# NOTICE OF EXEMPTION

State of California
The Natural Resources Agency
California Department of Forestry and Fire Protection (CAL FIRE)

| | | | |
|---|---|---|---|
| **PROJECT TITLE** | Las Posadas Fuels Reduction | | |
| **PROJECT LOCATION** | Las Posadas Experimental State Forest | **COUNTY** | Napa |
| **LEAD AGENCY** | California Department of Forestry and Fire Protection (CAL FIRE) | | |
| **CONTACT** | Peter Leuzinger, Forester II | | |
| **ADDRESS** | CAL FIRE's Sonoma Lake Napa Unit Headquarters<br>1199 Big Tree Road, St Helena, CA 94574 | **PHONE** | (707) 928-4378 |

**PROJECT DESCRIPTION**

Las Posadas Demonstration State Forest is a 796-acre mixed conifer forest managed by CAL FIRE. The property is heavily overgrown and currently exhibits a dangerously high volume of burnable fuels. This accumulation of fuels would normally be reduced by periodic wildfire, but fire suppression, lack of prescribe burning, and absence of other forms of fuels management has created a significant fire risk.

The proposed project involves the management and reduction of fuels with the goal of a reduced threat of catastrophic wildfire, and an increase in forest health and vigor. Fuels reduction methods include prescribed burning, mastication, and hand-cutting and piling. The project will treat 311 acres in total out of the 796-acre property. 93 acres will be treated with mastication, 181 acres will be treated with prescribed burning, and 37 acres will be treated by hand-cutting and piling.

**EXEMPTION STATUS**

- [x] Categorical Exemption Type/Section: Class 4 §15304. Minor Alterations to Land
- [ ] Statutory Exemption (state code section):
- [ ] Ministerial (§21080(b)(1); 15268)
- [ ] Declared Emergency (§21080(b)(3); 15269(a))
- [ ] Emergency Project (§21080(b)(4); 15269(b)(c))

**REASONS PROJECT IS EXEMPT**

This project fits under the Categorical Exemption to CEQA: Class 4 (Minor Alterations to Land). The project involves minor public or private alterations in the condition of land water and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. Specifically, subsection 14 CCR 15304€ authorizes temporary use of land resulting in no permanent environmental effects. Field review by CAL FIRE staff confirmed that no exceptions apply which would preclude the use of a Notice of Exemption for this project. The Department has concluded that no significant environmental impact would occur to aesthetics, agriculture and forestland/timberland, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, or to utilities and service systems. Documentation of the environmental review completed by the Department is kept on file at CAL FIRE's LNU Headquarters in St. Helena.

**DATE RECEIVED FOR FILING**

Governor's Office of Planning & Research

JUL 24 2019

STATE CLEARINGHOUSE

For Helge Eng, Deputy Director Date 7/17/19
California Department of Forestry and Fire Protection

# California Department of Forestry and Fire Protection
# Environmental Review Report for an Exempt Project

**Note:** This report form is intended for use by California Department of Forestry and Fire Protection (CAL FIRE) staff to document a limited environmental impact analysis supporting the filing of a notice of exemption document for a proposed CAL FIRE project. Although the project appears to fit within the descriptions for allowable categorical exemptions, this report presents CAL FIRE's review for possible exceptions that would preclude finding the project to be categorically exempt as discussed in CEQA Guidelines Section 15300.2. This report will be filed with the CEQA administrative record for this project to document the environmental impact analysis conducted by CAL FIRE.


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Project Name: Las Posadas Fuels Reduction
Project Number:
Program Type: State Forests
CAL FIRE Unit: Sonoma-Lake-Napa
County: Napa
Acres: 311
Legal Location: MDB&M: T11N R8W Sec 1, 12; T11N R7W Sec 7
Name of USGS 7.5'Quad Map(s): St. Helena
☒Project Vicinity Map Attached ☒Project Location Map Attached ☒Photos Attached

**Other Public Agency Review or Permit Required:**

| Would the project result in: | YES | NO |
|---|---|---|
| Alterations to a watercourse (DFW - Lake and Stream Alteration Agreement) | ☐ | ☒ |
| Conversion of timberland (CAL FIRE - Conversion Permit or Exemption) | ☐ | ☒ |
| Demolition (Local Air District - Demolition Permit) | ☐ | ☒ |
| Soil disturbance over 1 acre (RWQCB - SWPPP) | ☐ | ☒ |
| Fill of possible wetlands (404 Permit - USACE) | ☐ | ☒ |
| Other: | ☐ | ☐ |

**Discuss any above-listed topic item checked Yes and consultation with agencies:**

**Project Description and Environmental Setting (describe the project activities, project site and its surroundings, its location, and the environmental setting):**

Las Posadas Demonstration State Forest (LPDSF) is a 796-acre mixed conifer forest, zoned by Napa County as Agricultural Watershed (AW). LPDSF was deeded to the State by a private landowner with deed restrictions allowing for research and demonstration, but not commercial timber operations. The property is heavily overgrown and currently exhibits a dangerously high volume of burnable fuels. This accumulation of fuels would normally be reduced by periodic wildfire, but fire suppression, lack of prescribed burning, and absence of other forms of fuels management has created a significant fire risk.

The proposed project involves the management and reduction of fuels with the goal of a reduced threat of catastrophic wildfire, and an increase in forest health and vigor. Fuels reduction methods include prescribed burning, mastication, and hand-cutting and piling. The project will treat 311 acres in total out of the 796-acre property. 93 acres will be treated with mastication, 181 acres will be treated with prescribed burning, and 37 acres will be treated by hand-cutting and piling.

