

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: South Park VMP

Lead Agency: California Department of Forestry and Fire Protection Contact Person: Gary Whitson
 Mailing Address: 785 Mountain Ranch Road Phone: (209) 754-2708
 City: San Andreas Zip: 95249 County: Tuolumne

Project Location: County: Tuolumne City/Nearest Community: Arnold
 Cross Streets: SR-4 & Big Trees Pkwy Zip Code: 95223
 Longitude/Latitude (degrees, minutes and seconds): 38 ° 13 ' 43 " N / 120 ° 15 ' 46 " W Total Acres: 491
 Assessor's Parcel No.: _____ Section: 6 Twp.: 4N Range: 15E Base: MD B&M
 Within 2 Miles: State Hwy #: SR-4 Waterways: North Fork Stanislaus River
 Airports: _____ Railways: _____ Schools: _____

Governor's Office of Planning & Research

Document Type:

CEQA: NOP Draft EIR Supplement/Subsequent EIR Mit Neg Dec
 Early Cons Neg Dec (Prior SCH No.)
 Neg Dec Mit Neg Dec
 NEPA: NOI EA Draft EIS FONSI
 Other: Joint Document Final Document Other: _____

STATE CLEARINGHOUSE

Local Action Type:

General Plan Update Specific Plan Rezone Annexation
 General Plan Amendment Master Plan Prezone Redevelopment
 General Plan Element Planned Unit Development Use Permit Coastal Permit
 Community Plan Site Plan Land Division (Subdivision, etc.) Other: _____

Development Type:

Residential: Units _____ Acres _____
 Office: Sq.ft. _____ Acres _____ Employees _____
 Commercial: Sq.ft. _____ Acres _____ Employees _____
 Industrial: Sq.ft. _____ Acres _____ Employees _____
 Educational: _____
 Recreational: _____
 Water Facilities: Type _____ MGD _____
 Transportation: Type _____
 Mining: Mineral _____
 Power: Type _____ MW _____
 Waste Treatment: Type _____ MGD _____
 Hazardous Waste: Type _____
 Other: Fireline shaded fuel break construction

Project Issues Discussed in Document:

Aesthetic/Visual Fiscal Recreation/Parks Vegetation
 Agricultural Land Flood Plain/Flooding Schools/Universities Water Quality
 Air Quality Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
 Archeological/Historical Geologic/Seismic Sewer Capacity Wetland/Riparian
 Biological Resources Minerals Soil Erosion/Compaction/Grading Growth Inducement
 Coastal Zone Noise Solid Waste Land Use
 Drainage/Absorption Population/Housing Balance Toxic/Hazardous Cumulative Effects
 Economic/Jobs Public Services/Facilities Traffic/Circulation Other: Wildfire

Present Land Use/Zoning/General Plan Designation:

Timberland Production Zone (TPZ)

Project Description: (please use a separate page if necessary)

The South Park Project area is in Tuolumne County approximately 5 miles southeast of Arnold, California along the southern boundary of Calaveras Big Trees State Park. The proposed project area is on property owned by Sierra Pacific Industries. The project will consist of a series of small, low intensity prescribed burns conducted in cooperation with Sierra Pacific Industries. Individual burns will generally be single day events and less than 30 acres in size. The objectives of the project are to: 1) create a shaded fuelbreak condition along the Big Trees State Park boundary to protect Big Trees State Park, Sierra Pacific Industries timberlands and USFS timberlands from an uncontrolled wildfire; 2) protect the mixed conifer over story by reducing surface fuel loading, and increasing canopy base height; 3) and, enhance wildlife habitat.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X".
If you have already sent your document to the agency please denote that with an "S".

- | | |
|--|--|
| <input checked="" type="checkbox"/> Air Resources Board | <input type="checkbox"/> Office of Historic Preservation |
| <input type="checkbox"/> Boating & Waterways, Department of | <input type="checkbox"/> Office of Public School Construction |
| <input type="checkbox"/> California Emergency Management Agency | <input checked="" type="checkbox"/> Parks & Recreation, Department of |
| <input type="checkbox"/> California Highway Patrol | <input type="checkbox"/> Pesticide Regulation, Department of |
| <input type="checkbox"/> Caltrans District # _____ | <input type="checkbox"/> Public Utilities Commission |
| <input type="checkbox"/> Caltrans Division of Aeronautics | <input checked="" type="checkbox"/> Regional WQCB # _____ |
| <input type="checkbox"/> Caltrans Planning | <input type="checkbox"/> Resources Agency |
| <input type="checkbox"/> Central Valley Flood Protection Board | <input type="checkbox"/> Resources Recycling and Recovery, Department of |
| <input type="checkbox"/> Coachella Valley Mtns. Conservancy | <input type="checkbox"/> S.F. Bay Conservation & Development Comm. |
| <input type="checkbox"/> Coastal Commission | <input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy |
| <input type="checkbox"/> Colorado River Board | <input type="checkbox"/> San Joaquin River Conservancy |
| <input type="checkbox"/> Conservation, Department of | <input type="checkbox"/> Santa Monica Mtns. Conservancy |
| <input type="checkbox"/> Corrections, Department of | <input type="checkbox"/> State Lands Commission |
| <input type="checkbox"/> Delta Protection Commission | <input type="checkbox"/> SWRCB: Clean Water Grants |
| <input type="checkbox"/> Education, Department of | <input type="checkbox"/> SWRCB: Water Quality |
| <input type="checkbox"/> Energy Commission | <input type="checkbox"/> SWRCB: Water Rights |
| <input checked="" type="checkbox"/> Fish & Game Region # _____ | <input type="checkbox"/> Tahoe Regional Planning Agency |
| <input type="checkbox"/> Food & Agriculture, Department of | <input type="checkbox"/> Toxic Substances Control, Department of |
| <input type="checkbox"/> Forestry and Fire Protection, Department of | <input type="checkbox"/> Water Resources, Department of |
| <input type="checkbox"/> General Services, Department of | Other: _____ |
| <input type="checkbox"/> Health Services, Department of | Other: _____ |
| <input type="checkbox"/> Housing & Community Development | |
| <input type="checkbox"/> Native American Heritage Commission | |

