# Final Program Timberland Environmental Impact Report

for the
Meadow Vista Vegetation Management Project

**Lead Agency**

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# FINAL PROGRAM TIMBERLAND ENVIRONMENTAL IMPACT REPORT (PTEIR)
## Meadow Vista Vegetation Management Project

## 1. INTRODUCTION AND PURPOSE

The Final PTEIR provides the lead agency, the California Department of Forestry and Fire Protection (CDF), an opportunity to respond to comments received on the Draft PTEIR and to incorporate any changes or additions necessary to clarify and/or supplement the information contained in the document. The Final PTEIR, therefore, represents the culmination of all environmentally related issues raised during the comment period on the Draft PTEIR for the Meadow Vista Vegetation Management Project.

This document has been prepared by the Placer County Resource Conservation District (RCD) to address comments received regarding the Draft PTEIR prepared for the Meadow Vista Vegetation Management Project. The 45-day public review period for the Draft PTEIR was June 15 through July 30, 1999. A copy of the Draft PTEIR and other relevant documents can be obtained from the Placer County RCD, 251 Auburn Ravine Road, Suite 201, Auburn, CA 95603.

## 2. SUMMARY

For each impact section, a summary description from the Draft EIR is provided with applicable mitigation measures.

### 2.1 PROJECT DESCRIPTION

In 1996, the Placer County Board of Supervisors adopted the Meadow Vista Community Plan to establish a policy framework for long-term community growth including policies to reduce wildland fire hazard through fuel reduction measures. Prominent policy direction is a desire to perpetuate the existing forested condition while recognizing that the area has significant fire dangers that must be addressed.

The purpose of the Meadow Vista Vegetation Management Project is to facilitate the implementation of a system of shaded fuelbreaks, defensible space, and defensible landscape practices in keeping with objectives of the Meadow Vista Community Plan utilizing the Program Timberland Environmental Impact Report (PTEIR) process as adopted by the California Board of Forestry. The PTEIR is tiered to the Meadow Vista Community Plan Final EIR which is incorporated by reference. The PTEIR is also consistent with the California Fire Plan prepared by the State Board of Forestry and implemented by the Nevada-Yuba-Placer Ranger Unit of the California Department of Forestry and Fire Protection.

Managing vegetation in accordance with this PTEIR may involve to some degree the commercial harvesting of trees, whether to remove dead or dying trees, trees posing a fire hazard, or those suffering from insect/disease problems. The California Department of Forestry and Fire Protection (CDF) regulates commercial timber harvesting on private lands in California as well as providing rural fire protection and enforcing defensible space vegetation standards around buildings.

The PTEIR also discusses the potential impacts of the "Proposition 204 Coordinated American River Watershed Health Improvement and Monitoring Project" in the Meadow Vista area. This $1,000,000 grant given to the American River Watershed Group will be used to inspect residences for defensible space. The impacts of the latter program are closely related to those which would result from the overall vegetation management program proposed in the PTEIR.

Mitigation measures in this document are based on current standard State forest practice rules and new measures with higher standards developed specifically for the Meadow Vista area.

## 2.2 LAND USE AND PLANNING

The Meadow Vista Community Plan (MVCP) contains several policies which relate to and support vegetation management. The Vegetation Management Project is an implementation strategy for community plan policy. Without the Vegetation Management Project, fuel load reduction in the form of shaded fuelbreaks, defensible space, and healthy forest practices will still occur but at a slower rate. The Meadow Vista Vegetation Management Project is consistent with existing county and community plans. No impact to land use planning policy is anticipated.

## 2.3 GEOLOGY AND SOILS

Implementation of the project would result in increased short- and long-term erosion from activities. This impact is considered significant because these activities would result in disruptions, displacements, compaction, or overcovering of the soil and would increase water erosion of soils on the site.

### Mitigation

1. Develop a slope map for the PTHP project site or have project maps on current USGS topographic map base.

2. Install waterbars on all exposed soil, heavy equipment trails, and roads no further apart than the Forest Practice Rules Moderate Erosion Hazard rating distance.

3. Restrict timber operations to those areas with low or moderate Erosion Hazard Ratings (EHRs) with slopes less than or equal to 50%. Prohibit timber operations on areas of high or extreme EHR or on slopes over 50%.

4. Require re-stocking in conformance with recommendations of the Registered Professional Forester (RPF) as contained in the PTHP.

5. Require that a minimum of existing organic matter be left on site to reduce energy of rainfall and lower potential erosion. Also, in areas of defensible landscape, lop and/or crush slash and leave it on the ground to further reduce the impact of rain on bare soil.

6. Lop all slash to less than 20 inches above ground, except in areas where higher standards apply (within 100 feet of residences).

7. Prohibit use of heavy equipment within any Watercourse and Lake Protection Zone (WLPZ) except at existing road crossings, thus protecting existing watercourses.

8. Allow only alternatives to WLPZ protection measures that increase the WLPZ width or restrictions within the zone. No decreased restrictions will be allowed.

9. Avoid heavy equipment use on saturated or near-saturated soils.

10. Restrict vegetation removal on landslide-prone areas.

11. Conduct mechanical treatments along contours on areas of moderate to high erosion hazard ratings.

12. New road construction shall be less than 100 feet in length, be on average slopes of less than 20%, involve no substantial cuts and/or fills, and may not occur in any Watercourse and Lake Protection Zone (WLPZ).

13. Allow only in-lieu winter operating plans that do not allow operations in WLPZ or on unstable ground.

**Level of Significance Following Mitigation**

With implementation of the recommended mitigation measures, impacts to geology and soils will be mitigated to a less than significant level.