Unit 1 – This broadcast burn unit is located adjacent to Las Posadas Road on a flat terrace near multiple state operated facilities. This Unit is primarily mixed oak woodland with a grassy understory. Lack of natural disturbance has resulted in oak woodland encroachment by conifer species. It is proposed to broadcast burn the grass component in the fall to reduce fuel loading and competition for the native oaks to preserve the mixed oak woodland. This area has been treated with broadcast burn and goat grazing in the past.
Unit 2 – This largest of the two mastication units is a Douglas-fir/Ponderosa pine forest type. Lack of disturbance in the last two decades has resulted in a densely stocked understory component of shade tolerant species such as Douglas-fir and Madrone trees. The advanced regeneration is so thick that it is impenetrable on foot and represents a severe fire hazard. Understory competition is so dense in Douglas-fir that the overstory Ponderosa pine is struggling to maintain vigor. This advanced

regeneration will be treated by mastication as the ground is favorable to tracked equipment and the vegetation is so dense that a broadcast burn would result in significant mortality of overstory tree species. Prescribed fire may be used in Unit 2 after the mastication to reduce ground fuels.

Unit 3 – This is a hand cut and pile unit. The work will be completed by CALFIRE firefighters, fuels crews, or inmates. This unit is overstocked with understory regeneration similar to Unit 2 however the ground is not favorable to utilizing equipment and a large historical resource exists within the Unit. Small diameter trees can be cut within the site however hand dragging of material out of the site for piling and burning will be required.

Units 4 & 5 – These Units total approximately 110 acres and will be broadcast burned. Both units are a whiteleaf manzanita/leather oak chapparal vegetation type occurring on primarily serpentine soils. The Units are bounded by roads on all sides and these roads will serve as control lines. On the interior side of the roads brush will be cut and windrowed into the units to facilitate desired burn conditions. Additional control lines will be necessary and will be constructed by fire crews or a CALFIRE dozer. Heavy equipment will not be permitted within 50 of watercourses or within cultural or historical resources. Dozer lines will be rehabbed and waterbarred at the conclusion of operations. Some road opening and brushing will occur in order to facilitate burning operations. Forest roads will be graded annually to maintain access for project work and the 4-H Camp. No new road construction is proposed.

Unit 6 – This unit is primarily evergreen forest vegetation type. Mastication will be used where feasible to reduce unwanted competition. Hand cut and pile or prescribed fire may be used in conjunction with mastication to achieve the desired results.

Unit 7 – This unit is a broadcast burn unit is a mixed manzanita chapparal vegetation type with isolated pockets of Douglas-fir and Coast Redwood trees along Wildcat Canyon Creek. Some hand cutting and piling will occur along the unit boundaries to reduce fuel loading to facilitate control of ground fire. No operations will occur within 50 feet of the watercourse and no merchantable sized timber will be cut. It is anticipated that small openings and pockets of grasses and brush will be burned in this unit.

## Environmental Impact Analysis

**Aesthetics**

☐ This topic does not apply to this project and was not evaluated further.

☒ This topic could apply to this project, and results of the assessment are provided below:

The project involves the reduction of overgrown vegetation resulting in less crowded tree stands and a more open understory. The property is not open to the public but can be seen from a public road. Any aesthetical impact that might occur should be positive in nature. Impacts would be less than significant.

**Agriculture and Forest Resources**

☐ This topic does not apply to this project and was not evaluated further.

☒ Yes ☐ No Would any trees be felled? If yes, discuss protection of nesting birds, if necessary.

☐ Yes ☒ No Would the project convert any prime or unique farmland?

☐ Yes ☒ No Would the project result in the conversion of forest land or timberland to non-forest use?

☒ This topic could apply to this project, and results of the assessment are provided below:

The project area is in Las Posadas Demonstration State Forest which is zoned Agricultural Watershed. The proposed fuel treatments involve the removal of understory brush species, thinning seedling and sapling-sized trees, and prescribed burning. These treatments will not reduce or eliminate existing nesting habitat of birds or mammals.

Only small diameter trees will be felled and will not be utilized commercially. No land conversion or change in land use will occur. Impacts will be less than significant.

**Air Quality**

☐ This topic does not apply to this project and was not evaluated further.

☒ Yes ☐ No The local Air Quality Management District guidelines for dust abatement and other air quality concerns were reviewed for this project.

☒ This topic could apply to this project, and results of the assessment are provided below:

This project involves several methods of hazard fuels reduction. The fuels reduction work will not result in significant air quality impacts associated with dust. All mastication work will occur when soil moisture is adequate, below saturation but damp enough to minimize production of dust.

Smoke emissions will result from the exhaust associated with the use of vehicles, chain saws, heavy equipment and burning activities. Burning will be conducted after piles have sufficiently dried and as climatic conditions allows for safe burning. Emissions should not result in impacts to air quality, and a majority of the treatment activities will be conducted over a relatively short duration of time. Once burning operations have commenced, it is anticipated burning will require approximately 5-7 days. All open burning requires a permit from the Bay Area Air Quality Management District. A smoke management plan will be required for this project and is subject to approval by AQMD. Following the conditions specified in the SMP will prevent significant impacts to air quality.

**Biological Resources**

☐ This topic does not apply to this project and was not evaluated further.
☐ Yes ☒ No Will the project potentially effect biological resources?
☒ Yes ☐ No Was a current California Natural Diversity Database review completed? Results discussed below:
☒ Yes ☐ No Was a biological survey of the project area completed? Results discussed below:
☒ This topic could apply to this project, and results of the assessment are provided below:

A CNDDB search of LPDSF was conducted on February 27, 2019 by CAL FIRE resource management staff. Plant species considered rare, threatened, endangered or of special concern that may occur within the project area were identified with a 9-quad area adjacent to and including the project quad (St. Helena). To assess other biological resources the scoping was focused solely on the St. Helena quad with the exception of Northern Spotted Owl (NSO). For NSO the scoping included all suitable habitat within 1 mile of the property. The project area contains suitable NSO habitat and occurs within the coast area therefore USF&WS attachment A protections would apply. No commercial timber operations are proposed within the scope of this project and all project activities on timberland will occur outside of the breeding season. Forest roads have, and will continue to be used regularly year round.