Local Public Review Period (to be filled in by lead agency)

Starting Date 6/10/19 Ending Date 7/10/19

Lead Agency (Complete if applicable):

Consulting Firm: _____	Applicant: _____
Address: _____	Address: _____
City/State/Zip: _____	City/State/Zip: _____
Contact: _____	Phone: _____
Phone: _____	

Signature of Lead Agency Representative:  **Date:** 6/7/19

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

**Initial Study/Negative Declaration
for the proposed
South Park 2018 VMP
Tuolumne County, California**



prepared by:

Gary Whitson Registered Professional Forester #2516
The California Department of Forestry and Fire Protection
The Lead Agency Pursuant to Section 21082.1 of the
California Environmental Quality Act

California Department of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460
(916) 653-4995

February 13, 2019

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Determination

This Initial Study/Negative Declaration (IS/ND) describes an environmental impact analysis conducted for the proposed South Park VMP project. This document was prepared by California Department of Forestry and Fire Protection staff utilizing information gathered from a number of sources including research and field review of the proposed project area and consultation with environmental planners and other experts on staff at other public agencies. Pursuant to Section 21082.1 of the California Environmental Quality Act, the Lead Agency, the California Department of Forestry and Fire Protection, has independently reviewed and analyzed the Initial Study/Negative Declaration and finds that this document reflects its independent judgment. The lead agency further finds that the proposed project, which includes revised activities and mitigation measures designed to minimize environmental impacts, would not result in significant adverse effects on the environment.

I hereby authorize the distribution of this IS/ND for public review and comment:



Dated: _____

5/29/19

Matthew Reischman

Assistant Deputy Director for Resource Management
California Department of Forestry and Fire Protection

Introduction and Regulatory Context

INTRODUCTION

This Initial Study/Negative Declaration (IS/ND¹) describes the environmental impact analysis conducted for the proposed South Park 2018 Vegetative Management project, located adjacent to Calaveras Big Trees State Park in Tuolumne County. This document was prepared by CAL FIRE staff utilizing information gathered from a number of sources including research and field review of the proposed project area and consultation with environmental planners and other experts on staff at other public agencies. Pursuant to § 21082.1 of CEQA, the lead agency, CAL FIRE, has prepared, reviewed, and analyzed the IS/ND and declares that the statements made in this document reflect CAL FIRE's independent judgment as lead agency pursuant to CEQA. CAL FIRE further finds that the proposed project, which includes revised activities and mitigation measures designed to minimize environmental impacts, will not result in significant adverse effects on the environment.

REGULATORY GUIDANCE

This IS/ND has been prepared by CAL FIRE to evaluate potential environmental effects that could result following approval and implementation of the South Park 2018 Vegetative Management Plan. This document has been prepared in accordance with current CEQA Statutes (Public Resources Code §21000 *et seq.*) and current CEQA Guidelines (California Code of Regulations (CCR) §15000 *et seq.*).

An Initial Study) is prepared by a lead agency to determine if a project may have a significant effect on the environment (14 CCR §15063(a)), and thus, to determine the appropriate environmental document. In accordance with CEQA Guidelines §15070 a “public agency shall prepare...a proposed negative declaration or mitigated negative declaration...when: (a) The initial study shows that there is no substantial evidence...that the project may have a significant impact upon the environment, or (b) The initial study identifies potentially significant effects but revisions to the project plans or proposal are agreed to by the applicant and such revisions will reduce potentially significant effects to a less-than-significant level.” In this circumstance, the lead agency prepares a written statement describing its reasons for concluding that the proposed project will not have a significant effect on the environment and, therefore, does not require the preparation of an Environmental Impact Report. This IS/ND conforms to these requirements and to the content requirements of CEQA Guidelines §15071.

This IS/ND evaluates the environmental effects of the proposed South Park VMP project. The project involves the maintenance and expansion of a shaded fuel break in northern Tuolumne County. The project will consist of fuels reduction projects that will utilize fire crew brush cutting, pile burning, and broadcast prescribed fire.

PURPOSE OF THE INITIAL STUDY

CAL FIRE has primary authority for carrying out the proposed South Park VMP and is the lead agency under CEQA. The purpose of this IS/ND is to present to the public and reviewing agencies the environmental consequences of implementing the proposed project and describe the adjustments made to the project to avoid significant environmental effects or reduce them to a less-than-significant level. This disclosure document is being made available to the public, and reviewing agencies, for review and comment. The IS/ND is being circulated for public and agency review and comment for a review period of 30 days. The beginning and ending dates of the 30-day public review period will be indicated on the Notice of Intent. Your views and comments on how the proposed project may affect the environment are welcomed. If you wish to submit written comments for CAL FIRE’s consideration, these must be postmarked on or prior to the date the public review period will close as indicated on the Notice of Intent.