## 2.4 HYDROLOGY AND WATER QUALITY

Changes in interception and infiltration rates with vegetation removal and the construction of tractor roads associated with the proposed project could contribute to existing flooding problems in Wooley Creek and along the Bear River. Use of heavy equipment, slash, and yarding could result in a possible decrease in water quality in the canals and reservoirs in the Plan area.

Vegetation management activities could result in possible short-term and long-term water quality degradation of streams. In addition to sedimentation impacts, use of heavy equipment presents the potential for accidental spills of pollutants such as gasoline, oil, and diesel fuel.

**Mitigation**

(See also mitigation measures for Geology and Soils)

1. Establish watercourse and lake protection buffer zones along perennial watercourses in which vegetation removal, fuel reduction, and ground disturbance are limited. The width of the buffer zone is dependent on the adjacent hillside slope and watercourse class as shown below:

| | Watercourse Class | | |
|---|---|---|---|
| Hillside Slope | Fish Bearing<br>I | Non-Fish Bearing<br>II | Intermittent<br>III |
| 0-30% | 75 feet | 50 feet | 25 feet |
| 30-50% | 100 feet | 75 feet | 50 feet |
| 50%> | 150 feet | 100 feet | 50 feet |

2. Prohibit heavy equipment from stream side buffer zones except at designated crossings.

3. Restrict new road construction to less than 100 feet in length with no construction within any watercourse buffer zone.

4. Prohibit clearcut harvesting.

**Level of Significance Following Recommended Mitigation**

With implementation of recommended mitigation measures, potential impacts to hydrology and water quality will be reduced to a less than significant level.

## 2.5 VISUAL RESOURCES

Implementation of the Meadow Vista Vegetation Management Project would result in a change in the visual character of the area through a reduction in the visual quality of the rural residential viewshed. The intent of the PTEIR is to maintain the existing forested condition of the Meadow Vista area while managing the vegetation for wildland fire protection.

Each one of these objectives means reducing the total amount of vegetation in the area, and spacing out remaining vegetation. Overall, the visual impact will be to keep the same basic forest types, only with a more open appearance.

**Mitigation**

1. Restrict allowable silvicultural harvest methods to only those that maintain at least a minimum amount of mature overstory trees.

2. Leave a variety of size class vegetation in shaded fuelbreak areas, while still providing an adequate disruption of fuel continuity for fuelbreak function.

3. Complete clean-up of slash and organic debris in defensible space and shaded fuelbreak areas. Clean up shall be by chipping, removing, or burning. Chipping shall occur no later than 45 days after the creation of the slash and debris. Piling for burning shall occur no later than 60 days after the creation of the slash or debris, with burning no later that April 1 of the year following creation or one year from the date of creation, whichever comes first. Removal shall occur no later than 60 days of the creation of the slash or debris. For clean-up purposes, shaded fuelbreaks shall be 100 feet either side of centerline of designated roads.

**Level of Significance**

Potential impacts to visual resources will be reduced by limited silvicultural practices proposed for fuel reduction purposes. Vegetative screening can be accomplished by selective removal of brush and understory to ensure privacy. Selective removal and replanting of native or other species to maintain a desired level of screening will reduce impacts to a less than significant level.

## 2.6 BIOLOGICAL RESOURCES

Individual Valley oaks could be removed to reduce fuel loading, as commercial hardwood, or indirectly as affected by soil disturbance and soil compaction. The extent of oak loss cannot be assessed at this time; however, future development in the Plan area could contribute incrementally to statewide loss of Valley Oaks in California. The loss of individual oaks could result in displacement or loss of wildlife species that depend on oaks for roosting, foraging, breeding, and movement corridors.

Although restricted activity is anticipated in riparian areas, limited vegetation trampling, streambank degradation, and disturbance to wildlife could occur.

The project could degrade wildlife habitat through fragmentation of continuous woodland and forest habitat, potentially disrupting linkages to other habitats, and lead to the direct and indirect loss or disturbance of special status plants and animals as well as native trees regulated under the Placer County Tree Preservation Ordinance.

The California Wildlife Habitat Relationships (CWHR) model was used to estimate overall impacts to wildlife. The model runs indicate that while some species will experience a reduction in habitat, others will benefit from the Vegetation Management Project. The model runs also indicate that overall urbanization has a more significant impact on wildlife than does removal of vegetation for fuel reduction purposes.

**Mitigation**

See also mitigation measures for Hydrology and Water Quality

1. Each proposed PTHP shall have proposed operating areas inspected by a qualified RPF or other qualified professional for the potential presence of any listed, threatened, or endangered species of plant or animal. No impacts to any listed species will be allowed.

2. Adjust the timing of vegetation management activities to avoid impacts on listed wildlife species, including actively nesting birds.

3. Avoid mechanical clearing in rare natural communities, including areas with special status plants.

4. Clean all equipment off-site to limit the spread of invasive plant species.

5. Encourage retention of Valley Oak areas within the community, and favor Valley Oak reproduction in those areas where it currently exists. Valley oak areas will be identified by individual land owners and retention will be encouraged.

6. Prohibit operations in any WLPZ except removal of dead/dying trees for public safety purposes and fire protection. All class I & II WLPZ watercourse corridors will otherwise remain intact.

7. Retain significant stand structure that will continue to be used for wildlife by restricting silvicultural harvest methods.

**Level of Significance Following Recommended Mitigation**

With implementation of recommended mitigation measures, potential impacts to biological resources will be reduced to a less than significant level.

## 2.7 CULTURAL RESOURCES

Implementation of the Vegetation Management Project could result in the possible disturbance of documented or undocumented cultural resources (archaeological or historical resources).

**Mitigation**

1. Project areas will be surveyed by a qualified RPF or other qualified professional for potential archaeological and historical resources prior to project implementation.

