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Initial Study/Mitigated Negative Declaration for the proposed Ahwahnee Hills Regional Park 2020/2021 FRP Madera County, California

Photo credit: Russ Cary

Prepared by:
Blue Sky Forestry
PO Box 461
Sanger, CA 93657

For:
California Department of Forestry and Fire Protection
1234 E Shaw Ave
Fresno, CA 93710
The Lead Agency Pursuant to Section 21082.1 of the California Environmental Quality Act

July 11, 2020 (Revised 08/27/2020)

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1 DETERMINATION

This Initial Study/Mitigated Negative Declaration (IS/MND) describes an environmental impact analysis conducted for the proposed Ahwahnee Hills Regional Park 2020/2021 Fuel Reduction Project. This document was prepared in coordination with 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/Mitigated 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/MND for public review and comment:

Matthew Reischman _____ Dated: 9/2/2020 _____

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

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2 INTRODUCTION AND REGULATORY CONTEXT

2.1 Introduction

This Initial Study/Mitigated Negative Declaration (IS/MND) describes the environmental impact analysis conducted for the proposed Ahwahnee Hills Regional Park 2020/2021 Fuel Reduction Project, located in Madera County. This document was prepared in collaboration with 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/MND 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.

2.2 Regulatory Guidance

This IS/MND was prepared to evaluate potential environmental effects that could result following approval and implementation of the Ahwahnee Hills Regional Park 2020/2021 Fuel Reduction Project. 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/MND conforms to these requirements and to the content requirements of CEQA Guidelines §15072.

This IS/MND evaluates the environmental effects of the proposed Ahwahnee Hills Regional Park 2020/2021 Fuel Reduction Project ("Project"). The Project is intended to reduce the risk of catastrophic wildfire events. The Project will consist of establishing a series of shaded fuelbreaks through tree thinning and pruning, brush removal, and slash treatment or removal. A fire line will also be established along the entire southern border of the property as well as portions of the eastern and western boundaries where grassland is the sole vegetation type.

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2.3 Purpose of the Initial Study

CAL FIRE is the funding element for the proposed Ahwahnee Hills Regional Park 2020/2021 Fuel Reduction Project and is the lead agency under CEQA. The purpose of this IS/MND 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/MND 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:

Len Nielson
California Department of Forestry and Fire Protection
Staff Chief, Prescribed Fire and Environmental Protection
1234 E. Shaw Avenue
Fresno, CA 93710
Phone: (559) 243-4126
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 mitigated 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 execute all or part of the project.

3 PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

3.1 Project Location

The Ahwahnee Hills Regional Park Project area is a 400-acre park in the community of Ahwahnee in Madera County approximately 7 miles outside of Oakhurst, California along Highway 49. Most of the Project area is owned by Madera County and managed by the Friends of Ahwahnee Hills Regional Park, a non-profit organization formed for this purpose. Additional Project area consists of certain segments of private ownership within 100 feet of the Park boundary, directly adjacent to the Park. This area adjacent to the Park is included in the Project area in order to best accomplish the fuelbreak objectives. Legal location is Sections 24 and 25, T06SN, R20E; Mount Diablo B&M.

3.2 Background and Need for the Project

Several Native American village sites existed near the present-day location of the Ahwahnee Hills Regional Park. The first private ownership of the land was established in 1882. In the

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1890's William Martin Sell, Sr. built the Ahwahnee Tavern to serve as a stage and luncheon stop. In 1903, President Theodore Roosevelt had lunch at the Ahwahnee Tavern on his way to meet John Muir and visit Yosemite Valley. In 1918, the Tavern and ranch were sold to Madera, Merced and Stanislaus Counties to create the Tri-County Tuberculosis Sanatorium, which operated until 1969. Henceforth, a private school for boys with behavioral problems was established on the site. The school closed in 1985.

In 1961, the Harlow Fire burned through the project area, completely destroying the towns of Ahwahnee and Nippinawasee, and setting records for fire behavior speed. The fire burned 43,329 acres in Madera and Mariposa Counties, destroyed 104 structures and claimed two lives. The fire started in a foothill area in Mariposa County and in a two-hour period burned over 18,800 acres, including the community of Ahwahnee.

In the 1990's, local residents began the work of establishing a park on the site and creating a non-profit organization dedicated to the management of the park for the benefit of the community. Since the site has been used as a park several environmental projects have been completed including development of wetlands guidance for park development, asbestos cleanup, restoration and improvement of recreation facilities, trail building, removal of sanatorium buildings, and development of environmental interpretation sites.

The predominantly south facing oak woodland and foothill pine vegetation found in the Project area is fire prone. Thick patches of native oak and pine trees are intermingled with *Ceanothus* and *Manzanita* shrubs. The oak woodland is surrounded by annual grassland and seasonal wetland. The area is used for recreation including picnicking, hiking, nature observation and horseback riding. There are several private homes surrounding the park, and a major highway that runs near the western extent of the park. All of these human uses create ample opportunity for a fire to spark. The continuity of fuel from dense brush and trees would likely carry fire into the canopy, likely leading to uncontrolled and potentially catastrophic wildfire. The objectives of this proposed fuel reduction project are to mimic natural fire by reducing fuel continuity to create a fire resilient landscape, protect natural resources within the project area, and prevent loss of life or property.

3.3 Project Objectives

1. Create a shaded fuelbreak condition as a surrogate to interrupted fire cycles along the perimeter and throughout Ahwahnee Hills Regional Park.
2. Create fire resilient landscapes with the Project boundary to prevent future catastrophic wildfire behavior and greenhouse gas emissions.
3. Protect the public and park from fire started outside of its boundary by creating a perimeter fuelbreak.
4. Enhance wildlife habitat by simulating disturbance within the Project area.
5. Remove invasive species and restore/enhance native grassland, oak savannah, and hardwood forests on the property.

The overall objective of this project is to remove hazardous fuels that could contribute to climate change or catastrophic fire. 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

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spread in the event of wildland fire or defensive wildland fire fighting operations. All healthy, mature trees will be favored for retention, with some exceptions made where stands are dangerously thick.

All of the treatment operations will be consistent with the California Forest Practice Rules, the Confidential Archeological Addendum, as well as the Biological Evaluation completed for this project. This project and treatments will be evaluated as required by the California Environmental Quality Act (CEQA) with the preparation of a mitigated 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.

3.4 Project Start Date

The project start date is tentatively slated for late July 2020.

3.5 Project Description

This project will reduce the risk of catastrophic fire events on the Park through fuel reduction treatments over approximately 293 acres of Park and adjacent privately-owned property. In addition, the Project will create a disc-line for defensible space around the perimeter of the Park where the primary fuel sources are grassland fuel types. The objectives will be accomplished through targeted thinning, mastication, pruning, and slash treatment or removal. Thinning operations will remove understory vegetation to prevent natural fire events from reaching the canopy of oak and pine trees. Healthy oak and pine trees will be retained to the greatest extent practicable while still creating a resilient landscape. High value wildlife snags will also be retained when they are isolated from trails, roads, or structures. Best practices will be adopted from the California Forest Practices Act to avoid, reduce, and mitigate potential harm to cultural resources, waterways, native wildlife and species of special concern.

All dead trees within the treatment area will be felled, brush/shrub vegetation within designated areas will be reduced, residual trees will be pruned up to 8' from the ground, and slash within the Project area will be disposed of. More specifically, shrubs, brush, or live trees less than 10" diameter at breast height (DBH) within the dripline of a dominant or co-dominant tree shall be removed. Pockets of trees less than 10" DBH shall be thinned to 12'x12' spacing and pockets of shrubs shall be reduced by 80% relative cover when no dominant overstory trees are present. No commercial harvest of timber will occur, this prescription is intended to reduce or eliminate the vertical and horizontal continuity of ladder fuels.

Work will be completed with a combination of tracked equipment and hand crews as determined by access (slope gradient will be a limiting factor for equipment). No new lay down areas or watercourse crossings shall be established as part of this project. No equipment operations shall be permitted in standing water at any time. Along classified watercourses, a buffer will be established that will limit equipment operations to prevent erosion and impacts to riparian habitat. Within "Equipment Exclusion Zones" (EEZ), fuel reduction work will be completed by hand crews; however, equipment will be permitted to utilize existing roads and crossings to access portions of the treatment area. Within any "Equipment Limitation Zones"

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(ELZ), fuel reduction work may be completed by equipment on slopes less than 30% where impacts to the bed, bank, or channel will not occur. For any ELZ with slopes greater than 30%, equipment may operate within ten feet of the "top of bank". In general, riparian vegetation and trees are not targeted within this fuel reduction prescription and tree canopy cover within riparian or watercourse corridors will be unaffected. To the extent feasible, riparian vegetation (willows, sedges, rushes, etc.) will be avoided by planned fuel reduction operations.

Slash will be disposed of by chipping, pile burning, or lop and scatter to <9" if burning/chipping are not safe/feasible. In addition, a disced or mowed fireline will be established along the southern extent of the property via tractor. The total footprint of the project is approximately 293 acres of fuel reduction. This includes approximately 291 acres of shaded fuel break/fuel reduction and 2 acres (5,000 linear feet) of disced fire line.

In the years following initial treatments, fuelbreak maintenance and invasive species management is also planned. Several means for control of undesirable vegetation are proposed including follow-up mechanical and herbicide treatments. Herbicide treatments will be carried out by a licensed professional. All applications will be performed to Pest Control Advisor (PCA) recommendations and label specifications as required by law, which together are functionally equivalent to an EIR.

3.6 Environmental Setting of the Project Region

The Ahwahnee Hills Regional Park Project area is a 400-acre park in the community of Ahwahnee in Madera County approximately 7 miles outside of Oakhurst, California along Highway 49. The terrain varies from gently sloping just north of the Park's southern boundary to steeply sloping in its northwest corner. The primary drainage associated with the project sire is Peterson Creek, which originates in the Chowchilla Mountains near Pilot Peak north of the site and drains to the Miami Creek, which in turn drains into the Fresno River. The climate in this region is Mediterranean, with warm dry summers and cool moist winters. Annual precipitation within the area is about 33 inches, mostly falling in the form of rain between the months of October and March.