**Northern Spotted Owl**

Project activities that occur within suitable NSO habitat will occur outside of the NSO breeding period therefore no significant adverse impact are anticipated. A NSO database search was conducted on 5/16/19. There is one Activity Center near the project area, NAP0028. This AC was established in 1992 by Ted Wooster. The Las Posadas Forest has been called regularly since 2009. There were no detections for this AC from 2009-2014. The most recent positive detections near this AC were in 2015. Multiple nighttime detections near and North of the AC are recorded in the CNDDB spotted owl viewer. No daytime location or nesting status was noted in 2015. In the three years of calling since that time there has been no detections on the property, however there have been multiple detections on the adjacent Pacific Union College property that are not in the CNNDB. It is believed that Owl from the NAP0028 AC has relocated onto the PUC property. Surveys will be performed annually to determine status of this AC, but all the tree work within suitable habitat will be conducted outside of the breeding season so no impacts will occur. All of the broadcast burn units are well outside of the 1320' buffer of the AC which is located along Moore Creek essentially within the 4-H camp. This area is heavily used by the 4H Camp, and the forest roads within the 1320' buffer are used regularly throughout the year. It is highly unlikely that there is an owl there. Commercial timber operations have never occurred on the property since it was deeded to the BOF so no core area or habitat analysis has been performed for this AC. For the purposes of this project no activities will be conducted within 0.25 miles of the mapped AC within the breeding period so no significant adverse impacts are expected. The results of this assessment have been discussed with CALFIRE Biologist Stacy Stanish who is in agreement with the findings. The Forest Manager and the CALFIRE biologist are planning on a multiple year calling effort in support of abandonment of the historical activity center status.

In project units that contain NSO habitat only unmerchantable sized trees under 12" DBH will be cut in a thin from below operation performed by hand crews and mechanical methods. In some units slash material will be piled and burned. In units where hand cut and pile and/or mastication is used fire may be put on the ground sporadically where it can be controlled. No mechanical operations are proposed in the hand cut and pile unit.

**Botanical Resources**

A query of the CNDDB database was conducted for occurrences of threatened or endangered species and for California Native Plant Society listed rare plants within the St. Helena Quadrangle. CALFIRE Resource Management staff also conducted a department record review. Included in this review is a 2009 property wide botanical assessment performed by Jake Rugyt. At least 18 special status species are known to occur at Las Posadas State Forest. This is an exceptional concentration compared to the size of the property. A few species are recognized as being rare and endangered by CNPS but most of these are species are recognized as being of limited distribution with no immediate risk of extinction. The entirety of the property occurs within the St. Helena Quad, and only one T&E plant species is known to occur within the quadrangle: Clara Hunt's Milk Vetch (*Astralagus claranus*). Botanical surveys were conducted on 4/23 and 4/24 of 2019 with the help of Amy Patten of CNPS. Amy Found two new occurrences of serpentine collomia in and around the serpentine burn unit to the south (one in the quarry and one on top of

the ridge). She Expanded the occurrences of green jewelflower (not flowering yet) and serpentine collomia throughout the northern serpentine grassland up to Recreation Flat and was very happy to see thousands of individuals of both species. Amy found the Cobb Mountain lupine (not blooming yet) and tons of nodding harmonia in the mastication unit at the north end of the forest. Additional surveys are planned for early June as some of the special status plants do not flower until late spring or early summer. Seed collection of sensitive species will also occur late summer. There has been no occurrence found of Clara Hunt's Milk Vetch in the last 10 years of botanical surveys. CNPS listed 1B.2 plant species are the only species that would warrant protection. In consultation with CNPS we plan to burn through the units without excluding areas where these rare plant species occur. These areas will be monitored over the following 2 spring and summer periods to determine the response to the broadcast burn. If the response is adverse these areas can be re-seeded with seed collected this summer. The results will be documented by CNPS in a scientific paper and hopefully published. In the mastication unit the nodding harmonia and Cobb Mountain Lupine populations will be avoided by the equipment. As none of the known species that occur are listed as Threatened and/or Endangered there is thought to be no significant adverse impacts resulting from this botanical research. This type of botanical research is in line with the management goals of the property as well as the deed of conveyance between the donor and the Board of Forestry.

The 18 species are:

*Amorpha californica var. napensis* (Napa false indigo) - CNPS List 1 B.2 - A deciduous shrub 4-10 ft tall with slender ascending branches. This species occurs in small groups or as individuals in Douglas Fir-Ponderosa Pine Forest near the rocky meadow, northeast of the fire station and in scattered locations along the road to the 4-H camp. It grows on this portion of the Napa Range and is more widespread on the Mt. Hood Range west of the Napa Valley. It can also be found in Sonoma, Marin and Monterey Counties..

*Brodiaea californica var. leptandra* (narrow-anthered California brodiaea) -CNPS List 1 B.2 -A perennial from a small bulb with basal leaves and flowering stems 8-30 inches tall. This species grows in open flat places among the Douglas Fir - Ponderosa Pine Forest north of the fire station. It occurs in at least 30 locations in Napa County both on the Napa Range and Mt. Hood Range but populations are generally small. It can also be found in Lake and Sonoma Counties.