2. No timber operations may occur on significant archaeological sites.

3. If an archaeological or historical site is discovered during vegetation management operations, work will immediately stop within 100 feet of the site and the CDF Director shall be notified. The significance of the resources shall be determined and necessary protection measures taken. For significant cultural sites that cannot be avoided, site-specific mitigation measures must be approved by the CDF Director.

**Level of Significance Following Mitigation**

With implementation of proposed mitigation measures, potential impacts to cultural resources will be reduced to a less than significant level.

## 2.8 NOISE

The proposed project has the potential to generate short term noise from equipment used in the vegetative management process. This equipment includes chain saws, chippers, and other heavy equipment. Desirable outdoor levels of 60 dBA for residential uses and 45 dBA indoors could be exceeded during the course of vegetation management.

**Mitigation**

1. Restrict operation of chainsaws and other power-driven equipment to the hours between 7:00 a.m. and 9:00 p.m.. The operation of all other power equipment, except highway vehicles, within 200 feet of an occupied dwelling shall be restricted to the hours between 7:00 a.m. and 9:00 p.m., and shall be prohibited on Sundays and nationally designated legal holidays.

**Level of Significance Following Mitigation**

Implementation of the recommended mitigation measure would reduce potential noise impacts to a less than significant level.

## 2.9 AIR QUALITY

The major sources of air pollution are reactive organic gases (ROG) and oxides of nitrogen (NOx) emissions from heavy equipment exhaust and wind-blown dust from earth disturbance. In addition, disposal of wood/vegetative waste by open burning can create substantial emissions of $PM_{10}$ (particulate matter 10 microns or less in size), CO (carbon monoxide), NOx, ROG, and other compounds.

The PTEIR encourages projects to evaluate other vegetation disposal methods and use burning only where there is no other feasible alternative or if prohibiting burning would cause substantial financial hardship. Some non-PTHP vegetation management projects will be coordinated with a chipper program coordinated by CDF. This provision will reduce potential smoke emissions.

Vegetation management activities would result in potentially increased pollutant emissions from limited open burning. This impact would be considered potentially significant if open burning was not regulated by the Placer County APCD to minimize harmful conditions and nuisance effects.

**Mitigation**

1. Burn only on designated burn-days stipulated by the Placer County Air Pollution Control District and with all necessary burn permits.

2. Reduce pre-burn fuel loadings by using other treatments.

3. Require material to dry before piling or allow sufficient time after piling for material to dry before burning. Piles that contain little soil and are constructed to allow air movement will result in a burn that consumes significantly more debris and produces less smoke. More efficient burning and greater heat output will lift smoke higher, reducing smoke concentration near the ground.

4. Use mass-ignition techniques that produce a short duration fire thereby increasing combustion efficiency and flow of smoke into the convection column.

5. Prevent stumps from burning and smoldering.

**Level of Significance Following Mitigation**

With burning restrictions contained within the PTEIR process, and with implementation of the recommended mitigation measures, impacts to air quality will be reduced to a less than significant level.

## 2.10 TRAFFIC AND CIRCULATION

The impact to traffic flow as a result of vegetation management activities is limited to heavy equipment entering and exiting the road shoulder during fuel reduction activities. During such time, through traffic can be disrupted by heavy equipment operation, leading to delays and potential safety concerns. This impact is considered potentially significant as most major roads in the Plan area will have shaded fuelbreaks along their margins with associated work within the public right-of-way.

**Mitigation**

1. Provide measures such as flagmen and directional traffic control as determined by the Placer County Public Works Department when heavy equipment ingress and egress is required in the public right-of-way.

2. Retain encroachment permits as needed for work in the Caltrans or County right-of-way.

**Level of Significance Following Mitigation**

Implementation of the proposed mitigation measures will reduce potential traffic impacts to a less than significant level.

## 2.11 FIRE PROTECTION

Successful implementation of the Meadow Vista Vegetation Management Project would lead to favorable impacts on wildfire management and fire fighting agencies. In the long run, the project would make it safer to fight fires around houses, would slow down the spread of fires between houses, and would lower overall fuel loads found in the forests of Meadow Vista.

Care must be taken, however, to reduce the threat of wildland fire by adequate clean-up following timber operations, including provisions for chipping, composting, or controlled burning of slash and debris.

The PTEIR program can only be effective if the public is informed of its benefits through an education program administered by fire agency personnel. The actual amount of increased demand cannot be determined because the levels of service will vary, depending on the commitment of fire service agencies.

**Mitigation**

1. Lop all logging slash to less than 20 inches above ground, except in those areas where current rules require other treatment (within 100 feet of residences).

2. Require clean up and disposal of debris on the ground within shaded fuelbreak projects to lower potential fire danger. Clean up shall be by chipping, removing, or burning. Chipping shall occur no later than 45 days after the creation of the slash and debris. Piling for burning shall occur no later than 60 days after the creation of the slash or debris, with burning no later that April 1 of the year following creation or one year from the date of creation, whichever comes first. Removal shall occur no later than 60 days of the creation of the slash or debris. For clean-up purposes, shaded fuelbreaks shall be 100 feet either side of centerline of designated roads.

3. Require clean up and disposal of all substantial size debris (greater than 1 inch) within defensible space harvests to lower potential fire danger.

4. Require rapid surface drying (spreading of material away from wet areas) for material left on the ground to prevent increase in insect brood material.

**Level of Significance Following Mitigation**

Implementation of the proposed mitigation measures will reduce potential fire protection impacts to a less than significant level.

## 2.12 ALTERNATIVES TO THE PROPOSED PROJECT

**No Project Alternative**

Under the no project alternative, the PTEIR process would not be used to facilitate the implementation of vegetation management projects, including those proposed under the Proposition 204 project. Individual landowners could continue to clear vegetation for defensible space and defensible landscape purposes with little or no assistance or control from local or state agencies.