Comments should be addressed to:

Christopher E. Browder, Deputy Chief, Environmental Protection
California Department of Forestry and Fire Protection
Resource Management – Environmental Protection Program
P.O. Box 944246
Sacramento, CA 94244-2460
Phone: (916) 653-4995
Email: sacramentopubliccomment@fire.ca.gov

After comments are received from the public and reviewing agencies, CAL FIRE will consider those comments and may (1) adopt the negative declaration and approve the proposed project; (2) undertake additional environmental studies; or (3) abandon the project. If the project is approved, CAL FIRE may design and executed all or part of the project.

Project Description and Environmental Setting

Project Location

The South Park Project area is in Tuolumne County approximately 5 miles southeast of Arnold, California along the southern boundary of Calaveras Big Trees State Park (CBTSP). The project area is owned by Sierra Pacific Industries. Legal location is Sections 32, 33, T5N, R16E; Sections 35, 36, T5N, R15E; Sections 5, 6, T4N, R16E; Section 1, T4N, R15E; Mount Diablo B&M.

BACKGROUND AND NEED FOR THE PROJECT

The Calaveras Big Trees became a State Park in 1931 to preserve the North Grove of giant sequoias. The North Grove includes the "Discovery Tree", also known as the "Big Stump", the first Sierra redwood noted by Augustus T. Dowd in 1852. In 1954, public purchase of the South Grove from Pickering Lumber added this area to CBTSP. The South Grove contains about 1,000 large Sierra redwoods, about 10 times as many as the North Grove. The largest redwoods in the park are found in the South Grove. In 1984 the South Grove was designated a Natural Preserve by the State Park Commission and was thus afforded the highest level of protection possible within the State Park System. Today the South Grove stands out as one of the least disturbed Sierra redwood groves.

In September of 2001 the Darby Fire burned 14, 200 acres in Calaveras and Tuolumne Counties and threatened CBTSP. CAL FIRE has recognized a need to reduce the threat of wildfire to CBTSP, provide a defensible location for firefighting operations, and protect the watershed values of the area.

PROJECT OBJECTIVES

1. Create a shaded fuelbreak condition along the Big Trees State Park boundary to protect Big Trees State Park, Sierra Pacific Industries timberlands and USFS timberlands from an uncontrolled wildfire.
2. Protect the mixed conifer over story by reducing surface fuel loading, and increasing canopy base height.
3. Enhance wildlife habitat.

All of the treatments indicated above will be utilized individually or in combination to create the final desired condition. The final desired condition will be an open and park like condition of larger diameter trees with enough of the understory vegetation removed to prevent vertical fire spread in the event of wildland fire or defensive wildland fire fighting operations. Tree species that will be favored for retention will be ponderosa pine, sugar pine, California incense cedar, black oak, and white fir.

All of the treatments that are proposed for the implementation of this project have been evaluated as required by the California Environmental Quality Act (CEQA) with the preparation of a negative declaration. The CEQA documentation is on file with the California Department of Forestry and Fire Protection Sacramento Headquarters Vegetation Management Program Manager's office.

PROJECT START DATE

The project start date is dependent on environmental conditions being within the burn prescription, but burn units are proposed for the Fall of 2019.

PROJECT DESCRIPTION

This project will be the maintenance and expansion of a 491-acre shaded fuel break adjacent to Calaveras Big Trees State Park in northern Tuolumne County. The project will consist of fuels reduction projects that will utilize fire crew brush cutting, pile burning, and broadcast prescribed fire. The fuels treatment mechanism that is most favored is broadcast prescribed fire. The project will consist of a series of small, low intensity prescribed burns conducted in cooperation with Sierra Pacific Industries. Individual burns will generally be single day events and less than 30 acres in size.

ENVIRONMENTAL SETTING OF THE PROJECT REGION

The South Park VMP Project is in Northern Tuolumne County on the west side of the Sierra Nevada Mountain Range. The Stanislaus National Forest is predominately contained within Tuolumne County. The project is approximately 5 miles southeast of Arnold, California, which is in Calaveras County. The project area drains into Griswold Creek to the East, Beaver Creek and the North Fork of the Stanislaus River to the West. Beaver Creek flows through the Western half of the project area. The project area is entirely owned by Sierra Pacific Industries, and is part of their Standard Block Ownership. The Standard Block is an approximately 20,000 acre block of timberland with scattered USFS inholdings. The entire Standard Block is intensively managed by Sierra Pacific Industries for commercial wood production.

DESCRIPTION OF THE LOCAL ENVIRONMENT

The approximately 491 acre project area is best described as Sierra Mixed Conifer consisting of ponderosa pine, sugar pine, white fir, incense cedar and oak overstory. Understory species consist primarily of bear clover, deer brush, and whitethorn. Slopes within the project area are variable, from nearly level topography on the ridgetops to moderately steep (30-50% slopes) areas along watercourses. Elevation ranges from 3600 to 5280 feet. The aspect is variable, but is primarily south or north facing, with drainages oriented east to west. Beaver Creek, a Class I Watercourse, runs through a portion of the project area.

CURRENT LAND USE AND PREVIOUS IMPACTS

The project area is entirely owned by Sierra Pacific Industries, and is part of their Standard Block Ownership. The Standard Block is an approximately 20,000-acre block of timberland with scattered USFS inholdings. The entire Standard Block is intensively managed by Sierra Pacific Industries for commercial wood production. In September of 2001 the Darby Fire burned 14, 200 acres in Calaveras and Tuolumne Counties. Approximately 3,500 acres of Sierra Pacific timberlands were destroyed in the Darby Fire. The Darby Fire area is adjacent to portions of the project on the Southeast side.

