19 tribal representatives indicated by NAHC. Responses were received from the Sherwood Valley Tribe and the Cahto Tribe. On February 05, 2024, Tribal Historic Preservation Officer (THPO) Valarie Stanley for the Sherwood Valley Tribe sent an email stating that the Tribe would not be formally responding as the project is not within their traditional territory. THPO Stanly also stated that the Cahto Tribe contact is more relevant to the project. Representatives of the Cahto Tribe are working closely with BBW Associates, ERRP and RA. James Roscoe of RA met with the Cahto Tribal Council on November 17, 2023, to discuss the proposed project, and cultural resource investigation strategies. Vernon Wilson, Tribal Monitor for the Cahto Tribe agreed to participate in the cultural study and guide the field survey. ERRP has an excellent cooperative working relationship with the Cahto Tribe as evidenced by their participation in the project and they will guide ERRP and its contractors, should cultural artifacts be encountered during forest health activities.

DETERMINATION

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 within the CalVTP treatable landscape is, therefore, WITHIN THE SCOPE of the CalVTP PEIR. For the proposed project areas outside of the CalVTP treatable landscape, no new circumstances have occurred, nor has any new information been identified requiring new analysis or verification. Project changes would not result in any new or substantially more severe significant impacts. NO ADDITIONAL CEQA DOCUMENTATION beyond this PSA and Addendum to the PEIR 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_____ Date _____ 2024

Printed Name_____ Title_____

Mendocino County Resource Conservation District
Agency

4.0 PROJECT-SPECIFIC ANALYSIS/ADDENDUM

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for each Impact, Standard Project Requirement (SPR) and Mitigation Measure (MM) identified in the Project-Specific Analysis Checklist (PSA Checklist). The information provides clarity for review and/or provides direction to the field staff that will implement the project utilizing the checklist (persons familiar with the project and preparation of the document may be different through the lifespan of the document). Answers should consider whether the proposed project would result in new or more substantial environmental effects than described in the CalVTP PEIR, after incorporation of applicable SPRs and MM required by the CalVTP PEIR.
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and short-term as well as long-term impacts. Refer to the applicable resource analysis section in the CalVTP PEIR for each environmental topic found at the following website: https://bof.fire.ca.gov/projects-and-programs/calvtp/calvtp-programmatic-eir/.
3. Once the project proponent has evaluated the environmental effect that may occur, then the checklist answers must indicate whether the impact is:

(Definitions located in Chapter 3 – "Environmental Settings, Impacts, and Mitigation Measures, 3.1.4 – Terminology Used In the PEIR")

- Less Than Significant (LTS) - An impact either on its own or with incorporation of SPRs, does not exceed the defined thresholds of significance (no mitigation required), or that is potentially significant and can be reduced to less than significant through implementation of feasible mitigation measures.
- Less Than Significant *with* Mitigation (LTSM) - An impact was identified within the PEIR which was viewed in totality as potentially significant and/or significantly unavoidable and the mitigation measures and SPRs and MMs provided in the PEIR will be implemented mitigating to a point of less than significance.
- Potential Significant (PS) - An impact treated as if it were a significant impact. "Potentially" is used to convey that not every qualifying treatment will result in impacts to the reasonably maximum degree that they are disclosed in this PEIR.
- Potentially Significant and unavoidable (PSU) - An impact is considered significant and unavoidable if it would result in a substantial adverse change in the environment that cannot be feasibly avoided or mitigated to a less-than-significant level. "Potentially" is used to convey that not every qualifying treatment will result in impacts to the reasonably maximum degree that they are disclosed in this PEIR
- Significantly Unavoidable (SU) - An impact is considered significant and unavoidable if it would result in a substantial adverse change in the environment that cannot be feasibly avoided or mitigated to a less-than-significant level.
- Not applicable (N/A)

If the impact is equal to or less than the impact identified in the PEIR, the PEIR can be utilized without a Negative Declaration, Mitigated Negative Declaration or EIR. If there are one or more entries where the impact is evaluated to be greater than the impact in the PEIR, additional documentation is required.

4. Where a Negative Declaration, Mitigated Negative Declaration is required, the environmental review would be guided by the directions for use of the PEIR with later activities in Section 15168. Where an EIR is required, the environmental review would be guided by Sections 15162 and 15163. When preparing any environmental document, the environmental analysis may incorporate by reference the analysis from the CalVTP PEIR and focus the environmental analysis solely on issues that were not addressed in the CalVTP PEIR.
5. Project proponents should incorporate into the PSA checklist references to information sources for potential impacts. Include a list of references cited in the PSA and make copies of such references available to the public upon request.
6. Standard Project Requirements (SPR) and Mitigations Measures (MM).
    - Applicable (Yes/No). Document whether the SPR or mitigation measure is applicable to the project (Yes or No). The applicability should be substantiated in the Environmental Checklist Discussion.
    - Implementing Entity. The implementing entity is the individual or organization responsible for carrying out the requirement. This could include the project proponent's project manager, a technical specialist (e.g., archeologist or biologist), a vegetation management contractor, a partner agency or organization, or other entities that are primarily responsible for carrying out each project requirement.
    - Verifying/Monitoring Entity. The verifying/monitoring entity is the individual or organization responsible for ensuring that the requirement is implemented. The verifying/monitoring entity may be different from the implementing entity.

NOTE: the cited SPRs and MMs are summarized to manage the template's size. Refer to the approved CalVTP language in attached *Maintenance and Monitoring Plan* (Appendix A) for the full list of requirements.

4.1 EC-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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities	LTS	Impact AES-1, pp. 3.2-16 – 3.2-19	Yes	AD-3 AD-4 AES-1 AES-2 AES-3 AQ-2 AQ-3	NA	LTS	No	Yes
Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	LTS	Impact AES-2, pp. 3.2-20 – 3.2-25	Yes	AD-3 AD-4 AES-1 AES-3	NA	LTS	No	Yes
Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Non-Shaded Fuel Break Treatment Type	SU	Impact AES-3, pp. 3.2-25 – 3.2-27	Yes	AD-3 AES-1 AES-3	NA	LTS	No	Yes

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

New Aesthetic and Visual Resource Impacts: Would the treatment result in other impacts to aesthetics and visual resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

Impact AES-1

Initial and maintenance treatments would include manual, mechanical, and prescribed burning treatments. The potential for these treatments to result in short-term, substantial degradation of scenic vista or visual character of the landscape is examined in the PEIR (CalVTP PEIR Volume II Section 3.2.3, p. 16-19).

The treatment activities and potential impacts for this project are within the scope of the PEIR because they are consistent with the activities and impacts addressed in the PEIR. SPRs AD-3 and 4, AES-1 through 3, and AQ-2 and 3 are all applicable to this project. The project area is located on private property within the Tenmile Creek Watershed near Laytonville, California in Mendocino County. Several treatment sites are located near US 101 and are within the viewshed of US 101, which is not a designated state scenic highway (California Department of Transportation, 2022). Mendocino County does not have designated scenic vistas (County of Mendocino, 2009). Smoke from prescribed burns would not result in substantial short-term aesthetic impacts, because burning would be temporary, and the requirement to prepare and adhere to a smoke management plan (SMP) (SPR AQ-2) and a Burn Plan (SPR AQ-3) which prescribe the conditions under which prescribed burning can occur to reduce the generation and visibility of smoke. By adhering to local plans, the proposed project will promote regrowth with native vegetation and will be similar in appearance to nearby meadow and forested areas. Therefore, the potential for the project to result in short-term substantial degradation of a scenic vista, visual character, or damage to scenic resources would be less than significant.

The inclusion of land in the proposed treatment area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing scenic resources are essentially the same within and outside of the treatable landscape; therefore, the short-term aesthetic impact is also less than significant. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AES-2

Initial and maintenance treatments would include manual, mechanical, and prescribed burning treatments for ecological restoration and fuel break treatment types. The potential for these treatments to result in long-term degradation of the visual character of the landscape was examined in PEIR (CalVTP PEIR Volume II Section 3.2.3, pages 20-22). The project area spans the Tenmile Creek Watershed within Mendocino County. SPR AES-1 through 3 and AD-4 are all applicable to this project.

As analyzed in Impact AES-1, the aesthetic impacts will be temporary and short-term because native plants will regenerate shortly after the treatments are implemented and will resemble conditions on surrounding hillsides. No forest land will be converted to other use and the aesthetic value will not be degraded. Because ecological restoration would be designed to improve habitat quality and create a landscape appearance closer to native conditions, it would result in long-term beneficial visual impacts. Based on the implementation of the applicable SPR's and the nature of the treatment types, the potential for this project to result in long-term substantial degradation of the visual character of the project area or damage to scenic resources would be less than significant.

The inclusion of land in the proposed treatment area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing scenic resources are essentially the same within and outside of the treatable landscape; therefore, the long-term aesthetic impact is also temporary and less than significant. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AES-3

This impact does not apply to the proposed project because non-shaded fuel breaks are not proposed. Only shaded-fuel breaks are proposed for this project. The potential for non-shaded fuel break treatments to result in long-term, substantial degradation of scenic resources or the visual character of the landscape was assessed in the PEIR (CalVTP Final PEIR Volume II Section 3.2.3, pages 25-27).

New Aesthetic and Visual Resource Impacts

The proposed treatment within the treatable landscape is consistent with the treatment types and activities analyzed in the CalVTP PEIR. The project proponent has evaluated and considered the site-specific characteristics to determine that the project treatments are consistent with the CalVTP PEIR's environmental and regulatory settings (CalVTP Final PEIR Volume II Sections 3.2.1 and 3.2.2). No changed circumstances would lead to new significant impacts not addressed in the CalVTP PEIR. Therefore, no new impact related to aesthetics and visual resources would occur that is not covered in the PEIR.

The inclusion of land in the proposed treatment area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those considered in the PEIR. No new impact related to aesthetics and visual resources would occur that is not covered in the PEIR.

4.2 EC-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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AG-1: Directly Result in the Loss of Forest Land or Conversion of Forest Land to a Non-Forest Use or Involve Other Changes in the Existing Environment Which, Due to Their Location or Nature, Could Result in Conversion of Forest Land to Non-Forest Use	LTS	Impact AG-1, pp. 3.3-7 – 3.3-8	Yes	NA	NA	LTS	No	Yes

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

New Agriculture and Forestry Resource Impacts: Would the treatment result in other impacts to agriculture and forestry resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

Impact AG-1

Initial and maintenance treatments would include manual, mechanical, and prescribed burning treatments for ecological restoration and fuel break treatment types. The potential for the proposed treatments to result in a loss of forested land was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.3.3 page 7-8).

The project's proposed vegetation removal would be primarily on private lands, many of which have historically been used for timber production and undergone a resulting change in vegetation. As described in the project description, the project does not propose to remove trees for commercial purposes, and generally will target the removal of understory trees, <16 inches DBH. Thinning and the removal of small-diameter conifers and tanoak would occur. In the longer term, marketable trees would experience better growth conditions than at present due to the proposed thinning. Other than some expansion of the meadows due to removal of young, smaller trees that have encroached on former meadows, no timber lands would be converted in the long term. Stand-replacing fires could adversely impact agricultural and forestry management by converting stands, displacing people and disrupting harvest schedules. Although treatment activities would alter forest land through vegetation removal, the treatment activities proposed for this project would not reduce forest land, as defined in CA PRC Section 12220(g), to less than 10% native tree cover of any species. The implementation of

the plan may enhance agricultural and forestry resources by reducing the potential for more disruptive stand-replacing fires originating at these private parcels or passing through them. Based on the treatment activities and beneficial results of the proposed project, no forestland, timberland, or farmland will be converted, thus any impact would be less than significant.

The inclusion of land in the proposed treatment area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing agricultural resources are essentially the same within and outside of the treatable landscape; therefore, the potential for the treatments to directly result in loss of forest land or conversion of forest land to non-forest use is less than significant, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Agriculture and Forestry Resource Impacts

The proposed project treatment is consistent with the treatment and activities that are considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed project and determined that they are consistent with the environmental and regulatory settings stated in the CalVTP PEIR (CalVTP Final PEIR, Volume II, 3.3.1 and 3.3.2). There have been no changed circumstances that would lead to new significant impacts not addressed in the PEIR.

The inclusion of land in the proposed treatment area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those considered in the PEIR.

No new impact related to agriculture and forestry resources would occur that is not covered in the PEIR.

4.3 EC-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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	PSU	Table 3.4-1; Impact AQ-1, pp. 3.4-26 – 3.4-32; Appendix AQ-1	Yes	AQ-1 AQ-2 AQ-3	AQ-1	PSU	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	AQ-1 HAZ-1 NOI-4 NOI-5	NA	LTS	No	Yes
Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	LTS	Section 3.4.2; Impact AQ-3, pp. 3.4-34 – 3.4-35	Yes	AQ-4 AQ-5	NA	LTS	No	Yes
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	PSU	Section 3.4.2; Impact AQ-4, pp. 3.4-35 – 3.4-37	Yes	AQ-2 AQ-3 AQ-6 AD-4	NA	PSU	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	AQ-1 HAZ-1 NOI-4 NOI-5	NA	LTS	No	Yes
Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	PSU	Section 2.5.2; Impact AQ-6; pp. 3.4-38	Yes	AQ-1 AQ-2 AQ-3 AQ-6 AD-3 AD-4	NA	SU	No	Yes

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

New Air Quality Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

Impact AQ-1

The proposed treatment types include mechanical, manual, and prescribed burning application. The use of vehicles, mechanical equipment, and prescribed burning during treatments would result in emissions of criteria pollutants that could exceed California ambient air quality standards (CAAQS), the national ambient air quality standards (NAAQS), or Mendocino County Air Quality Management District (MCAQMD) rules and regulations. Most notable air pollutants for vehicle and fossil fuel-powered equipment usage are ozone precursors – reactive organic gasses (ROG) and nitrogen oxides (NOx), particulate matter in two regulated size categories (PM10 and PM2.5), carbon monoxide (CO) and sulfur dioxide (SO_2 (California Emissions Estimator Model, 2022)). Smoke from the combustion of vegetation during the project's prescribed burn phases also contains substantial amounts of criteria air pollutants, especially ozone precursors and particulates. The potential for emissions of criteria pollutants to exceed CAAQS or NAAQS thresholds was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, pages 26-33). The proposed treatments, treatment equipment, and equipment use duration are consistent with the scope of the PEIR.

SPRs AQ-1 through 3 are all applicable to this project. As described in the PEIR, due to multiple variables quantifying the reduction of emissions, the impact would remain potentially significant and unavoidable. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Mitigation Measure AQ-1 would reduce the mass emissions of criteria air pollutants and precursors generated by use of on-road vehicles and off-road equipment during treatment activities.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions present and air basin in the areas outside the treatable landscape area essentially the same as those within the treatable landscape; therefore, the air quality impact remains potentially significant and unavoidable, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AQ-2

Use of vehicle and mechanical equipment during initial and maintenance treatments has the potential to expose people to diesel particulate matter emissions. The potential to expose people to diesel particulate matter emissions was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, page 33-34). Diesel particulate matter emissions from the proposed treatments are within the scope of the PEIR because the exposure potential is the same as analyzed in the PEIR, and the types and amount of equipment that would be used, as well as the duration of use, during proposed treatments are consistent with those analyzed in the PEIR. The project area spans the Tenmile Creek Watershed near Laytonville, California. SPRs AQ-1, HAZ-1, NOI-4, and NOI-5 are all applicable to this project.

Diesel particulate matter generated by treatment activities would not take place near any single sensitive receptor for an extended period. In addition, diesel particulate matter dissipates rapidly from the source, and exposure concentrations would decline with distance from these activities. In accordance with SPR HAZ-1, all

diesel and gasoline-powered equipment will be properly maintained to comply with all state and federal emissions requirements, which would prevent excessive emissions of diesel particulate matter due to poorly functioning equipment. Also, SPR NOI-4 will keep vegetation treatment activities and staging areas located as far as possible from human receptors and SPR NOI-5 restricts equipment idling time. Diesel exhaust emissions would be temporary, would not be generated at any one location for an extended period, and would dissipate rapidly from the source with an increase in distance. Implementation of these SPRs reduce the impact to less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions and sensitive receptors (i.e., exposure potential) present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also less than significant, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact AQ-3

Use of vehicles, mechanical equipment, and prescribed burning during treatments would involve ground disturbing activities. The potential to expose people to naturally occurring asbestos (NOA)-containing fugitive dust emissions was examined in the Program EIR (CalVTP Final PEIR Volume II Section 3.4.3, page 34-35). Portions of the project are located in soil types where Naturally Occurring Asbestos (NOA) has the potential to be present according to MCAQMD NOA mapping (Mendocino County Air Quality Management District, 2024). Potential NOA exposure from the proposed treatments is within the scope of the activities and impacts addressed in the Program EIR because the exposure potential is essentially the same within and outside the treatable landscape and avoidance of treatments in NOA-containing areas is consistent with the impacts analyzed in the Program EIR. SPRs AQ-4 and 5 are applicable to this project.

SPR AQ-4 would minimize dust including NOA-containing fugitive dust. In accordance with SPR AQ-5, no treatments would occur in these areas unless an Asbestos Dust Control Plan (17 CCR Section 93105) is prepared and approved by MCAQMD. This determination is consistent with the Program EIR and would not constitute a substantially more severe significant impact than what was covered in the Program EIR

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the Program EIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also the same, as described above.

Impact AQ-4

Prescribed burning in the form of pile and/or broadcast burning during initial and maintenance treatments has the potential to expose people to toxic air contaminants, which was examined in the PEIR. The duration and parameters of prescribed burning are within the scope of activities analyzed in the PEIR and will be consistent with parameters imposed by the Bay Area Air Quality Management District, Mendocino County Air Quality Management District Interim CEQA Criteria and GHG Pollutant Thresholds, and for those impacts analyzed in the PEIR for Mendocino County. Therefore, the potential for exposure to toxic air contaminants is also within the scope of the PEIR. SPRs AQ-2, AQ-3, AQ-6, and AD-4 are all applicable to this project.

The project proponent would apply AD-4, which directs for public notifications before prescribed burning. AQ-2 requires submitting a smoke management plan to MCAQMD. An approved smoke management plan limits prescribed burning to permissible burn days. All feasible measures to prevent and minimize smoke emissions as

well as exposure to smoke are included in SPRs. No additional mitigation measures are feasible, and this impact would remain potentially significant and unavoidable, as explained in the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions present and air basin in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also significant and unavoidable, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR

Impact AQ-5

The use of vehicles and mechanical equipment during initial and maintenance treatments has the potential to expose people to odors from diesel exhaust. The potential to expose human receptors to diesel exhaust was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.4.3, page 37-38). The potential impacts associated with the release of objectionable odors from diesel exhaust during maintenance treatments is within the scope of the PEIR because treatment activities are consistent with those analyzed in the PEIR. SPRs AQ-1, HAZ-1, NOI-4 and NOI-5 are all applicable to this project.