Burning of removed material would be permitted by the APCD on designated burn days. Shaded fuel breaks would be implemented by local and state agencies as well as private property owners on a voluntary basis and with funds as they become available. If commercial timber harvesting is proposed as part of the vegetation management process, then the existing timber harvest plan process on an individual basis would be pursued.

Existing regulations governing modified timber harvest plans could be used to implement some vegetation management objectives. The cost to individual landowners to use this process, however, will be higher than under the PTHP process due to Department of Fish and Game review fees and the need for detailed archaeological reports on all operating areas. The modified THP process has fewer environmental controls as a part of mandated conditions of approval and there are fewer constraints on logging debris disposal methods in most situations. The modified THP system would only partially achieve goals of the PTHP process while not incorporating the necessary mitigation measures contained in the PTEIR.

Vegetation management and fuel load reduction would continue to occur, but at a slower rate than with the PTEIR alternative. The benefits of the application of Forest Practice Rules and mitigation measures within the PTEIR would not be achieved with continued private application of fuel reduction measures. Impacts to soils, water quality, vegetation, wildlife, and air quality would be greater with the no project alternative. This could be especially true if the continued build-up of fuel load lead to a catastrophic wildfire in the community.

Fuel loads would gradually build up throughout the Meadow Vista Community as timber volumes and tree densities increase in the absence of harvesting and/or vegetation management. As a result, risks of damaging wildfires would increase relative to existing conditions. Because of the fuel management practices and standards specified in the PTEIR, the proposed project would not increase wildfire hazards relative to existing conditions and would reduce such hazards relative to the no project alternative.

**Alternative 1 - PTEIR with Reduced Vegetation Management**

Under this alternative, instead of reducing vegetative ground cover by 40-60%, vegetative cover would be kept at 60-85% ground cover, through the restriction on types of silvicultural practices allowed within any PTHP. Because there would be less vegetation manipulation, there would be less impacts to wildlife habitat, air quality, short-term noise and aesthetics.

Silvicultural practices from the Forest Practice Rules are defined in the *Introduction and Project Description*, including those to be applied in the various harvesting methods described in the PTEIR. Of the systems defined, only clearcutting is prohibited under the PTEIR system. Under the reduced vegetation management requirements, only alternative prescriptions would be allowed with provisions similar to the Sanitation/Salvage system. Under Sanitation/Salvage, only those trees that are dead, dying, or that have severe structural problems are removed. The Forest Practice Rules alternative prescription would allow a limited number of green trees to be removed.

For projects undertaking a PTHP under the PTEIR process, less vegetation would be removed than with other silvicultural practices. This could result in less land disturbance, fewer impacts to wildlife, reduced visual impacts, and reduced potential for air quality impacts. As greater restrictions are placed on the PTEIR process, however, fewer property owners will choose this alternative and the potential effectiveness of mitigation measures in the PTEIR will be reduced.

In addition, reduced vegetation management practices inherent in this alternative would not meet the objective of the project which is to reduce wildland fire hazards. In addition, this alternative would not meet many policy objectives of the Meadow Vista Community Plan to provide a fire safe community.

**Environmentally Preferred Alternative**

The proposed PTEIR project is the environmentally preferred alternative. The no project alternative would not provide the incentives for vegetation management that the PTEIR project would, nor would environmental protection measures be assured with continued private property owner pursuit of fuel load reduction outside of the PTEIR process.

Alternative 1 - PTEIR with Reduced Vegetation Management Requirements, would reduce several potential significant effects of the project but would not meet the overall objectives of the project to reduce wildfire hazards. This could result in greater potential for a catastrophic wildfire in the Meadow Vista community and the resulting significant impacts to water quality, biological, visual, cultural and air quality resources.

## 4. WRITTEN COMMENTS AND RESPONSES

Response letters were received from the following agencies and individuals:

A. California Department of Fish and Game

B. Placer County Planning Department

C. Donna Ford

D. Patrice Taylor

Following are responses to comments. Comments are summarized and keyed to the comment letters attached as Attachment "A."

**A. California Department of Fish and Game**

**Comment 1:**

*Fish and wildlife mitigation measures are not sufficient to reduce potential cumulative impacts. To achieve adequate reduction, the project must:*

*Identify and protect valley elderberry longhorn beetle.*

**Response:**

On page 6-11 of the PTEIR, under "Special Status Wildlife Species with Known or Potential Occurrence in the Meadow Vista Community Plan Area", the valley elderberry longhorn beetle is listed. Mitigation measure no. 1 on page 6-26 requires that all project areas be surveyed for the presence of any listed species, and no impacts to listed species are allowed to occur. This mitigation, and the subsequent monitoring program, will identify the potential presence of valley elderberry longhorn beetle and provide for protection.

**Comment 2:**

*No shrub removal should be allowed in WLPZs on perennial or intermediate watercourses. WLPZs should be 100 feet on perennial watercourses and 50 feet on intermediate ones.*

**Response:**

No timber operations are proposed in any WLPZ areas within Meadow Vista, except if a dead or dying tree is a public safety or fire protection hazard. In all cases, no heavy equipment will be operated within the zone (mitigation measure no. 6, page 6-27). No shrubs or green trees will be removed in these areas.

For the PTEIR/PTHP, WLPZs are a base 75 feet on either side of fish bearing watercourses in flat areas and up to 150 feet on steep areas. For intermediate watercourses, WLPZ ranges from 50 feet to 100 feet, depending on slope. These measures will adequately protect all watercourses and adjacent riparian zones.

**Comment 3:**

*No snag should be removed in any WLPZ if it is not a hazard.*

**Response:**

As stated in b. above, no trees will be removed in any WLPZ, unless the tree is a public safety or fire hazard (mitigation measure no. 6, page 6-27).