Maps and Figures

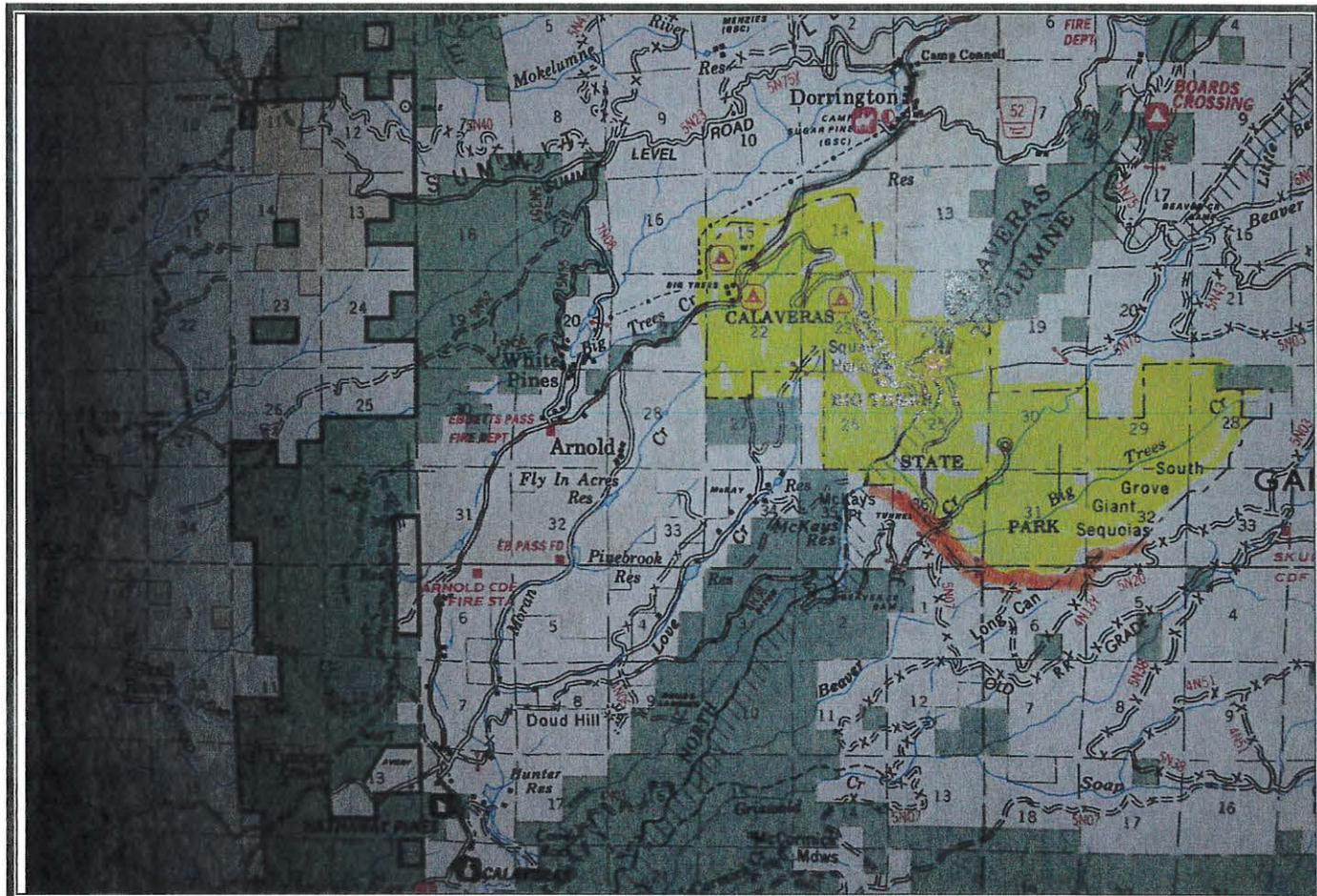


Figure 1. Project Vicinity Map showing location of project in relation to the communities of Arnold and Dorrington on Highway 4. Calaveras Big Trees State Park is highlighted in yellow. The general project area is shown in orange.

