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MEMORANDUM

To: Jill Demers, Humboldt County RCD
Date: 3/5/24
From: Cassie Pinnell, VNLC
No. Pages: 4

Subject: Minor Clarification to the Mattole and Salmon Creek Forest Health and Wildfire Resilience Project PSA/Addendum

The Humboldt County Resource Conservation District (HCRCD) has discovered the need for three minor clarifications in its Mattole and Salmon Creek Forest Health and Wildfire Resilience Project CEQA documentation and, therefore, is preparing this memorandum to keep in the project records.

The HCRCD was awarded a CAL FIRE Forest Health Grant for the Mattole and Salmon Creek Forest Health and Wildfire Resilience Project. This project covers two separate project areas that are disparately located, one in the larger Mattole watershed (Mattole River and McGinnis Creek) and the other in the Salmon Creek watershed. The HCRCD evaluated the Mattole watershed treatments, approximately an 1,100-acre area, for CEQA compliance as later activities covered by the Program Environmental Impact Report (Program EIR) for the California Vegetation Treatment Program (CalVTP), using its Project-Specific Analysis (PSA) checklist. In June 2023, HCRCD completed a PSA and an Addendum to the CalVTP Program EIR (PSA/Addendum) and concluded that all proposed treatments were within the scope of the CalVTP Program EIR.

Minor clarifications made to the PSA/Addendum include the following:

1. Western Bumble Bee (*Bombus occidentalis*)

The impacts to special-status wildlife species (Impact BIO-2) included an analysis of potential impacts to the western bumble bee (*Bombus occidentalis*). The PSA/Addendum did specify that the project would not constitute a substantially more severe significant impact than what was covered in the PEIR, but did not include the actual potential impact assessment for this species found in the Biological Resource Evaluation (VNLC 2023- Appendix A).

The following revisions to Section 5.5 Biological Resources, Impact BIO-2, Special-status Insects of the PSA/Addendum text are signified by underline (<u>underline)</u> where text is added.

'Due to difficulty in detecting overwintering and nesting bumble bees and determining the occurrence and severity of impacts, for purposes of good faith, full disclosure under CEQA,

this impact is designated in the PEIR to be potentially significant and unavoidable. However, based on the Biological Resource Evaluation (VNLC 2023), included as Appendix A to this PSA, ultimately this project is expected to increase the quality of habitat for this species and therefore is expected to have a less than significant impact. This finding is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.'

This detail of impact was already included in the Appendix A to the PSA/Addendum, but was not clearly detailed in the PSA/Addendum main text. It is being added here for clarity; there is no new or additional analysis required in the PSA/Addendum for this clarification. This clarification does not constitute a change to the project and all of the environmental impact conclusions remain the same, so additional review under CEQA Guidelines Sections 15162 or 15164 is not warranted.

2. Sensitive Habitats - Riparian Corridors

The impacts to sensitive habitats (Impact BIO-3) included descriptions of potential impacts and measures for work conducted in riparian areas (SPR BIO-4). The PSA/Addendum stated that treatment activities in riparian communities would adhere to design specifications intended to retain or improve habitat functions. However, the Biological Resources Discussion within the PSA did not include one of the parameters required under SPR BIO-4, as detailed in the Mitigation, Monitoring, and Reporting Plan (MMRP – Appendix B), as follows: "A scientifically-based, project-specific explanation substantiating the retention size parameter for native riparian hardwood tree removal will be provided in the Biological Resources Discussion of the PSA. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, presence of sufficient seed trees, light availability, and changes in stream shading may inform the tree size retention requirements."

The following revisions to Section 5.5 Biological Resources, Impact BIO-3, Sensitive Habitats of the PSA/Addendum text are signified by underline (underline) where text is added.

'Work in riparian communities will adhere to SPR BIO-4, which includes designing treatments in riparian habitats to retain or improve habitat functions by retaining target canopy covers, limiting to removal of uncharacteristic fuel loads, minimizing removal of large, native riparian hardwood trees, notifying CDFW under Section 1602, minimizing ground disturbance, and avoiding removal of shading vegetation.

Specifically, up to 50 alder trees will be thinned/felled within approximately 4,000 linear feet of the McGinnis Creek treatment area due to the need for improved line of sight operations by the helicopters and ground crews for the restoration activities including the helicopter placement of up to 400 logs as large-woody debris to improve habitat for in-stream species. Alder seed production begins at about 10 years, with optimum production at about 25 years of age US Forest Service and US Department of Agriculture Fire Effects Information System[1]. Therefore, trees should only be removed where sufficient seed source can be

[1] Uchytil, Ronald J. 1989. Alnus rubra. In: Fire Effects Information System, [Online]. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Fire Sciences Laboratory (Producer). Available: https://www.fs.usda.gov/database/feis/plants/tree/alnrub/all.html [2024, February 12].

maintained. Since this project is only proposing to remove up to 50 trees within the entire project footprint, over 75% of existing riparian canopy will be maintained and no additional impact to wildlife habitat suitability or erosion potential is anticipated. Additionally, since this species is a prolific seeder (Ibid), sufficient seed trees will be maintained by removing only 50 trees within the 4,000 linear foot area. By maintaining over 75% of the existing canopy cover (and following the other guidelines already outlined in SPR BIO-4), the project will retain sufficient seed trees, suitability for nesting or other wildlife habitat, shade, and erosion control.