**Comment 4:**

*A minimum of 40% of existing shrubs should be retained on parcels greater than five acres.*

**Response:**

Shrub removal on any size parcel will be a function of what fuel load reduction would best achieve objectives and comply with mitigation measures of the vegetation management project, spacial arrangement and health of existing vegetation, and landowner direction. To set an absolute standard of 40% retention of shrubs may not allow achievement of these goals.

**B. Placer County Planning Department**

**Comment 1:**

*How can abuses of the process be prevented when someone wants to harvest trees only for the commercial value.*

**Response:**

Private landowners have the right to harvest trees and brush on their property. If they desire to harvest a tree for commercial purposes, they must currently have an individual timber harvest plan. Should the property owner desire to harvest trees for commercial value under the PTEIR/PTHP process, the harvesting must achieve overall fuel reduction and fire protection objectives of the vegetation management project as outlined in the PTEIR. If a proposed fuel reduction project does not achieve these objectives, including compliance with the monitoring program, then CDF will not approve the PTHP and the commercial harvest of trees could not take place.

**Comment 2:**

*Will the vegetation management project supersede local land use ordinances, such as allowing commercial logging operations in a zone district that does not otherwise permit Forestry uses?*

**Response:**

The vegetation management project is intended to be consistent with planning and zoning laws and it is noted that tree harvesting, as opposed to commercial logging operations, is not prohibited in any zone district in Placer County. As there is no TPZ zoning in Meadow Vista, it is doubtful that any parcel is dedicated to the exclusive growing of commercial timber products. As stated in the response to comment no. 1, above, any trees harvested for commercial value under the PTEIR/PTHP process must have fuel reduction for fire protection as the primary objective.

**Comment 3:**

*Is expenditure of the Proposition 204 implementation money contingent upon the adoption of the PTEIR?*

**Response:**

The Proposition 204 contract requires environmental documentation satisfactory to the State Water Resources Control Board prior to project implementation. This affects each contract entity whether they are federal, state, or local agencies. CDF may use the PTEIR as part of their environmental documentation requirement for Proposition 204 projects in the Meadow Vista area. The balance of the larger Proposition 204 program for CDF, the United States Forest Service, and the Natural Resources Conservation Service, however, must undergo separate environmental documentation.

**Comment 4:**

*Will individual slope maps for projects be prepared?*

**Response:**

Current forest practice regulations do not require individual slope maps for each timber harvest plan. A 7.5' USGS topographic map base, with field checking and refinement by the Registered Professional Forester, is generally adequate for the desired level of information in a PTHP. Mitigation measure no. 1 on page 3-10, however, provides for preparation of an individual slope map if appropriate.

**Comment 5:**

*High erosion hazard occurs on slopes that are much less than 50%. Should not more conservation standards be used in implementing the program?*

**Response:**

The primary criterion for determining the appropriateness of fuel reduction operations is not slope, but rather the erosion hazard rating (EHR) of the soil. Mitigation measure no. 3 on page 3-10 restricts timber operations to those areas with low or moderate EHR. Timber operations on soils with high or extreme EHR or on slopes greater than 50% are prohibited.

**Comment 6:**

*The PTEIR should include specific examples, formulas and strategies for preserving visual privacy. Visual resource impacts should be listed as "Significant and unmitigated" due to lack of prescriptions that will guarantee visual privacy and protect scenic vistas.*

**Response:**

Proposed projects subject to the PTEIR\PTHP process will impact the density of vegetation. However, specific mitigation measures prevent removal of most vegetation (mitigation measure no. 1, page 5-6), require that a variety of size class vegetation be retained (mitigation measure no. 2), and require specific clean-up standards (mitigation measure no. 3). It is anticipated that these measures will perpetuate the forested areas of Meadow Vista in a scenic condition, while at the same time providing greater fire protection. Any proposed project subject to the PTEIR and its monitoring program that does not conform with these measures will be denied by CDF. The PTEIR mitigation measures and monitoring program requires the Registered Professional Forester to consider aesthetic impacts when preparing a PTHP. No such requirements exist for private landowner vegetation removal or timber operations undertaken pursuant to a traditional THP.

With regard to scenic resources, specifically screening and scenic vistas, the Meadow Vista Community Plan contains the following policies:

**1.K.1.** The County shall require that new development in scenic areas (e.g., river canyons, lake watersheds, scenic highway corridors, ridgelines, and steep slopes [especially Sugar Pine Mountain]) is planned and designed in a manner which employs design, construction, and maintenance techniques that:

b. Incorporate design and screening measures which utilize natural landforms and vegetation for screening structures, access roads, building foundations, and cut-and-fill slopes *consistent with the needs of the State Fire Plan and Fire District Defensible Space programs.* (emphasis added)

1.K.8. The County shall balance the desire to maintain heavily vegetated corridors along circulation routes to preserve their rural nature and perceived values as natural noise buffers *with the need to reduce fuel loads (both the volume and density of flammable vegetation) along fire escape routes to increase safety for emergency fire equipment and evacuating civilians, to provide a point of attack or defense from a wildfire, and as fuel or fire breaks.* (emphasis added)

The Final EIR for the Meadow Vista Community Plan found that adoption of these polices would reduce potential visual impacts to a less than significant level. Additional mitigation in the PTEIR is consistent with and provides implementation for these policies. In that the project is consistent with the Meadow Vista Community Plan and is tiered to the Plan EIR, there is no evidence to suggest that the additional mitigation measures contained in the PTEIR will not reduce potential aesthetic impacts to a less than significant level.