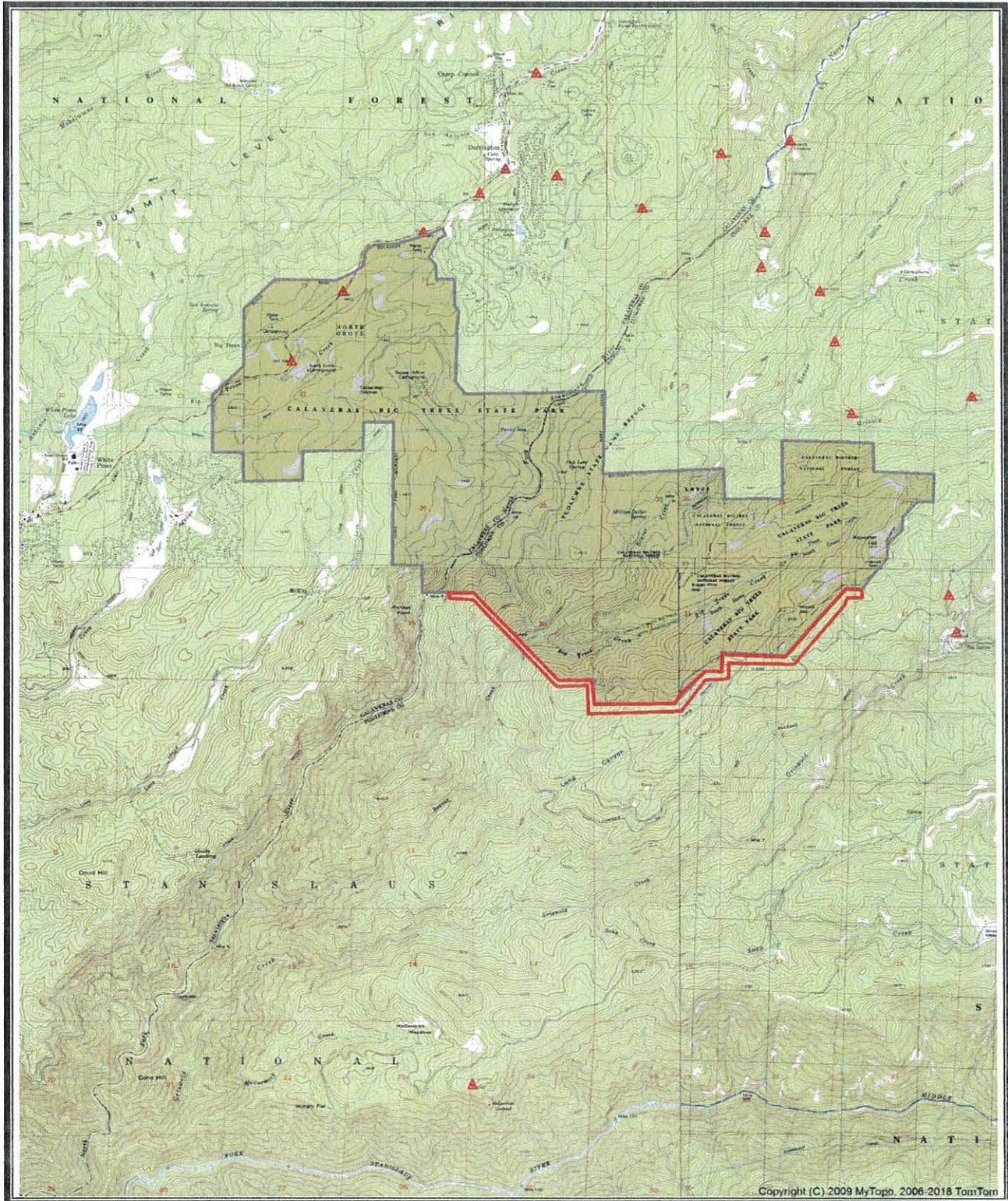


Figure 2. Project Location Map #1 of 2. Red area shows the approximate location of the project along the south side of Calaveras Big Trees State Park.



Figure 3. Project Location #2 of 2. Red area shows the approximate location of the project along the south side of Calaveras Big Trees State Park. Project follows existing fuelbreak adjacent to park.



Figure 5&6. Photos showing overstocked stands in CBTSP at the edge of the South Grove

Conclusion of the Negative Declaration

ENVIRONMENTAL PERMITS

The proposed project will not require any additional environmental permits.

SUMMARY OF FINDINGS

This IS/ND has been prepared to assess the project's potential effects on the environment and an appraisal of the significance of those effects. Based on this IS/ND, it has been determined that the proposed project will not have any significant effects on the environment after implementation of mitigation measures. This conclusion is supported by the following findings:

1. The proposed project will have no effect related to land use and planning, mineral resources, population and housing, recreation, hazards and hazardous materials, public services, and utilities and service systems.
2. The proposed project will have a less than significant impact on aesthetics, air quality, biological resources, agriculture and forest resources, greenhouse gas emissions, geology and soils, hydrology and water quality, noise, transportation and traffic.

The Initial Study and Environmental Checklist included in this document discusses the results of resource-specific environmental impact analyses which were conducted by the Department. This initial study revealed that potentially significant environmental effects could result from the proposed project, however, CAL FIRE has revised the project to eliminate impact or reduce environmental impacts to a less-than-significant level. CAL FIRE has found, in consideration of the entire record, that there is no substantial evidence that the proposed project, as currently proposed, would result in a significant effect upon the environment. The IS/ND is therefore the appropriate document for CEQA compliance.

INITIAL STUDY/ENVIRONMENTAL CHECKLIST

PROJECT INFORMATION	
1. Project Title:	South Park VMP Project
2. Lead Agency Name and Address:	California Department of Forestry and Fire Protection P.O. 944246 Sacramento, CA 94244-2460
3. Contact Person and Phone Number:	Christopher E. Browder (916) 653-4995
4. Project Location:	Adjacent to the Southern Border of Calaveras Big Trees State Park, Tuolumne County
5. Project Sponsor's Name and Address:	N/A (CAL FIRE is project sponsor and lead agency)
6. General Plan Designation:	R: Resource
7. Zoning:	TPZ
8. Description of Project: See Pages 3-4 of this document	
9. Surrounding Land Uses and Setting:	Refer to page 4 of this document
10: Other public agencies whose approval may be required:	California Department of Fish and Wildlife, California Regional Water Quality Control Board, Tuolumne County Air Pollution Control District.