Most of the local residential and other odor-sensitive receptors are located in and near the city of Laytonville with most of the treatment areas more than a mile away. The project removal/restoration work would not occur over the entire project area for the entire project period, but sequentially on the many project parcels one or two at a time. Thus, the source of project odor from diesel-powered equipment exhaust would not be in any one place for an extended time and on average the source would be located relatively distant from Laytonville's odor-sensitive areas.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions, and sensitive receptors present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also less than significant, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was analyzed in the PEIR.

Impact AQ-6

Prescribed burning in the form of pile and broadcast burning during initial and maintenance treatments has the potential to expose people to objectionable odors, as described in the PEIR (CalVTP Final PEIR Volume II 3.4.3, page 38-39). The duration and parameters of the prescribed burn operations and the exposure potential are consistent with the activities analyzed in the PEIR. For this reason, the potential for exposure to objectionable odors from smoke is also within the scope of impacts covered in the PEIR. SPRs: AQ-1, AQ-2, AQ-3, AQ-6, and AD-4 are all applicable to this project.

Prescribed burn treatments could expose people to objectionable odors. Prescribed burning would be conducted in accordance with local air district regulations and the Smoke Management Plan as required in SPR AQ-1 and AQ-2. Treatments are located in less populated areas. Additionally, exposure to smoke would be short duration and occur infrequently. The duration and parameters of the prescribed burn treatments are within the scope of the activities addressed in the PEIR therefore, the resultant potential for exposure to objectionable odors from smoke is also within the scope of impacts covered in the PEIR. All feasible measures to prevent and minimize smoke odors as well as exposure to smoke odors are included in SPRs.

The inclusion of land in the proposed treatment area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the air quality conditions and sensitive receptors in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the air quality impact is also potentially

significant and unavoidable, as described above. This determination is consistent with the PEIR and would not constitute a substantially more sever significant impact than what was analyzed in the PEIR

New Air Quality Impacts

The proposed treatments are consistent with the treatment types and activities covered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (CalVTP Final PEIR Volume II Sections 3.4.1 and 3.4.2). No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impact. Therefore, no new impact related to air quality would occur.

The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to air quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same. The impacts associated with the proposed treatment project are consistent with those covered in the PEIR. There are no changed circumstances present that would lead to new significant impacts not addressed in the CalVTP PEIR. Therefore, no new impact related to air quality would occur.

4.4 EC-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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources	LTS	Impact CUL-1, pp. 3.5-14 – 3.5-15	Yes	CUL-1 CUL-7 CUL-8	NA	LTS	No	Yes
Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources	SU	Impact CUL-2, pp. 3.5-15 – 3.5-16	Yes	CUL-1 CUL-2 CUL-3 CUL-4 CUL-5 CUL-8	CUL-2	SU	No	Yes
Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	LTS	Impact CUL-3, p. 3.5-17	Yes	CUL-1 CUL-2 CUL-3 CUL-4 CUL-5 CUL-6 CUL-8	NA	LTS	No	Yes
Impact CUL-4: Disturb Human Remains	LTS	Impact CUL-4, p. 3.5-18	No	NA	NA	NA	No	Yes

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

New Archaeological, Historical, and Tribal Cultural Resource Impacts: Would the treatment result in other impacts to archaeological, historical, and tribal cultural resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

Roscoe and Associates Cultural Resources Consultants (RA) is currently working to complete a cultural resources investigation for the non-federal private lands portion of the project area (1,908 acres). This portion of the project is split into two categories, Phase 1 implementation parcels and Phase 2 planning parcels. As part of the cultural resources investigation and consistent with SPR CUL-1, RA conducted a records search of the Phase 1 implementation parcels and Phase 2 planning parcels at the Northwest Information Center (NWIC) in Rohnert Park California, on December 14, 2023 (NWIC File No. 22-0822) and January 18, 2024 (NWIC File No. 23-0956). The record search however did not include a portion of the Cahto Creek Ranch Phase 2 planning parcels, as the areas to the west, east and south of the Varnhagen parcel (APN 014-411-009) were added to the Cahto Creek Ranch portion of the planning project after January 2024. Prior to the implementation of the project within the Cahto Creek Ranch, an addendum record search will be performed at the NWIC. The NWIC records search revealed four previously recorded archaeological sites and historic-era features within the Phase 1 parcels and

two archaeological sites within the Phase 2 planning parcels. Sites identified within the Phase 1 parcels include one built-environment historic-era feature, one Native American archaeological site, one Native American isolated artifact and one multi-component archaeological site. The built-environment historic-era feature is a rock wall. Two Native American archaeological sites have been previously identified within the Phase 2 planning parcels. None of these resources have been evaluated for eligibility listing in the California Register of Historical Resources (CRHR). One is an isolated artifact which are generally not eligible for listing in the CRHR. Isolated artifacts are defined as one or two artifacts occurring by themselves and not associated with an archaeological site, and therefore have no historical context in which to evaluate against significance criteria.

Consistent with SPR CUL-2, RA obtained an updated Native American contact list from the Native American Heritage Commission (NAHC) on January 24, 2024. On February 05, 2024, letters inviting consultation regarding the proposed project were emailed or sent via the United States Postal Service to the 19 tribal representatives indicated by NAHC. Responses were received from the Sherwood Valley Tribe and the Cahto Tribe. On February 05, 2024, Valarie Stanley THPO for the Sherwood Valley Tribe sent an email stating that the Tribe would not be formally responding as the project is not within their traditional territory. THPO Stanly also stated that the Cahto Tribe contact is more relevant to the project. Representatives of the Cahto Tribe are working closely with BBW associates and RA. James Roscoe met with the Cahto Tribal Council on November 17, 2023, to discuss the proposed project, and cultural resource investigation strategies. Verne Wilson, Tribal Monitor for the Cahto Tribe agreed to participate in the cultural study and guide the field survey.

Impact CUL-1

Proposed treatment activities include mechanical treatments and prescribed burning, which could damage historical resources. The NWIC records search revealed one historic-era feature, a rock wall, is documented within the West Ten Mile project location (APN 013-570-059). This structure has not been evaluated for CRHR eligibility. Structures (i.e., buildings, bridges, roadways) over 50 years old that have not been recorded or evaluated for historical significance may be present in the project area; these structures will be identified and avoided pursuant to SPR CUL- 7. The potential for these treatment activities to result in disturbance, damage, or destruction of built-environment structures that have not yet been evaluated for historical significance was examined in the PEIR. This impact is within the scope of the PEIR, because treatment activities and the intensity of ground disturbance of the treatment project are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the potential to encounter built-environment structures that have not yet been evaluated for historical significance in areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to historical resources is also the same, as described above. SPRs applicable to this impact are CUL-1, CUL-7, and CUL-8. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact CUL-2

Vegetation treatment would include mechanical work using heavy equipment that could churn up the surface of the ground as vegetation is removed; this may result in damage to known or previously unknown archaeological resources. The NWIC records search revealed two archaeological sites and one isolated artifact within the Phase 1 parcels and two archaeological sites within the Phase 2 planning parcels. None of these resources, however, have been evaluated for eligibility for listing in the CRHR. Therefore, it is not known whether these sites are considered resources under CEQA. A survey will be conducted before treatment pursuant to SPR CUL-4 to identify any previously unrecorded archeological resources and identified resources will be avoided according to the provisions of SPR CUL-5. The potential for these treatment activities to result in inadvertent discovery and subsequent damage of unique archaeological resources or subsurface historical resources during vegetation treatment was examined in the PEIR. This impact was identified as significant and unavoidable in the PEIR because of the large geographic extent of the treatable landscape and the possibility that there could be

some rare instances where inadvertent damage of unknown resources may be extensive. For the Tenmile Creek Watershed Forest Health Project (CALFIRE #8GG22660), SPRs and Mitigation Measure CUL-2 would require identification and protection of resources, and it is reasonably expected that implementation of these measures would avoid a substantial adverse change in the significance of any unique archaeological resources or subsurface historical resources. However, given the large geographic extent of the project area and uncertainty regarding the potential extent of damage during inadvertent excavation of an unknown resource, if it occurred, this impact would remain significant and unavoidable, as explained in the PEIR. This impact is within the scope of the PEIR, because treatment activities and intensity of ground disturbance of the treatment project are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the potential for discovery of archaeological resources is essentially the same within and outside the treatable landscape; therefore, the potential impact to unique archaeological resources or subsurface historical resources is also the same, as described above. SPRs applicable to this impact are CUL-1 through CUL-5 and CUL-8. Mitigation Measure CUL-2 would also apply to this treatment to protect any inadvertent discovery. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact CUL-3

RA contacted the Native American Heritage Commission (NAHC), in a letter on January 15, 2024, to request the results of a Sacred Lands File records (SLF) search and a list of Native American tribal representatives and interested individuals who should be contacted for more information. The NAHC responded on January 25, 2024, stating that the results of the SLF records search were negative, however, this does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites. The NAHC attached a list of Native American tribal representatives and individuals who may also have knowledge of cultural resources in the project area.

This list included Tasheena Sloan, Vice Chairperson, Cahto Tribe; Kendra Campbell, Secretary-Treasurer, Cahto Tribe; Mary Norris, Chairperson, Cahto Tribe; Richard Campbell, Acting Chairperson, Coyote Valley Band of Pomo Indians; Michael Derry, Historian, Guidiville Rancheria of California; Bunny Tarin, Tribal Administrator Guidiville Rancheria of California; Sonny Elliott, Chairperson, Hopland Band of Pomo Indians; Ramon Billy, THPO Hopland Band of Pomo Indians; Priscilla Hunter, Chairwoman, Intertribal Sinkyone Wilderness Council; Jaime Cobarrubia, Chairperson, Manchester Band of Pomo Indians of the Manchester Rancheria; Noyo River Indian Community; Leona Willams, Chairperson, Pinoleville Pomo Nation; Erica Carson, THPO, Pinoleville Pomo Nation; Salvador Rosales, Chairperson, Potter Valley Tribe; Debra Ramirez, Chairperson Redwood Valley or Little River Band of Pomo Indians; Beniakem Cromwell, Chairperson, Robinson Rancheria of Pomo Indians; James Russ, President, Round Valley Reservation/ Covelo Indian Community; Valerie Stanley, THPO, Sherwood Valley Band of Pomo Indians; Yokayo Tribe, Chairperson.

Research Associate Melinda Salisbury sent letters to these representatives on behalf of Mr. Roscoe on February 5, 2024. These letters included a description of the activities used (e.g., mastication, chipping) and associated acreages, a map of the treatment area at a sufficient scale to indicate the spatial extent of activities, a request for information regarding potential impacts to cultural resources from the proposed treatment and a description of the expected depth of ground disturbance. All Tribal notifications also included the information that representatives of the Cahto Tribe's Laytonville Rancheria are participating in the investigation and a tribal member is working with RA during the field surveys.

The potential for the proposed treatment activities to cause a substantial adverse change in the significance of a tribal cultural resource during implementation of vegetation treatment was examined in the PEIR. This impact is within the scope of the PEIR, because the intensity of ground disturbance of the treatment project is consistent with that analyzed in the PEIR. As explained in the PEIR, while tribal cultural resources may be identified within

the treatable landscape during development of later treatment projects, implementation of SPRs would avoid any substantial adverse change to any tribal cultural resource. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the tribal cultural affiliations present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact to tribal cultural resources is also the same, as described above. SPRs applicable to this impact are CUL-1 through CUL-6 and CUL-8. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR

Impact CUL-4

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

New Archaeological, Historical, and Tribal Cultural Resource Impacts

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

4.5 EC-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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTS	Impact BIO-1, pp 3.6-132–3.6.138	Yes	AD-2 AQ-3 AQ-4 BIO-1 BIO-2 BIO-7 BIO-9 GEO-1 GEO-3 GEO-4 GEO-5 GEO-7 HYD-4	BIO-1a BIO-1b	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTS	Impact BIO-2, pp 3.6-139–3.6-187	Yes	AD-2 AD-5 AQ-2 AQ-3 BIO-1 BIO-2 BIO-7 BIO-10 BIO-12 GEO-1 GEO-3 GEO-4 GEO-5 GEO-7 HYD-1 HYD-4	BIO-2a BIO-2b BIO-2c BIO-2e	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 3.6-186–3.6-192	Yes	AD-2 BIO-1 BIO-2 BIO-3 BIO-4 BIO-6 BIO-9 HYD-4	BIO-3a BIO-3b BIO-3c	LTSM	No	Yes

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTS	Impact BIO-4, pp 3.6-192–3.6-193	Yes	AD-2 BIO-1 BIO-2 GEO-1 GEO-3 GEO-4 GEO-5 GEO-7 HAZ-1 HYD-1 HYD-4	BIO-4	LTSM	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTS	Impact BIO-5, pp 3.6-193–3.6-197	Yes	AD-2 BIO-1 BIO-2 BIO-4 BIO-10 GEO-1 GEO-3 GEO-4 GEO-5 GEO-7 HAZ-1 HYD-1 HYD-4	BIO-5	LTSM	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197–3.6-199	Yes	AD-2 AD-5 BIO-1 BIO-2 BIO-3 BIO-4 BIO-12	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	No Impact	Impact BIO-7, pp 3.6-199	Yes	AD-3	NA	NA	NA	NA
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation	No Impact	Impact BIO-8, pp 3.6-199–3.6-200	No	NA	NA	NA	NA	NA

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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Plan, Habitat Conservation Plan, or Other Approved Habitat Plan								

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

New Biological Resources Impacts: Would the treatment result in other impacts to biological resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

In accordance with SPR BIO-1, a reconnaissance level survey of the Project Area was conducted in March 2024 by Stillwater biologists. Habitats within the Project Area were qualitatively evaluated for potential to support special-status species—including plants, fish, and wildlife—based on habitat types, habitat elements, and visual observation of species present. Vegetation types were classified using the California Wildlife Habitat Relationship (CWHR) habitat classification scheme (CDFW 2021). The Project Area is dominated by forested habitats with developed areas and open grasslands mixed throughout (Table 4). Maps and representative photographs of existing conditions are provided in Appendix B.

Table 4: California Wildlife Habitat Relationship types in the Project Area.

CWHR Type	Acres	Percent of Project Area	Habitat Description
Montane Hardwood-Conifer	1561.6	43.4%	The Montane Hardwood-Conifer habitat type was dominated by a mixture of Ponderosa pine (*Pinus ponderosa*), Douglas fir (*Pseudotsuga menziesii*), black oak (*Quercus kelloggii*), and madrone (*Arbutus menziesii*). Within the Project Area, this forest habitat type was most often observed lacking a substantial understory shrub layer.
Annual Grassland	862.4	24.0%	The Annual Grassland habitat type was characterized by open grasslands which were seasonally dormant at the time of the site assessment (March). Dominant species include primarily nonnative annual grass such as wild oats (*Avena* sp.) and various bromes (*Bromus* sp.).

CWHR Type	Acres	Percent of Project Area	Habitat Description
Montane Hardwood	784.4	21.8%	The Montane Hardwood habitat type was dominated by madrone and oaks. Stands of black oak and madrone were mixed in size and age and were found to have some understory composed of nonnative grasses, bracken fern (*Pteridium aquilinum* var. *pubescens*), and California blackberry (*Rubus ursinus*).
Mixed Chaparral	149.8	4.2%	The Mixed Chapparal habitat type was composed almost entirely of dense, monotypic stands of manzanita shrubs (*Arctostaphylos manzanita* ssp. *manzanita)*. These stands were found exclusively growing in open clearings with no overstory and had little to no herbaceous understory.
Douglas Fir	141.6	3.9%	The Douglas Fir habitat type was primarily composed of Douglas fir with low diameter at breast height growing closely together and forming a dense canopy layer. The understory was heavily shaded with occasional tanoak (*Notholithocarpus densiflorus* var. *densiflorus*) and sword fern (*Polystichum munitum*).
Montane Riparian	11.6	0.3%	The Montane Riparian habitat type was dominated by riparian hardwood trees such as bigleaf maple (*Acer macrophyllum*), alder (*Alnus spp.*), and willow (*Salix spp.*). Much of the vegetation in this habitat type was seasonally dormant at the time of the site assessment (March).
Developed/Active Channel/Water	86.4	2.4%	--
Total	3,597.8	100.0%	--

Preliminary lists of special-status plant, wildlife, and fish species with the potential to occur in the Project Area were developed through a query of the following resources:

- U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Conservation (IPaC) portal (USFWS 2024a);
- National Marine Fisheries Service's (NMFS), West Coast Region, California Species List Tool (NMFS 2016);
- California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB) (CDFW 2024); and
- California Native Plant Society's (CNPS) Inventory of Rare and Endangered Plants of California (CNPS 2024a).

The database queries were based on the U.S. Geological Survey 7.5-minute quadrangles in which the Project is located (Cahto Peak and Tan Oak Park) and the surrounding ten quadrangles (Laytonville, Lincoln Ridge, Leggett, Iron Peak, Dutchmans Knoll, Sherwood Peak, Longvale, Updegraff Ridge, Bell Springs, and Noble Butte), collectively referred to as the Project Vicinity. The USFWS IPaC query was based on the spatial extent of the Project Area.

The following resources were also reviewed to gain further information regarding species' potential to occur within the Project Area:

- Google Earth aerial imagery (Google Earth 2024).
- Soils data (NRCS 2024); and
- Wetlands and riparian data, including the National Wetland Inventory (USFWS 2024b).
- eBird (eBird 2024);
- North American Bat Acoustic Monitoring Portal (BatAMP) (Conservation Biology Institute and USFS 2024)

The preliminary lists of special-status plant, wildlife, and fish species were evaluated to determine the likelihood for each species' occurrence within the Project Area based on their habitat requirements and known distributions, field assessments of habitat within the Project Area, elevations (1,250–2,900 feet) in the Project Area, location and date of last recorded observation, and professional judgment. The likelihood of occurrence was rated as *high*, *moderate*, *low*, or *none* based on available information and professional judgment. If a species on the preliminary list requires habitat that is lacking within the Project Area (e.g., coastal dunes) or occurs outside the elevation range of the Project Area, the species' likelihood of occurrence was considered to be none.

Special-status plants

Of the 68 special-status plant species previously documented in the Project Vicinity, 12 species were determined to have no potential to occur in the Project Area due to lack of suitable habitat (i.e., no serpentine soil); the remaining 56 special-status plant species have low, moderate, or high potential to occur within the Project Area (Table 3 of Appendix B).

In accordance with SPR BIO-7, Protocol-level special-status plant surveys were conducted within the implementation areas of the Lower Tenmile, Vassar, Gravier, and West Tenmile portions of the Project Area by Salix Natural Resource Management in April, May, June, and July 2024. These areas all have work planned for the first year of implementation. No special-status species were identified within the survey area during the 2024 surveys. A comprehensive list of all plant species documented during the special-status plant surveys is provided in Appendix B.

Special-status wildlife

Of the 30 special-status fish and wildlife species that were identified from the database queries conducted for the Project, 11 have a high potential to occur within the Project Area, 11 have a moderate potential, five have a low potential, and three have no potential to occur. Table 5 provides the likelihood for these special-status fish and wildlife species to occur, and for the 22 species with a moderate to high potential to occur, their sensitive life history timing, and an analysis of potential Project effects on individuals and their habitat are also provided.

Table 5: Special-status wildlife evaluated with the potential to occur within the Project Area and potential Project effects.