*Calamagrostis ophitidis* (serpentine reed grass)-CNPS List 4.3 -A perennial bunchgrass with flowering culms 2-3.5 ft tall and leaves 2-15 inches long. This species has very limited distribution in Napa County with only four recorded locations. It occurs in small patches in White leaf- Leather Oak Serpentine Chaparral north of Recreation Flat and near the gravel pit. It can also be found in Lake, Sonoma and Marin Counties.

*Clarkia gracilis ssp. tracyi* (Tracy's Clarkia) CNPS List 4.2-An annual herb with simple to few branched stems 1-3.5 ft tall. It grows in grassy meadows among White leaf- Leather Oak Serpentine Chaparral south of Recreation Flat. It occurs in several other locations from near Sage Canyon to Snell Valley and Knoxville. It can also be found in six other North Coast Range counties as far north as Humboldt County

*Collomia diversifolia* (serpentine collomia) - CNPS List 4.3 -A small annual species 1.5-5 inches tall. This species occurs in White leaf- Leather Oak Serpentine Chaparral in rocky openings north of Recreation Flat. It occurs in numerous places in northeast Napa County in addition to Chiles Canyon, Sage Canyon and Mt. St. Helena. It can also be found in other counties from Contra Costa to Shasta.

*Delphinium uliginosum* (swamp larkspur) - CNPS List 4.2-A perennial herbaceous species with fleshy bright green leaves and flower stems 1-3 ft tall. This species occurs in chaparral openings and in open grassland in shallow drains fed by seeps or springs. It occurs in large numbers near the edge of Recreation Flat. It has been recorded in many locations in northeast Napa County. It can also be found in Lake, Colusa and Siskiyou Counties.

*Erigeron angustatus* (narrow-leaved daisy) - CNPS List 18.2 - A perennial species with erect or ascending stems 1-2 ft. long. This species occurs on rock outcrops, preferring brushy habitats but is found in wooded or forested places on occasion. It occurs in Douglas Fir-Ponderosa Pine Forest at LPSF. It also occurs in scattered locations through much of Napa County in addition to places in Lake and Sonoma Counties. Populations are generally small and confined.

*Harmonia nutans* (nodding harmonia) - CNPS List 4.3 - A small annual herb with simple or few-branched stems 3-10 inches long. This species grows in full sun in exposed rocky meadows and ridgetops. It occurs on volcanic soils in the rock meadow of the Douglas Fir-Ponderosa Pine Forest at LPSF. It is locally abundant on the Napa Range and in a few scattered locations along the crest of ranges of east and west Napa County. It can also be found in Sonoma and Yolo Counties.

*Helianthus exilis* (serpentine sunflower) - CNPS List 4.2 -A annual true sunflower with erect stems 1-4 ft. tall. This species grows in full sun along shallow drains on serpentine soils. It can be found near the edge of Recreation Flat in late summer. This species is difficult to distinguish from H bolanderi and some controversy remains as to whether it is distinct or of hybrid origin. It is locally common in northeast Napa County and can also be found in counties northward to Trinity.

*Hesperolinon sharsmithii* [ = R serpentinum] (Napa western flax) - CNPS List 1 B.1 -A wiry stemmed annual 1-16 inches tall. This species grows on rocky serpentine soils in brushy areas. It occurs north and east of Recreation Flat. In Napa County it occurs from Chiles Valley to Snell Valley and Knoxville. It can also be found in Alameda, Lake and Stanislaus Counties.

*Lilium rubescens* (redwood lily) -CNPS List 4.2 - A perennial with single stems 3-6 ft. tall. This species grows in shaded forest and seldom in chaparral. It occurs in Douglas Fir -Redwood Forest uphill of the 4-H Camp. Few individuals were seen and no plants were observed in flower. This species is subject to grazing by deer and insect damage that eliminate successful flowering.

In Napa County, this species has been seen in numerous locations but populations are almost always very small and confined. It can also be found from Lake to Del Norte Counties.

*Lomatium repostum* (Napa lomatium)-CNPS List 4.3 -A perennial with basal leaves and a few spreading to erect flowering stems 3-12 inches long. This species grows in brushy to forested communities in rocky soils. It occurs in Douglas Fir-Ponderosa Pine Forest and Mixed Manzanita Chaparral at LPSF in small patches. This species occurs in numerous locations on ridges throughout Napa County and is much less common in Lake, Solano and Sonoma Counties.

*Lupinus sericatus* (Cobb Mtn. Lupine) -CNPS List 1 B.2 -A perennial with a woody base forming clumps 1-4 ft wide and 8-16 inches tall. This species grows on rocky volcanic soils, typically ash deposits. It occurs at the edge of the rocky meadow north of fire station in Douglas Fir-Ponderosa Pine Forest. In Napa County is has been recorded in at least 25 locations. Populations are generally restricted to less than an acre. It can also be found in Lake, Sonoma and Colusa Counties.

*i1Jonardel/a viridis ssp. viridis* (green coyote mint)- CNPS List 4.3 -A subshrub branched at the based with slender woody stems 8-16 inches tall. This species grows in several vegetation types preferring forest and chaparral. In Napa County it is widespread,

growing on serpentine and volcanic soils. In LPSF it can be found in several locations. It is less common in Lake, Solano and Sonoma Counties.

*Navarretia jepsonii (*Jepson's navarretia*)*-CNPS List 4.3 -An annual herb with simple to few-branched stems, 2-8 inches tall. This species grows on open flats or gradual slopes in grassland or chaparral on serpentine soils. It has been observed at Recreation Flat but was not seen in 2008, an unusually dry year. In Napa County it has been recorded in about 25 locations from LPSF to Knoxville. It can also be found in Colusa, Glenn, Lake, Tehama and Yolo Counties.