Environmental Factors Potentially Affected and Determination

The environmental factors checked below would be potentially affected by this project involving at least one impact that is a "potentially significant impact" as indicated by the checklist on the following pages.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

<input checked="" type="checkbox"/> Aesthetics	<input checked="" type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Public Services
<input type="checkbox"/> Agriculture Resources	<input type="checkbox"/> Hazards & Hazardous Materials	<input checked="" type="checkbox"/> Recreation
<input checked="" type="checkbox"/> Air Quality	<input checked="" type="checkbox"/> Hydrology / Water Quality	<input type="checkbox"/> Transportation/Traffic
<input checked="" type="checkbox"/> Biological Resources	<input type="checkbox"/> Land Use / Planning	<input checked="" type="checkbox"/> Tribal Cultural Resources
<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Mineral Resources	<input type="checkbox"/> Utilities/Service Systems
<input type="checkbox"/> Energy	<input checked="" type="checkbox"/> Noise	<input checked="" type="checkbox"/> Wildfire
<input checked="" type="checkbox"/> Geology / Soils	<input type="checkbox"/> Population/Housing	<input checked="" type="checkbox"/> Mandatory Findings of Significance

DETERMINATION:

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION would be prepared.

- I find that although the proposed project COULD have a significant effect on the environment, there WOULD NOT be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION would be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Christopher E. Browder, Deputy Chief, Environmental Protection
California Department of Forestry and Fire Protection
Resource Management – Environmental Protection Program

Date

Environmental Checklist and Discussion

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project is in a remote location and is not easily viewed from long range. No adverse impacts to scenic vistas are anticipated.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project is in a remote location and cannot be viewed from a state scenic highway.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A short term reduction in the visual character or quality of the area may be experienced immediately after burning. The project area should appear park like within one to two growing seasons.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A

II. AGRICULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project is compatible with agricultural use.

b) Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A Project area is zoned TPZ, and the proposed project is compatible to this use.

c) Would the project conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A Project area is zoned TPZ, and the proposed project is compatible to this use.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. Project is developed and designed to help protect and preserve forest land.

e) Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. Project is developed and designed to help protect and preserve forest land.

III. AIR QUALITY

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A Smoke Management Plan has been obtained from the Tuolumne County Air Pollution Control District. Implementation of the SMP should prevent conflict or obstruction of the applicable air quality plan.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

A Smoke Management Plan has been obtained from the Tuolumne County Air Pollution Control District. Burning on designated burn days, and restricting burning to small (20-30 acre) units will minimize short term smoke impacts.

c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A The project is not expected to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

d) Would the project expose sensitive receptors to substantial pollutant concentrations?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No long term impact on air quality will result from this project. Best available control measures will be utilized to minimize short term impacts of smoke emissions from the project. Burning on designated burn days and partitioning burn units in small units (20 – 30 acres) will minimize short term smoke impacts.

e) Would the project create objectionable odors affecting a substantial number of people?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No long term impact on air quality will result from this project. Best available control measures will be utilized to minimize short term impacts of smoke emissions from the project. Burning on designated burn days and partitioning burn units in small units (20 – 30 acres) will minimize short term smoke impacts.

IV. BIOLOGICAL RESOURCES

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

On January 7, 2018, I conducted a query of the California Natural Diversity Database (CNDDDB). No threatened or sensitive species were identified within the project area. The California Department of Fish and Wildlife was notified by mail, and was provided a description of the project and location maps. CDFW did not respond with any concerns or recommendations. Recommendations from CDFW on a

similar VMP area have been incorporated. Sierra Pacific biologists and botanists conducted surveys of the project area in 2016 and 2017 and did not identify any threatened or sensitive species. On February 11, 2019, I did a follow up query of the CNDDDB to look for any species added. No threatened or sensitive species were identified within the project area. Should a threatened, endangered, candidate, sensitive, or special status species be identified during the project implementation, operations in the area will cease until mitigations can be put in place.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Where riparian habitat is identified that will likely benefit from low intensity fire, burning will be conducted within riparian areas with site specific objectives to either reduce heavy fuels loads or to promote development of riparian habitat. Heavy equipment shall not be used within the standard width of a WLPZ along all watercourses except along existing roads. Where burning is used within 50 feet of a classified watercourse, a downhill backing fire will be the preferred firing method. This will assure retention of a functional filter strip. Snags and dead trees adjacent to the fireline which may pose a safety or firing hazard may be felled.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A No impacts to federally protected wetlands as defined by Section 404 of the Clean Water Act are expected.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A No impacts to the movement of any native resident or migratory fish or wildlife species or to established native resident or migratory wildlife corridors, or impendance of the use of native wildlife nursery sites are expected to occur.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. No local policies or ordinances exist within or adjacent to the project area.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A.

V. CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

An archaeological records check was obtained on November 13, 2017. The Native American consultation was completed. A Confidential Archaeological Addendum was completed by RPF Gary Whitson to discuss protection measures and implementation of the proposed protection measures. This report was reviewed and approved by CAL FIRE Archaeologist Stephanie Duncan. The Confidential Archaeological Addendum is attached (as a confidential attachment) in the VMP package. Implementation of protection measures within the CAA should prevent substantial adverse change to a historical resource.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

An archaeological records check was obtained on November 13, 2017. The Native American consultation was completed. A Confidential Archaeological Addendum was completed by RPF Gary Whitson to discuss protection measures and implementation of the proposed protection measures. This report was reviewed and approved by CAL FIRE Archaeologist Stephanie Duncan. The Confidential Archaeological Addendum is attached (as a confidential attachment) in the VMP package. Implementation of protection measures within the CAA should prevent substantial adverse change to an archaeological resource.