3.7 Description of the Local Environment

The local environment surrounding the project area is largely similar in terrain and species presence. However, most of the surrounding area has been developed for rural housing. Habitats identified within the project boundary, but not necessarily within designated treatment areas, include California annual grassland, interior live oak/chaparral, Valley oak riparian, mixed oak woodland, pond, seasonal wetland, and perennial aquatic. The oak woodland and foothill pine vegetation found in the project area is fire prone. Thick patches of native oak and pine trees are intermingled with *Ceanothus* and *Manzanita* species. The oak woodland is surrounded by annual grassland; invasive weed species such as Tocalote (*Centaurea melitensis*) and *Cirsium spp* are present.

3.8 Current Land Use and Previous Impacts

The project area is currently used for scenic enjoyment and recreation. Visitors to the Park commonly hike throughout the property or ride on horseback. Trails have been maintained,

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but vegetation has not been intensively managed. The management style has contributed to a natural appearance that enhances the experience of Park visitors. There are more intensively-utilized recreation facilities within the Park, but outside of the boundaries of the treatment area, including picnic tables, restrooms, interpretive areas and study centers.

Historic uses involved several buildings, most of which have been removed. The Tri-County Tuberculosis Sanatorium built dozens of structures, including a hospital complex, quarters for doctors and nurses, a children's home, and a school. The Sanatorium utilized the original tavern as a kitchen until it burned down in 1937. The Ahwahnee Hills School for Boys utilized many of the Sanatorium buildings until it was shuttered in 1985. During the period that the site was used for the Sanatorium and the Boys School, vegetation near the structures was maintained in a manicured fashion, not kept in its native state. The treatment area boundaries for this project exclude the footprint of these historic structures. Recent land management practices (since the closure of the Boys School) have allowed native vegetation to become established in most of the historically impacted areas, but the vegetation in those areas is not dense enough to warrant inclusion in this proposed Project.

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4 MAPS AND FIGURES

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Figure 2 Representative Overview of Northern Bounds of Project

Figure 1 Representative Overview of Northeast Bounds of Project (see reference point for Figure 1)

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Figure 3 View to the West of Figure 4

Figure 4 Northern Park Boundary and Private Property Planned for Treatment

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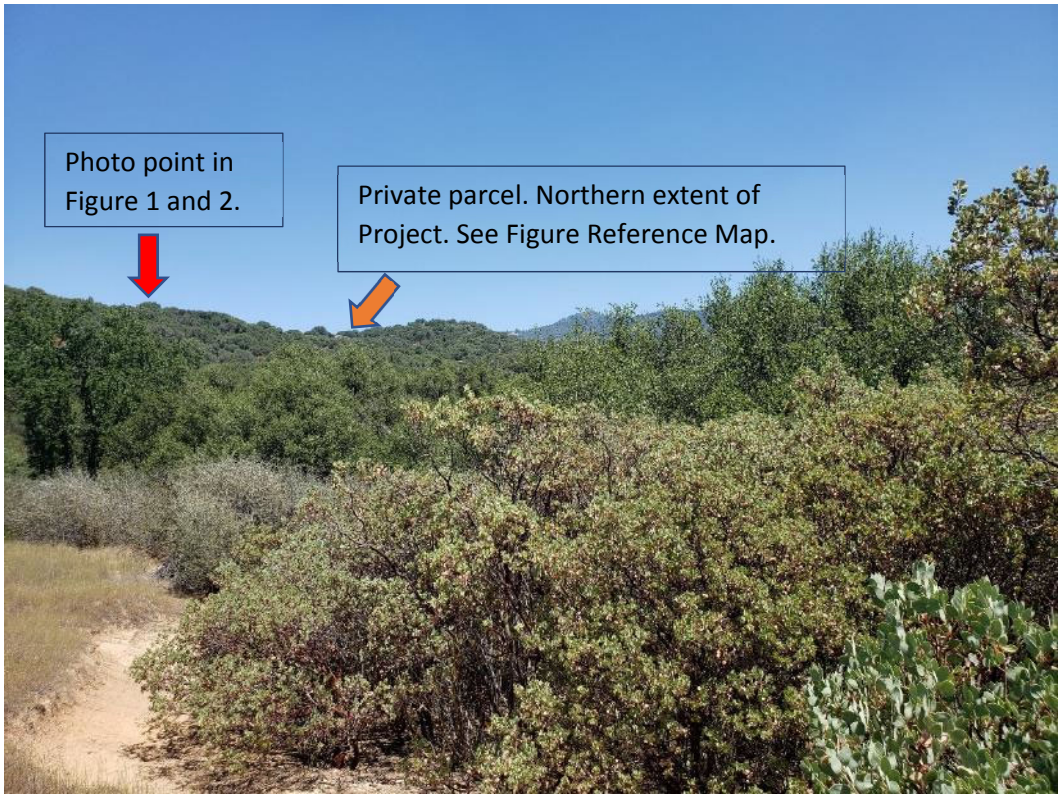

Figure 5 View North from Figure 5 Photo Location.

Figure 6 View of Eastern Extent of AHRP Fuel Reduction Project

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Figure 7 Drone Photo 1

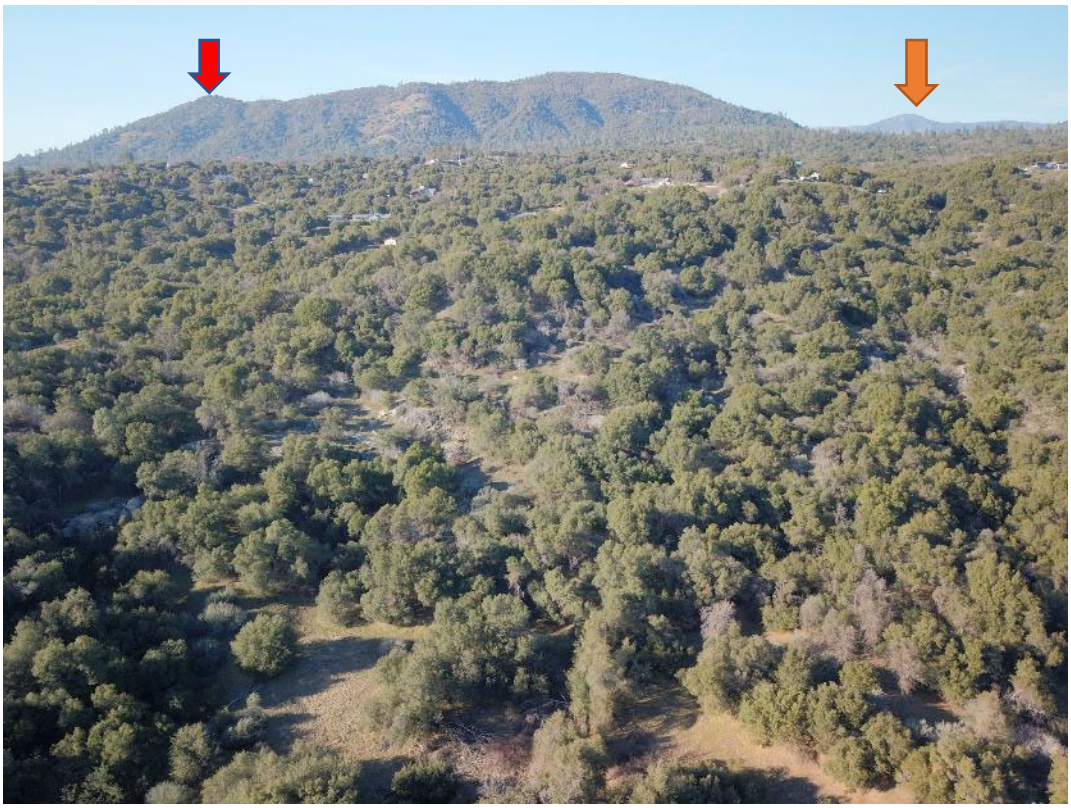

Figure 8 Drone Photo 2. Red Arrow is Landmark Reference to Figure 7, Orange Arrow to Figure 9

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Figure 9 Drone Photo 3, Orange Arrow is Landmark Reference to Figure 8.