**Comment 7:**

*Burning should be eliminated as an option for slash disposal.*

**Response:**

Burning of slash and debris will be strictly controlled when undertaken within the PTEIR process. Burning will be allowed only if other methods of disposal are unavailable or prove infeasible, or when denial of burning would pose a risk of imminent and substantial economic loss (Draft PTEIR, page 1-15). Any limited burning that does take place would be in compliance with burn regulations established by the Placer County APCD, and under permit from CDF, if applicable. Coordination with a chipper program is also required. These restrictions, combined with current regulations of the air pollution control district to manage the limited burning which may occur, will reduce air pollution impacts to a less than significant level. If in the future, burning of woody debris is not legally permitted in the air basin, then PTEIR/PTHP projects will be similarly restricted.

**Comment 8:**

*No heavy equipment should be allowed in steamside buffer zones.*

**Response:**

Mitigation measure no. 2 on page 4-11 of the PTEIR states, "Prohibit heavy equipment from streamside buffer zones except at designated crossings". This means that no heavy equipment can operate within any buffer zone (WLPZ) except at designated crossings where heavy equipment is passing over the watercourse. For example, a designated crossing would be the Placer Hills Road crossing of Woolley Creek and its associated buffer zone.

**Comment 9:**

*"Minimum amount" of retained trees should be higher for residential areas than for commercial timber growing areas.*

**Response:**

Page 1-14 of the PTEIR lists the silvicultural harvest systems allowed within the Meadow Vista area for PTEIR/PTHP projects. Clearcutting is not a permitted harvest system; when using other permitted systems, "at least twice the number of minimum leave trees specified in the Forest Practice Rules must be retained."

**Comment 10:**

*Native hardwood removal is not adequately addressed, particularly black oaks.*

**Response:**

As with all other vegetation in the Meadow Vista area, native oaks, including black oaks, could be removed to achieve the objectives of the vegetation management project.

Because California black oak is extremely common in Meadow Vista, and there is no potential to reduce this overall abundance, no specific discussion of black oak is included. Valley oak, due to its rarity in the area, and identified protection in the Meadow Vista Community Plan, is discussed and subject to specific mitigation (measure no. 5 on page 6-27).

**Comment 11:**

*The PTEIR should address cumulative impacts of tree removal and urbanization.*

**Response:**

Cumulative impacts to biological resources resulting from combined fuel reduction and urbanization were analyzed utilizing the WHR computer runs, based on different acreage impacts of tree removal and/or urbanization. The discussion found in Chapter 6 of the PTEIR reflects the results of these different runs.

From a cumulative standpoint, urbanization overwhelms fuel reduction in terms of impacts to habitat, aesthetics, and other environmental characteristics. The Meadow Vista Community Plan would allow the construction of approximately 1,200 additional dwelling units to reach its holding capacity of 7,471 persons. Assuming 1/3 acre of disruption for each unit for the structure, outbuildings, driveways, and urban landscaping, up to 400 acres of habitat would be clearcut. It should also be remembered that urbanization itself creates the need for fuel reduction measures which otherwise would not be needed, including required clearance around structures and additional fuelbreaks.

**Comment 12:**

*The PTEIR should fully disclose assumptions and workings of the WHR model computer program. Do RPFs have the needed knowledge to identify all listed threatened or endangered species of plants and animals, and to protect them?*

**Response:**

Specifics of the WHR computer program are beyond the scope of the PTEIR. Development of the program was a multi-agency effort including CDF, the Forest Service, NRCS, and the Department of Fish and Game. It is the only wildlife computer run specific to California that can be used by wildlife biologists to assist them in making estimates of potential impacts of given projects. Placer County accepted and is using the WHR program for community plan update purposes. Persons wishing more specifics on the program should contact the California Department of Fish and Game in Sacramento, California.

Mitigation measure no. 1 on page 6-26 states, "a qualified RPF or other qualified professional...". An RPF (Registered Professional Forester) is mandated by the Forest Practice Rules to design and prepare a timber harvest plan or program timber harvest plan. The RPF is the only licensed natural resource professional in the state and is governed by the RPF Licensing Act. That act, which includes disciplinary measures, requires that an RPF provide only forestry services for which he/she is qualified. If the RFP's level of expertise is surpassed, he/she is required to consult with other resource professionals who have the needed expertise.

If an RPF does not have the knowledge to fully identify a specific species, he/she is required to consult with an expert who has such qualifications. CDF, the agency responsible for enforcing provisions of the PTEIR/PTHP, will ensure that these provisions are implemented.

**Comment 12:**

*Impacts to Biological Resources should be "Significant and unmitigatable."*

**Response:**

Chapter 6 includes an analysis of potential impacts to biological resources, including runs of the California Wildlife Habitat Relationships model. Those runs and analysis by CDF biologists for the project conclude that overall habitat values remain constant or will be increased for 83% of the species potentially occurring in the Meadow Vista area. While habitat for 17% of species may decline, such decreases are not considered significant. When considering applicable forest practice rules and additional mitigation measures contained in the PTEIR, it is concluded that potential impacts to biological resources have been mitigated to levels less than significant. This finding is also consistent with conclusions of the Meadow Vista Community Plan Final EIR which found that impacts to biological resources as a result of implementing the Meadow Vista Community Plan are less than significant.

**Comment 13:**

*Because there may be an increase in smoke in the area due to burning, air resources impacts should be "Significant and unmitigatable."*

**Response:**

Due to restrictions on burning incorporated into the project, combined with coordination with a chipper program, the amount of burning will likely decrease as more private property owners utilize the PTEIR/PTHP process.

The project therefore has the potential to reduce the amount of burning compared to existing levels. Any limited burning which does occur would be only as legally permitted by regulations of the Placer County Air Pollution Control District.