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. No known unique paleontological resource or site or unique geologic feature exists within or adjacent to the project area.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. No known human remains exist within or adjacent to the project area.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The Native American consultation was completed, and no response was received concerning tribal cultural resources.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The Native American consultation was completed, and no response was received concerning tribal cultural resources. The project is located on industrial timberland which has a long-term history of vegetation manipulation. No adverse changes to a tribal cultural resource should result from this project.

VI. ENERGY

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>N/A.</i>				
b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>N/A.</i>				

VII. GEOLOGY AND SOILS

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A No unstable areas or seismic related issues exist within the project area.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project is designed to reduce the risk of catastrophic fire which would result in significant erosion and risk to human life and property. Significant soil erosion will be prevented by installing erosion control on dozer lines and avoidance of heavy equipment use on steep slopes or near watercourses.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A No geological unit or unstable soil type exists within the project area.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project area is located on intensively managed industrial timberland, where ground disturbance activities have regularly occurred. This project will only result in vegetation being manipulated.

VIII. GREENHOUSE GAS EMISSIONS

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Bear clover, saplings, and surface litter will be the primary fuels consumed, leaving intermediate, dominant, and co-dominant trees. Removal of competing vegetation in the understory is expected to increase growing space for residual trees, which should improve their ability to sequester carbon. The proposed burns are expected to make the residual stands more resistant to catastrophic, stand replacing fires.

Through development of the South Park 2018 VMP, the projects potential to generate and affect greenhouse gases were evaluated. The First Order Fire Effects Model (FOFEM) was used to determine the amount and type of emissions likely to occur through project implementation. Emission calculations are based on several factors including fuel models, fuel conditions and expected fuel consumption in tons per acre. FOFEM results indicate Carbon dioxide (CO₂) as the primary and most abundant greenhouse gas constituent. Through project implementation approximately 17.91 tons/acre of fuel will be consumed resulting in 27.5 tons/acre of CO₂. The estimated net project area (491 acres) will yield a total of 5,500 tons of CO₂ emissions. (Table 1)

Table 1: FOFEM CO₂ Emissions

	lbs/acre	tons/acre	Total Project Area Emission (491 acres)
FOFEM	55,000	27.5	13,502.5 tons

FOFEM calculations were based on combined calculations for all fuel models

Note: the project will be implemented over three years likely reducing annual emissions to 4,503 tons per year.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project is designed to reduce the chance of a large catastrophic wildfire emitting large amounts of emissions.

IX. HAZARDS AND HAZARDOUS MATERIALS

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. Only small amounts of petroleum products will be transported for use on this project. No other hazardous materials will be transported or used.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. Only small amounts of petroleum products will be transported for use on this project. By following the Forest Practice Rules for watercourse and lake protection zones, no petroleum products should be introduced into the waterways or ground water.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. No school exists or is proposed in the area of the project.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project is not located on or adjacent to any listed hazardous material site.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project is not located on or adjacent to any airport.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project is not located on or adjacent to any private airstrip.

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project is in a remote location. Multiple access roads exist within the project area, which in an emergency could be used as an alternative escape route.

h) Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project is being designed and implemented to reduce the potential fire hazard in the area.

X. HYDROLOGY AND WATER QUALITY

a) Would the project violate any water quality standards or waste discharge requirements?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Rene LeClerc of the Rancho Cordova office of the California Regional Water Quality Control Board was notified of the project in a January 17, 2017 letter which included a project description and maps. Mr. LeClerc expressed no concerns in a phone conversation on January 26, 2017.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. Project may increase short-term ground water availability due to removal of understory vegetation.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial on- or off-site erosion or siltation?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The reduction of some water using vegetation may result in slightly greater ground water availability and runoff. Hydrophobic soil conditions will be avoided by utilizing a “cool” burn prescription. Adequate vegetation and forest debris will be retained to minimize surface runoff. The project is not expected to substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial on- or off-site erosion or siltation.

d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in on- or off-site flooding?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The reduction of some water using vegetation may result in slightly greater ground water availability and runoff. Hydrophobic soil conditions will be avoided by utilizing a “cool” burn prescription. Adequate vegetation and forest debris will be retained to minimize surface runoff. The project is not expected to substantially increase the existing drainage pattern of the site or area.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project is located in a remote location with no structured stormwater drainage system. No significant change in runoff is anticipated.

f) Would the project otherwise substantially degrade water quality?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Heavy equipment shall not be used within the standard width of a WLPZ along all watercourses except along existing roads. Where riparian habitat is identified that will likely benefit from low intensity fire, burning will be conducted within riparian areas with site specific objectives to reduce heavy fuels loads and reduce the effects of catastrophic wildfire on the riparian habitat. Where burning is used within 50 feet of a classified watercourse, a downhill backing fire will be the preferred firing method. This will assure retention of a functional filter strip. No degradation of water quality is expected from this project.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. No housing development is proposed under this project.

h) Would the project place within a 100-year flood hazard area structures that would impede or redirect flood flows?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project is not located in a 100-year flood hazard area. No structures are proposed to be developed under this project.

i) Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A

j) Would the project result in inundation by seiche, tsunami, or mudflow?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A

XI. LAND USE AND PLANNING

a) Would the project physically divide an established community?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project is in a remote location well away from local communities.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project should not affect any habitat conservation plan or natural community conservation plan.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. No known mineral resource exists within or adjacent to the project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. No known mineral resource recovery site exists within or adjacent to the project.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project create exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project is in a remote area where only personnel conducting the project should be exposed to noise, so no applicable local, state or federal standards should be violated.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project create exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

N/A. Some minor groundborne vibration or noise levels may occur due to bulldozer operations during installation of control lines, and idling fire trucks during mop-up operations. The effects will be not be significant.

c) Would the project create a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. A short term increase in noise shall occur during operations. No permanent increase in ambient noise should occur.

d) Would the project create a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Hikers in Calaveras Big Trees State Park's South Grove may experience an increase in ambient noise during fireline construction and on days when burning is occurring. This increase will be temporary and should not be significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project is not on or adjacent to an airport land use plan.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project is not on or adjacent to a private airstrip.