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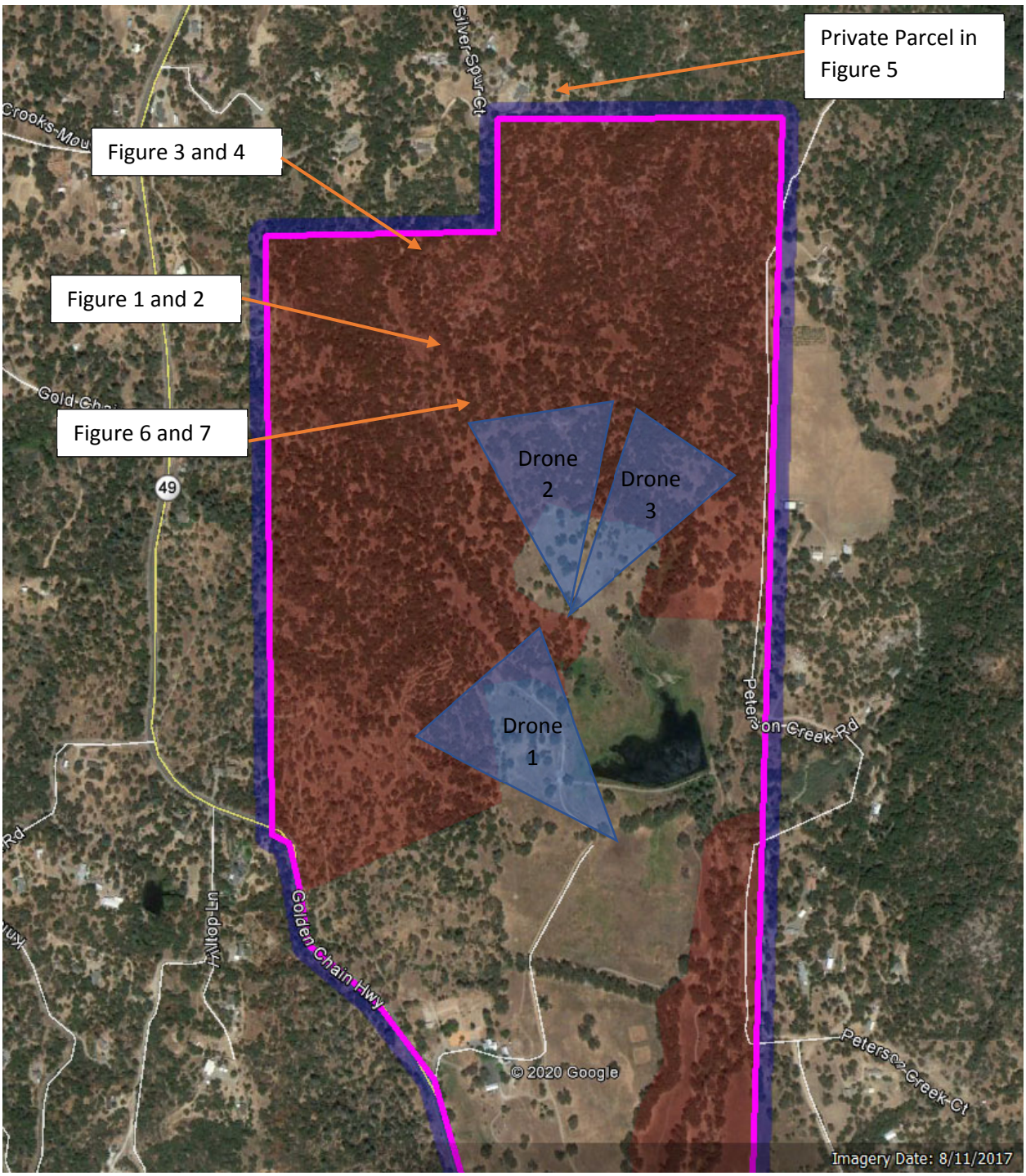

Figure 10 Overview of Figure Locations

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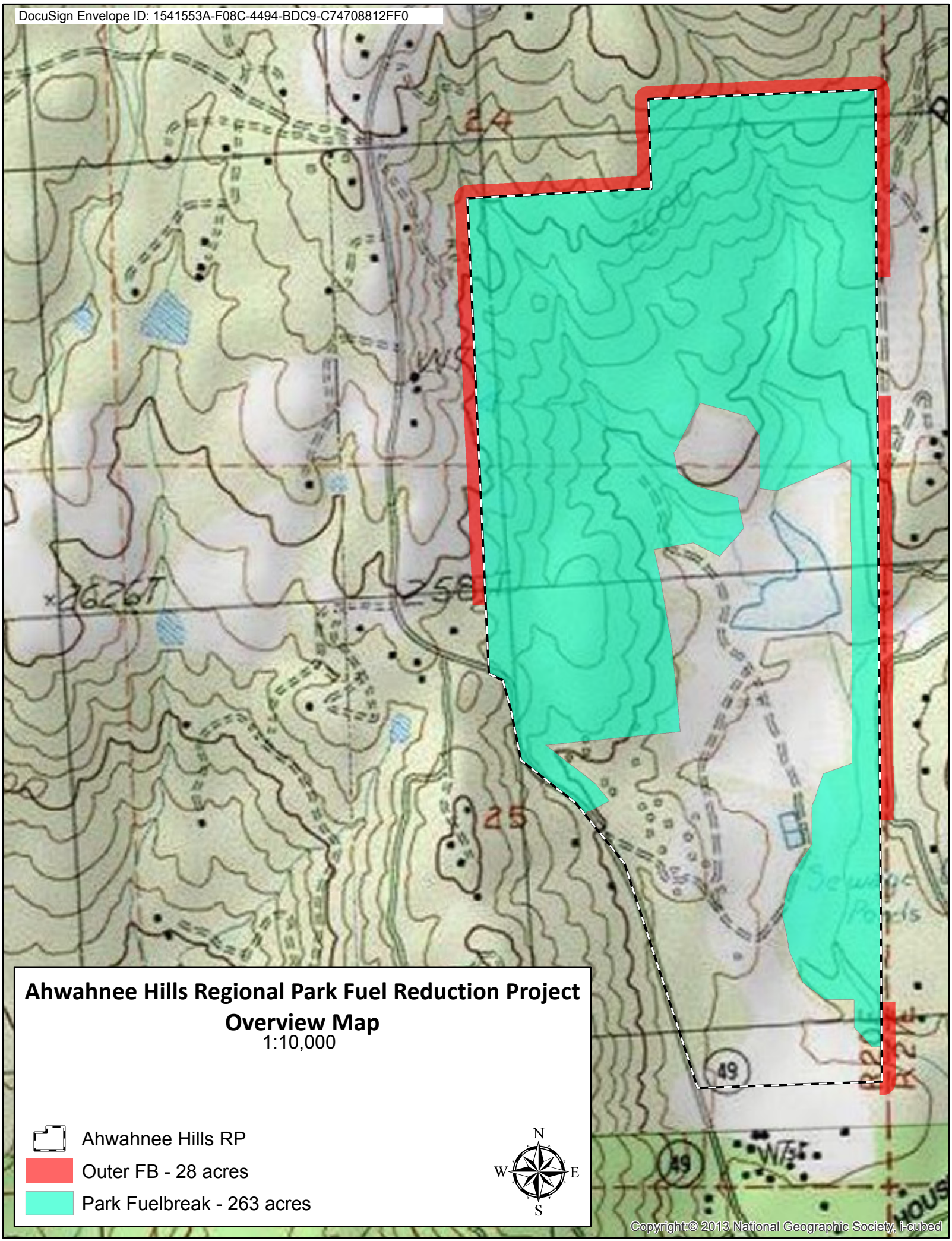

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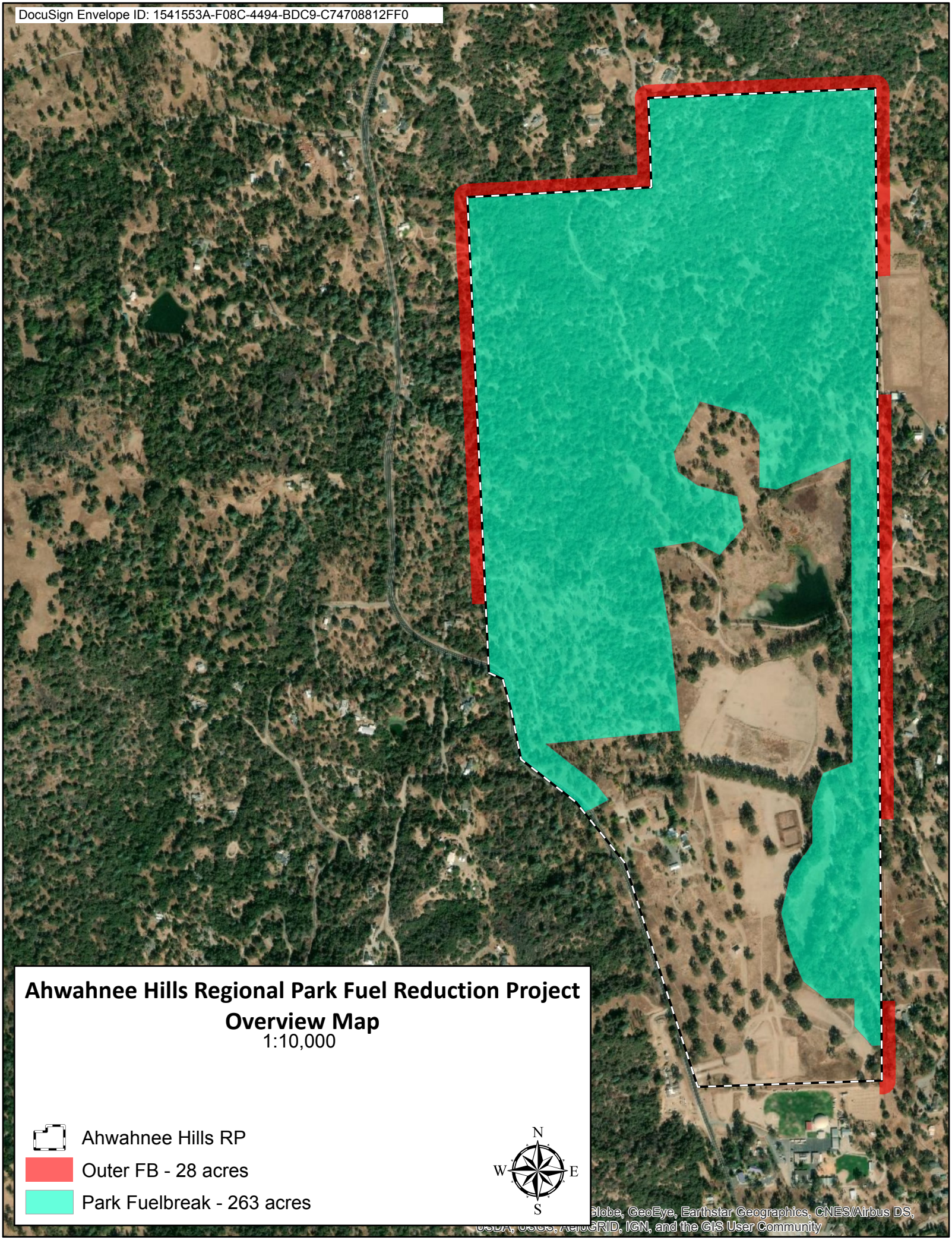