Common Name *Scientific Name*	Query Sources	Status[a] Federal/ State	Distribution in California	Habitat Association	Likelihood to Occur within Project Area	Sensitive Life History Timing[b]	Potential Project-related Effects on the Species and Habitat
Invertebrates							
Monarch butterfly (California overwintering population) Danaus plexippus	USFWS	FC/–	Range includes most of California; it breeds throughout California and overwinters in suitable groves along the California coast	Adults forage on a variety of flowering plants during breeding and migration; larva (caterpillars) require milkweed (Asclepias spp.) as a host plant. Overwinter roosts include eucalyptus (Eucalyptus sp.), Monterey pines (Pinus radiata), and Monterey cypress (Hesperocyparis macrocarpa) trees or groves.	**High**: Monarch butterflies have the potential to breed in the Project Area because Asclepias cordifolia (purple milkweed) was documented in the Lower Tenmile area during the 2024 special-status plant surveys (Appendix B). Also, flowering plants for which adults can forage for nectar are present in the Project Area. Monarch adults have been observed within 1.5 miles of the Project Area (Lower Tenmile) and larvae have been observed on Asclepias spp. within 4.5 miles of the Cahto Ranch (2013) (Western Monarch Milkweed Occurrence Database 2024). No critical habitat has been designated for this species.	Breeding season: March through October; purple milkweed blooms from March through July, while vegetative parts can be present one to two months before and after this period Overwintering season: November through February	Forest management activities can affect breeding habitat (milkweed) if it is removed or disturbed, and larvae may directly be harmed or killed if milkweed is disturbed during the breeding season.
Western bumble bee Bombus occidentalis	CDFW	–/SCE	Current range includes northern California and northern Sierra Nevada Mountains	Forages on flowering plants in chaparral, scrub, mountain meadows, forested openings, open grassy areas, and urban parks and gardens. Host plant genera include, but are not limited to, Ceanothus, Centaurea, Chrysothamnus, Cirsium, Eriogonum, Geranium, Grindellia, Lupinus, Melilotus, Monardella, Rubus, Solidago, and	**Low**: While foraging habitat and potential nesting sites occur within the Project Area, the species is generally rare in the southern portion of the range. Observations within the vicinity include two observations within two miles of Lower Tenmile (1981 and 1984) and one observation within ten miles of Vassar (1968) (CDFW 2024). The closest occurrence in the Bumble Bee Watch database	Colony active period: March through October Overwintering period: November through February	Forest management activities are not expected to disturb nesting or foraging habitat because treatment activities will be restricted to forested areas, a habitat that western bumblebees generally do not forage or nest in.

Common Name *Scientific Name*	Query Sources	Status[a] Federal/ State	Distribution in California	Habitat Association	Likelihood to Occur within Project Area	Sensitive Life History Timing[b]	Potential Project-related Effects on the Species and Habitat
				Trifolium. Nests underground in pre-existing cavities (abandoned small mammal burrows) but can also nest above ground in thatched grass, brush piles, fallen logs, and human-made structures.	is over 60 miles away (Xerces Society 2024).		
Crotch's bumble bee Bombus crotchii	CDFW	–/SCE	Range includes the southern Pacific Coast, Great Basin, Mojave Desert, Sonoran Desert, Central Valley, and adjacent foothills through most of southwestern California; recent observations mainly in southwestern and central California.	Forages on flowering plants in open grassland and scrub habitats. Host plant genera include, but are not limited to, Antirrhinum, Asclepias, Chaenactis, Clarkia, Dendromecon, Eschscholzia, Eriogonum, Lupinus, Medicago, Phacelia, Salvia, and Phacelia. Nests are often located underground. in pre-existing cavities (abandoned small mammal burrows), but can may also nest aboveground in thatched grass, brush piles, fallen logs, and human-made structures.	**Low**: Potential foraging habitat and nesting sites occur within the Project Area. The most recent occurrence is about 35 miles from Cahto Trail in 2022 (Xerces Society 2024), and the nearest CNDDB observation is about 1.5 miles from Lower Tenmile in 1978 (CDFW 2024).	Colony active period: March through September, while may occur as early as February or as late as October Overwintering period: September through March	Forest management activities are not expected to disturb nesting or foraging habitat because treatment activities will be restricted to forested areas, a habitat that Crotch's bumblebees generally do not forage or nest in.

Common Name *Scientific Name*	Query Sources	Status[a] Federal/ State	Distribution in California	Habitat Association	Likelihood to Occur within Project Area	Sensitive Life History Timing[b]	Potential Project-related Effects on the Species and Habitat
Fish							
Coho salmon, Southern Oregon/Northern California Coast Evolutionary Significant Unit (ESU) Oncorhynchus kisutch	NMFS, CDFW	FT/ST	Range includes Punta Gorda north to the Oregon border	Low-gradient portions of coastal draining streams with sufficiently cool water temperatures. Adult spawning: fine to coarse gravel in pool tailouts or low-gradient riffles with nearby cover or deep pools. Juvenile rearing: instream pool habitats often associated with large wood or off-channel features that provide low-velocity protection from high flows and cover from predation and water temperatures less than approximately 17°C.	**High**: Present in waterways (e.g., Cahto Creek and Tenmile) within or adjacent to the Project. Juvenile coho salmon have been documented in Cahto Creek (Higgins 2023), a tributary to Tenmile Creek. Critical habitat is located on creeks (e.g., Cahto Creek, Tenmile Creek) within the Project Area.	Adult migration: fall and winter Spawning: few weeks following migration (December–February) Fry emergence: 3–4 months after spawning Juvenile rearing: year round Emigration from streams to mainstem: March–May Outmigration: April and May, peak in early May	While no in-water work would occur, mobilization of sediment, as a result of ground disturbance near waterways, could affect water quality and embeddedness of spawning gravel and affect the survival of eggs and health of juveniles and adults.
Steelhead, northern California distinct population segment (DPS) winter-run Oncorhynchus mykiss irideus	NMFS, CDFW	FT/–	Range includes Coastal streams from the Russian River (exclusive) north to Redwood Creek (Humboldt County)	Rivers and streams with cold water, clean gravel of appropriate size for spawning, and suitable rearing habitat. Adult spawning: medium to coarse gravel in pool tails or low-gradient riffles with nearby cover or deep pools. Juvenile rearing: pool or deep run habitats with instream cover from winter flows and predation, often associated with large cobble, boulders, or large wood in water temperatures less than approximately 22°C. Juveniles typically rear in fresh water for 1 or more years before migrating to the ocean.	**High**: Present in waterways (e.g., Cahto Creek and Tenmile) within or adjacent to the Project. Stillwater Sciences surveys in June 2023 and CDFW surveys in July 2009 observed steelhead/rainbow trout in Cahto Creek (Stillwater Sciences 2023, CDFG 2009). CNDDB occurrence from 2022 include Tenmile Creek and tributaries (e.g., Peterson Creek) (CDFW 2024). Designated critical habitat is located on creeks (e.g., Chato Creek and Tenmile Creek) within the Project Area.	Adult migration: October through March Spawning: late February through April Fry emergence: 6 weeks following hatching (April–June) Juvenile rearing: year-round Outmigration: late-winter and spring (February–June [peak in March and April] and October–November)	While no in-water work would occur, mobilization of sediment, as a result of ground disturbance near waterways, could affect water quality and embeddedness of spawning gravel affect the survival of eggs and health of fry, juveniles, and adults.

Common Name *Scientific Name*	Query Sources	Status[a] Federal/ State	Distribution in California	Habitat Association	Likelihood to Occur within Project Area	Sensitive Life History Timing[b]	Potential Project-related Effects on the Species and Habitat
Steelhead, northern California DPS summer-run Oncorhynchus mykiss irideus	NMFS, CDFW	FT/SE	Range includes portions of Redwood Creek (Humboldt County) and the Mad, Eel, and Mattole River basins	Rivers and streams with cold water, clean gravel of appropriate size for spawning, and suitable rearing habitat; juveniles typically rear in fresh water for 1 or more years before migrating to the ocean. Adults require suitable pools for holding prior to spawning and tend to spawn in smaller, higher-gradient streams than winter-run steelhead. Adults are capable of spawning upstream of partial barriers to movement, which are only passable at intermediate stream flows.	**None**: Outside known distribution. CNDDB location in area notes that the population is extirpated (CDFW 2024). Not known to occur in the Tenmile Creek watershed. Designated critical habitat is not present within the Project Area.	Not applicable	Not applicable
Tidewater goby Eucyclogobius newberryi	CDFW, USFWS	FE/–	Range includes San Diego County north to the mouth of the Smith River in Del Norte County	Typically lives in shallow waters of coastal lagoons and the uppermost zone of brackish large estuaries; prefer sandy substrate for spawning, but can be found on silt, mud, or rocky substrates; typically in shallow water, but can occur in water up to 15 feet in lagoons and within a wide range of salinity (0–42 ppt).	**None**: Outside the range and no suitable habitat present. The nearest CNDDB occurrence is from 1997 about 14 miles from the Project Area (CDFW 2024). Critical habitat has been designated for this species and is not present within the Project Area.	Not applicable	Not applicable
Pacific lamprey Entosphenus tridentatus	CDFW	–/SSC	Most coastal flowing watersheds between Mexico and Oregon.	Anadromous species that spawns and rears in freshwater before emigrating to the ocean to feed and grow. Generally distributed wherever salmon and steelhead occur. Adult spawning: coarse	**High**: Present in waterways within or adjacent to the Project. Holding adults documented in Cahto Creek in 2012 (Stillwater Sciences 2014). The nearest CNDDB occurrence is 13 miles from the Project Area in 1996	Adult migration: late winter to early summer Spawning: March through July Egg hatching: 15 days after eggs deposited into the redd Emergence: 15 days following	While no in-water work would occur, mobilization of sediment, as a result of ground disturbance near waterways, could affect water quality and embeddedness of spawning gravel affect the survival of eggs and

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				gravel or small cobble in pool tails or low-gradient riffles. Larval rearing: low-velocity areas where they burrow into fine silt and sand substrates that often contain organic matter. Water temperatures less than approximately 22°C.	(CDFW 2024).	hatching Juvenile rearing: 4–10 years Outmigration: fall to spring Ocean period: 18–40 months	health of fry, juveniles, and adults.

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Reptile							
Northwestern pond turtle *Actinemys marmorata*	USFWS, CDFW	FPT/SSC	Range is from the Oregon border along the coast ranges to the Mexican border, and west of the crest of the Cascades and Sierras	Permanent, slow-moving fresh or brackish water with available basking sites and adjacent open habitats or forest for nesting	**Moderate:** Tenmile and Cahto Creek provide suitable aquatic habitat, while the extent of basking and breeding habitat has not been assessed. Northwest pond turtles have been observed within the Project Area (Vassar) in Tenmile Creek (1988) (CDFW 2024). Surveys conducted near Holland Reservoir in 2023 documented two individuals in off-channel pond habitat about 0.5 mile upstream of Cahto Ranch (Stillwater Sciences 2023). Additional observations include a CNDDB occurrence in a pond three miles south of Cahto Ranch (2017) and about eight miles from West Tenmile, Gravier, and Cahto	General active period: February through November Mating: April–May Nesting: April–August Egg incubation: while unknown, laboratory hating occurred in 73–81 days Hatchling emergence: late-summer or fall, but some may overwinter and emerge the following spring Hibernation: winter in either aquatic or terrestrial habitat Estivation: summer in aquatic habitat	While no in-water work would occur, upland ground disturbance could directly affect upland nesting and hibernating habitat, which can cause mortality to incubating eggs and individuals.

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					Trail (2004) (CDFW 2024). Critical habitat has not been designated for this species.		

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Amphibians							
Pacific tailed frog (also known as coastal-tailed frog) *Ascaphus truei*	CDFW	–/SSC	Coastal Mendocino County north to the Oregon border, with an isolated population in Shasta region	Occurs in montane hardwood-conifer, redwood, Douglas-fir and ponderosa pine habitats. Restricted to perennial montane streams. In and adjacent to cold, clear, moderate- to fast-flowing, perennial montane streams. Tadpoles require water below 15°C.	**Low:** In 2023, Stillwater Sciences biologists measured water temperatures in the mainstem of Cahto Creek and the southern Cahto Creek tributary to be 12.5–13.5°C, which is suitable for tadpole development. However, these temperatures were recorded in early summer following a wet water year, and temperatures during a normal late-summer/fall (during tadpole development) likely exceed 15°C. It is anticipated that other creeks within the Project Area are also too warm based on these recordings. Most CNDDB occurrences are near the coast or more than 20 years old. The nearest occurrence is from 1999 about 1.5 miles from Lower Tenmile in Elder Creek and from 1996 about 7 miles of Cahto Ranch in the Middle Fork Tenmile River (CDFW 2024).	Not applicable	No Project effects are anticipated

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Northern red-legged frog *Rana aurora*	CDFW	–/SSC	Ranges from Mills Creek in Mendocino County to Oregon border	Breeds in still or slow-moving water with emergent and overhanging vegetation, including wetlands, wet meadows, ponds, lakes, and low-gradient, slow moving stream reaches with permanent pools; uses adjacent uplands for dispersal and summer retreat	**High:** Suitable aquatic habitat for breeding and terrestrial habitat for cover and dispersal is present within the Project Area. Two occurrences about seven miles west of Lower Tenmile near Huckleberry Creek (2006, 2012). Several occurrences about ten miles south of Cahto Ranch (CDFW 2024).	Active period: year-round Egg laying: late November to April Egg hatching: about 4 weeks following egg laying Tadpole metamorphosis: 4–7 months following hatching Upland dispersal period: post-tadpole metamorphosis	While no in-water work would occur, mobilization of sediment, as a result of ground disturbance near waterways, could affect water quality and the survival of eggs and health of tadpoles, juveniles, and adults. Forest management activities in upland habitats, including use of vehicles and/or mechanized equipment, may result in direct injury or mortality of dispersing juveniles and adults.
Foothill yellow-legged frog, North Coast clade *Rana boylii*	CDFW	–/SSC	North of San Francisco Bay through the Coast Range and Klamath Mountains	Shallow tributaries and mainstems of perennial streams and rivers, typically associated with cobble or boulder substrate	**High:** Suitable aquatic habitat is present in Tenmile Creek, Cahto Creek, and the southern and northern Cahto Creek tributaries. Many occurrences within the Project Area and in the Project vicinity, which include one occurrence within the Project Area (Lower Tenmile) along Fox Creek in 2018, another 2018 occurrence within one mile of Black Oak Ranch and West Tenmile along Big Rock Creek, and several observations within five miles of Lower Tenmile in McKinley Creek, Elder Creek, Tenmile Creek, and South Fork Eel River (CDFW 2024).	Active period: year-round Mating and egg-laying: occurs exclusively in streams and rivers from April until early July, after streams have slowed from winter runoff. Egg hatching: about four weeks following egg laying Tadpole metamorphosis: July to October Upland dispersal: post-tadpole metamorphosis	While no in-water work would occur, mobilization of sediment, as a result of ground disturbance near waterways, could affect water quality and the survival of eggs and health of tadpoles, juveniles, and adults. Forest management activities in upland habitats, including use of vehicles and/or mechanized equipment, may result in direct injury or mortality of juveniles and adults.

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Southern torrent salamander *Rhyacotriton variegatus*	CDFW	–/SSC	Coastal drainages from near Point Arena in Mendocino County to the Oregon border	In and adjacent to cold, permanent, well-shaded mountain springs, waterfalls, and seeps with rocky substrate	**Moderate:** Tributaries within the Project Area likely provide suitable aquatic habitat with adjacent terrestrial refuge for cover. The most recent occurrence (2012) is about 1.5 mi southwest of Lower Tenmile in Skunk Creek, with several more historic occurrences (1985) within two miles of the Project Area (Lower Tenmile) in McKinley Creek, Elder Creek, and Tenmile Creek (CDFW 2024).	Breeding: may occur year-round, while peak oviposition period is in August and September Egg hatching: about 8 months following egg laying; peak egg hatching occurs in the spring Larval metamorphosis: 2–2.5 years following hatching	While no in-water work would occur, mobilization of sediment, as a result of ground disturbance near waterways, could affect water quality and the survival of eggs and health of developing larvae, juveniles, and adults.
Red-bellied newt *Taricha rivularis*	CDFW	–/SSC	Along the coast from near Bodega, Sonoma County, to near Honeydew, Humboldt County, and inland to Lower Lake and Kelsey Creek, Lake County	Breeding and larval development habitat includes rapid-flowing, permanent streams or rivers with rocky substrate in proximity to redwood forests and other coastal woodlands. Adult terrestrial habitat primarily includes redwood forests but also found within mixed conifer, valley-foothill woodland, montane hardwood and hardwood-conifer habitats.	**Moderate:** Tributaries within the Project Area likely provide suitable breeding habitat with adjacent coniferous forest (primarily composed of Montane Hardwood Conifer CWHR habitat) for adults. The majority of occurrences are south of the Project Area (east of Fort Bragg), and a few occurrences have been documented about 7.5 miles east of Lower Tenmile (2004) and ten miles southeast of Cahto Ranch (2014) (CDFW 2024).	Breeding and egg laying: February–April Egg hatching: 16–34 days following egg laying, depending on temperature Larval metamorphosis: late summer to early fall Adult aestivation: summer months (terrestrial habitat)	While no in-water work would occur, mobilization of sediment, as a result of ground disturbance near waterways, could affect water quality and the survival of eggs and health of developing larvae, juveniles, and adults. Forest management activities in upland habitats, including use of vehicles and/or mechanized equipment, may result in direct injury or mortality of juveniles and adults.

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Birds							
American goshawk *Accipiter atricapillus*	CDFW	–/SSC	Nests in North Coast Ranges through Sierra Nevada, Klamath, Cascade, and Warner Mountains, in Mount Pinos and San Jacinto, San Bernardino, and White Mountains; winters along north coast, throughout foothills, and in northern deserts	Mature and old-growth stands of coniferous forest, and while found over a large range, they are more commonly found in middle and higher elevations (1,000–10,800 ft); nests in dense part of stands (> 60% canopy cover) near an opening	**Moderate:** May nest within coniferous forest stands within the Project Area, which primarily consists of second growth Montane Hardwood-Conifer habitat, with a mixture of Ponderosa pine (*Pinus ponderosa*), Douglas fir (*Pseudotsuga menziesii*), black oak (*Quercus kelloggii*), and madrone (*Arbutus menziesii*) that lacks a substantial shrub layer. Older- more-suitable nesting stands may be present in adjacent non-private lands. Foraging habitat present. Recent sightings of goshawks have occurred at the Angelo Coast Range Reserve, located about 3.5 miles from the Project (2012, 2015, 2019) (eBird 2024) The most recent CNDDB occurrence is 8.5 miles north of Lower Tenmile in the Hollow Tree Creek watershed (1997) (CDFW 2024).	General breeding season: February through August Nesting initiated: March or early-April Egg laying: late-April to early May Incubation period: 28–32 days following egg laying Nestling period: 34–35 days following hatching	Noise from vehicles and/or mechanized equipment or burning may affect breeding individuals, if nesting nearby, which could result in mortality of young if adults leave the nest. Due to the Project removing younger trees and brush, it is not anticipated that nests within large trees will be removed. The Project is to remove understory trees and brush, which is anticipated to ultimately enhance foraging opportunities and habitat (more open flyways within a forest structure and access to prey).
Golden eagle *Aquila chrysaetos*	USFWS	BGECP/FP	Species is an uncommon permanent resident and migrant throughout California, except center of Central Valley	Open woodlands and oak savannahs, grasslands, chaparral, sagebrush flats; nests on steep cliffs or medium to tall trees	**Moderate**: While cliffs appear absent from the Project Area, individuals may be nesting in forests within or adjacent to the Project Area. Suitable foraging habitat is present in grasslands within the Project Area. Numerous observations within 10 miles of the Project Area including several occurrences within the Project Area at Black Oak Ranch (2016, 2017), one	General breeding season: late January through August Nesting initiated: late January Egg laying: typically, in March, while may occur 1–3 months after nest is constructed	If breeding is occurring within or near the treatment areas, noise from equipment (e.g., chainsaws) or burning may disturb eagles during the breeding season, which could result in indirect mortality to individuals. Since the Project is intended to remove younger trees and understory brush, no removal of nest trees is anticipated.