**Comment 14:**

*The "PTEIR With Reduced Vegetation Management" alternative should be the preferred alternative because there are fewer impacts.*

**Response:**

The Reduced Vegetation Management alternative would reduce short and mid-term impacts to wildlife, aesthetics, air quality, and other resources by reducing the amount of disturbance and vegetation removal. It is noted, however, that no impacts of the proposed vegetation management project were determined to be significant and unavoidable.

The reduced vegetation option was not chosen as the environmentally preferred alternative because it does not meet fire protection goals of the State Fire Plan. The reduced vegetation management alternative would not substantially reduce the potential for large fires nor protect the public health and safety of the people in Meadow Vista. While meeting objectives of the proposed project is ordinarily not a consideration in selecting the environmentally preferred alternative, it must be considered in this case. A catastrophic fire in the Meadow Vista Community would result in significant and unavoidable impacts to wildlife, air quality, visual resources, water quality, and the well being of residents.

**C. Donna Ford**

**Comment 1:**

*The project will result in a change to the visual character of area, in unknown amounts, with unacceptable results.*

**Response:**

See response to comment no. 6 from the Placer County Planning Department letter.

**Comment 2:**

*Stating that the commercial value of trees may be used to generate revenue is inappropriate in the PTEIR.*

**Response:**

The PTEIR/PTHP process is governed by the California Board of Forestry which is empowered by the Z'berg-Nejedley Forest Practice Act to regulate commercial timber harvesting on private lands in California. The Board has no regulatory authority of non-commercial tree removals. Therefore, the only type of timber operations to which the PTEIR and future PTHPs apply are fuel reduction harvests where revenue is generated by the sale of timber products. Also see response to comment no. 1 from the Placer County Planning Department.

**Comment 3:**

*All species of pines, oaks, manzanita, buckeye and toyon should be encouraged to be retained.*

**Response:**

To achieve the specified fire protection goals contained in the vegetation management project, some vegetation will be removed for better spacing and clearance. The type of plant removed is dependent on the spacial arrangement, health, and size of existing vegetation on the parcel being proposed as a project under a PTHP. Pines, oaks, and manzanita are some of the most abundant species in the Meadow Vista area and some of these species will need to be removed. Depending on their location, size, and condition, buckeye and toyon plants may or may not be removed in any given operation.

**Comment 4:**

*The Reduced Vegetation Management Alternative should be the preferred alternative.*

**Response:**

See the response to comment no. 14 from the Placer County Planning Department letter.

## D. Patrice Taylor

**Comment 1:**

*For this "volunteer" program to be successful, public understanding and awareness is critical. The July 8, 1999 public hearing on the Draft PTEIR was attended by just six people. It is indicative that the PTEIR still does not clarify, mitigate or resolve many issues as the "Public" in attendance still has concerns after the Draft PTEIR supposedly addressed their initial concerns made on the NOP.*

**Response:**

The Placer County Resource Conservation District (RCD), CDF, and the Placer Hills Fire District have made a distinct effort to publicize the PTEIR program. In addition to an initial scoping meeting, presentations have been made on the PTEIR at a Placer Hills Fire District public meeting and at public meetings of the Meadow Vista Municipal Advisory Council (MAC) where summaries of the document were provided. At both the fire district and MAC meetings, the time, location, and purpose of the public hearing on the Draft PTEIR were discussed. Legal notices of the July 8, 1999 public hearing appeared in the Colfax Record and Auburn Journal as well as in the Sacramento Bee Neighbors section. A single page public notice was placed in the Meadow Vista post office, the fire district, and the RCD office. Copies of the PTEIR were made available at the fire district, RCD, and CDF offices. In addition, an informal public meeting was held on the PTEIR on June 21, 1999.

Responses to the May 12, 1998 NOP letter are contained in comments 8 through 29.

**Comment 2:**

*Why are fuel reduction projects being done before any monitoring or studies on water quality? What studies are going to be done in this area to justify the high cost of fuels treatment projects?*

**Response:**

Current State law mandates vegetation clearance around all structures in forested areas of the State. The current State Fire Plan has identified the need for pre-fire vegetation management projects to reduce the future cost and damage done by wildfires in the forested portion of the State. To implement these goals, the PTEIR is only one statewide program. Studies on water quality are needed to implement programs to reduce potential fire dangers.

No studies are being planned at this time. The vegetation management project and participation by private landowners is voluntary and any costs of the PTHP and carrying out the field project are paid by the private landowner. The long-term benefits of the increased vegetation management and higher fire protection levels has been identified in the California Fire Plan as leading to lower future fire protection costs.

**Comment 3:**

*Need for pre- and post-treatment monitoring has not clearly been addressed.*

**Response:**

There is no requirement within the PTEIR/PTHP process for pre-treatment monitoring. The location of shaded fuel breaks and the need for clearance around structures, however, as identified in the State Fire Plan, are based on extensive field surveys and identification of fuel buildup in urbanized areas. Individual PTHPs will also identify the existing environment on the site with specific recommendations for fuel load reduction while protecting site resources. A system of post-treatment monitoring is contained in Chapter 13 of the PTEIR. The monitoring program will ensure that the mitigation measures contained in the PTEIR/PTHP have been properly implemented and allow for review of their effectiveness.

**Comment 4:**

*Will there be an increase in man/equipment fires, and what are the potential impacts to Fire Districts and homeowner's insurance rates.*

**Response:**

A small increase in accidental fires may occur with implementation of the PTEIR/PTHP process due to use of equipment that could cause fires (chain saws, etc.). All operations under an approved PTHP, however, must be carried out by a licensed timber operator and State Safety Codes and fire regulations will govern those operations. It is probable that professional operators will cause fewer accidental fires compared to individual homeowners undertaking brush removal. As for impacts to homeowner's insurance rates, it is hoped that insurance companies recognize areas where landowners have increased their fire protection through vegetation management and actually lower insurance rates.