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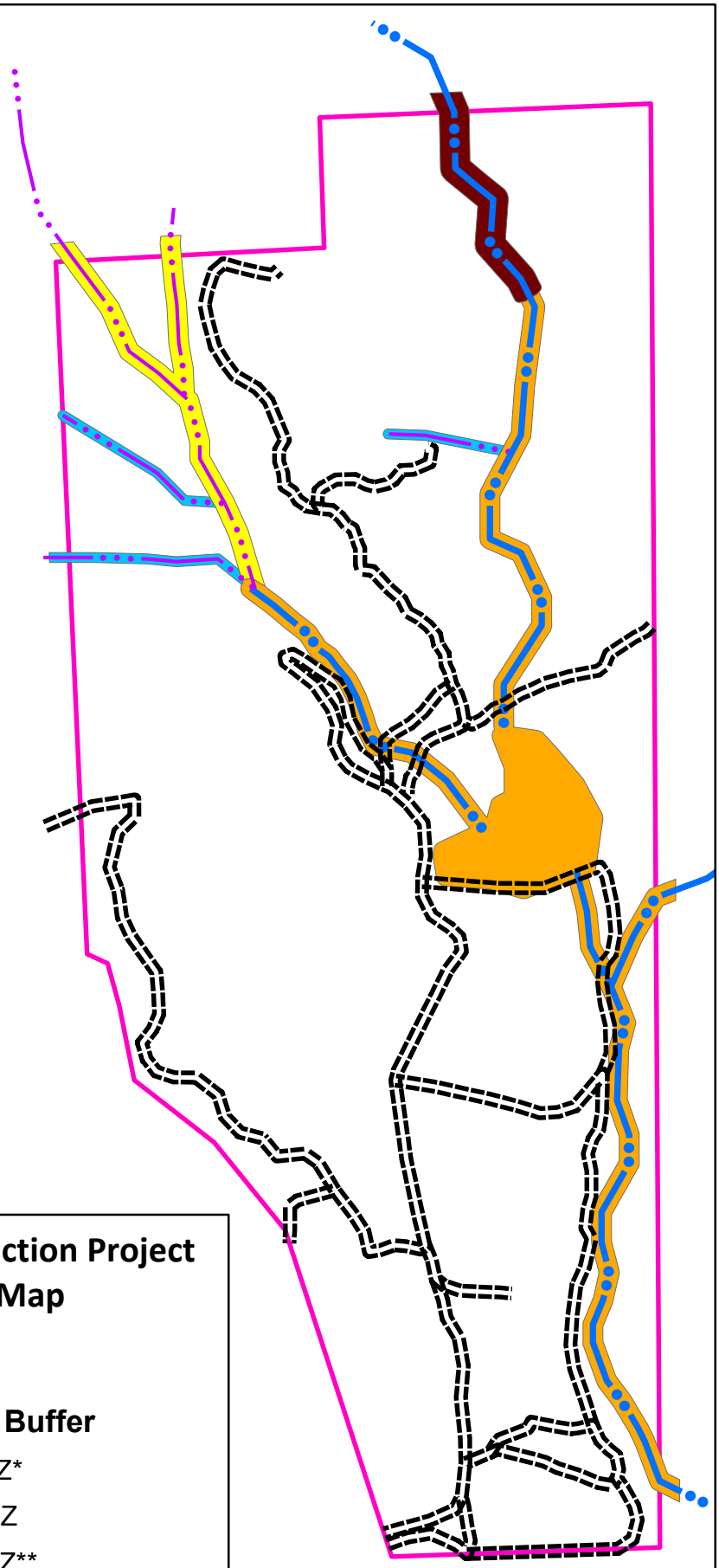

Ahwahnee Hills Regional Park Fuel Reduction Project
Road, Watercourse, and Buffer Map
1:10,000

Ahwahnee Hills RP
Outer FB - 28 acres
General Fuelbreak - 263 acres
Road

Watercourse

Class

II
III

Presumed Buffer

25' ELZ*
50' ELZ
50' EEZ**
75' EEZ

*Equipment Limitation Zone - equipment permitted on slopes <30% and existing crossings.
**Equipment Exclusion Zone - No equipment operations except on existing roads or crossings where no water is present.

N
W E
S

e, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

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5 CONCLUSION OF THE MITIGATED NEGATIVE DECLARATION

5.1 Environmental Permits

During certain times of year, and under specific conditions, permits may be required by the San Joaquin Valley Air Pollution Control District or Cal Fire to facilitate burning of slash. All permits required for burning will be obtained consistent with all applicable laws and regulations.

No new watercourse crossings are planned as part of this fuel reduction project; therefore, discretionary permits related to Clean Water Act Section 401 and 404 or Fish and Game Code Section 1602 are not necessary to support the proposed action.

5.2 Summary of Findings

This IS/MND 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/MND, 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, tribal cultural resources, cultural resources, greenhouse gas emissions, geology and soils, hydrology and water quality, noise, transportation and traffic.

3. 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/MND is therefore the appropriate document for CEQA compliance.

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6 INITIAL STUDY/ENVIRONMENTAL CHECKLIST

PROJECT INFORMATION	
1. Project Title:	Ahwahnee Hills Regional Park 2020/2021 Fuel Reduction 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:	Len Nielson (559) 243-4126
4. Project Location:	Adjacent to Hwy 49 at the north end of Ahwahnee, roughly 5 miles northwest of Oakhurst.
5. Project Sponsor's Name and Address:	Cal Fire Attn: Len Nielson 1234 E. Shaw Avenue Fresno, CA 93710
6. General Plan Designation:	PI (Public Institution) RRS (Rural Residential, Single Family) ARE-40 (Agricultural)
7. Zoning:	Institution Area District (IA) for AHRP and Agricultural, Rural, Exclusive (40 acre) District(ARE-40), RRS-2.5 or RRS-5 for Residential Areas.
8. Description of Project:	Fuel Reduction project to protect community from wildfire.
9. Surrounding Land Uses and Setting:	Primarily residential housing and open space. Some periodic forest agriculture and livestock operations also exist nearby.
10: Other public agencies whose approval may be required:	California Department of Fish and Wildlife, California Regional Water Quality Control Board, San Joaquin Valley Air Pollution Control District.

6.1 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.

6.2 Environmental Factors Potentially Affected:

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

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6.3 Determination

On the basis of this initial evaluation:

☒ 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.

Matthew Reischman 9/2/2020

Matthew Reischman, Assistant Deputy Director Date
California Department of Forestry and Fire Protection
Resource Protection and Improvement

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6.4 Environmental Checklist and Discussion

6.4.1 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?	☐	☐	☐	☒

The project area is not visible from a scenic vista.

	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?	☐	☐	☒	☐

The project will not damage scenic resources. Minor or temporary impacts may be visible from Highway 49 to vegetation; however, this will not result in a significant impact.

	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?	☐	☐	☒	☐

A short-term reduction in the visual character or quality of the area may be experienced immediately after operations. The Project area should appear "park-like" within one growing season.

	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?	☐	☐	☐	☒

No new light or glare will be created.

6.4.2 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?	☐	☐	☐	☒

The project area is not currently used for agriculture and the project will not convert the area's use.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒

Project area is zoned Public Institution (PI) and is maintained as a park. The proposed project is compatible with this use.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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))?	☐	☐	☐	☒

Project area is not zoned TPZ and no conversion of forest, timber, or wildland is occurring. The proposed project is compatible with the current use and zoning.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

This Project is developed and designed to help protect and preserve forest land.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

This Project is developed and designed to help protect and preserve forest land.

6.4.3 AIR QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

Burning on designated burn days and in line with all applicable state and local regulations will minimize short term smoke impacts, including applicable burn permits from the San Joaquin Valley Air Pollution Control District and Cal Fire.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐

Burning on designated burn days, in line with all applicable state and local regulations will minimize short term smoke impacts.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	☐	☐	☒	☐

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. The Project will reduce and remove excessive forest fuels thereby reducing the potential for future catastrophic wildfire and substation GHG release.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Would the project expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

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 will minimize short term smoke impacts.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Would the project create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

No significant or long-term impact on air quality or odors 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 will minimize short term smoke impacts.
The number of people living or recreating near the project site is not expected to be substantial during operations.

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6.4.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

A query of the California Natural Diversity Database (CNDDB) showed no threatened or sensitive species were identified within or adjacent to the project area. RPF conducted assessments of the project area in 2020 did not identify any threatened or sensitive species, or habitat. The Project action will not lead to a decline in population or distribution of species. AMM #1-3 are intended as mitigation to achieve "less than significant impacts" or "no impact" to biological resources, including individuals or habitats.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

No impact to 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 shall occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

No impacts to federally protected wetlands as defined by Section 404 of the Clean Water Act are expected based on protection measures. Only existing roads and watercourse crossings will be used for the project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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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 impedance of the use of native wildlife nursery sites are expected to occur from Project activities.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

There are no HCPs, NCCPs, or other habitat conservation plans that this Project will conflict with.

6.4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	☐	☒	☐	☐

An archaeological records check was obtained March 2020. The Native American consultation was completed (1st and 2nd letters). A Confidential Archaeological Addendum (CAA) was completed by the Project RPF, which outlines protection measures and implementation of the proposed protection measures. This report was reviewed and approved by CAL FIRE Archaeologist and the CAA is attached (as a confidential attachment) in the IS/MND package. Implementation of protection measures within the CAA should prevent substantial adverse change to a historical resource. AMM #4

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐

An archaeological records check was obtained March 2020. The Native American consultation was completed (1st and 2nd letters). A Confidential Archaeological Addendum (CAA) was completed by the Project RPF, which outlines protection measures and implementation of the proposed protection measures. This report was reviewed and approved by CAL FIRE Archaeologist and the CAA is attached (as a confidential attachment) in the IS/MND package.

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Implementation of protection measures within the CAA should prevent substantial adverse change to a historical resource. AMM #4

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project directly or indirectly destroy a unique paleontological resource or site?	☐	☒	☐	☐

No known unique paleontological resource or site exists within or adjacent to the project area. AMM #4 will provide adequate protection should resources be discovered.

	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?	☐	☒	☐	☐

No known human remains exist within or adjacent to the project area. AMM #4 will provide adequate protection should resources be discovered.

	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)?	☐	☒	☐	☐

The Native American consultation was completed, and no response was received concerning tribal cultural resources. AMM #4 will provide adequate protection should resources be discovered.

	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	☐	☒	☐	☐

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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?				

The Native American consultation was completed, and no response was received concerning tribal cultural resources. No adverse changes to a tribal cultural resource should result from this project. AMM #4 will provide adequate protection should resources be discovered.