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					observation about one mile from West Tenmile and Gravier (2024), and another observation about 3 miles south of Cahto Ranch (2015) (eBird 2024). Nearest CNDDB occurrence is about 25 miles away (1975) (CDFW 2024).	Incubation period: 41–45 days following egg laying Nestling period: 45–81 days following hatching	
Marbled murrelet *Brachyramphus marmoratus*	USFWS, CDFW	FT/SE	Nesting birds mostly concentrated near coastal waters in Del Norte and Humboldt counties, and in lesser numbers near San Mateo and Santa Cruz counties; species winters throughout the nesting range and in small numbers in southern California	Most time spent on the ocean; nests inland in large areas of old-growth conifers with suitable platforms, especially redwood or Douglas-fir forests near coastal areas	**Moderate**: Due to the densely forested habitat within the Project Area, which primarily consists of second growth CWHR Montane Hardwood-Conifer habitat, and the proximity of critical habitat being within and adjacent to the Project Area, there is a moderate potential that individuals may be roosting within or adjacent to the Project Area (especially in the Lower Tenmile parcel which is within and adjacent to critical habitat). There is a high potential for individuals to be flying over the Project Area during daily migrations to forage at the ocean. A single CNDDB record from 1995 is about 4.5 miles west of the Project Area (CDFW 2024). Critical habitat has been designated for this species. Designated critical habitat borders a small portion of the Project Area (Lower Tenmile). No Project activities will occur within critical habitat. All other treatment parcels within the Project Area are located within three miles of critical habitat (USFWS 2024c).	Nesting initiated: May, while as late as July Egg laying: variable occurring between March through August Incubation period: 28–30 days following egg laying Nestling period: 30 days following hatching	If nesting is occurring within or near the treatment areas, noise from equipment (e.g., chainsaws) or burning may disturb marbled murrelets during the breeding season, which could result in indirect mortality to individuals. Since the Project is intended to remove younger trees and understory brush, no removal of nest trees is anticipated.

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Western snowy plover *Charadrius alexandrinus nivosus*	USFWS	FT/SSC	Species nests in locations along the California coast, including the Eel River in Humboldt County; nests in the interior of the state in the Central Valley, Klamath Basin, Modoc Plateau, and Great Basin, Mojave, and Colorado deserts; winters primarily along coast	Barren to sparsely vegetated beaches, barrier beaches, salt-evaporation pond levees, and shores of alkali lakes; also nests on gravel bars in rivers with wide flood plains; needs sandy, gravelly, or friable soils for nesting	**None:** Outside the range and no suitable habitat present. Documented occurrences are from distances more than 15 miles from the Project (eBird, CDFW 2024). Designated critical habitat is not present within the Project Area.	Not applicable	No Project effects are anticipated.
Yellow-billed cuckoo *Coccyzus americanus*	USFWS	FT/SE	Species breeds in limited portions of the Sacramento River and the South Fork Kern River; small populations may nest in Butte, Yuba, Sutter, San Bernardino, Riverside, Inyo, Los Angeles, and Imperial counties	Summer resident of valley foothill and desert riparian habitats; nests in open woodland with clearings and low, dense, scrubby vegetation	**Low:** Suitable riparian habitat may be present along creeks within the Project Area, while the cuckoo is not likely to occur as the closest known occurrence is more than 30 miles away (CDFW 2024, eBird 2024). Critical habitat is not present within the Project Area and is located about 75 miles east of the Project Area.	Not applicable	No Project effects are anticipated.
Bald eagle *Haliaeetus leucocephalus*	USFWS	BGECP/SE	Species is a permanent resident and uncommon winter migrant, found nesting primarily in Butte, Lake, Lassen, Modoc, Plumas, Shasta, Siskiyou, and Trinity counties	Large bodies of water or rivers with abundant fish, uses snags or other perches; nests in advanced-successional conifer forest near open water	**Moderate:** Suitable nesting trees may be present within the Project Area. Eagles typically nest near foraging habitat, and the most suitable foraging habitat in the area is Holland Reservoir and the Eel River, which is about 0.4 miles and 2 miles from the Project Area, respectively. Observations of eagles have occurred along the Eel River and have also been observed annually since 2018 at the Angelo Coast Range Reserve (eBird	Breeding season: February through August Nest building: typically 1 to 3 months before egg-laying	If breeding is occurring within or near the treatment areas, noise from equipment (e.g., chainsaws) or burning may disturb bald eagles during the breeding season, which could result in indirect mortality to individuals. Since the Project is intended to remove younger trees and understory brush, no removal of nest trees is anticipated. Project-related noise disturbance could result in temporary displacement of

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					2024), which is about 3.5 miles from the Project.		individuals flying in the vicinity of the nearby Holland Reservoir, where they may be present foraging.
Purple martin *Progne subis*	CDFW, USFWS	–/SSC	Summer resident and migrant; most densely populated in central and northern coastal conifer forests and smaller and more localized areas in the Sierra Nevada, interior foothills, and southern California	Conifer, valley-foothill, montane-hardwood forests with large snags in open areas; most nest sites located in upper slopes of hilly terrain; also may nest in human-made structures with cavities	**High**: Two occurrences within the Project Area (Black Oak Ranch in 2022 and Cahto Ranch in 2017). Numerous occurrences within five miles of the Project Area (eBird 2024). The nearest CNDDB occurrence is an observation of a breeding pair about ten miles west of the Project Area in 1994 (CDFW 2024).	Nesting bird season: February – August	Removing vegetation could result in direct mortality to nesting individuals, including eggs and young, if present and loss of nesting habitat.
Northern spotted owl *Strix occidentalis caurina*	USFWS, CDFW	FT/SSC	Range includes Northwestern California south to Marin County, and southeast to the Pit River area of Shasta County	Typically found in older forested habitats; nests in complex stands dominated by conifers, especially coastal redwood, with hardwood understories; some open areas are important for foraging.	**Moderate:** Suitable nesting, roosting, and/or foraging habitat is likely present within, or adjacent to, the Project Area. The forest structure within the Project Area, primarily consists of second growth Montane Hardwood-Conifer habitat, with a mixture of Ponderosa pine, Douglas fir, black oak, and madrone that lack a substantial shrub layer. . Habitat adjacent to the Project Area appears to consist of dense coniferous forest and mixed hardwood/conifer forest, which may support older more suitable nesting stands on non-private lands. The closest nesting owl location (activity center) (MEN0228) is about 0.7 miles south of the Project Area (Cahto Ranch) and was last documented in 1995. Another nearby activity center	Breeding season: March 1 through September 30 Critical breeding season: March 1–July 15 Late-breeding season is July 16–September 30	Chainsaw noise disturbance and burning activities will not occur within 0.25 miles of known activity centers; therefore, no effects from these activities are anticipated on known activity centers. If breeding owls are present within 0.25 miles, then noise from chainsaws may disturb owls during the breeding season, and if chainsaw use occurs within 195 feet during the critical breeding season then owls may be disrupted to the point that breeding activities may be affected. Similarly, if burning occurs within 0.25 miles of an activity center during the breeding season, activity centers may be disturbed and if burning occurs within 0.25 miles during the critical breeding

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					(MEN0012) is 1.15 miles west of Lower Tenmile and was last documented in 1998. Twelve other activity centers are within 7 miles of the Project Area. (CDFW 2024). Critical habitat is not present within the Project Area and is located about 2.5 miles west of the Project Area.		season, then breeding activities may be affected. Vegetation removal will occur within the home range (1.2 miles) of 2 known activity centers. While the goal of the Project is to remove understory trees and brush, the ultimate benefit will likely enhance foraging opportunities and habitat (more open flyways within a forest structure and access to prey).
Numerous other species, including but not limited to, Allen's hummingbird, chestnut-backed chickadee, western screech owl	USFWS	MBTA	Range encompasses California	Variable including, but not limited to, grasses, shrubs, and trees	**High:** Birds protected under the MBTA have been documented within the Project Area (e.g., Allen's hummingbird in 2017; chestnut-backed chickadee, oak titmouse, and wrentit in 2022; and rufous hummingbird in 2024) and within 5 miles of the Project Area (e.g., olive-sided flycatcher in 2022, and western screech owl in 2023) (eBird 2024).	Nesting bird season: February through August	Removing vegetation could result in direct mortality to nesting individuals, including eggs and young, if present and loss of nesting habitat.

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Mammals							
Pallid bat *Antrozous pallidus*	CDFW	–/SSC	Throughout California except for elevations greater than 3,000 m in the Sierra Nevada	Roosts in rock crevices, cavities in live or dead trees hollows, mines, caves, and a variety of vacant and occupied buildings; feeds in a variety of open woodland habitats and most frequently in riparian zone, in open oak savannah, and open mixed deciduous forest.	**High:** Trees with cavities may provide roosting habitat. Bats may also roost in buildings on the parcels. Upland foraging habitat present. No known mines or caves are present. Species documented acoustically about two miles from the Project Area in 2020 (Conservation Biology Institute and USFS 2024). The nearest CNDDB occurrence is within eight miles of the Project Area (2004). The most recent CNDDB occurrence is from 2016 and is 17 miles north of the Project Area (CDFW 2024).	Maternity season: May 1 through August 31 Hibernating season: November 1 through March 31	Removing trees with cavities (roosting habitat), may result in mortality to bats, including non-volant young (young not able to fly), during the maternity season and to adults during the hibernating season. Any bats roosting in buildings would not likely be affected as no treatment activities will occur within 100 feet of any structure.
Townsend's big-eared bat *Corynorhinus townsendii*	CDFW	–/SSC	Throughout California, found in all but subalpine and alpine habitats, details of distribution not well known	Roosts in cavities, most often in tunnels, caves, mines, and buildings, but also rock shelters, preferentially close to water. Most abundant in mesic habitats, also found in oak woodlands, desert, vegetated drainages, caves or cave-like structures (including basal hollows in large trees, mines, tunnels, and buildings).	**High:** Roosting habitat may be present in any caves or mines and buildings in the Project Area, if present. Roosting may also occur in trees with large basal hollows for roosting, if present. Suitable foraging habitat present throughout the Project Area. No known mines or caves are present. Species documented acoustically about two miles from the Project in 2020 (Conservation Biology Institute and USFS 2024). The nearest CNDDB occurrence is from 1990 within one mile of the Project Are (Lower Tenmile), while more recent occurrences include 2017 and 2015, which are about 14 and 20 miles from the Project Area, respectively (CDFW 2024).	Maternity season: May 1 through August 31 Hibernating season: November 1 through March 31	Noise- and smoke-generating activities have the potential to disturb roosting bats in caves/mines and trees with large basal hollows, which could cause roost abandonment, which may also result in mortality to non-volant young (young unable to fly), depending on proximity to the source of the disturbance. Any bats roosting in buildings would not likely be affected as no treatment activities will occur within 100 feet of any structure.
Western red bat *Lasiurus frantzii*	CDFW	–/SSC	Near the Pacific Coast, Central Valley, and	Roosts on foliage in forests and woodlands, and primarily in riparian trees such as	**Moderate:** Riparian trees along creeks within the Project Area may provide roosting habitat; suitable	Maternity season: May 1 through August 31	Removing riparian trees with foliage (roosting habitat), may result in mortality to bats,

Common Name *Scientific Name*	Query Sources	Status[a] Federal/ State	Distribution in California	Habitat Association	Likelihood to Occur within Project Area	Sensitive Life History Timing[b]	Potential Project-related Effects on the Species and Habitat
			the Sierra Nevada	sycamores and cottonwoods, while less in shrubs; feeds over a wide variety of habitats including grasslands, shrublands, open woodlands and forests, and croplands. Hibernates under leaves in forests.	foraging habitat present throughout the Project Area. Species documented acoustically about two miles from the Project in 2020 (Conservation Biology Institute and USFS 2024). The only CNDDB occurrence in the Project Vicinity is from 1998 and is 13 miles east of the Project Area (CDFW 2024).	Hibernating season: November 1 through March 31	including non-volant young (young not able to fly). If individuals are present during the winter season, ground disturbance may result in injury or mortality to individuals roosting under leaves.
Sonoma tree vole *Arborimus pomo*	CDFW	–/SSC	Along the North Coast from Sonoma County north to the Oregon border, generally along the fog belt	Primarily nests in old-growth or partially harvested old-growth stands, while also present in young stands. Associated with Douglas-fir, redwood, grand fir, and montane hardwood-conifer habitats in the fog belt. Feeds almost exclusively on Douglas fir needles.	**Moderate:** The existing forest structure of a mixed aged stand of Douglas-fir trees and redwoods may provide suitable nesting and foraging habitat. While rare to uncommon throughout its range, the species was documented (six nests) within the Project Area (Lower Tenmile) in 1984, and numerous observations of nests have occurred within five miles of the Project Area (CDFW 2024).	Breeding season: year-round, mainly February through September	Removing trees may result in direct mortality to individuals. The Project will ultimately enhance forest health by providing opportunities for trees to grow larger in stature, which would be beneficial to the vole.
Fisher, Northern California/Southern Oregon DPS *Pekania pekanti*	CDFW	–/SSC	The northern Coast Range, including the Trinity and Klamath forests	Dense (greater than 50% canopy cover), advanced-successional conifer forests, with complex forest structure; den in hollow trees and snags.	**Moderate:** Suitable habitat within the Project Area includes denning features such as hollow snags within dense conifer forests. The Project Area may also be used as a corridor to adjacent forests outside of the Project Area, which may provide higher-quality later-successional forests. While suitable habitat may be present in the area and the Project is within the range of the fisher, most occurrences within Project vicinity are over 100 years old, including one occurrence within the Project Area (Cahto Ranch) from 1889. The most recent occurrence is from 2012, about 23 miles southeast of	Mating season: March and April Embryo development: approximately 10 months following breeding Gestation period: approximately 40 days, so kits are born between March and April (one year after mating and just before the new mating season begins).	Removing trees with snags (denning habitat), especially between spring and fall, may result in harm or mortality to individuals. If breeding is occurring within or near the treatment areas, noise from equipment (e.g., chainsaws) or burning may disturb fishers during the breeding season, which could result in indirect mortality to individuals.

Common Name *Scientific Name*	Query Sources	Status[a] Federal/ State	Distribution in California	Habitat Association	Likelihood to Occur within Project Area	Sensitive Life History Timing[b]	Potential Project-related Effects on the Species and Habitat
					the Project Area (CDFW 2024). The lack of observations may be due to the species being elusive.	Weaning: 6–8 weeks following birth Dispersal period: fall	
American badger *Taxidea taxus*	CDFW	–/SSC	Throughout the state except in the humid coastal forests of Del Norte County and the northwest portion of Humboldt County	Shrubland, open grasslands, fields, and alpine meadows with friable soils	**Low:** While suitable habitat (open grasslands) is present in the Project Area, the species is rare with only two historical CNDDB occurrences from 1945 and 1916, 2 and 15 miles from the Project Area, respectively (CDFW 2024).	Not applicable	No Project effects are anticipated.

Notes: CDFW = California Department Fish and Wildlife; CNDDB = California Natural Diversity Database; ppt = parts per thousand; USFWS = U.S. Fish and Wildlife Service

[a] Status codes:

Federal		State	
FE	Listed as endangered under the federal Endangered Species Act	SE	Listed as Endangered under the California Endangered Species Act
FT	Listed as threatened under the federal Endangered Species Act	ST	Listed as Threatened under the California Endangered Species Act
FC	Federal candidate species	SCE	State Candidate Endangered
FPT	Federally proposed for listing as threatened	SSC	CDFW Species of Special Concern
BGECP	Protected under the Bald and Golden Eagle Protection Act	FP	Fully protected
MBTA	Protected under the Migratory Bird Treaty Act	–	No state status

[b] Sensitive life history timing was identified for species with a moderate to high potential to occur within the Project Area.

Impact BIO-1

The proposed Project could result in direct or indirect adverse effects on the 56 special-status plant species that have the potential to occur in the Project Area.

The potential for adverse effects on special-status plants is within the scope of the activities and impacts addressed in the PEIR because the activities and level of disturbance planned for this Project are consistent with those analyzed in the PEIR. As discussed in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, pages 133-134), prescribed burning has the potential to directly burn or scorch special-status plants, mechanical treatments may directly disturb special-status plants through masticating, tilling or grubbing, and manual treatments may impact special-status plants through trampling by ground workers. However, the removal of dense understory plants and invasive species through manual, mechanical, and burning treatments, as well as increase in canopy gaps produced by removal of codominant trees will promote regeneration of native species that supports a healthier residual ecosystem.

In accordance with SPR BIO-7, protocol level surveys will be conducted for special-status plant species with the potential to be affected by Project treatment activities prior to initiation of treatment. Where special-status plants are identified during protocol-level surveys, Mitigation Measures BIO-1a or BIO-1b, depending upon species status, would be implemented to avoid loss of identified special-status plants. Per Mitigation Measures BIO-1a and BIO-1b, if special status plants are identified during protocol level surveys, a no disturbance buffer of at least 50 feet would be established around the area occupied by these species within which Project activities would not occur unless qualified RPF or biologist determines based on substantial evidence, that the species would benefit from treatment in the occupied habitat area. In the case of plants listed pursuant to CESA or ESA, the determination of beneficial effects would need to be made in consultation with the California Department of Fish and Wildlife (CDFW) and/or USFWS, depending on species status. If treatments are determined to be beneficial and would be implemented in areas occupied by special status plants, under specific conditions described under Mitigation Measures BIO-1a and BIO-1b, additional impact minimization and avoidance measures or design alternatives to reduce impacts would be identified. An evaluation of the appropriate treatment design and frequency to maintain habitat function for special-status plants will be conducted by a qualified RPF or botanist. Project activities would be designed to maintain habitat function for special-status plants species present.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the Project Area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on special-status plants is also the same, as described above. Biological resource SPRs that apply to Project impacts under Impact BIO-1 are SPR AD-2, SPR AQ-3, SPR AQ-4, SPR BIO-1, SPR BIO-2, SPR BIO-7, SPR BIO-9, SPR GEO-1, SPR GEO-3, SPR GEO-4, SPR GEO-5, SPR GEO-7, and SPR HYD-4. Biological resource mitigation measures that apply to Project impacts under Impact BIO-1 are Mitigation Measure BIO-1a and Mitigation Measure BIO-1b. With the implementation of the above listed SPRs and Mitigation Measures, it is likely that this Project will result in a less than significant impact on special-status plant species. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-2

The proposed Project could result in direct or indirect adverse effects on special-status wildlife species and habitat suitable for these species within the treatment area, as described in the following sections. The potential for adverse effects on special-status wildlife species is within the scope of the activities and impacts addressed in the PEIR because the activities and level of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the treatment area, general habitat characteristics are essentially the same within and

outside the treatable landscape; therefore, the potential impact on special-status wildlife is also the same as described above.