*Perideridia gairdneri ssp. gairdneri* (Gairdner's yampah) - CNPS List 4.2 - A perennial with mostly basal leaves and slender stems 1-4 ft tall. This species grows in seasonal wetlands in sun to partial shade. It occurs in Douglas Fir - Ponderosa Pine Forest north of the fire station. In Napa County it occurs in a few isolated populations on the Napa Range and in Napa Valley. This species has been lost in some counties in southern California due to development but can still be found in most bay area counties.

*Streptanthus breweri ssp. hesperidis* (Green jewelflower)-CNPS List 1B.2 -An annual herb with simple to few branched ascending stems, 4-12 inches tall. It grows in rocky openings in White leaf- Leather Oak Serpentine Chaparral north and southeast of Recreation Flat. In Napa County it has been recorded from 10-15 locations from Sage Canyon to Knoxville. It can also be found in Lake County.

*Trichostema ruygtii* (Napa bluecurls) - CNPS List lB.2 -An annual herb with simple to several branched erect to ascending stems, 4-20 inches tall. It grows in seasonally wet places in chaparral, woodland or forest. In LPSF it occurs in Douglas Fir - Ponderosa Pine Forest north of the fire station. This population is disjunct from populations near Rector Canyon and further south and has atypically pale flowers. It has been recorded from about 20 locations. It has been recorded from Lake County and is expected to occur in west Solano County.

**Foothill Yellow-legged Frog**

The Foothill Yellow-legged Frog has a grey, brown, or reddish dorsum, with yellow coloration under the legs that may extend to the abdomen. The foothill yellow-legged frog is found in or near rocky streams in a variety of habitats, including valley-foothill hardwood, valley-foothill hardwood-conifer, valley-foothill riparian, ponderosa pine, mixed conifer, coastal scrub, mixed chaparral, and wet meadow types. Adults often bask on exposed rock surfaces near streams. When disturbed, they dive into the water and take refuge under submerged rocks or sediments. During periods of inactivity, especially during cold weather, individuals seek cover under rocks in the streams or on shore within a few meters of water. Unlike most other ranid frogs in California, this species is rarely encountered (even on rainy nights) far from permanent water. Tadpoles require water for at least three or four months while completing their aquatic development.[1] The upper reaches of Moore Creek are intermittent and do not provide a permanent or semi-permanent source of water of sufficient duration to support breeding by the species. The lower reaches may contain water throughout the year however would provide low quality habitat at best and no project operations with the exception of broadcast burning are proposed within 60 feet of Moore Creek so no impacts are anticipated. The only unit adjacent to Moore Creek at its lower reaches is Unit 4 which will be broadcast burned. A seasonal road acts as a buffer between the burn unit and the watercourse and the burn unit is over 60 feet from the watercourse. No additional line construction will be required for burning near the watercourse due to the seasonal road acting as a control line. The unit is primarily grassland near the watercourse and the burning will be done in the fall during the driest time of the year when the likelihood of amphibians leaving the channel zone of the watercourse are virtually zero. Similarly, other man made and natural drainages/swales within or adjacent to the project site are temporary and transport water only as a result of rainfall events. Both Wildcat Canyon creek (Unit 7) and Uncle John Creek (Unit 5) bisect burn units however these streams are ephemeral and dry up in the summer and fall. Neither watercourse could support the life cycle of Foothill yellow legged frog so no impacts are anticipated as a result of the proposed operations. The results of this assessment were discussed with CALFIRE Biologist Stacy Stanish who is in agreement with the determination that no significant impacts to this candidate species will occur.

[1] Morey, S. "Foothill Yellow-legged Frog" California Wildlife Habitat Relationships System, California Department of Fish and Wildlife, California Interagency Wildlife Task Group. January 2000

Habitat assessment was conducted at all seven of the treatment units to determine the likelihood of occurrence of any sensitive species identified in the CNDDB search. Through this assessment CAL FIRE staff determined that adverse impacts to any biological resources are unlikely to occur as a result of this project and further biological surveys are unwarranted.

**Cultural Resources**

☐ This topic does not apply to this project and was not evaluated further.
☒ Yes ☐ No Was a current archaeological records check completed? Results discussed below:
☒ Yes ☐ No Was a CAL FIRE staff or contract archaeologist consulted? Results discussed below:
☒ Yes ☐ No Was an archaeological survey of the project area completed? Results discussed below:
☐ Yes ☒ No Will the project effect any historic, archaeological or tribal cultural resources?
☒ This topic could apply to this project, and results of the assessment are provided below:

A cultural resource assessment was performed in concert with Ben Harris, CALFIRE Archaeologist. Archaeological surveys were conducted throughout each of the seven treatment units by licensed professional archaeologists in April and May of 2019. A confidential Archaeology report has been prepared and will be kept with the project file. A memo received from CALFIRE Archaeologist Ben Harris indicates that the project has been reviewed and that no impacts are anticipated to cultural or historical resources.

**Geology and Soils**

☐ This topic does not apply to this project and was not evaluated further.
☒ This topic could apply to this project, and results of the assessment are provided below:

This project involves the clearing of understory regeneration, brush and grass by mastication, hand-cutting and piling, and prescribed burning. No heavy equipment work will occur on unstable areas. The mastication work will not result in significant soil disturbance and will not occur within 100 feet of Moore Creek which is a Class I watercourse. Hand crews will construct burn piles no larger than eight feet wide by six feet high in order to minimize heat and potential scorching to the soil. Broadcast burning will be limited to light surface fuels consisting of forest leaf litter, duff, brush, and grass. Mastication operations will not occur during periods of saturated soil conditions. CAL FIRE has determined this project would not result in significant impact to geology or soils.