6.4.6 ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

No unnecessary consumption of energy resources will occur from the Project operations. All equipment is "off-grid" and will utilize individual combustion engines to complete fuel reduction work.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

No renewable energy projects exist within the footprint of the Project. In addition, no renewable energy projects are planned in or adjacent to the Project. Therefore, no obstruction or conflict with renewable energy or energy efficiency is expected from the Project.

6.4.7 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:				
	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.)	☐	☐	☐	☒

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒

No impact to unstable areas will occur within the Project footprint. In addition, the Project will not create seismic related issues.

	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?	☐	☐	☒	☐

The project is designed to reduce the risk of catastrophic fire which would result in significant erosion and risk to human life and property. No new roads or trails will be built in the implementation of this project. Minimal soil erosion may occur as a result of removal of understory vegetation, but will not have a significant impact. In general, the project will mimic the California Forest Practice Rules for forest operations, maintenance of beneficial uses of water, and conservation of soil. Due to timing, methods of operations, duration of activities less than significant impacts are anticipated. AMM #3 provides guidelines for conservation of soil and prevention of erosion from project activities.

	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?	☐	☐	☐	☒

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?	☐	☐	☐	☒

No building or construction is involved in this Project.

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	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?	☐	☐	☐	☒

No sewage will be created and no waste disposal system will be required for this project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Would the project directly or indirectly destroy a or unique geological feature?	☐	☐	☐	☒

The project will have no impact on any unique geological feature.

6.4.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

Ladder fuels including understory shrubs and suppressed trees will be removed (in some cases intermediate trees will also be removed). This will result in a residual stand of 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. Carbon on the site should stay near current levels over time, however the stand dynamic will change in such a way that carbon will be stored in larger diameter trees rather than small trees and shrubs. The proposed treatments are expected to make the residual stands more resistant and resilient to catastrophic, stand-replacing fires and CO_2 release.

During and after the project, GHG emissions from operations and pile burning are anticipated to be "less than significant" or "no impact". This is due to:

1. ***The temporary nature of emissions from operations (equipment and pile burning);***
2. ***The net benefit of preventing catastrophic wildfire and subsequent significant releases of GHG by maintaining sequestered carbon onsite through fuel reduction and fire resiliency treatments;***
3. ***The net benefit of encouraging higher rates of sequestration from increased residual tree vitality and subsequent growth rates.***

Equipment use on the project is expected to produce negligible GHG emissions from combustion engines, which includes diesel equipment as well as chainsaws. The most significant contributor to GHG emissions will be burning of activity-generated slash via pile burning. Table 1 outlines maximum expected GHG emissions from pile burning during the project.

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Piled Fuels Biomass and Emissions Calculator Report

Pile Group Data:							
Group No.	**Group Name**	**No. Piles**	**Pile Type**	**Pile Shape**	**Pile Dimensions**	**Pile Composition**	**Consumption**
1	AHRP Pile Burning	200	Hand	Half ellipsoid	W1: 10′ H1:8′ L1: 10′	Shrub/Hardwood	90%

Pile Group Results:										
Gross Volume (cubic ft)	**Adjusted* Volume (cubic ft)**	**Pile Biomass (tons)**	**Consumed Fuel (tons)**	**Emissions by pollutant (tons)**						
				PM	**PM_{10}**	**$PM_{2.5}$**	**CO**	**CO_2**	**CH_4**	**NMHC**
83,775.80	58,420.00	73.79	66.41	0.73	0.51	0.45	2.52	110.48	0.19	0.15

Table 1: AHRP Pile Burning Emissions

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

The project is designed to reduce the chance of a large catastrophic wildfire emitting significant volumes of greenhouse gasses. In addition, residual tree growth is expected to increase thereby shifting carbon storage from small trees and shrubs to larger overstory trees.

6.4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒

Only small amounts of petroleum products will be transported for use on this project. No other hazardous materials will be transported or used. AMM #5 should provide additional protection and prevent hazardous material spills.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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 groundwater. AMM #5 should provide additional protection and prevent hazardous material spills.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

One school exists within one-quarter mile south of the project. The project activities will not impact school operations or endanger children in any way. The majority of the treatment area is greater than one-quarter mile from the school and operations within a quarter mile will be limited to a disc line along the southern perimeter of the Park property. No discing will occur during school hours.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significan t Impact	No Impact
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?	☐	☐	☐	☒

The project is not located on or adjacent to any airport. Furthermore, the project design will not impact future airports that might be developed in the area.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

The project is not located on or adjacent to any private airstrip. Furthermore, the project design will not impact future private airstrips that might be developed in the area.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

The Project operations and implementation will not impact emergency evacuation of any neighborhoods or communities. In the event that recreation users need to evacuate, their egress will not be impacted by project operations.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

The Project is being designed and implemented to reduce the potential fire hazard in the area. In addition, the Project will be implemented by a Licensed Timber Operator (LTO). LTOs are trained and held to certain standards for completing forest operations, which includes standards for wildfire prevention.

6.4.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒

No violations of water quality standards or waste discharge requirements will occur. AMM#3 and #5 are designed to preserve the beneficial uses of water and prevent violation of water quality standards or waste discharge requirements. In addition, no new roads, landings, or watercourse crossings are proposed as part of this project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	☐	☐	☐	☒

Project may increase short-term groundwater availability due to removal of vegetation.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

The reduction of some water-using vegetation may result in slightly greater groundwater availability and runoff. Adequate vegetation and forest debris will be retained to minimize surface runoff. The project is not expected to substantially alter the existing drainage pattern

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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. AMM#3 and #5 are designed to preserve the beneficial uses of water and prevent violation of water quality standards or waste discharge requirements.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

The reduction of some water-using vegetation may result in slightly greater groundwater availability and runoff. 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. AMM#3 and #5 are designed to preserve the beneficial uses of water and prevent violation of water quality standards or waste discharge requirements. In addition, no new roads, landings, or watercourse crossings are proposed as part of this project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

The project is in a rural area with limited structured stormwater drainage systems; however, there are culverts downstream of the project that cross under Highway 49. Riparian areas will largely be left untreated, which will maintain filter strips. No significant change in runoff is anticipated.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Would the project otherwise substantially degrade water quality?	☐	☐	☒	☐

No degradation of water quality is expected from this project. Heavy equipment shall not be used within the standard width of a WLPZ along all watercourses except at existing roads. AMM#3 and #5 are designed to preserve the beneficial uses of water and prevent violation of water quality standards or waste discharge requirements.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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No housing development is proposed under this project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
h) Would the project place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☒

No structures are proposed to be developed under this project. No flood risk will be impacted by this project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

No operation will occur on or within a proximity to dam infrastructure that creates the potential for damage. The project will not impact risk of flooding.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
j) Would the project result in inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Topographic conditions on the project area are not susceptible to seiche, tsunami, or substantial mudflow.

6.4.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project physically divide an established community?	☐	☐	☐	☒

The project will have no impact on the location or connectivity of any community.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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

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	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?	☐	☐	☐	☒

The project will not conflict with any habitat conservation plan or natural community conservation plan.

6.4.12 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?	☐	☐	☐	☒

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?	☐	☐	☐	☒

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

6.4.13 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?	☐	☐	☒	☐

The project is in a semi-rural area where only personnel conducting the project should be exposed to high levels of noise. Nearby homeowners and Park visitors may be able to hear the operation of heavy equipment and chainsaws during implementation, but 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?	☐	☐	☒	☐

Some minor groundborne vibration or noise levels may occur due to heavy equipment operations to implement the fuel reduction project. The impact will not be significant.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project create a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒

A short-term increase in noise will occur during operations. No permanent increase in ambient noise will occur.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Park visitors may experience an increase in ambient noise during project implementation. This increase will be temporary and should not be significant.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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

6.4.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	☐	☐	☐	☒

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?	☐	☐	☐	☒

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No homes will be displaced as a result of this project. The project may actually prevent displacement of homes in the event of a wildfire event by creating fuelbreaks and defensible space.

	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?	☐	☐	☐	☒

No residents will be displaced as a result of this project.

6.4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other Public Facilities?	☐	☐	☐	☒

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

6.4.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial	☐	☐	☐	☒

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physical deterioration of the facility would occur or be accelerated?

The project area is within and adjacent to the Ahwahnee Hills Regional Park, but the fuel reduction project will not increase the use of the Park and will not contribute to deterioration of any facility.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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

6.4.17 TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

The project as proposed will have no impact on a transportation circulation system.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Would the project conflict with or be inconsistent with CEQA Guidelines 15064.3, subdivision (b)?	☐	☐	☐	☒

The project will not impact transportation.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

The project as proposed will have no impact on air traffic patterns.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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)?	☐	☐	☐	☒

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Would the project result in inadequate emergency access?	☐	☐	☐	☒

The project as proposed will not impact emergency access.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☐	☒

The project will not conflict with any alternative transportation programs.

6.4.18 Tribal or Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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:	☐	☒	☐	☐
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	☐	☒	☐	☐
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	☐	☒	☐	☐

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resource to a California Native American tribe.

CAL FIRE Archaeologist reviewed and approved the Confidential Archaeological Addendum for the Ahwahnee Hills Regional Park FRP, which included protection measures. No adverse changes to a known tribal cultural resource should result from this project. AMM #4.

6.4.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒

No wastewater treatment facilities will be impacted by the project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

No water or wastewater treatment facilities will be impacted by the project. No new water or wastewater treatment facilities will be necessary as a result of this project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

No water supplies on the project site will be utilized.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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				

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projected demand, in addition to the provider's existing commitments?	☐	☐	☐	☒

The Project will not result in change in projected demand for wastewater treatment capacity.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒

No landfill accommodations will be necessary for the implementation of this project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

The Project will comply with federal, state, and local statues related to solid waste; however, no solid waste will be produced or removed from the Project area.

6.4.20 WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

The project has been developed to reduce the fire hazard severity. The project should not impair any emergency response plans or emergency evacuation plans, rather it should enhance fire responder safety and suppression effectiveness.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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	☐	☐	☐	☒

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				

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.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

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.