Invertebrates

Three special-status invertebrate species have the potential to occur in the Project Area (Table 5). Forest management activities are not anticipated to disturb nesting or foraging habitat of western bumblebee or Crotch's bumblebee because treatment activities will be restricted to forested areas, a habitat that western bumblebees generally do not use for foraging or nesting. Forest management activities could potentially have adverse impacts on monarch butterfly breeding habitat (milkweed) if it is removed or disturbed, and larvae may directly be harmed or killed if milkweed is disturbed during the breeding season.

The potential for treatment activities and maintenance treatments to result in adverse effects on special-status invertebrate species was examined in the PEIR. In accordance with SPR BIO-7 and SPR BIO 10, protocol-level special-status plant surveys and focused surveys for wildlife nursery sites will be conducted prior to initiation of vegetation treatment activities. If active nest sites or breeding habitat (milkweed) is identified in the vegetation treatment area, Mitigation Measures BIO-2b and BIO-2c will be implemented. No disturbance buffers will be placed around any active nest sites or breeding habitat (milkweed). All active or potentially active will be marked for avoidance. Physical avoidance markers will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the nesting habitat. The avoidance area buffer size will be determined by the qualified RPF or biologist using the most current, commonly accepted science and in coordination with USFWS. Buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed.

In addition, in accordance with SPR BIO-2, all crew members and contractors will receive training from a qualified RPF or biologist prior to implementing vegetation management activities. The training will include the identification, relevant life history information, and avoidance measures for special-status invertebrates, impact minimization procedures, and reporting requirements.

These measures would minimize any potential impacts so that the Project would have no effect on special-status invertebrates. The potential adverse impacts on special-status invertebrates from Project activities is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Fish

Four special-status fish species have the potential to occur in the Project Area (Table 5). While no in-water work would occur during Project activities, mobilization of sediment, as a result of ground disturbance near waterways, could affect water quality and embeddedness of spawning gravel and affect the survival of eggs and health of juveniles and adult fish. The potential for treatment activities and maintenance treatments to result in adverse effects on special-status fish species was examined in the PEIR. In accordance with SPR HYD-4 and Project treatment specifications, no vegetation treatment work will take place within 100 feet of a Class I or II watercourse (including Tenmile Creek), within 30 feet of a Class III watercourse, or within 50 feet of a wetland. Implementation of SPR GEO-1, SPR GEO-3, SPR GEO-4, SPR GEO-5, SPR GEO-7, SPR HAZ-1, and SPR HYD-1 will protect water quality and minimize impacts on special-status fish and their habitat from erosion and increased sediment delivery to streams during precipitation events. The potential adverse impacts on special-status fish from Project activities is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Reptiles and Amphibians

One special-status reptile and four special-status amphibian species have the potential to occur in the Project Area (Table 5). While no in-water work would occur during Project activities, mobilization of sediment, as a

result of ground disturbance near waterways, could affect water quality and the survival of eggs and health of tadpoles, juveniles, and adults. Forest management activities in upland habitats, including use of vehicles and/or mechanized equipment, may result in direct injury or mortality of dispersing juveniles and adult amphibians. Upland ground disturbance could also directly affect upland nesting and hibernating habitat of northwestern pond turtle, which can cause mortality to incubating eggs and individuals.

The potential for treatment activities and maintenance treatments to result in adverse effects on special-status reptile and amphibian species was examined in the PEIR. In accordance with SPR HYD-4 and Project treatment specifications, no vegetation treatment work will take place within 100 feet of a Class I or II watercourse (including Tenmile Creek), within 30 feet of a Class III watercourse, or within 50 feet of a wetland. Implementation of SPR GEO-1, SPR GEO-3, SPR GEO-4, SPR GEO-5, SPR GEO-7, SPR HAZ-1, and SPR HYD-1 will protect water quality and minimize impacts on aquatic life stages of special-status amphibians and their habitat from erosion and increased sediment delivery to streams during precipitation events.

Northwestern pond turtle, northern red-legged frog, foothill yellow-legged frog, and red-bellied newt spend portions of their life in upland habitats and can travel far from water. Forest management activities in upland habitats, including use of vehicles and/or mechanized equipment, may result in direct injury or mortality of juveniles and adult amphibians and could directly affect northwestern pond turtle upland nesting and hibernating habitat, which can cause mortality to incubating eggs and individuals.

In accordance with SPR BIO-10, focused visual encounter surveys for northern red-legged frog, foothill yellow-legged frog, and red-bellied newt, and northwestern pond turtle and for potentially suitable northwestern pond turtle burrows or nesting sites with potential to be directly or indirectly affected by a treatment activities will be conducted by a qualified RPF or biologist within habitat areas suitable for the species within approximately 1,500 feet of aquatic habitat (i.e., streams, ponds) and within any potential migration corridors (e.g., between freshwater ponds and creeks). The surveys will be conducted no more than 14 days prior to the beginning of treatment activities.

If active sites (including nests, dens, burrows, etc. are identified during focused surveys, Mitigation Measure BIO-2b and BIO-2c will be implemented. No disturbance buffers will be placed around any active sites. All active or potentially active will be marked for avoidance. Physical avoidance markers will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the nesting habitat. The avoidance area buffer size will be determined by the qualified RPF or biologist using the most current, commonly accepted science and in coordination with USFWS. Buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed.

In addition, in accordance with SPR BIO-2, all crew members and contractors will receive training from a qualified RPF or biologist prior to implementing vegetation management activities. The training will include the identification, relevant life history information, and avoidance measures for northern red-legged frog, foothill yellow-legged frog, and red-bellied newt, and northwestern pond turtle, impact minimization procedures, and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF or biologist.

These measures would minimize any potential impacts so that the Project would have no effect on special-status reptiles and amphibians. The potential adverse impacts on special-status reptiles and amphibians from Project activities is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Birds

Seven special-status bird species as well as numerous other species protected under the Migratory Bird Treaty Act have the potential to occur in the Project Area (Table 5). Treatment activities, including mechanical treatments, manual treatments, and prescribed burning conducted during the nesting bird season (February 1–August 31) could result in direct mortality to nesting individuals, including eggs and young and loss of nesting habitat if trees or shrubs containing nests are removed or burned. Noise from vehicles and/or mechanized equipment may affect breeding individuals. Potential Project-related effects on specific bird species and their habitats are described in Table 5.

The potential for treatment activities to result in adverse effects on special-status birds was examined in the PEIR. In accordance with SPR BIO-1, if it is determined that adverse effects on habitat suitable for nesting special-status birds can be clearly avoided by physically avoiding habitat suitable for the species or conducting treatments outside of nesting bird season (February 1–August 31), then no mitigation would be required. If some treatments cannot be conducted outside of the nesting bird season, then focused nesting bird surveys would be conducted prior to implementation of treatment activities (SPR BIO-10). If no active bird nests are observed during focused surveys, then additional avoidance measures for these species would not be required. If active special-status bird nests are observed during focused surveys, then Mitigation Measures BIO-2a and BIO-2b would be implemented and no-disturbance buffers would be established around the nests and no treatment activities would occur within this buffer until the chicks have fledged as determined by a qualified biologist. Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. For example, under Mitigation Measure BIO-2a, a no disturbance buffer of 0.5 mile would be established around active golden eagle nests and a 0.25 mile would be established around active northern spotted owl nests. Additionally, trees containing golden eagle nests would not be removed pursuant to the Bald and Golden Eagle Protection Act. Habitat function for special-status birds would be maintained because treatment activities would not result in removal of trees or snags greater than 12 inches DBH. Furthermore, the removal of understory trees and brush is anticipated to encourage the growth of larger trees in the stand as well as enhance foraging opportunities and habitat for some species (more open flyways within a forest structure and access to prey). The potential adverse impacts on birds from Project activities is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Mammals

Six special-status mammal species have the potential to occur in the Project Area (Table 5). Removing trees may result in direct mortality to Sonoma tree vole individuals and removing trees with snags (denning habitat), especially between spring and fall, may result in harm or mortality to fisher individuals. Removing trees with cavities (roosting habitat), may result in mortality to bats, including non-volant young (young not able to fly), during the maternity season and to adults during the hibernating season. Noise- and smoke-generating activities may disturb roosting bats and fishers during the breeding season which could result in direct or indirect mortality of individuals. If western red bat individuals are present during the winter season, ground disturbance may result in injury or mortality to individuals roosting under leaves.

The potential for treatment activities and maintenance treatments to result in adverse effects on special-status mammal species was examined in the PEIR. In accordance with SPR HYD-4 and Project treatment specifications, no vegetation treatment work will take place within 100 feet of a Class I or II watercourse (including Tenmile Creek), within 30 feet of a Class III watercourse, or within 50 feet of a wetland. This will minimize impacts on western red bats that live in riparian trees along creeks (Table xx). Per SPR BIO-1, if it is determined that adverse effects on special-status bats can be clearly avoided by conducting treatments outside of the season of sensitivity (i.e., maternity season), then mitigation would not be required. Adverse effects on special-status bat maternity roosts would be clearly avoided by conducting initial and maintenance treatments outside of the bat maternity season (April 1–August 31).

In accordance with SPR BIO-10, focused visual encounter surveys will be conducted by a qualified RPF or biologist within habitat areas suitable for special-status mammal species and potential denning, roosting, or hibernating habitat within the Project implementation area. The surveys will be conducted no more than 14 days prior to the beginning of treatment activities. If active sites (including nests, dens, burrows, etc. are identified during focused surveys, Mitigation Measure BIO-2b and BIO-2c will be implemented. All active or potentially active will be marked for avoidance and no-disturbance buffers will be places around any active sites. Physical avoidance markers will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the nesting habitat. The avoidance area buffer size will be determined by the qualified RPF or biologist using the most current, commonly accepted science and in coordination with USFWS. Buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed.

In addition, in accordance with SPR BIO-2, all crew members and contractors will receive training from a qualified RPF or biologist prior to implementing vegetation management activities. The training will include the identification, relevant life history information, and avoidance measures for special-status mammals, impact minimization procedures, and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF or biologist.

The potential for treatment activities to result in adverse effects on special-status wildlife was examined in the PEIR. As discussed in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, pages 139-187), The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the Project Area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on special-status wildlife is also the same, as described above.

Treatment activities implemented under the proposed CalVTP, including prescribed burning, mechanical treatment, and manual treatment, could result in direct or indirect adverse effects to special-status wildlife species. Biological resource SPRs that apply to Project impacts under Impact BIO-2 are SPR AD-2, SPR AD-5, SPR AQ-2, SPR AQ-3, SPR BIO-1, SPR BIO-2, SPR BIO-7, SPR BIO-10, SPR BIO-12, SPR GEO-1, SPR GEO-3, SPR GEO-4, SPR GEO-5, SPR GEO-7, SPR HYD-1, and SPR HYD-4. Biological resource mitigation measures that apply to Project impacts under Impact BIO-2 are Mitigation Measure BIO-2a, Mitigation Measure BIO-2b, Mitigation Measure BIO-2c, and Mitigation Measure BIO-2e. With the implementation of the above listed SPRs and Mitigation Measures, it is likely that this Project will result in a less than significant impact on special-status wildlife species. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-3

Based on the reconnaissance-level surveys conducted for the Project, the geographic range, habitat, and occurrence data (CNPS 2024b) nineteen sensitive natural communities we identified to have the potential to occur within the Project Area (Table 2 in Appendix B). Riparian habitat is present within the Project Area adjacent to streams, lakes, and ponds.

The potential for treatment activities to result in adverse effects on riparian habitat or other sensitive natural communities is within the scope of the activities and impacts addressed in the PEIR because the activities and level of disturbance planned for this Project are consistent with those analyzed in the PEIR. As discussed in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, pages 187-192), prescribed burning has the potential to directly burn or scorch vegetation that characterizes sensitive natural communities or sensitive habitats, mechanical treatments may directly disturb vegetation in sensitive natural communities through masticating, tilling or

grubbing, and manual treatments may impact non-target vegetation including species that characterize sensitive natural communities or habitats.

The potential for Project activities to result in adverse effects on riparian habitat or other sensitive natural communities was examined in the PEIR. In accordance with SPR BIO-1 and SPR BIO-3, protocol level surveys will be conducted for sensitive natural communities or sensitive habitats with the potential to be affected by Project treatment activities prior to initiation of treatment and those resources will be avoided to the extent possible. If sensitive natural communities are present in the Project implementation area, Mitigation Measures BIO-3a, BIO-3b, or BIO-3c will be implemented to avoid potential impacts on sensitive natural communities and compensate for loss of riparian habitat and sensitive natural communities if adverse effects can no be avoided. In accordance with SPR HYD-4 and Project treatment specifications, no vegetation treatment work will take place within 100 feet of a Class I or II watercourse (including Tenmile Creek), within 30 feet of a Class III watercourse, or within 50 feet of a wetland. Per SPR BIO-2, crew members and contractors are required to receive training regarding biological resources from a qualified RPF or biologist so crews are aware of potential sensitive natural communities and sensitive habitats in the treatment area and measures to reduce adverse effects. Implementation of SPR BIO-4 will design Project vegetation treatments to avoid adverse effects in riparian areas and will ensure that best management practices are utilized to avoid spreading plant pathogens that could impact sensitive natural communities. These measures would minimize any potential impacts so that the Project would have no effect on riparian habitat or other sensitive natural communities.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the Project Area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on riparian habitat or other sensitive natural communities is also the same, as described above. Biological resource SPRs that apply to Project impacts under Impact BIO-3 are SPR AD-2, SPR BIO-1, SPR BIO-2, SPR BIO-4, SPR BIO-6, SPR BIO-9, and SPR HYD-4. Biological resource mitigation measures that apply to Project impacts under Impact BIO-3 are Mitigation Measure BIO-3a, Mitigation Measure BIO-3b, and Mitigation Measure BIO-3c. With the implementation of the above listed SPRs and Mitigation Measures, it is likely that this Project will result in a less than significant impact on riparian habitat or other sensitive natural communities. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-4

Based on the reconnaissance-level surveys conducted for the Project and the USFWS National Wetland Inventory (USFWS 2024b), wetlands and waters including Tenmile Creek and its tributaries (Cahto Creek, Mud Springs Creek, Spring Creek, Peterson Creek, and other unnamed tributaries) as well as emergent wetlands and freshwater ponds are present in the Project Area (Appendix B).

The potential for treatment activities to result in adverse effects on state or federally protected wetlands is within the scope of the activities and impacts addressed in the PEIR because the activities and level of disturbance planned for this Project are consistent with those analyzed in the PEIR. As discussed in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, pages 192–193), vegetation treatment activities including prescribed burning have the potential to alter wetland hydrology or topography or remove wetland vegetation resulting in a loss or degradation of wetland function.

In accordance with SPR BIO-1 and SPR HYD-4, potential wetlands will be identified and marked for avoidance prior to implementing treatment. Per SPR HYD-4 and Project treatment specifications, no vegetation treatment work will take place within 100 feet of a Class I or II watercourse (including Tenmile Creek), within 30 feet of a Class III watercourse, or within 50 feet of a wetland. Implementation of SPR GEO-1, SPR GEO-3, SPR GEO-4, SPR GEO-5, GEO-7, SPR HAZ-1, and SPR HYD-1 will protect water quality and minimize impacts on wetland habitats from erosion and increased sediment delivery to streams during precipitation events. Under Mitigation

Measures BIO-4, a qualified RPF or biologist will delineate the boundaries of wetlands that are potentially federally- or state-protected and mark them for avoidance. A no disturbance buffer of at least 25 feet would be established around all wetland features but may be larger if deemed necessary by the qualified RPF or biologist. Wetland boundary markers will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). Per SPR BIO-2, crew members and contractors will receive training regarding biological resources from a qualified RPF or biologist so crews are aware of potential wetland habitats in the treatment area and measures to reduce adverse effects.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the Project Area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on state or federally protected wetlands is also the same, as described above. Biological resource SPRs that apply to Project impacts under Impact BIO-4 are SPR AD-2, SPR BIO-1, SPR BIO-2, SPR BIO-3, SPR BIO-4, SPR BIO-6, SPR BIO-9, and SPR HYD-4. The biological resource mitigation measure that applies to Project impacts under Impact BIO-4 is Mitigation Measure BIO-4. With the implementation of the above listed SPRs and Mitigation Measure, it is likely that this Project will result in a less than significant impact on state or federally protected wetlands. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-5

Based on the review of biological resources conducted under SPR BIO-1 and the reconnaissance-level surveys conducted for the Project, the Project area has the potential to be used as wildlife movement corridors or nurseries. Riparian habitat is present in the Project Area adjacent to streams, lakes, and ponds; Tenmile Creek flows through many of the different Project regions and they are all part of the same watershed. Anadromous fish species in Tenmile Creek and its tributaries have the potential to be impacted by Project activities. While no in-water work would occur during Project activities, mobilization of sediment, as a result of ground disturbance near waterways, could affect water quality and embeddedness of spawning gravel and affect the survival of eggs and health of juveniles and adult fish.

The potential for treatment activities to result in adverse effects on wildlife movement corridors or nurseries is within the scope of the activities and impacts addressed in the PEIR because the activities and level of disturbance planned for this Project are consistent with those analyzed in the PEIR. As discussed in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, pages 193–197), Project activities have the potential to temporarily shift wildlife movements to avoid or navigate around active treatment sites and nursery sites could be removed, degraded, or disturbed. Noise or visual disturbance due to the presence of equipment, personnel, or fire could cause resident or migratory wildlife to temporarily avoid or move out of the areas immediately surrounding treatment areas. Project activities could modify, degrade, or remove important habitat features of a nursery site including large trees nesting, hollow trees for bat maternity roosts, and milkweed patches for monarch overwintering.

The potential for Project activities to result in adverse effects on riparian habitat or other sensitive natural communities was examined in the PEIR. In accordance with SPR HYD-4 and Project treatment specifications, no vegetation treatment work will take place within 100 feet of a Class I or II watercourse (including Tenmile Creek), within 30 feet of a Class III watercourse, or within 50 feet of a wetland protecting riparian areas. Implementation of SPR GEO-1, SPR GEO-3, SPR GEO-4, SPR GEO-5, SPR GEO-7, SPR HAZ-1, and SPR HYD-1 will protect water quality and minimize impacts on special-status fish and their habitat from erosion and increased sediment delivery to streams during precipitation events. Per SPR BIO-10, a qualified RPF or biologist will conduct focused surveys for nursery sites with potential to be directly or indirectly affected by Project activities. Unless otherwise specified in a protocol, the surveys will be conducted no more than 14 days prior to the beginning of treatment activities. If any potentially active nursery sites are identified, Mitigation Measure BIO-5 will be implemented, and

these features will be marked for avoidance and retention during Project treatment activities. A qualified RPF or biologist will establish a non-disturbance buffer around the nursery site if Project activities will take place while the nursery site is active/occupied.