**Greenhouse Gas Emissions**

☐ This topic does not apply to this project and was not evaluated further.
☐ Yes ☒ No Would the project generate significant greenhouse gas (GHG) emissions?
☐ Yes ☒ No Would these GHG emissions result in a significant impact on the environment? Discuss below:
☐ Yes ☒ No Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? Discuss below:

GHG emission estimates related to the fuels reduction project were determined using the formulas and conversion factors provided by the California Climate Action Registry (CCAR) General Reporting Protocol. These estimates are based on anticipated fuel usage from vehicles and equipment needed to complete the project work and from burning. These activities will be limited to a short time frame and will not lead to long term increases in greenhouse gas emissions. Anticipated resources include a diesel powered masticator, a diesel transport truck for the masticator, a diesel powered crew bus, three gasoline powered pickup trucks, and gasoline powered chainsaws.

It is estimated that the masticator will work a total of approximately 36 hours using an average of 10 gallons of diesel per hour, the transport will travel approximately 100 miles at an average of 10 miles per gallon, the pickup trucks will travel an average of approximately 300 miles each at an average of 15 miles per gallon. It is anticipated that the crews will spend 60 hours of chainsaw time using approximately 1 gallon of gasoline per hour. The crew busses will travel approximately 300 miles at an average of 10 miles per gallon. The results are listed below:

Diesel consumption: (masticator: 120gal.) + (transport: 20gal.) + (crew bus: 30gal.) = 170(10.15)/1000 = 1.73 metric tons $CO_2$

Gasoline consumption: (pickup trucks: 60gal.) + (chainsaws: 60gal.) = 120(8.18)/1000 = 0.98 metric tons $CO_2$

Total metric tons of $CO_2$ emitted = 2.71

The estimated fuel consumption for planned motor vehicle and equipment use to facilitate this project will result in a volume of GHG emissions that CAL FIRE has determined to be below a level which would be significant (900 metric tons of carbon dioxide equivalent - MT $CO_2e$ per year for combined construction and operational emissions).

**Hazards and Hazardous Materials**

☒ This topic does not apply to this project and was not evaluated further.
☐ This topic could apply to this project, and results of the assessment are provided below:

There are no known hazardous materials within the project site. Work will be done using hand tools, chainsaws, and one piece of heavy equipment. Hand crews will be supervised, wear the proper PPE, and be sufficiently trained in the use of chainsaws and hand tools. Refueling of chainsaws and equipment will be conducted according to CAL FIRE protocols. Equipment used on this project will not be serviced in locations which could allow oil or fuel to contaminate soil or deliver to a watercourse. The project would not create a significant impact from the transport, use, or disposal of hazardous materials.

**Hydrology and Water Quality**

☐ This topic does not apply to this project and was not evaluated further.
☐ Yes ☒ No Will the project potentially affect any watercourse or body of water?
☒ This topic could apply to this project, and results of the assessment are provided below:

The methods of fuels treatments proposed for this project will not decrease slope stability, result in increased erosion, or cause impacts to ground water or surface flows. No equipment operations will take place within 100 feet of the Class I Moore Creek or Uncle John's Creek, which is a Class II watercourses. Class III watercourse impacts would be less than significant.

**Land Use and Planning**

☒ This topic does not apply to this project and was not evaluated further.
☐ This topic could apply to this project, and results of the assessment are provided below:

This project will have no effect on current land use and planning.

**Mineral Resources**

☒ This topic does not apply to this project and was not evaluated further.
☐ This topic could apply to this project, and results of the assessment are provided below:

This project will have no effect on mineral resources.

**Noise**

☐ This topic does not apply to this project and was not evaluated further.
☒ This topic could apply to this project, and results of the assessment are provided below:

This project involves the use of one piece of heavy equipment and some chainsaw work, however the project area is closed to the public and is not in close proximity to any residential or business areas. All work will occur Monday through Friday between 8:00 AM and 5:00 PM and will be consistent with mechanized methods of hazard fuel reduction work. There are no noise receptors near the project site. No noise related impacts would occur.

**Population and Housing**

☒ This topic does not apply to this project and was not evaluated further.
☐ This topic could apply to this project, and results of the assessment are provided below:

This project will have no effect on population and housing.

**Public Services**

☒ This topic does not apply to this project and was not evaluated further.
☐ This topic could apply to this project, and results of the assessment are provided below:

This project will have no effect on public services.

**Recreation**

☒ This topic does not apply to this project and was not evaluated further.
☐ This topic could apply to this project, and results of the assessment are provided below:

The project will be conducted on State property that closed to the public. There is a 4H Camp within the property but it is outside of the project area. No impacts to recreation will occur.

**Transportation and Traffic**

☒ This topic does not apply to this project and was not evaluated further.
☐ This topic could apply to this project, and results of the assessment are provided below:

This project will have no impact on transportation or traffic.

**Utilities and Service Systems**

☒ This topic does not apply to this project and was not evaluated further.
☐ This topic could apply to this project, and results of the assessment are provided below:

This project will have no effect on utilities and service systems.