XIV. POPULATION AND HOUSING

a) Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project will not induce population growth.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project displace substantial numbers of existing homes, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. No homes exist within or adjacent to the project area.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. No residents exist within or adjacent to the project area.

XV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other Public Facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. No governmental facilities are associated with, exist or will be necessary as a result of this project.

XVI. RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. No neighborhood or regional parks are associated with the project area. The project should have no effect on Big Trees State Park visitor numbers.

b) Would the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project does not propose or require the construction of recreational facilities.

XVII. TRANSPORTATION

a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project as proposed will have no effect on a transportation circulation system.

b) Would the project conflict with or be inconsistent with CEQA Guidelines 15064.3, subdivision (b)?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project as proposed should have no effect on air traffic patterns.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project as proposed will not alter any road design feature or cause incompatible use.

e) Would the project result in inadequate emergency access?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project as proposed should not affect emergency access.

f) Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project as proposed should not conflict with any alternative transportation programs.

XVIII. TRIBAL OR CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resource Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

i) Listed or eligible for listing in the California Register of Historic Resources or in a local register of historical resources as defined in Public Resource Code section 5020.1(k) or	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The Native American consultation was completed, and no response was received concerning tribal cultural resources with cultural value to a California Native American tribe. CAL FIRE Archaeologist Stephanie Gallanosa reviewed the Confidential Archaeological Addendum for the South Park VMP. No adverse changes to a known tribal cultural resource should result from this project.

XIX. UTILITIES AND SERVICE SYSTEMS

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. No waste water treatment facilities will be affected by the project.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. No water or waste water treatment facilities will be affected by the project. No new water or waste water treatment facilities will be necessary as a result of this project.

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project will not directly or indirectly affect storm water drainage facilities. No new storm water drainage facilities will be necessary as a result of this project.

d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. Only limited water use will be necessary for this project. No new water entitlements will be necessary.

e) Would the project result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. No landfill accommodations will necessary for the implementation of this project.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A

XX. WILDFIRE

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project has been developed to reduce the fire hazard severity. The project should not impair any emergency response plans or emergency evacuation plans.

b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project has been developed to reduce the fire hazard severity. The project should not exacerbate wildfire risks or expose anyone to pollutant concentrations resulting from wildfire or the uncontrolled spread of wildfire.

c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or may result in temporary or ongoing impacts to the environment?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project is designed to reduce the fire hazard severity by reducing flammable fuels. No new roads, water sources, power lines or other utilities will be necessary as a result of this project.

d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire slope stability, or drainage changes?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

N/A. The project is in a remote location on fairly gentle slopes. No downslope or downstream flooding or landslides should result from this project. No immediate downstream or downslope infrastructure exists for the project area.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

a) Would the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

On February 11, 2019, I conducted a query of the California Natural Diversity Database (CNDDDB). No threatened or sensitive species were identified within the project area. The California Department of Fish and Wildlife was notified by mail, and was provided a description of the project and location maps. CDFW did not respond with any concerns or recommendations. Recommendations from CDFW on a similar VMP area have been incorporated. Sierra Pacific biologists and botanists conducted surveys of the project area in 2016 and 2017 and did not identify any threatened or sensitive species. On February 11, 2019, I did a follow up query of the CNDDDB to look for any species added. No threatened or sensitive species were identified within the project area. Should any threatened or sensitive species be discovered during implementation of this project, operations in the area will be suspended until mitigations can be established.

An archaeological records check was obtained on November 13, 2017. The Native American consultation was completed. A Confidential Archaeological Addendum was completed by RPF Gary Whitson to discuss protection measures and implementation of the proposed protection measures. This report was reviewed and approved by CAL FIRE Archaeologist Stephanie Duncan. The Confidential Archaeological Addendum is attached (as a confidential attachment) in the VMP package. Implementation of protection measures within the CAA should prevent substantial adverse change to an archaeological resource.

No substantial degradation to the environment, fish and wildlife habitat, fish or wildlife population, plant or animal community, endangered species, or cultural resource is expected to occur as a result of this project.

b) Would the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	Potentially Significant Impact <input type="checkbox"/>	Less Than Significant with Mitigation Incorporated <input type="checkbox"/>	Less Than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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The cumulative effect of the shaded fuel break project will be to help restore the South Park VMP area to a condition that is more fire resistant. This project is being prepared by a Registered Professional Forester. I have consulted with resource professionals from the California Department of Fish and Wildlife, Water Quality, State Parks, Sierra Pacific Biologist and Botanist, and CAL FIRE Archaeologists as part of the scoping process for this project to ensure that any negative cumulative effects are avoided.

c) Would the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	Potentially Significant Impact <input type="checkbox"/>	Less Than Significant with Mitigation Incorporated <input type="checkbox"/>	Less Than Significant Impact <input type="checkbox"/>	No Impact <input checked="" type="checkbox"/>
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N/A

LIST OF PREPARERS OF THIS DOCUMENT

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