Implementation of SPR BIO-4 will design Project vegetation treatments to avoid adverse effects in riparian areas and will ensure that best management practices are utilized to avoid spreading plant pathogens that could impact sensitive natural communities. Per SPR BIO-2, crew members and contractors are required to receive training regarding biological resources from a qualified RPF or biologist so crews are aware of potential sensitive natural communities and sensitive habitats in the treatment area and measures to reduce adverse effects. These measures would minimize any potential impacts so that the Project would have no effect on riparian habitat or other sensitive natural communities.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the Project Area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on wildlife movement corridors or nurseries is also the same, as described above. Biological resource SPRs that apply to Project impacts under Impact BIO-5 are SPR AD-2, SPR BIO-1, SPR BIO-2, SPR BIO-4, SPR BIO-10, SPR GEO-1, SPR GEO-3, SPR GEO-4, SPR GEO-5, SPR GEO-7, SPR HYD-1, and SPR HYD-4. The biological resource mitigation measure that applies to Project impacts under Impact BIO-5 is Mitigation Measure BIO-5. With the implementation of the above listed SPRs and Mitigation Measure, it is likely that this Project will result in a less than significant impact on wildlife movement corridors or nurseries. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-6

Project activities would occur in habitats that support common native bird, mammal, reptile, amphibian, and invertebrate species. The potential for treatment activities to result in adverse effects on common wildlife species, including nesting birds is within the scope of the activities and impacts addressed in the PEIR because the activities and level of disturbance planned for this Project are consistent with those analyzed in the PEIR. As discussed in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, pages 197–199), Project activities have the potential to disturb breeding; remove or damage active nests, dens, and other breeding sites; kill or injure individuals; and temporarily reduce breeding productivity of these species.

The potential for treatment activities to result in adverse effects on common wildlife species, including nesting birds was examined in the PEIR. In accordance with SPR BIO-2, all crew members and contractors will receive training regarding minimizing disturbances to wildlife. Additionally, SPRs designed to identify special-status species habitat (SPR BIO-1) and sensitive natural communities (SPR BIO-3) and retain the habitat function and value of riparian habitat (SPR BIO-4), as well as compliance with protective statutes (e.g., California Fish and Game Code sections 3503 and 3503.5 and the federal MBTA), would reduce the likelihood of impacts to common species using these important habitats. In accordance with SPR BIO-12, Project treatment activities would be scheduled to avoid the active nesting season of common native bird species, including raptors that could be present within or adjacent to the treatment site if feasible. If a treatment must occur during the nesting season of common native bird species, including raptors, SPR BIO-12 would require nesting bird surveys prior to treatment activities and implementation of feasible impact avoidance strategies (e.g., protective buffers, treatment modifications, raptor nest monitoring).

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the Project Area, the existing environmental conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential impact on common wildlife species, including nesting birds is also the same, as described above. Biological resource SPRs that apply to Project impacts under

Impact BIO-6 are SPR AD-2, SPR AD-5, SPR BIO-1, SPR BIO-2, SPR BIO-3, SPR BIO-4, and SPR BIO-12. No mitigation measures were identified in the PEIR for Impact BIO-7. With the implementation of the above listed SPRs it is likely that this Project will result in a less than significant impact on common wildlife species, including nesting birds. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-7

The potential for Project activities to result in conflict with local policies or ordinances was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.6.3, page 199). The potential for the proposed Project to conflict with local policies or ordinances is within the scope of the activities and impacts addressed in the PEIR because the treatment Projects implemented under the CalVTP are required to comply with any applicable county, city, or other local policies, ordinances, and permitting procedures (SPR AD-3) and are consistent with those analyzed in the PEIR. The Department of Planning & Building was contacted during the planning phase of this Project to ensure compliance with applicable local ordinances and policies. The County responded on March 12, 2024, and stated that the Project is exempt from the County's local permitting. There are no other applicable local ordinances.

The potential for the proposed treatments to conflict with local policies is within the scope of the PEIR because vegetation treatment locations, types, and activities are consistent with those analyzed in the PEIR. The inclusion of land in the proposed Project Area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the Project Area boundary, the existing regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the potential for conflicts with local policies or ordinances is also the same, as described above. The SPRs that applies to Project impacts under Impact BIO-7 is SPR AD-3. No mitigation measures were identified in the PEIR for Impact BIO-7. This impact of the proposed Project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PIER.

Impact BIO-8

The Project Area is not located within a habitat conservation plan (HCP), a natural community conservation plan (NCCP), or other approved habitat plan area. The inclusion of land in the proposed Project Area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the areas outside the CalVTP treatable landscape are also not located within a HCP, NCCP, or other approved habitat plan area. This impact is within the scope of the PEIR because conflict with an HCP or NCCP was covered in the PEIR, and the proposed treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. This impact of the proposed Project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

4.6 EC-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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	LTS	Impact GEO-1, pp. 3.7-26 – 3.7-29	Yes	GEO-1 through GEO-8 AQ-3 AQ-4 HYD-4	NA	-	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	AQ-3 GEO-1 GEO-3 GEO-4 GEO-7 GEO-8	NA	-	No	Yes

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

New Geology, Soils, Paleontology, and Mineral Resource Impacts: Would the treatment result in other impacts to geology, soils, paleontology, and mineral resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

The geological and geographic context of the area is defined by the California Coast Ranges, a mountain range within the larger Pacific Mountain System (CGS 2002). The Laytonville Valley was formed by geologic faults and is subject to erosion and continued fault movements. The underlying geology is mostly Franciscan base sandstone, conglomerate, mudstone, siltstone, claystone, shale chert, serpentine and schist. Forest soils in the project area are generally deep with moderate drainage. Erosion hazard ratings range from Low-High depending upon slope.

The Coast Range is mapped as Mesozoic sedimentary and meta-sedimentary rocks primarily of the Franciscan Complex which dates to the Cretaceous and Jurassic periods containing sandstone with small amounts of shale, chert, limestone, conglomerate, and serpentinites with blue schist, or eclogite scattered above it (Jennings, Strand, Boylan, Moar, & Switzer, 1977)). Rocks in the Eel River basin are soft sedimentary formations deposited during the Tertiary Era with landslides contributing a great deal to the river's sediment load. Landslides are also prominent in the Coast Range as evidenced by wrinkled and rumpled surfaces in grassy slopes. Landslides in this area are caused by the deep soils and closely fractured rocks, particularly the serpentinites, which cover the slopes (Alt & Hyndman, 2000).

Impact GEO-1

Unstable areas within this part of Mendocino County are characterized by the mass movement of soil and an accompanying layer of vegetation. Specific soil types containing high concentrations of sand or gravel are defined as unstable in their characteristics. They can be identified in the field by observing hummocky (bumpy) topography, tension cracks, slope scarps, headwall scarps, lateral scarps, and irregular bowl-shaped slopes that indicate historical slope failures. Leaning or "J"-shaped trees are another indicator of active slope instability. Unstable soils combined with springs and seeps will create slope instability that can lead to landslides. The California Geological Survey (CGS) produced a series of maps showing landslides and relative slope stability based on soil type, topography, and aerial photographs. These maps are especially useful in determining the appropriateness of using heavy equipment in the project area. Field reviews are used to determine current conditions and suitability. The CGS Report 120 (Davies and Spittler 1999) identifies potential landslides and land instability in parts of Mendocino County. Mapped unstable areas in the project area may be inactive or incompletely mapped. ERRP uses LIDAR imagery that can confirm areas of instability, but no equipment operation will take place on slopes of greater than 30% and hand crew activity is not likely to trigger instability.. If unstable areas are discovered, avoidance measures defined in the Standard Project Requirements will be implemented. Consultation with a CGS geologist will take place if there is any geologic risk.

The entire project has soils with an Erosion Hazard Rating (EHR) of Low to High depending upon the slope angle (NRCS, 2024). The majority of the project areas are Moderate in terms of Erosion Hazard Rating (NRCS, 2024). Erosion Hazard Rating means the rating derived from the procedure specified in the California Forest Practice Rules 14 CCR § 912.5 [932.5, 952.5], which are designed to evaluate the susceptibility of the soil within a given location to erosion.

Vegetation treatments would include ecological restoration, fuel reduction, and shaded fuel breaks through the use of pile burning, broadcast burning, mechanical treatment and manual treatment. These activities could result in varying levels of soil disturbance and have the potential to increase the rates of erosion and loss of topsoil. The potential for these treatment activities to cause substantial erosion or loss of topsoil was examined in the PEIR. Mechanical treatments using heavy machinery are the most likely to cause soil disturbance that could lead to substantial erosion or loss of topsoil, especially in areas that contain steep slopes, or in areas that previously experienced fire. This impact is within the scope of the PEIR because the soil characteristics of the project area are essentially the same within and outside the CalVTP treatable landscape, and the use and type of equipment, extent of vegetation removal, and intensity of prescribed burning are consistent with those analyzed in the PEIR. As described above under Section 1.2, "CEQA and Document Purpose," MCRCD and ERRP propose to revise requirements under SPR AQ-3 for prescribed burning activities to allow for the use of non-CAL FIRE burn plan templates (e.g., burn plan templates developed by the California State-Certified Burn Boss curriculum development committee, or equivalent). Burn plans prepared by Eel River Recovery Project would include all of the requirements of CAL FIRE burn plans. Further, prior to implementing broadcast burning activities, MCRCD and ERRP would minimize soil burn severity to reduce the potential for runoff and soil erosion, by following the guidelines outlined in SPR AQ-3.

For these reasons, proposed revisions to SPR AQ-3 would not result in greater soil erosion, and revisions to SPR AQ- 3, specifically for prescribed burning treatment activities, would not result in a substantially more significant effect related to soil erosion than what was covered in the PEIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental conditions present in the areas outside of the treatable landscape are essentially the same within and outside the treatable landscape; therefore, the potential impact related to soil erosion is the same, as described above. SPRs applicable to this impact are GEO-1 through GEO-8, AQ-3, AQ-4, and HYD-4. As explained above, impacts related to soil erosion resulting from the proposed project, including proposed revisions to the project description, compared to the PEIR program description, would not constitute new or substantially more severe significant impact than what was covered in the PEIR.

Initial and maintenance treatments include manual, mechanical, and prescribed burning treatments activities, which have the potential to result in vegetation removal and soil disturbance, which may result in increased rates of erosion and loss of topsoil. The potential for these treatment activities to cause substantial erosion or loss of topsoil were examined in the PEIR (CalVTP Final PEIR Volume II Section 3.7.3, pages 26-29).

Treatment activities would include pile burning, broadcast burning, mechanical treatment and manual treatment. No areas with known active landslide activity are identified within the project area (USGS 2022). However, given the variable topography in some of the treatment areas, the remoteness of the area, steep terrain, and wet winter conditions, there is the potential for landslides in the project area. The potential for treatment activities to increase landslide risk was examined in the PEIR. This impact is within the scope of the PEIR because the extent of vegetation removal, intensity of prescribed burning, and characteristics of the geographical terrain are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. As described above under Section 1.2, "CEQA and Document Purpose," Mendocino County RCD proposes to revise requirements under SPR AQ-3 for prescribed burning activities to allow for the use of non-CAL FIRE burn plan templates (e.g., burn plan templates developed by the California State-Certified Burn Boss curriculum development committee, or equivalent). Burn plans prepared by Eel River Recovery Project would include all of the requirements of CAL FIRE burn plans. Further, prior to implementing broadcast burning activities, MCRCD and ERRP would minimize soil burn severity to reduce the potential for runoff and soil erosion, by following the guidelines outlined in SPR AQ-3.

For these reasons, proposed revisions to SPR AQ-3 would not result in an increased risk of landslide by removing root systems that stabilize slopes, and revisions to SPR AQ-3, specifically for prescribed burning treatment activities, would not result in a substantially more significant effect related to landslide risk than what was covered in the PEIR.

Impact GEO-2

Treatment activities would include thinning, pile burning, broadcast burning, mechanical treatment and manual treatment in areas with steep slopes, which could decrease the stability of slopes and increase the risk of landslides. Review of the California Geological Survey landslide inventory shows that most of the landslides are mapped out near the Vassar property. These areas do not appear to be active. The potential for treatment activities to increase landslide risk was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.7.3, pages 29-30). Given the variable topography in some of the treatment areas, the remoteness of the area, steep terrain, and wet winter conditions, there is the potential for landslides in the project area. The potential for treatment activities to increase landslide risk was examined in the PEIR. This impact is within the scope of the PEIR because the extent of vegetation removal, intensity of prescribed burning, and characteristics of the geographical terrain are consistent with those analyzed in the PEIR.

New Geology, Soils, Paleontology, and Mineral Resource Impacts

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment area and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.7.1, "Environmental Setting," and Section 3.7.2, "Regulatory Setting," in Volume II of the Final PEIR).

Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the PEIR, but existing environmental and regulatory conditions pertinent to geology and soils that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatments are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to geology, soils, paleontology, or mineral resources would occur that are not covered in the PEIR.

SPRs applicable to this impact are GEO-1, GEO-3, GEO-4, GEO-7, GEO-8, and AQ-3. As explained above, impacts related to landslide risk resulting from the proposed project, including proposed revisions to the project description, compared to the PEIR program description, would not constitute new or substantially more severe significant impact than what was covered in the PEIR.

4.7 EC-Greenhouse Gases 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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs	LTS	Impact GHG-1, pp. 3.8-10 – 3.8-11	Yes	GHG-1	NA	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	PSU	Impact GHG-2, pp. 3.8-11 – 3.8-17	Yes	AQ-3	GHG-2	PSU	No	Yes

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

New Greenhouse Gases Emissions Impacts: Would the treatment result in other impacts to GHG emissions that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

Impact GHG-1

Use of vehicles and mechanical equipment and prescribed burning during initial and maintenance treatments would result in greenhouse gas (GHG) emissions. Consistency of treatments under the CalVTP with applicable plans, policies, and regulations aimed at reducing GHG emissions was examined in the PEIR. This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment, duration of use, and resultant GHG emissions, are consistent with those analyzed in the PEIR. Actions will be consistent with the California Air Resources Control Board (CARB 2017) strategy for controlling greenhouse gasses. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the same plans, policies, and regulations adopted to reduce GHG emissions apply in the areas outside the treatable landscape, as well as areas within the treatable landscape; therefore, the GHG impact is also the same, as described above. SPR GHG-1 is not applicable to the proposed project; ERRP and MCRDD are not subject to the requirement to provide information to inform reporting under the Board of Forestry and Fire Protection's Assembly Bill 1504 Carbon Inventory Process, because this project is not a registered offset project. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR. All forest workers are local and have a small carbon footprint in terms of travel to the job site.

Impact GHG-2

Use of vehicles and mechanical equipment and prescribed burning during initial and maintenance treatments would result in GHG emissions. The potential for these treatments to generate GHG emissions were analyzed in

the PEIR (CalVTP Final PEIR volume II Section 3.8.3, pages 11-17). This impact is within the scope of the PEIR because the proposed activities, as well as the associated equipment and duration of use, and the intent of the treatments to reduce wildfire risk and GHG emissions related to wildfire are consistent with those analyzed in the PEIR. Mitigation Measure GHG-2 would be implemented and would reduce GHG emissions associated with the prescribed burning. However, emissions generated by the treatment would still contribute to the annual emissions generated by the CalVTP, and this impact would remain significant and unavoidable, consistent with, and for the same reasons described in the PEIR. SPR AQ-3 is also applicable to this treatment and will contain the description of feasible GHG reduction techniques implemented per Mitigation Measure GHG-2.

As described above under Section 1.2, "CEQA and Document Purpose, the MCRCD and ERRP propose to revise requirements under SPR AQ-3 for prescribed burning activities to allow for the use of non-CAL FIRE burn plan templates (e.g., burn plan templates developed by the California State-Certified Burn Boss curriculum development committee, or equivalent). Burn plans will be prepared by a certified Burn Boss and will include Smoke Management Plans and other elements that would meet the same standards as required under CAL FIRE burn plans and the CAL VTP PEIR.

For these reasons, proposed revisions to SPR AQ-3 would not result in greater generation of GHG emissions, and revisions to SPR AQ-3, specifically for prescribed burning treatment activities, would not result in a substantially more significant effect on GHG emissions than what was covered in the PEIR.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the climate conditions present in the areas outside of the treatable landscape are essentially the same within and outside the treatable landscape; therefore, the GHG impact is also the same, as described above. The SPR applicable to this treatment project is AQ-3. As explained above, impacts on GHG emissions resulting from the proposed project, including proposed revisions to the project description, compared to the PEIR program description, would not constitute a new or substantially more severe significant impact than what was covered in the PEIR.

Combustion of vegetation during the project's prescribed burn phases would also produce substantial amounts of GHG. The PEIR provides the rates of GHG emissions based on past vegetation treatment projects conducted in California associated with each treatment activity (i.e., mechanical treatment, manual treatment, and prescribed burning) and predominant fuel type (i.e., tree, shrub, and grass).

The cover types within the project area for Phase 1 treatment areas range from montane hardwood to annual grassland. Project vegetation treatments through equipment/vehicle use and prescribed burns would result in GHG emissions. The general potential for vegetation treatments to generate GHG emissions was examined in the PEIR. Consistent with the PEIR, project treatment activities would result in GHG emissions from fossil-fueled off-road equipment, hand tools (e.g., chain saws), and prescribed burns. This project impact would be significant, especially due to prescribed burning, even with the implementation of Mitigation Measure GHG-2. No other feasible and effective mitigation exists to substantially reduce GHG emissions to a less-than-significant level. This impact is within the scope of the PEIR because the proposed project activities, as well as the associated equipment use and duration of use, are consistent with those analyzed in the PEIR.

The mechanical, manual, and prescribed burn treatments will reduce slash and combustible fuels available for fire consumption. This, in turn, reduces the potential for uncharacteristic high intensity wildfires, restores ecology that was historically fire-adapted, puts fire back on the landscape where it was historically present, and creates a more stable natural carbon storage. Therefore, the benefits to net GHG emissions resulting from the project outweigh the short-term carbon emissions. GHG generation was examined in the PEIR. Mitigation Measure GHG-2 would be implemented and would reduce GHG emissions associated with the prescribed burning. However, emissions generated by the treatment would still contribute to the annual emissions generated by the CalVTP, and this impact would remain significant and unavoidable, consistent with, and for the same reasons described in, the PEIR. SPR AQ-3 is also applicable to this treatment and will contain the description of feasible

GHG reduction techniques implemented per Mitigation Measure GHG-2. Therefore, this impact would remain potentially significant and unavoidable, as determined in the PEIR.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the climate conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the GHG impact is also potentially significant and unavoidable, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Impacts Related to GHG Emissions

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable regulatory and environmental conditions presented in the CalVTP PEIR (CalVTP Final PEIR Volume II Section 3.8.1 and 3.8.2).

Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing environmental conditions pertinent to the climate conditions that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to GHG emissions would occur.

4.8 EC-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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy	LTS	Impact ENG-1, pp. 3.9-7 – 3.9-8	Yes	NA	NA	LTS	No	Yes

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

New Energy Resource Impacts: Would the treatment result in other impacts to energy resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

Impact ENG-1

Initial and maintenance treatments will require the consumption of energy through the use of fossil fuels for chainsaws, mechanical equipment, other mechanized hand tools, and transporting personnel to and from the work site. The potential for impacts to result in wasteful, inefficient, or unnecessary consumption of energy and the use of fossil fuels was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.9.3, pages 7-8). The consumption of energy during implementation of the treatment project is within the scope of the PEIR because the types of activities, as well as the associated equipment and duration of proposed use, are consistent with those analyzed in the PEIR. There are no SPRs applicable to this impact.

The inclusion of land in the proposed treatment area that is outside of the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the existing energy consumption is essentially the same within and outside the treatable landscape; therefore, the energy impact is also less than significant, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

New Energy Resource Impacts

The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable regulatory and environmental setting conditions developed in the PEIR (CalVTP Final PEIR Volume II Section 3.9.1 and 3.9.2). The circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to energy use would occur that is not covered in the PEIR.

The project proponent has also determined that the inclusion of land outside the treatable landscape in the proposed treatment area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions present in the areas

outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment activities are also consistent with those analyzed in the PEIR. There are no changes in circumstances that would lead to significant impacts not addressed in the PEIR. Therefore, no new impact to energy resources would occur that is not covered in the PEIR.

4.9 EC-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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials	LTS	Impact HAZ-1, pp. 3.10-14 – 3.10-15	Yes	HAZ-1 HAZ-2 HAZ-3 HAZ-4 HAZ-5	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	No	NA	NA	NA	No	Yes
Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites	LTSM	Impact HAZ-3, pp. 3.10-18 – 3.10-19	No	NA	HAZ-3	LTSM	No	Yes

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

New Hazardous Materials, Public Health and Safety Impacts:: Would the treatment result in other impacts related to hazardous materials, public health and safety that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

Impact HAZ-1

Initial and maintenance treatments would include the use of manual, mechanical, and prescribed fire treatment activities, all of which require the use of hazardous material. These activities would require the transportation, use, filling (into equipment), and storage of petroleum products (fuels, oils, and lubricants). The potential for treatment activities to create a significant health hazard from the use of hazardous materials was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.10.3, pages 14-15). SPRs HAZ-1 through 5 are all applicable to this project. All equipment associated with the proposed project will comply with SPR HAZ-1 to ensure proper maintenance and minimize leaks. SPR HAZ-2 requires mechanized hand tools to have spark arrestors and will be implemented to minimize the risk of potential ignitions. Based on the proper storage and transportation of fuels and oils, the use of PPE, and the implementation of the applicable SPR's, the potential for this project to result in significant health hazards from the use of hazardous materials is less-than-significant. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR. Mendocino County (2020) has a multi-jurisdictional hazard mitigation plan and this Project is in conformance..

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the exposure potential and regulatory conditions are essentially the same within and outside the treatable landscape; therefore, the hazard material

impact is also less than significant, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact HAZ-2

This impact does not apply to the proposed project because herbicide use is not proposed.

Impact HAZ-3

Initial and maintenance treatments proposed under this project include mechanical and prescribed burning treatment activities, which have the potential to disturb soils and expose workers, the public, or the environment to hazardous material if a contaminated site is present within the project area. The potential for the treatment activities to disturb or encounter contaminated sites that could expose workers, the public, or the environment to hazardous materials was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.10.3, page 18-19). No SPRs are applicable to this impact. As directed by Mitigation Measure HAZ-3, database searches for hazardous materials were performed utilizing the Department of Toxic Substances Control (DTSC) Cortese List, as well as DTSC EnviroStor web search. Based upon records searches, there are no known hazardous waste sites identified within the proposed project area. Therefore, this impact is reduced to less than significant.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, a database search for hazardous materials performed utilizing the DTSC Cortese List (CEPA 2023) as well as DTSC EnviroStor web search reveals there are no nearby Known Hazardous Material Sites. Therefore, the potential to encounter hazardous materials and the regulatory conditions present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape, which is less than significant, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Hazardous Materials, Public Health and Safety Impacts

The initial and maintenance treatments proposed for this project are consistent with the treatment types and activities analyzed in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the environmental and regulatory conditions presented in the CalVTP PEIR (CalVTP Final PEIR Volume II Section 3.10.1 and 3.10.2).

No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to hazardous materials, public health, and safety would occur that are not covered in the PEIR.

The project proponent has also determined that the inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to hazardous materials that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to hazardous materials, public health, or safety would occur.

4.10 EC-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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning	LTS	Impact HYD-1, pp. 3.11-25 – 3.11-27	Yes	AD-3 AQ-3 BIO-1 BIO-4 BIO-5 GEO-3 GEO-4 GEO-6 HYD-4	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	AD-3 BIO-1 GEO-1 through GEO-5 GEO-7 GEO-8 HAZ-1 HAZ-5 HYD-1 HYD-4 HYD-5	NA	LTS	No	Yes
Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory	LTS	Impact HYD-3, p. 3.11-29	No	-	-	-	-	-
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	LTS	Impact HYD-4, pp. 3.11-30 – 3.11-31	No		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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Through the Ground Application of Herbicides								

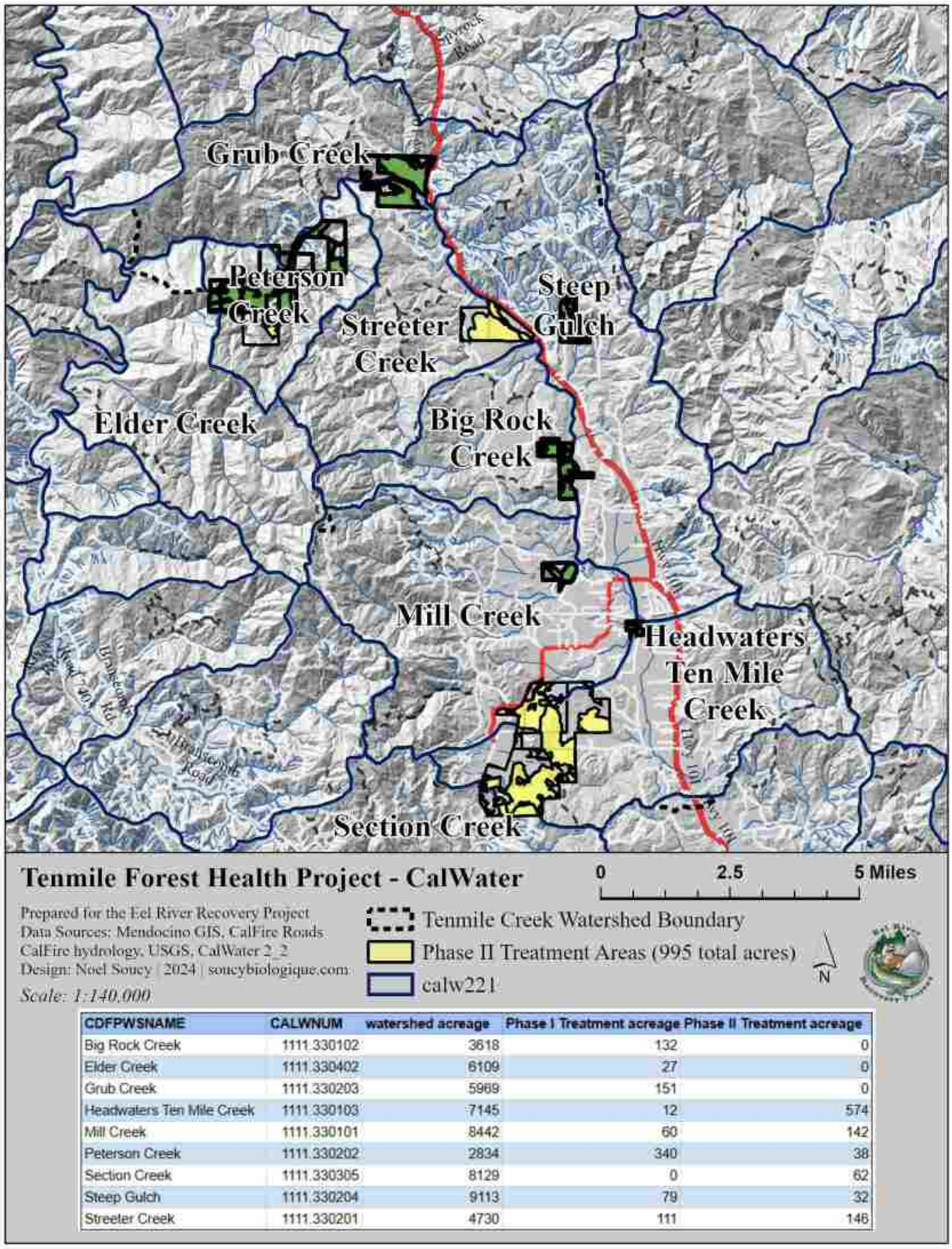
[1]NA: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Hydrology and Water Quality Impacts: Would the treatment result in other impacts to hydrology and water quality that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

The project area is located in the following Hydrologic Areas (HA) South Fork Eel (11113) and Cal Water watersheds (as described by the watershed mapping system http://egis.fire.ca.gov/watershed_mapper/#): Streeter Creek 1111.330201; Headwaters Ten Mile Creek 1111.330103; Peterson Creek 1111.330202; Grub Creek 1111.330203; Mill Creek 1111. 330101; Big Rock Creek 1111.330.102 and Steep Gulch 1111.330204. All of the watersheds in the project area drain into the Pacific Ocean and contain habitat for anadromous and other aquatic species.



CDFPWSNAME	CALWNUM	watershed acreage	Phase I Treatment acreage	Phase II Treatment acreage
Big Rock Creek	1111.330102	3618	132	0
Elder Creek	1111.330402	6109	27	0
Grub Creek	1111.330203	5969	151	0
Headwaters Ten Mile Creek	1111.330103	7145	12	574
Mill Creek	1111.330101	8442	60	142
Peterson Creek	1111.330202	2834	340	38
Section Creek	1111.330305	8129	0	62
Steep Gulch	1111.330204	9113	79	32
Streeter Creek	1111.330201	4730	111	146

Figure 11: Tenmile Forest Health Project Phase I and Phase II treatment acres by Calwatershed units.

The South Fork Eel River HA is currently listed under Section 303(d) of the Clean Water Act due to impairment and or threat of impairment to water quality by sediment and temperature (California State Water Board North Coast - R1, 2024). The 303(d) listing is regulated at the state level by the Water Quality Control Policy for developing California's Clean Water Act Section 303(d) Listing Policy. Forest health improvement projects that utilize heavy equipment or ground disturbing activities create an opportunity to generate sediment. This project is designed to avoid unnecessary disturbance and further comply with applicable Water Quality waste discharge requirements in the Basin Plan for the North Coast (SPR HYD-1).

Several of the impacts below (i.e., HYD-1 through 4) evaluate compliance with water quality standards or waste discharge requirements. The State Water Resources Control Board is requiring all projects using the CalVTP PEIR to follow the requirements of their Vegetation Treatment General Order, which would meet the requirements of SPR HYD-1. Users of the CalVTP PSA process are automatically enrolled in the General Order and are required to implement all applicable SPRs and mitigation measures from the PEIR. In addition, the General Order requires project proponents to comply with any applicable Basin Plan prohibitions.

As described above under Section 1.2, "CEQA and Document Purpose," ERRP and the MCRCD propose to revise requirements under SPR AQ-3 for prescribed burning activities to allow for the use of non-CAL FIRE burn plan templates (e.g., burn plan templates developed by the California State-Certified Burn Boss curriculum development committee, or equivalent). Burn plans prepared by Mendocino County RCD or Eel River Recovery Project would include all of the requirements of CAL FIRE burn plans. Further, prior to implementing broadcast burning activities, Eel River Recovery Project would minimize soil burn severity to reduce the potential for runoff and soil erosion, as outlined in SPR AQ-3.

Impact HYD-1

ERRP and its contractors will conduct vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general waste discharge requirements (WDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, WDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.11.3, pages 25-27).

Impact HYD-2

The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads, including temporary roads.

Impact HYD-3

This impact does not apply to the proposed project because prescribed herbivory is not a proposed treatment activity for this PSA.

Impact HYD-4

All forest treatments will avoid streams and watercourses, with WLPZs protection zones ranging from ranging from 25 to 150 feet (Table 2). The potential for prescribed burning activities to cause runoff and violate water quality regulations or degrade water quality was examined in the PEIR. This impact is within the scope of the PEIR because the use of low-intensity prescribed burns and associated impacts to water quality are consistent with those analyzed in the PEIR.

Impact HYD-5

This impact does not apply to the proposed project because herbicide treatment is not a proposed treatment activity for this PSA

Impact HYD-6

This Project will not interfere with any drainage systems, such as road culverts, or exacerbate any problems in natural drainage systems because there will be no operations in buffer zones of any water course. In fact, the Project will be improving natural drainage systems through placement of woody materials in Class III streams that are covered under an addendum (Appendix 3). The potential for treatment activities to substantially alter the existing drainage pattern of a project site was examined in the PEIR. This impact to site drainage is within the scope of the PEIR because the types of treatments and treatment intensity are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, surface water conditions are essentially the same within and outside the treatable landscape; therefore, the impact related to alteration of site drainage patterns is also the same, as described above. SPRs applicable to this impact are AD-3, GEO-5, HYD-4, and HYD-6. The potential for mechanical treatments to substantially alter existing drainage patterns of the project site was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.11.3, pages 30-31), but mechanical treatments in the Project are restricted to 38 acres and no operation will take place within buffer zones of water courses.

New Hydrology and Water Quality Impacts

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.11.1, "Environmental Setting," and Section 3.11.2, "Regulatory Setting," in Volume II of the Final PEIR).

Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the PEIR and revisions to SPRs constitute a revision to the Program. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to hydrology and water quality that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. Impacts resulting from proposed revisions to SPRs and mitigation measures are consistent with the impacts analyzed in the program, as explained under relevant impacts above. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape and revisions to SPRs and mitigation measures would not give rise to any new significant impacts. Therefore, no new impact related to hydrology and water quality would occur.

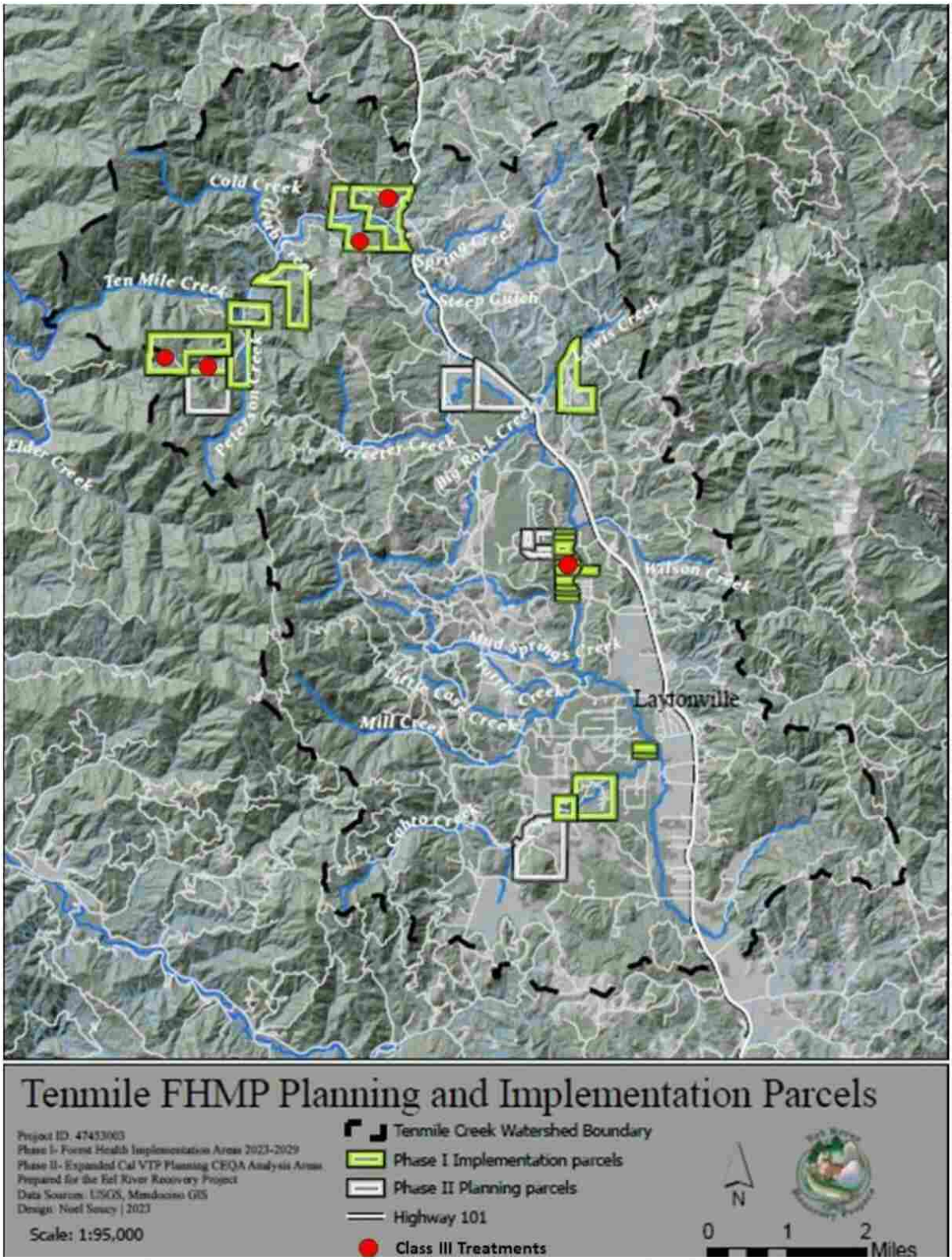


Figure 12: Location of gullies and or Class III watercourse locations for gully stabilization using thinning biomass.

4.11 EC-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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation	LTS	Impact LU-1, pp. 3.12-13 – 3.12-14	Yes	AD-3	NA	LTS	No	Yes
Impact LU-2: Induce Substantial Unplanned Population Growth	LTS	Impact LU-2, pp. 3.12-14 – 3.12-15	Yes	NA	NA	NA	NA	NA

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

New Land Use and Planning, Population and Housing Impacts: Would the treatment result in other impacts to land use and planning, population and housing that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

Impact LU-1

Treatment activities would occur within the project site, which is on a variety of private rangeland, remote residential, agricultural, and forest designated lands in unincorporated Mendocino County. The potential for treatment activities to cause a significant environmental impact due to conflict with a land use plan, policy, or regulation was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.12.3, pages 13-14). SPRs AD-3 is applicable to this project. Several of the parcels involved have existing forest health management plans. No conflicts with a land use plan or policy would occur because the project would adhere to SPR AD-3.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent considered in the PEIR. However, land uses in the project area are essentially the same within and outside the treatable landscape; therefore, the land use impact is also less than significant, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

Impact LU-2

The potential for initial and maintenance treatments to result in substantial population growth as a result of increases in demand for employees was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.12.3, pages 14-15). No SPRs are applicable to this impact.