**Changes Made to Avoid Environmental Impacts:**

Best management practices consistent with fuels reduction and prescribed burning have been incorporated into this project. Cultural resource areas present on LPDSF have been identified by CAL FIRE Archaeologist Ben Harris and these areas have been flagged and will be avoided. If cultural resources are found while working on the project, work will cease and the CAL FIRE Archaeologist will be called. A listing and geographical locations of known sensitive species was referenced prior to the development of this plan. Surveys will be conducted immediately prior to commencement of work to re-confirm that no biological concerns are present, or have developed within the project area.

| **Mandatory Findings of Significance:** | **YES** | **NO** |
|---|---|---|
| (a) Does the project have the potential to 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 a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory? | ☐ | ☒ |
| (b) Does 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 probably future projects. | ☐ | ☒ |
| (c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☒ |

**Justification for Use of a Categorical Exemption (discuss why the project is exempt, cite exemption number(s), and describe how the project fits the class):**

**15304. Minor Alterations to Land**

Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. Examples include, but are not limited to:

(a) Grading on land with a slope of less than 10 percent, except that grading shall not be exempt in a waterway, in any wetland, in an officially designated (by federal, state, or local government action) scenic area, or in officially mapped areas of severe geologic hazard such as an Alquist-Priolo Earthquake Fault Zone or within an official Seismic Hazard Zone, as delineated by the State Geologist.

(b) New gardening or landscaping, including the replacement of existing conventional landscaping with water efficient or fire resistant landscaping.

(c) Filling of earth into previously excavated land with material compatible with the natural features of the site;

(d) Minor alterations in land, water, and vegetation on existing officially designated wildlife management areas or fish production facilities which result in improvement of habitat for fish and wildlife resources or greater fish production;

(e) Minor temporary use of land having negligible or no permanent effects on the environment, including carnivals, sales of Christmas trees, etc;

(f) Minor trenching and backfilling where the surface is restored;

(g) Maintenance dredging where the spoil is deposited in a spoil area authorized by all applicable state and federal regulatory agencies;

(h) The creation of bicycle lanes on existing rights-of-way.

(i) Fuel management activities within 30 feet of structures to reduce the volume of flammable vegetation, provided that the activities will not result in the taking of endangered, rare, or threatened plant or animal species or significant erosion and sedimentation of surface waters. This exemption shall apply to fuel management activities within 100 feet of a structure if the public agency having fire protection responsibility for the area has determined that 100 feet of fuel clearance is required due to extra hazardous fire conditions.

**Note:** Authority cited: Section 21083, Public Resources Code; Reference: Section 21084, Public Resources Code.

**Discussion:** This section describes the class of projects involving minor alterations to the land. The 1998 revision to the section specified that this exemption applies to fuel management activities which will not impact threatened or endangered species or result in significant erosion or sedimentation.

The project activities proposed at Las Posadas Experimental Forest have been determined to be meet the requirements for the use of this Categorical Exemption.

**Conclusion:**

☒ After assessing potential environmental impacts and evaluating the description for the various classes of categorical exemptions to CEQA, CAL FIRE has determined that the project fits within one or more of the exemption classes and no exceptions exist at the project site which would preclude the use of this exemption. CAL FIRE considered the possibility of (a) sensitive location, (b) cumulative impact, (c) significant impact due to unusual circumstances, (d) impacts to scenic highways, (e) activities within a hazardous waste site, and (f) significant adverse change to the significance of a historical resource. A notice of exemption will be filed at the State Clearinghouse.

☐ After assessing potential environmental impacts and evaluating the description for the various classes of categorical exemptions to CEQA, CAL FIRE has determined that the project does not fit within the description for the various exemption classes or has found that exceptions exist at the project site that precludes the use of a categorical exemption for this project. Additional environmental review will be conducted and the appropriate CEQA document used may be a negative declaration or a mitigated negative declaration.