6.4.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Based upon all available data and surveys regarding habitat and species paired with avoidance and minimization measures, the Project <u>DOES NOT</u> 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. Because the project provides a net benefit to the environment by protecting humans, natural resources, and property from catastrophic wildfire, impacts should be considered "less than significant" or "no impact".

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.)	☐	☐	☒	☐

The Project will not have impacts that are individually limited, but cumulatively considerable. This shaded fuel break project is isolated and comparatively small in scale in the context of the surrounding undisturbed area. No other fuelbreak projects are planned nearby or adjacent to the Project. In addition, human development and/or natural resource management activity in the area is relatively low. The Project will help restore the Ahwahnee Hills Regional Park FRP area to a condition that is resilient and resistant to catastrophic wildfire, thus providing a net benefit for the environment. Cumulative impacts from this Project should be considered "less than significant" or "no impact".

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

The project area is outside of heavily utilized portions of the Park. Recreation will be temporarily limited in the treatment areas in order to protect public safety. Visitors to the Park may be slightly inconvenienced by temporary closure of project areas, but the project will not have any substantial adverse impact on human beings. Environmental effects to human beings, either directly or indirectly, should be considered "less than significant" or "no impact".

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7 AVOIDANCE AND MINIMIZATION MEASURES

AMM	Name	Description
1.1	Mariposa Pussypaws	If operations are planned to occur during the bloom period for Mariposa pussypaws (July to August), preconstruction surveys shall be conducted within the treatment area where habitat exists to ensure no impact occurs. If populations, or individuals, are located a twenty-five-foot (25') buffer will be established to ensure no impacts occur during the bloom period.
1.2	Western Pond Turtle	All operators shall be trained in identification of western pond turtle (WPT) prior to the start of ground disturbing operations. If a WPT is identified within the treatment area, operations shall be stopped immediately and the RPF shall be contacted. The RPF or a qualified biologist will provide further guidance to avoid harm or harassment of WPT. In general, any suitable habitat found within the treatment area shall be buffered by at least 25' and equipment will be excluded from these areas. In addition, equipment and vehicles shall be parked no less than 100' from occupied aquatic habitat for the Western pond turtle at all times (large pond within the ownership).
2	Nesting Birds.	If operations are to occur between March 1 and August 15 (nesting season), pre-operations surveys shall be conducted for nesting birds. Appropriate buffers per Forest Practice Rules Section 959.3 "Specific Requirements for Protection of Nest Sites" shall be implemented upon discovery of active nests.
3	Watercourse and Lake Protection.	This measure is intended to ensure that operations do not potentially cause significant adverse site-specific and cumulative impacts to the beneficial uses of water, native aquatic and riparian-associated species, and the beneficial functions of riparian zones; or result in an unauthorized take of listed aquatic species; or threaten to cause violation of any applicable legal requirements. Any classified watercourses will be appropriately protected and buffered consistent with Forest Practice Rules Section 956, "Watercourse and Lake Protection". In addition, any existing roads or trails used as watercourse crossings will abide by Section 954.8 "Tractor Road Watercourse Crossing".
4	Cultural Resources Protection.	1. General mitigation for the project will be to survey the entire project area for unrecorded resources and avoid all operations within sites or near known resources. 2. New discoveries will be recorded, and appropriate buffers will be established around sites to avoid impacts prior to the start of operations. 3. All sites/resources will be identified in the field with flagging, and locations will be shared with the LTO, prior to the start of operations. 4. Undiscovered resources encountered during operations shall be identified/avoided, Cal Fire will be contacted immediately, and the resources will then be assessed or recorded as necessary based on direction from Cal Fire cultural resources staff.
5	Refueling Procedures.	All refueling, and maintenance of equipment shall occur on <15% slopes and outside any designated protection area (equipment exclusion zone, cultural site, watercourse buffer, etc.) or on existing or designated laydown areas, landings, or roads. Exceptions shall be considered or allowed for equipment breakdowns and/or other safety considerations.

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10 APPENDIX – BIOLOGICAL EVALUATION

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BIOLOGICAL EVALUATION/ANALYSIS

Ahwahnee Hills Regional Park Hazardous Fuel Reduction Project

Ahwahnee, CA

June 26, 2020

(*Revised 08/20/2020*)

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Biological Evaluation/Analysis

California Climate Initiative Grant No. 5GG17172
Ahwahnee Hills Regional Park Hazardous Fuel Reduction Project

Presented to:

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Executive Summary

This biological study of the Ahwahnee Hills Regional Park in Ahwahnee, Madera County was completed by Blue Sky Forestry in order to assess the possible impacts to biological resources from a planned fuel reduction project ("Project"). The Project will encompass approximately 293 acres of the 400-acre property. The Project seeks to remove ladder fuels in an effort to reduce vertical continuity that often promotes crown fire. The Project will also thin live trees below 10" DBH, remove all dead/dying oak trees, and reduce shrub continuity. Project activities that could directly impact sensitive habitat or species include equipment use, falling operations, and slash disposal (chipping, piling, or burning).

The Project will result in no impact or a less than significant impact to biotic resources. Project design was developed in a way that should improve habitat for wildlife as well as disturbance dependent plant species. Based on project specific designs, including measures from the California Forest Practice Rules and proposed avoidance and minimization measures (AMMs) discussed in this evaluation, impacts to sensitive biotic resources will be avoided. In addition, proposed measures and AMMs prescribed will mitigate all impacts to biological resources to a "less than significant" or "no effect" standard. Avoidance and minimization measures are also designed to be implemented should any special status species be discovered on the site during surveys or operations.

Nesting birds could potentially be impacted by the Project construction. Pre-operation surveys will be conducted during the nesting season (March-August) to ensure compliance with federal and state law protecting migratory and nesting birds. Should active nests be found on the site, suitable buffers will be established and maintained until the young have left the nest as confirmed by the RPF.

Introduction

The Project is located in the Sierra Nevada foothills of Madera County, California approximately 2 miles south of the Mariposa County line. The site can be found on the Fish Camp 7.5-minute quadrangle Section 25, Township 6 South, and Range 20 East MDBM.

In 2018, the Friends of Ahwahnee Hills Regional Park successfully received a grant from Cal Fire to develop fuel reduction projects within the Ahwahnee Hills Regional Park (Park) and surrounding communities that wish to participate on an individual landowner basis. The following is the general project scope of work (SOW) for the Ahwahnee Hills Regional Park 2020/2021 Fuel Reduction Project (Project). In general, the Project goal is to create a series of shaded fuelbreaks within the Park that extend beyond the boundary by 100'. All dead trees greater than 8" diameter at breast height (DBH) will be removed, brush/shrub vegetation within designated areas will be reduced, residual trees will be pruned up to 8' from the ground, and slash within the Project area will be disposed of. More specifically, shrubs, brush, or live trees less than 10" DBH within the dripline of a dominant or co-dominant treed shall be removed. Furthermore, pockets of trees less than 10" DBH shall be thinned to 12'x12' spacing and pockets of shrubs shall be reduced by 80% relative cover. This prescription is intended to reduce or eliminate the vertical and horizontal continuity of ladder fuels.

Work will be completed with a combination of tracked equipment and hand crews as determined by access (slope gradient will be a limiting factor for equipment). No new lay down

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areas or watercourse crossings shall be established as part of this project. No equipment operations shall be permitted in standing water at any time. Along classified watercourses, a buffer will be established that will limit equipment operations to prevent erosion and impacts to riparian habitat. Within "Equipment Exclusion Zones" (EEZ), fuel reduction work will be completed by hand crews; however, equipment will be permitted to utilize existing roads and crossings to access portions of the treatment area. Within any "Equipment Limitation Zones" (ELZ), fuel reduction work may be completed by equipment on slopes less than 30% where impacts to the bed, bank, or channel will not occur. For any ELZ with slopes greater than 30%, equipment may operate within ten feet of the "top of bank". In general, riparian vegetation and trees are not targeted within this fuel reduction prescription and tree canopy cover within riparian or watercourse corridors will be unaffected. To the extent feasible, riparian vegetation (willows, sedges, rushes, etc.) will be avoided by planned fuel reduction operations.

Slash will be disposed of by chipping, pile burning, or lop and scatter to <9" if burning/chipping are not safe/feasible. In addition, a disced or mowed fireline will be established along the southern extent of the property via tractor. Work is expected to begin in mid-2020 with a total footprint of approximately 293 acres of fuel reduction. This includes approximately 291 acres of shaded fuel break or fuel reduction and 2 acres (approximately 5,000 linear feet) of disced fire line.

Existing Biological Conditions

The Project and surrounding areas were examined/assessed for wildlife, plants, snags/dens, coarse woody debris, road density, stand structure, and hardwood cover during project layout to assess habitat quality, functionality, and potential for sensitive species. Wildlife noted either by scat or individual sightings included deer, turkey, quail, pond turtle, and wood rat. There are no major migration routes or fawning areas in the Project area. In addition, within the 3-mile assessment area there are no U.S. Fish and Wildlife designated critical habitats and no habitats designated as a "Sensitive Natural Community" by CDFW.

The majority of the developed overstory is comprised of small diameter hardwood, likely a byproduct of re-sprouting hardwoods after a large wildfire burned through the area in the 1960s. Based on the low average diameter and high density of tree per acre, the potential for tree denning or nesting wildlife within the Project area is low to moderate. Snag density in the Project area is low (<1 snag greater than 30-inch DBH visually estimated per acre). Large downed woody debris (100-hr fuel) is low to moderate on-site (<1.5 tons per acre visually estimated on average). Topography and stand structure vary widely on surrounding lands in the assessment area. Hardwood densities within the plan area also vary greatly from dense (higher elevation, higher slope gradient areas) to low (lower elevation, lower slope gradient areas). Table 1 provides an overview of special status species from California Natural Diversity Database (NDDB) queries within the Fish Camp and adjacent quad maps ("9-quad search").

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Table 1: Sensitive, Candidate, Threatened, or Endangered Animals and Plants in Madera Co.