Crews implementing the proposed project would typically range between 4 to 10 in size, and up to three crews would be working simultaneously to implement the proposed project. Impacts associated with short-term increases in the demand for workers during implementation of the proposed project are within the scope of the PEIR because the number of workers required for implementation of treatments is generally consistent with the crew size analyzed in the PEIR for the types of treatments proposed (i.e., two to 10 workers for mechanical

treatments, and up to 10 workers for manual treatments. Employing local contractors will be encouraged where feasible to minimize the risk of impacting population and housing resources. Based on the consistency with the scope of the PEIR, this impact would remain less than significant.

The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the population and housing characteristics of the project area are essentially the same within and outside the treatable landscape; therefore, the population and housing impact is also less than significant, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR.

New Land Use and Planning, Population and Housing Impacts

The proposed project is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (CalVTP Final PEIR Volume II Section 3.12.1 and 3.12.2).

The MCRCD has also determined that the circumstances under which the proposed treatment project would be undertaken are also consistent with those considered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to land use and planning or population and housing would occur that is not covered in the PEIR.

Including land in the proposed project area that is outside the treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing conditions that are pertinent to land use and planning, population and housing that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to land use and planning, population and housing would occur.

4.12 EC-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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation	LTS	Impact NOI-1, pp. 3.13-9 – 3.13-12; Appendix NOI-1	Yes	AD-3 NOI-1 NOI-2 NOI-3 NOI-4 NOI-5 NOI-6	NA	LTS	No	Yes
Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities	LTS	Impact NOI-2, p. 3.13-12	Yes	NOI-1	NA	LTS	No	Yes

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

New Noise Impacts: Would the treatment result in other noise-related impacts that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

Impact NOI-1

Initial and maintenance treatments proposed for this project including manual, mechanical, and prescribed fire treatment activities will require the use of heavy, noise-generating equipment. The potential for substantial short-term increase in ambient noise levels was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.13.3, pages 9-12).

Manual, mechanical, and prescribed burning treatment activities, as well as chipping/mastication and pile burning occurring adjacent to sensitive land uses, could temporarily expose receptors to noise levels that exceed local standards. The potential for a substantial short-term increase in ambient noise levels from use of heavy equipment was examined in the PEIR. This impact is within the scope of the PEIR because the number and types of equipment proposed, and equipment use being temporary and sporadic, are consistent with the assumptions analyzed in the PEIR. The proposed treatments would not require the use of helicopters, which was the loudest type of equipment evaluated in the PEIR. Mendocino County does not have a noise ordinance or policy restricting the time of day when noise-generating activity can occur. In the absence of standards for construction noise, the County's land use/noise compatibility interior standards would be applied, which limit interior noise to 45 decibels (dB) Ldn (Level day-night) for noise sensitive receptors. Ldn is the day-night average sound level and is used to describe the cumulative noise exposure during an average annual day. As discussed in the PEIR, noise levels generated by individual equipment range from 77 to 87.9 dB at 50 feet from

the noise source, with the loudest type of equipment being a chainsaw. Project operations may employ multiple pieces of equipment simultaneously; however, these would typically be spread out (i.e., usually more than 100 feet apart) rather than operating next to each other. This is particularly true of larger, heavy-duty off-road equipment such as masticators, chippers, bulldozers, skid steers, and excavators. Noise-generating equipment would be used intermittently between 7:00 a.m. and 6:00 p.m. during treatment operations. While there is the potential for some prescribed burning to occur during nighttime and weekend hours, all treatment activities using noise-generating equipment would be limited to 7:00 a.m. to 6:00 p.m. Monday through Friday, which would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours.

Although operation of equipment would temporarily and intermittently generate elevated noise during daytime hours, the interior noise standard is an average that considers daytime and nighttime noise levels, and when averaged with the noise levels during the quiet nighttime hours, it is reasonably expected that noise generated during treatments would not exceed the local Ldn threshold. In addition, treatments would primarily occur outside of the 100-foot defensible space requirement described in PRC 4291, and therefore, most treatments would not occur within 100 feet of sensitive receptors. The noise levels assessed in the PEIR and discussed above are at 50 feet from the source. Therefore, there would typically be additional attenuation for distance, vegetation, and building materials that would result in interior noise levels being lower than the 77 to 87.9 dB levels estimated for equipment. Treatments would also be dispersed throughout the 1.971-acre project area so that short-term noise increases at any one sensitive receptor would be limited. SPRs AD-3 and NOI-1 through NOI-5 are applicable to this treatment. With implementation of SPR AD-3, noise levels associated with vegetation treatment activities under the CalVTP would not exceed local land use/noise compatibility standards, and noise exposure attributed to vegetation treatment activities under the CalVTP would not generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of local standards. For any sensitive receptors that are within 1,500 feet of a treatment area, SPR NOI-6 would also apply. There is one school within 1,500 feet of the proposed project area and noise producing work will not occur when school is in session. In addition, there are residences scattered throughout the project area that could be within 1,500 feet of proposed treatments.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the exposure potential to any sensitive receptors present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the noise impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR

Impact NOI-2

Initial and maintenance treatments would involve trucks hauling heavy equipment to the project area. These haul trucks would be dispersed on roadways providing access to the project area including, but not limited to, Highways 101 and Branscomb Road. Vehicle traffic on area highways would not generate a noticeable increase in traffic-related noise. Haul truck trips on the local roadways would pass by residential receptors and the event of each truck passing by could increase the single event noise levels. The potential for a substantial short-term increase in single event noise levels was examined in the PEIR. This impact is within the scope of the PEIR because the number and types of equipment proposed are consistent with those analyzed in the PEIR. The haul trips associated with the treatment would occur during daytime hours, which would avoid the potential to cause sleep disturbance to residents during the more noise-sensitive evening and nighttime hours. SPR NOI-1 is applicable to this treatment.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the exposure potential is essentially the same within and outside the treatable landscape; therefore, the noise impact is also the same, as described above. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Initial and maintenance treatments proposed for this project will require the use of trucks hauling heavy equipment to and from the project site, like masticators, chainsaws, and other noise-generating equipment. These haul truck trips would be dispersed on area roadways providing access to the project area including, but not limited to, Highways 101 and Branscomb Road. Vehicle traffic on area highways would not generate a noticeable increase in traffic-related noise. Although the project site is located in rural Mendocino County, transportation to and from the project site would pass by residential receptors and the event of each truck passing by could increase the single event noise levels. The potential for substantial short-term increase in Single-Event Noise Levels (SENL) was examined in the PEIR (CalVTP Final PEIR Volume II Section 3.13.3, page 12). SPR NOI-1 is applicable to this treatment.

New Noise Impacts

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatments and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.13.1, "Environmental Setting," and Section 3.13.2, "Regulatory Setting," in Volume II of the Final PEIR).

Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to noise that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to noise is expected to occur.

4.13 EC-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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas	LTS	Impact REC-1 pp. 3.14-6 – 3.14-7	Yes	AD-1 AD-3	NA	LTS	No	Yes

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

New Recreation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

Impact REC-1

The initial and maintenance treatments proposed for this project may result in degradation of views and decreased air quality to nearby recreation areas but as treatment would be on private land, treatment activities would not directly impact recreation. The potential for treatment activities to disrupt recreational activities was analyzed in the PEIR (CalVTP Final PEIR Volume II Section 3.14.3, pages 6-7). The temporary disruption of recreational activities during project implementation is within the scope of activities and impacts addressed in the PEIR because the treatments and associated equipment and duration of use is consistent with those analyzed in the PEIR.

Vegetation treatment activities have the potential to disrupt recreational activities within the project area through temporary trail closures during active treatments and by degrading the experience of recreationists through the creation of noise, dust, degradation of scenic views, or increased traffic. The potential for vegetation treatment activities to disrupt recreation activities was examined in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, the availability of recreational resources within the project area is essentially the same within and outside the treatable landscape; therefore, the impact to recreation is also the same, as described above. The SPR applicable to this treatment is AD-1. Maintaining consistency with local plans, policies, and ordinances (SPR AD-3) would reduce the risk of indirect disruption to recreational activities near the project area. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than covered in the PEIR

New Recreation Impacts

The proposed project is consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.14.1, "Environmental Setting," and Section 3.14.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land in the proposed project area that is outside the treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental conditions pertinent to recreation that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. The SPRs applicable to this treatment are AD-1 and AD-3. Maintaining consistency with local plans, policies, and ordinances (SPR AD-3) would reduce the risk of indirect disruption to recreational activities near the project area. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to recreation would occur.

4.14 EC-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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures	LTS	Section 3.15.2; Impact TRAN-1 pp. 3.15-9 – 3.15-10	Yes	AD-3 HYD-2 TRAN-1	NA	LTS	No	Yes
Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses	LTS	Impact TRAN-2 pp. 3.15-10 – 3.15-11	Yes	AD-3 HYD-2 TRAN-1	NA	LTS	No	Yes
Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP	PSU	Impact TRAN-3 pp. 3.15-11 – 3.15-13	Yes	NA	AQ-1	SU	No	Yes

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

New Transportation Impacts: Would the treatment result in other impacts to transportation that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

Impact TRAN-1

Initial and maintenance treatments have the potential to increase vehicular traffic due to hauling equipment and crew transportation to and from the project site. The potential for a temporary increase in traffic to conflict with a program, plan, or policy addressing roadways facilities or prolonged road closures was evaluated in the PEIR (CalVTP Final PEIR Volume II Section 3.15.3, pages 9-10). SPRs AD-3, HYD-2, TRAN-1 are all applicable to this project.

The project affects private roads, and a Traffic Management Plan is not necessary for this project (GOPR 2018). The operators will, however, provide signage and traffic control (as needed) during operational hours. This project should not contribute to smoke dispersion onto public roadways (SPR TRAN-1). The project will avoid construction of new roads.

Impact TRAN-2

The potential for smoke to affect visibility along roadways during implementation of treatment activities was examined in the PEIR (CalVTP Final PEIR volume II Section 3.15.3, pages 10-11). This impact is within the scope of

the PEIR because the equipment and methods used for prescribed burning are consistent with those analyzed in the PEIR. SPRs AD-3, HYD-2, TRAN-1 are all applicable to this project.

Impact TRAN-3

Initial and maintenance treatments have the potential to increase vehicle miles traveled (VMT) above baseline conditions because the project area is in a remote location and would require vehicle trips to access treatment locations. The potential for net increase in VMT to occur was analyzed in the PEIR and was identified as potentially significant and unavoidable (CalVTP Final PEIR Volume II Section 3.15.3, pages 11-13). This project is expected to remain below the threshold of 110 trips per day, which is generally assumed to cause less-than-significant transportation impacts, as discussed in the PEIR and the Technical Advisory on Evaluation Transportation Impacts (OPR, 2018). The highest VMT would occur at the beginning and end of project activities and would likely occur on days where broadcast burning is likely to occur. Maximum daily VMT would consist of transportation of fire suppression equipment, hand crews, and heavy machinery to and from the project site, however, the number of trips would remain below 110. Furthermore, hiring local contractors will be encouraged where feasible to reduce the amount of VMT. Temporary increases in VMT are within the scope of the activities and impacts addressed in the PEIR because the number and duration of increased vehicle trips is consistent with those analyzed in the PEIR. Additionally, Mitigation Measure AQ-1 would encourage contractors to carpool or use public transportation when feasible as outlined in the PEIR. This impact would remain potentially significant and unavoidable as determined in the PEIR (CalVTP Final PEIR Volume II Section 3.15.3, page 12-13).

New Transportation Impacts

The proposed treatment is consistent with the treatment types and activities discussed in the PEIR. The project proponent has considered all site-specific characteristics of the proposed treatment project and determined they are consistent with the regulatory and environmental setting conditions presented in the PEIR (CalVTP Final PEIR Volume II 3.15.1 and 3.15.2).In summary, due to an intended decrease in the occurrence and severity of wildfires following achievement of the proposed treatment acreage targets under the CalVTP, implementation of the CalVTP could result in a net reduction in VMT in the long term because wildfire response travel could be reduced, resulting in a less-than-significant impact.

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

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

New Public Services, Utilities and Service System Impacts: Would the treatment result in other impacts to public services, utilities and service systems that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

Impact UTIL-1

Operators will be responsible for filling required water tenders and/or tanks; outside the project area. Initial and maintenance treatments for this project would include prescribed burning, which may require on-site water supply for fire suppression during burn activities as well as dust control during vegetation removal. If needed, water would be supplied from water trucks, water trailers, or fire engines. The potential increased demand for water was examined in the PEIR (CalVTP Final EIR Volume II Section 3.16.1, page 9). There are no relevant SPRs for this impact.

The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the water supplies present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the water supply impact is also the same, as described above. No SPRs are applicable to this impact. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact UTIL-2

Initial and maintenance treatments would generate biomass as a result of vegetation removal activities within the treatment area. Biomass generated by manual and mechanical treatments will be disposed of primarily through burning on site, chipping, masticating, incineration, or lop and scatter. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the solid waste services present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the solid waste infrastructure impact is also the same as described above. No SPRs are applicable to this impact because all project generated biomass will be disposed of on-site. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact UTIL-3

As discussed above, initial and maintenance treatments would generate biomass. Biomass generated by mechanical and manual treatments would be disposed of with pile burning, mulching, lopping and scattering, or hauling biomass offsite in areas where material cannot safely be burned. If offsite disposal is needed, MCRCD would comply with all federal, state, and local management and reduction goals, statutes, and regulations related to solid waste. Compliance with reduction goals, statutes, and regulations related to solid waste was examined in the PEIR. This impact is within the scope of the activities and impacts addressed in the PEIR because the type and amount of biomass that may need to be hauled off-site are consistent with those analyzed in the PEIR. The inclusion of land in the proposed treatment area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the biomass conditions in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, impacts related to biomass are also the same, as described above. SPR UTIL-1 would be applicable to the proposed treatments if biomass is hauled off-site. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

New Impacts to Public Services, Utilities and Service Systems

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The site-specific characteristics of the proposed treatments are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.16.1, "Environmental Setting," and Section 3.16.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to public services, utilities, and service systems that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts are the same and, for the reasons described above, impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside of the CalVTP treatable landscape would not give rise to any new significant impacts. Therefore, no new impact related to public services, utilities, or service systems would occur.

4.16 EC-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[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Section 3.17.1; Impact WIL-1 pp. 3.17-14 – 3.17-15	Yes	AD-3 AQ-3 HAZ-2 HAZ-3 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-3 GEO-4 GEO-5 GEO-8 -	NA	LTS	No	Yes

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

New Wildfire Impacts: Would the treatment result in other impacts related to wildfire that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
No new impacts to report.	☐	☐	☐

Discussion

Impact WIL-1

Proposed vegetation treatment activities are mechanical, manual and prescribed burn treatments. Vegetation treatments involving motorized equipment could pose a risk of accidental ignition. Temporary increases in risk associated with uncontrolled fire from prescribed burns could also occur. As discussed in Section 3.17.1, "Environmental Setting," in Volume II of the Final PEIR, under "Prescribed Burn Planning and Implementation," implementing a prescribed burn requires extensive planning, including the preparation of prescription burn plans, smoke management plans, site-specific weather forecasting, public notifications, safety considerations, and ultimately favorable weather conditions so a burn can occur on a given day. Prior to implementing a broadcast burn, fire containment lines would be established by clearing vegetation surrounding the designated burn area to help prevent the accidental escape of fire. Water containers and safety equipment would be staged on site as necessary.

The potential increase in exposure to wildfire during implementation of treatments was examined in the PEIR. Increased wildfire risk associated with the use of heavy equipment in vegetated areas and with prescribed burns is within the scope of the PEIR because the types of equipment and treatment duration and the types of prescribed burn methods proposed as part of the project are consistent with those analyzed in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the

wildfire risk is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. SPRs applicable to this impact are AD-3, AQ-3, HAZ-2, HAZ-3, and HAZ-4. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact WIL-2

Vegetation treatment types would include mechanical and manual vegetation treatment, and prescribed burning, which could exacerbate fire risk as described in Impact WIL-1 above. The potential for post-fire landslides and flooding was evaluated in the PEIR. The potential exposure of people or structures to post-fire landslides and flooding are within the scope of the activities and impacts covered in the PEIR because the equipment types and duration of treatments, and methods of prescribed burn implementation are consistent with those analyzed in the PEIR.As described above under Section 1.2, "CEQA and Document Purpose," Mendocino County RCD and Eel River Recovery Project proposes to revise requirements under SPR AQ-3 for prescribed burning activities to allow for the use of non-CAL FIRE burn plan templates (e.g., burn plan templates developed by the California State-Certified Burn Boss curriculum development committee, or equivalent). Burn plans prepared by Mendocino County RCD and Eel River Recovery Project would include all of the requirements of CAL FIRE burn plans. Further, prior to implementing broadcast burning activities, Mendocino County RCD and Eel River Recovery Project would minimize soil burn severity to reduce the potential for runoff and soil erosion, as outlined in SPR AQ-3.

For these reasons, proposed revisions to SPR AQ-3 would not result in an increased risk of post-fire landslides and flooding, and revisions to SPR AQ-3, specifically for prescribed burning treatment activities, would not result in a substantially more significant effect related to post-fire landslide and flooding risk than what was covered in the PEIR. The inclusion of land in the proposed project area that is outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the wildfire risk of the project area is essentially the same within and outside the treatable landscape; therefore, the wildfire impact is also the same, as described above. SPRs applicable to this impact are AQ-3, GEO-3 through GEO-5, and GEO-8. Although most mechanical treatments would occur from existing roads or skid trails or on flat to moderate slopes, SPR GEO-8 would apply if a treatment area contains steep slopes. Furthermore, because the treatments reduce wildfire risk, they would also decrease post wildfire landslide and flooding risk in areas that could otherwise burn in a high-severity wildfire without treatment. As explained above, impacts related to wildfire risk resulting from the proposed project, including proposed revisions to the project description, compared to the PEIR program description, would not constitute new or substantially more severe significant impact than what was covered in the PEIR.

New Impacts to Wildfire

The proposed treatments are consistent with the treatment types and activities considered in the CalVTP PEIR. The project proponent has considered the site-specific characteristics of the proposed treatment project and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (refer to Section 3.17.1, "Environmental Setting," and Section 3.17.2, "Regulatory Setting," in Volume II of the Final PEIR). Including land from outside the CalVTP treatable landscape in the proposed project area constitutes a change to the geographic extent presented in the PEIR and revisions to SPRs constitute a revision to the Program. However, within the boundary of the project area, the existing environmental and regulatory conditions pertinent to wildfire that are present in the areas outside the treatable landscape are essentially the same as those within the treatable landscape; therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances would give rise to new significant impacts not addressed in the PEIR. Therefore, no new impact related to wildfire would occur that is not covered in the PEIR.

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