Impact BIO-3 was already assessed in the PSA/Addendum, this additional information is included to provide the level of detail required under SPR BIO-4; there is no new or additional analysis required in the PSA/Addendum for this clarification. This clarification does not constitute a change to the project and all of the environmental impact conclusions remain the same, so additional review under CEQA Guidelines Sections 15162 or 15164 is not warranted.

3. Vegetation Treatment Activities

The CalVTP vegetation treatment activities evaluated in the PSA/Addendum are four fuel break treatments: mechanical treatment, manual treatment, prescribed fire (broadcast), prescribed fire (pile burn). These activities have not changed, but the specific combination of treatments applied to two areas has changed.

The following revisions to 'Table 1. Project Treatment Types and Associated Acreage' of the PSA/Addendum text are signified by strikeouts (~~strikeouts~~) where text is removed and by underline (underline) where text is added:

Table 1. Project Treatment Types and Associated Acreage[1]

CALVTP TREATMENT TYPE	TREATMENT ACTIVITY	ACRES	PROPOSED TREATMENTS
Fuel Break	Mechanical Treatment	534	Forest thinning, vegetation removal from grassland, piling
	Manual Treatment	986	Forest thinning, pruning, piling, invasive plant removal, native plant installation
	Prescribed Fire (Broadcast)	220	Understory broadcast burn of slash
	Prescribed Fire (Pile Burn)	818	Pile burning of slash
Ecological Restoration	Mechanical Treatment	32	Helicopter placement of whole trees in-stream and riparian zone with manual riparian tree planting
	Manual Treatment	11	Riparian Tree Planting

[1] Total acreages in this table exceed total project acreage due to multiple treatments being applied across areas.

The following revisions to 'Table 5. Ecological Restoration Treatment Activities Information' of the PSA/Addendum text are signified by strikeouts (~~strikeouts~~) where text is removed and by underline (underline) where text is added:

Table 2. Ecological Restoration Treatment Activities Information

ECOLOGICAL RESTORATION TREATMENT ACTIVITY	**ACRES**	**SLOPE**	**SPECIFICATIONS**	**EQUIPMENT REQUIRED**
In-stream ~~and Riparian Wood Installation~~ Tree Placement and Riparian Tree Planting	32	Under 50%	Install whole trees from grassland tree removal areas with helicopter and manually install trees and shrubs using hoedad and/or shovel	Vertol or Chinook Helicopter; Fuel Truck; 4x4 Truck; ATV; UTV; Hoedad/shovel
Riparian Tree Planting	11	Under 50%	Manually install trees and shrubs using hoedad and/or shovel	Hoedad/shovel; 4x4 Truck; ATV; UTV

The following revisions to the 'Figure 2. Study Area and Proposed Project Map' of the PSA/Addendum text are signified by strikeouts (~~strikeouts~~) where text is removed and by underline (underline) where text is added within the Legend (and corresponding features within the map):

Mechanical and Manual Thinning; Pile Burn (~~68~~ 56 ac.)

Mechanical and Manual Removal; Pile Burn;
Native Seeding (~~76~~ 90 ac.)

In-Stream Tree Placement and Riparian Tree Planting (32 ac.)

In addition, 'Figure 2 – Study Area and Proposed Project Map' will be replaced with the following map to reflect these changes (see following page):

There is no new or additional analysis required in the PSA/Addendum for this clarification. This clarification does not constitute a change to the project and all of the environmental impact conclusions remain the same, so additional review under CEQA Guidelines Sections 15162 or 15164 is not warranted.

FIGURE 2
Study Area and Proposed Project Map

The Mattole and Salmon Creek Forest Health and Wildfire Resilience Project
Humboldt County, California

Legend

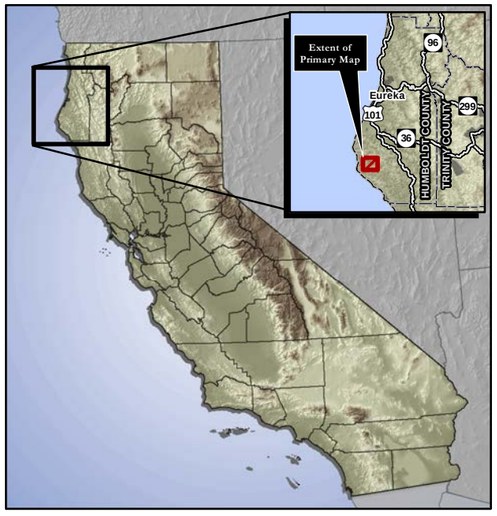
- Study Area
- Stream

Fuel Break Treatment Area

- Mechanical and Manual Thinning; Pile Burn; Tree Planting (680 ac.)
- Mechanical and Manual Thinning; Pile Burn (56 ac.)
- Mechanical and Manual Thinning; Broadcast Burn; Tree Planting (222 ac.)
- Mechanical and Manual Removal; Pile Burn; Native Seeding (90 ac.)
- Manual Removal; Pile Burn; Native Seeding (7 ac.)

Ecological Restoration Treatment

- In-stream Tree Placement and Riparian Tree Planting (32 ac.)
- Riparian Tree Planting (11 ac.)



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W E
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1:42,000

(1 inch = 3,500 feet at tabloid layout)

0 500 1,000 2,000 Meters

0 2,000 4,000 8,000 Feet

Vollmar NATURAL LANDS CONSULTING

Data Sources: CNDDB, 03/2023 | USFWS, 2017
ESRI Online Imagery, 2021 | MRC, 2023
GIS/Cartography by Anton Bokisch, April 2023
Map File: 590_Site_Map_B-L_2024-0305.mxd