Species	Species Status	Habitat Requirements	Present In Project Area: Habitat And/Or Detections	Effects Determination	Measures Needed For No Effect
Terrestrial Species					
Bald eagle	CE	Nest in large trees or snags near rivers, streams or lakes.	Not observed, suitable nesting habitat may be present nearby; the area may be used to forage.	May affect foraging individuals but would not lead to loss in viability or a trend toward federal listing.	Avoid impacts to nesting individuals. If active nests are found during the course of operations AMM #2 will be implemented by the RPF.
California spotted owl	CSC	Nest in multi-storied old growth conifer forest. May forage in more open stands.	No suitable habitat is not present in the project area.	No effect.	N/A
Great gray owl	CE	Nest in conifer and/or oak forests near open meadows for foraging. Usually above 4000' in elevation.	No suitable habitat is not present in the project area.	No effect	N/A
Willow flycatcher	CE	Species needs riparian areas w/ willows to nest.	No suitable habitat is present in the project area.	Effect unlikely. Although willows are found near the Project, the area is below the typical range of the species.	No willows will be affected by the project.
Sierra Nevada red fox	CT	High elevations above 4000'. Mainly in red fir, lodgepole, and sub-alpine forests.	No suitable habitat is present in the project area	No effect	N/A
Townsend's big-eared bat	CSC	Roost in caves abandoned mines, or buildings.	No suitable habitat is not present in the treatment area.	No effect	N/A
Spotted bat	CSC	Occupies a wide variety of habitats from arid deserts and grasslands through mixed conifer forests. Feeds over water and along washes. Feeds almost entirely on moths. Needs rock crevices in cliffs or caves for roosting.	No suitable habitat is not present in the treatment area.	No effect	N/A
Western mastiff bat	CSC	Many open, semi-arid to arid habitats, including conifer & deciduous woodlands, coastal scrub, grasslands, chaparral, etc. Roosts in crevices in cliff faces, high buildings, trees and tunnels.	No suitable habitat is not present in the treatment area.	No effect	N/A
Western red bat	CSC	Roosting in caves, generally roost singly within tree foliage or	Unlikely to occur. Roosting habitat is absent from the	Not likely to impact based on project design and marginal	N/A

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Species	Species Status	Habitat Requirements	Present In Project Area: Habitat And/Or Detections	Effects Determination	Measures Needed For No Effect
		shrubs, and often along edge habitat adjacent to streams or open fields.	project site; however, the species could occur on adjacent properties.	habitat present. May affect individuals temporarily but would not cause a loss of viability or lead to a trend toward listing.	
Pallid bat	CSC	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.	Unlikely to occur. Suitable roosting habitat is absent from the project site; however, the species could occur on adjacent properties.	Not likely to impact based on project design and marginal habitat present. May affect individuals temporarily but would not cause a loss of viability or lead to a trend toward listing.	N/A
Crotch Bumble Bee	SC	Found in grassland and scrub habitats from coastal California east to the Sierra-Cascade crest and south into Mexico.	No habitat present.	The site is outside the current known range of the species.	N/A
Valley Elderberry Long-horned Beetle	FT	Occurs only in the Central Valley of California, in association with blue elderberry (Sambucus mexicana). Prefers to lay eggs in elderberries 2-8 inches in diameter; some preference shown for "stressed" elderberries.	No habitat present within the treatment area.	No effect.	N/A
Fisher	FPT, CCT, CSC	Occurs at higher elevations of the Sierra Nevada in a variety of habitats from wet meadows to forested areas. Uses dense vegetation and rocky areas for cover and denning.	No habitat present.	The site is outside the current known elevational range of the species.	N/A
Sierra Nevada red fox	FC, CT	Historically found from the Cascades down to the Sierra Nevada above 5,000' elevation. Found in a variety of habitats from wet meadows to forested areas. Use dense vegetation and rocky areas for cover and den sites. Prefer forests interspersed with meadows or alpine fell-fields.	Project is below the known elevational range of the species	No effect.	N/A

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Species	Species Status	Habitat Requirements	Present In Project Area: Habitat And/Or Detections	Effects Determination	Measures Needed For No Effect
California wolverine	FPT, CT	Found in the north coast mountains and the Sierra Nevada. Found in a wide variety of high elevation habitats. Needs water source. Uses caves, logs, burrows for cover and den area. Hunts in more open areas. Can travel long distances.	Project is outside the current presumed range of this species.	No effect.	N/A
American badger	CSC	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	Uncommon in montane habitats.	Species is unlikely to be present within the project area. No effect.	N/A
Aquatic Dependent Species					
California red-legged frog	T	Found mainly near ponds in humid forests, woodlands, grasslands, and streamside with plant cover. Most common in lowlands or foothills.	Not observed. No suitable habitat is present in the project area.	No effect	N/A
Northwestern pond turtle	CSC	Found in a variety of both permanent and intermittent aquatic habitats including streams, canals, and reservoirs.	Suitable habitat is present near the treatment area (large pond), where the species was observed.	Not likely to affect.	Suitable habitat is not found within any treatment areas. Riparian corridors that could support species movement or denning are outside treatment areas. AMM 1.2 to ensure no effect.
Foothill yellow-legged frog	CE	Found in or near rocky perennial streams and rivers in a variety of habitats including riparian, mixed conifer, and wet meadow types below 6,000'.	No suitable habitat is present in project area. Streams within the project area lack pooling due to steep gradient.	No effect.	N/A
Yosemite Toad	FC, CSC	Occurs in wet meadows, willow thickets, and borders of forests near water of the Central and Southern Sierra Nevada mountain range between 6,400 and 11,300 feet in elevation.	No suitable habitat present in project area. Outside known range.	No effect.	N/A

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Species	Species Status	Habitat Requirements	Present In Project Area: Habitat And/Or Detections	Effects Determination	Measures Needed For No Effect
Sierra Nevada Yellow-legged Frog	FE, CT	Found in cold mountain lakes and streams, generally from 5,000 to 12,000 feet in elevation. Breeding and egg laying occur after snowmelt from June to August.	No suitable habitat present in project area. Outside known range.	No effect.	N/A
Sierra Nevada mountain beaver	CSC	Dense growth of small deciduous trees & shrubs, wet soil, & abundance of forbs in the Sierra Nevada & east slope. Needs dense understory for food & cover. Burrows into soft soil. Needs abundant supply of water.	No habitat present.	No effect.	N/A
Plant Species					
Mariposa Pussy-Paws	FT	Coarse granitic sands in Mariposa, Madera and Fresno Counties between 1,320 and 4,000 feet.	Possible. Although the project is within the known range of the species, suitable habitat was not identified within treatment areas. Closest known population is approximately 0.7 miles away.	Not likely to affect.	Although suitable habitat was not identified, habitat will likely not be disturbed by forest management treatment prescription. operations are likely to occur outside of bloom period and after the plant senescence. AMM 1.1 to ensure no effect.
Rawson's Flaming Trumpet	S	Occurs on stabilized alluvium in riparian zones between 2,500 and 6,600 feet. Endemic to Madera and Mariposa Counties.	Unlikely. This species has the potential to occur in riparian habitat; however, the nearest documented occurrence is approximately six miles east of the project site.	No affect.	N/A
Slender-stalked Monkeyflower	S	Occurs within disturbed places such as burns and railroad grades; also on thin granitic soil in cracks in large granite rocks. Chaparral, cismontane woodland, lower montane coniferous forest between 1,640 and 4,265 feet.	Not likely to be present. Although some suitable habitat exists for the species, the overgrowth present on the site likely precludes populations from developing within treatment areas.	Habitat may be improved for the species after treatments.	No presence within treatment area. In addition, operations are likely to occur outside of bloom period and after the plant senescence.

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Species	Species Status	Habitat Requirements	Present In Project Area: Habitat And/Or Detections	Effects Determination	Measures Needed For No Effect
Small's Southern Clarkia	S	This species occurs in open, rocky sites in conifer forest or oak woodland between 2,800 and 6,200 feet in elevation in Calaveras, Madera, Mariposa, and Tuolumne Counties.	Unlikely. May occur within the project area; however, the site is near the low elevation limit for this species.	Not likely to affect. No habitat present within treatment area. In addition,	N/A
Slender-stemmed monkeyflower	S	Cismontane woodland, lower montane coniferous forest, meadows and seeps, upper montane coniferous forest. Within the transition zone of the Sierra Nevada; moist granitic sand and meadow edges; vernally mesic sites. 1,800'-5,000'.	Not likely to be present within treatment areas. The species may be present in meadows outside the treatment area on the ownership; however, the overgrowth within treatment areas likely precludes populations from developing within treatment areas.	Not likely to affect. No habitat present within treatment area.	N/A
Big-scale balsamroot	S	Chaparral, valley and foothill grassland, cismontane woodland. Sometimes on serpentine soils. 100-4,500'.	Possible. Not observed. The project is within the known range of the species,	Not likely to affect.	N/A
Bolander's clover	S	Meadows and seeps, lower montane coniferous forest, upper montane coniferous forest. Moist mountain meadows. 6,000'-8,000'.	Unlikely. The project is outside the known elevational range for the species.	No affect.	N/A
Congdon's lewisia	S	Chaparral, valley and foothill grassland, lower montane coniferous forest, cismontane woodland, upper montane coniferous forest. North exposures; in crevices on slopes among rocks. Granitic or metamorphic substrates. 2,000-6,500' elevation.	Unlikely. Not observed. The treatment areas are predominately south facing which creates a harsh environment for this plant.	No affect.	N/A
Congdon's woolly sunflower	S	Chaparral, cismontane woodland, lower montane coniferous forest, valley and foothill grassland. In cracks in rock outcroppings, and on talus; sometimes with Quercus douglasii, Aesculus californica. 1,200'-5,500'.	Possible. Not observed.	Unlikely to affect. The project will not impact any rocky areas or outcrops.	N/A