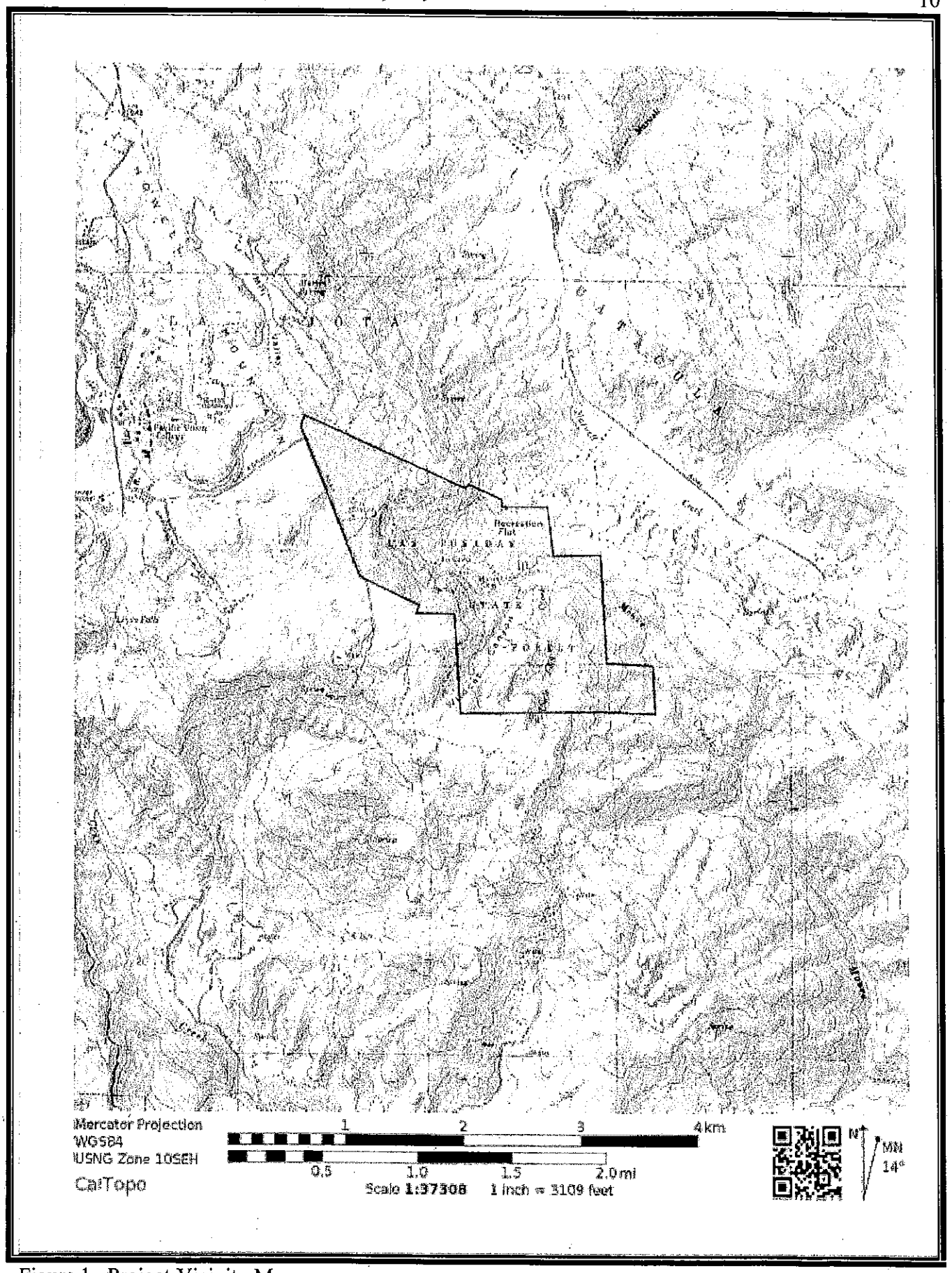


Figure 1. Project Vicinity Map.

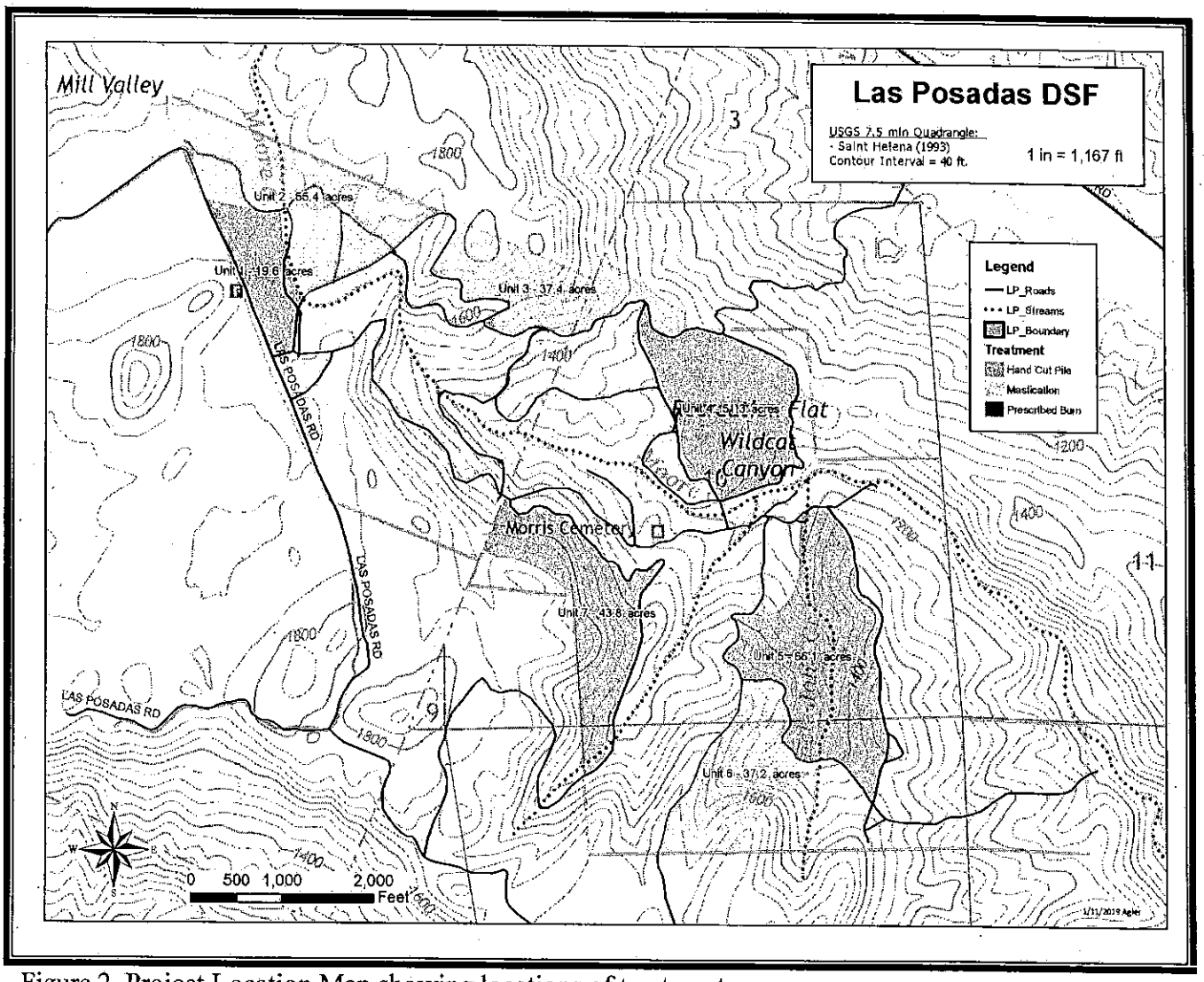


Figure 2. Project Location Map showing locations of treatments.