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Species	Species Status	Habitat Requirements	Present In Project Area: Habitat And/Or Detections	Effects Determination	Measures Needed For No Effect
Jepson's dodder	S	Upper montane coniferous forest, lower montane coniferous forest, broadleaved upland forest. Primary host species are Ceanothus diversifolius and Ceanothus prostratus. 3,600'-8,400'.	Unlikely. The project is outside the known elevational range for the species.	No affect.	N/A
Madera leptosiphon	S	Cismontane woodland, lower montane coniferous forest. Dry slopes; often on decomposed granite in woodland. 400'-5,000'	Possible. Not observed.	Unlikely to affect. The project will not impact any rocky areas or forest opening that are void of ladder fuels.	N/A
Orange lupine	S	Riparian forest, lower montane coniferous forest, meadows and seeps. On stabilized alluvium in riparian zones. 2,000'-6,000' elevation.	Possible. Not observed.	Unlikely to affect. The project will not impact any riparian areas.	N/A
Short-leaved hulsea	S	Lower montane coniferous forest, upper montane coniferous forest. Granitic or volcanic soil of forest openings and road cuts. 3,500-7,000' elevation.	Unlikely. The project is outside the known elevational range for the species.	No affect.	N/A
Yellow-lip pansy monkeyflower	S	Lower montane coniferous forest, meadows and seeps. Vernally wet sites. Soils can be clay, volcanic, or granitic. 1,800'-6,000' elevation.	Possible. Not observed.	Unlikely to affect. The project will not impact any riparian or meadow areas.	N/A
Yosemite popcornflower	S	Lower montane coniferous forest, meadows and seeps. 3,000-4,000' elevation.	Unlikely. The project is outside the known elevational range for the species.	No affect.	N/A
Abrams' onion	S	Lower montane coniferous forest, upper montane coniferous forest. On sandy soils, derived from disintegrated granite. 3,000-9,000' elevation.	Unlikely. The project is on the fringe of the known elevational range for the species.	No affect.	N/A
Bolander's woodreed	S	Meadows and seeps, upper montane coniferous forest. Streamsides and other mesic areas. 3,600'-6,500' elevation.	Unlikely. The project is outside the known elevational range for the species.	No affect.	N/A
Mud sedge	S	Bogs and fens, lower montane coniferous forest, meadows and	Unlikely. The project is outside the known	No affect.	N/A

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Species	Species Status	Habitat Requirements	Present In Project Area: Habitat And/Or Detections	Effects Determination	Measures Needed For No Effect
		seeps, marshes and swamps, upper montane coniferous forest. In floating bogs and soggy meadows and edges of lakes. 4,000'-7,500'.	elevational range for the species.		
Yosemite onion	S	Broadleafed upland forest, chaparral, cismontane woodland, lower montane coniferous forest. In pockets of wet soil or in wet cracks of metamorphic rock; also on slopes and walls. 1,500'-6,500' elevation.	Unlikely. No suitable habitat exists within the treatment area.	No affect.	N/A

Status Key

FE	Federally Endangered	CE	California Endangered
FT	Federally Threatened	CT	California Threatened
FPT	Federally Proposed Threatened	CR	California Rare
FC	Federal Candidate	CFP	California Fully Protected
CCT	California Candidate Threatened	S	Sensitive/Indicator Species
CSC	California Species of Special Concern		

Biological Assessment – Impacts and Mitigation

In accordance with Cal Fire Technical Rule Addendum #2, *biological assessment areas* (BAA) will vary with the species being evaluated and its habitat. The assessment area for this project includes the project area as well as 3 miles outside the project boundary. By evaluating species within the 25,261-acre BAA, the RPF is able to develop a large enough sample size to capture wildlife designated for protection or species of concern within the area that have potential to exist within the project boundary. The BAA is large enough to assess species of both large and small geographic ranges (BAA map attached) and account for habitat variability within and adjacent to the Project.

California Natural Diversity Database Evaluation

Six species (three plant and three animal) were found within the 3-mile assessment area based on Natural Diversity Database analysis. Although there are no formal recordings of western pond turtle within the assessment area, the treatment area is adjacent to occupied habitat. Of the six species that were detected in the NDDB query, two will not be affected by the project; this includes the Anandrenid bee and Leech's diving beetle. Of the remaining four species included in the NDDB query one species is unlikely to occur based on marginal habitat conditions, the foothill yellow-legged frog.

The following section provides guidelines or justification to demonstrate no impact, minimization of impacts, or avoidance of impacts to species which are known to occur within the BAA. If potential or suitable habitat exists for species within the BAA, avoidance and

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minimization measures (AMMs) will be outlined and implemented below to achieve “no impact” or “less than significant impact” to meet the fully mitigated CEQA standard.

Foothill Yellow-legged Frog *(Rana boylii*)

Credit Cal Herpes

Foothill yellow-legged frog (FYLF) is a medium-sized frog with grainy skin, ridges on the sides, and generally grows to between 1.5 - 3.2 inches long from snot to vent (CalHerpes). Coloring is gray, brownish, or olive, sometimes red, tending to match the background of its habitat. Can be plain or mottled with dark spotting. Occasionally heavily mottled. There is no mask through the eyes. A light-colored band runs across the top of the head. The undersides of the rear legs and lower abdomen are yellow. The venter is whitish with dark spotting on the throat and chest.

Habitat is frequently rocky streams and rivers with rocky substrate and open, sunny banks, in forests, chaparral, and woodlands. Sometimes found in isolated pools, vegetated backwaters, and deep, shaded, spring-fed pools. Generally, the species is found below 6,000’ elevation. The species uses its aquatic habitat for reproduction, and researchers have found egg masses between April 22nd and July 6th in California, with an average of May 3rd. Tadpoles remain around the egg mass for a about a week, then they move away to feed, using rocks and gravel for cover. Tadpoles transform in 3 to 4 months, typically from July to October. Newly metamorphosed juveniles typically migrate upstream from the hatching site.

The FYLF is not currently listed for protection under the federal Endangered Species Act, however it is listed as “Endangered” under the California Endangered Species Act. The Project falls within the historic range of the species, and potential habitat may exist for FYLF near treatment areas. Within the Treatment Area the habitat for the species is non-existent to low quality due to the watercourse gradients being too high to support lower velocity flows and pooling neccessary to support breeding and tadpole development.

Mariposa Pussypaws (*Calytridium pulchellum*)

Credit CALFLORA

Mariposa pussypaws is a dichotomous annual herb that is native to California and is endemic (limited) to California (CALFLORA). Mariposa pussypaws is designated as “threatened” under the Federal Endangered

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Species Act for protection and is included in the CNPS Inventory of Rare and Endangered Plants as “rare, threatened, or endangered in CA and elsewhere”. Although never documented within the project area, or immediate vicinity, Mariposa pussypaws could be present within or near treatment areas. However, due to overgrowth of oak and shrub species presence is unlikely as the species requires open areas with sandy or gravelly, granitic soils. No suitable habitat was identified within the project area.

Blooming period of the plant occurs in April-August and operations are likely to occur post-bloom and pre-germination. Post project conditions will be more favorable for the species should seedbeds exist or migration onto the property occurs. Out of an abundance of caution, the following IS/MND AMM will be implemented to avoid potential impacts to Mariposa pussypaws:

- *AMM 1.1 – If operations are planned to occur during the bloom period for Mariposa pussypaws (July to August), preconstruction surveys shall be conducted within the treatment area where suitable habitat exists to ensure no impact occurs. If suitable habitat, populations, or individuals, are located a 25’ buffer will be established to ensure no impacts occur during the bloom period.*

Slender Stalked Monkeyflower (*Mimulus gracilipes*)

Credit CALFLORA

Slender stalked monkeyflower is a dichotomous annual herb herb that is native to California and is endemic (limited) to California (CALFLORA). Slender stalked monkeyflower is not designated under ESA or CESA for protection or included in the CNPS Inventory of Rare and Endangered. The plant is unlikely to be present on the property due to overgrowth of shrub species and lack of southern exposure. Post project conditions will be more favorable for the species should seedbeds exist or migration onto the property occurs. Blooming period of the plant occurs from April to June. Operations that result in ground disturbance could occur during the bloom period.

Based on planned timing of operations and low probability off existence within project boundary identified for treatments, impacts are not likely. Habitat may be improved for the species once disturbance occurs and chaparral/shrub canopy is thinned.

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Small's Southern Clarkia (*Clarkia australis*)

Small's southern clarkia is an annual herb that is native to California and is endemic (limited) to California (CALFLORA). Small's southern clarkia is not designated under ESA or CESA for protection, but is included in the CNPS Inventory of Rare and Endangered Plants as "rare, threatened, or endangered in CA and elsewhere". The plant is unlikely to be present on the property given the overall lack of suitable habitat (open rocky sites). In addition, the Project is at the lower limit of the elevational range for the species.

Credit CALFLORA

Blooming period of the plant occurs from May to August; however, operations are likely to occur post-bloom and pre-germination. Based on average annual precipitation, length of growing season, and known elevation where this plant occurs it is unlikely that the plant occurs within the treatment areas (CALFLORA, CNPS); therefore, impacts to this species are unlikely.

Western Pond Turtle (*Actinemys marmorata*)

A small to medium-sized drab dark brown, olive brown, or blackish turtle with a low unkeeled carapace (Herps). The western pond turtle is uncommon to common in suitable aquatic habitat throughout California, west of the Sierra-Cascade crest and absent from desert regions, except in the Mojave Desert along the Mojave River and its tributaries. Elevation range extends from near sea level to 4,600' (Morey). The species is associated with permanent or nearly permanent water in a wide variety of habitat types.

Credit Cal Herpes

No suitable habitat exists within the treatment area; however, the species is known to occur in a large pond adjacent to the treatment area. and because the species does not typically disperse any distance from aquatic habitat no impacts are anticipated from operations.

- *AMM 1.2 – All operators will be trained in identification of western pond turtle (WPT) prior to the start of ground disturbing operations. If a WPT is identified within the treatment area, operations shall be stopped immediately and the RPF will be contacted. The RPF or a qualified biologist will provide further guidance to avoid harm or harassment of WPT. In general, any suitable habitat found within the treatment area will be buffered by at least 25' and equipment will be excluded from these areas. In addition, equipment and vehicles shall be parked no less than 100' from occupied aquatic habitat for the Western pond turtle at all times (large pond within the ownership).*

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