**Comment 5:**

*Reductions in tree numbers with resulting reductions in carbon dioxide intake have impacts on air quality that are not mitigated.*

**Response:**

Air quality in the Meadow Vista area is influenced by many factors, the most important of which is the air pollutants that drift up from the more populated Sacramento Valley area. Removal of some vegetation may reduce the short term carbon dioxide intake of plants, but in the long-term, will better protect the area from more dangerous pollutants caused by wildfires. With better spacing of vegetation leading to healthier individual plants, it is expected that each remaining tree will be more efficient in its utilization of atmospheric carbon dioxide resulting in little overall change in plant uptake of carbon dioxide in the area.

**Comment 6:**

*It is difficult to see that there can ever be an implementation of a fuel load reduction project that will not affect irreversibly the rural character -- habitat, biodiversity, air and water quality, scenic resources and viewscapes, etc.-- of Meadow Vista. Urbanization has been introduced slowly into this "interface" with the mixed oak and pine forest and wildlife to date have seemingly been able to adapt. Shelter, nesting, and food sources will be heavily impacted by the proposed vegetation management project, especially over its shorter time span if it is to be effective as a measure to reduce catastrophic fire.*

**Response:**

Chapter 6 of the PTEIR estimates the impact of the project on biological resources. The California Wildlife Habitat Relationships (CWHR) model runs compared current habitat values and the values that would occur if all landowners completed all projects. This approach constitutes an analysis of the extreme case which is unlikely to occur (not all landowners will participate, nor will all projects occur at once). Overall, the CWHR model run indicates the potential for reduction in habitat for 17% of the species which might occur in Meadow Vista with no habitat value change or habitat increases for 83% of the potential species in the area.

In a second run of the CWHR model, habitat was converted to urban use in keeping with projections from the Meadow Vista Community Plan. Consistent with the writer's experience, 123 species had an increase in habitat values and only one species shows a decrease in habitat value, indicating that many species such as deer, racoon, and coyote can co-exist with urbanization. However, the conversion to urban use results in the complete loss of habitat for 47 species. This evaluation shows that impacts to existing vegetation and habitat from the vegetation management program will be much less than what will occur when development is built out in accordance with existing land use plans.

**Comment 7:**

*The Meadow Vista PTEIR should include picture ID's of wildlife species.*

**Response:**

This PTEIR is a disclosure document intended to describe the Meadow Vista Vegetation Management Project, how individual projects carried out under it would be conducted, and to disclose potential environmental impacts that might occur with its implementation. It is not intended to define and discuss individual life forms, habitats, and life cycles. There are many other books and manuals that achieve this purpose.

**Comment 8:**

*What is the mitigation monitoring program, and is it addressed in the PTEIR? Is a public hearing involved in the process of modifying mitigation measures contained in the Meadow Vista Community Plan Final PTEIR?*

**Response:**

The mitigation monitoring program is an important component of the Meadow Vista PTEIR and is contained in Chapter 13 of the document. It is a program to insure that the mitigation measures proposed to reduce potential adverse impacts of the project to less than significant levels are in fact carried out in the subsequent PTHP covering individual projects. The Draft PTEIR had a 45-day public comment period, which included a noticed public hearing on July 8, 1999. In order to modify any mitigation measures approved as part of the Final PTEIR, an environmental document would be prepared (such as a negative declaration or subsequent EIR) and the public would be provided an opportunity to review and comment on the proposed modifications.

**Comment 9:**

*Our experience within a 20 acre "neighborhood" that has undergone fuel reduction by various plans and means has given us a first hand look at the processes and the results. What are the possible mitigation measures to reduce the potential impacts to changes in water drainage and water quality?*

**Response:**

The fuel reduction programs mentioned were carried out by private property owners or federal cost-share programs. These programs were not implemented under the PTEIR/PTHP process nor subject to Forest Practice Rules or the mitigation measures and monitoring requirements of the PTEIR. Therefore, a comparison of the results may not be valid.

Mitigation measures in the PTEIR to reduce impacts to drainage and water quality include: operations carried out under the PTEIR/PTHP process must not operate on unstable ground areas; new road construction may only be 100 feet long or less and may not contain any substantial cuts and/or fills; tractor skid trails will be kept to the minimum number to remove harvested trees; timber yarding operations will only occur during dry rainless periods; no heavy equipment operations will be allowed in watercourse and lake protection zones adjacent to creeks; and waterbars will be installed on all native soil skid trails to divert surface water so that it dissipates back into the ground.

**Comment 10:**

*There is a need to protect Sugar Pine Mountain.*

**Response:**

Open rocky areas with no or only sparse amounts of vegetation will not need to be treated, as they are not potential fire prone areas and already act as natural fuel breaks. Many areas adjacent to the mountain top and on the mountain itself, however, have dense vegetation similar to other areas of the Meadow Vista Community. Fuel reduction programs in these areas in keeping with the mitigation requirements of the PTEIR will benefit defensive fire protection efforts while protecting habitat and scenic resources.

**Comment 11:**

*An appropriate plan for "public awareness" and education is the shaded fuelbreak being created along Placer Hills Road near the I-80 interchange.*

**Response:**

Comments noted. The shaded fuelbreak at this location lead to erosion problems. Mitigation measures within the PTEIR will provide for slope stabilization prior to the winter months.

**Comment 12:**

*What measures will be taken to monitor and correct run-off of pesticides, herbicides and fertilizers used to maintain and revegetate areas after treatment?*

**Response:**

Use of pesticides, herbicides and fertilizers are not proposed as part of the PTEIR. After fuel reduction treatment, raking of leaves, limbs and other plant debris, and pulling or moving resprouting vegetation will maintain the reduced fuel areas.

**Comment 13:**

*Will change in the quantity of ground water adversely affect local septic systems?*

**Response:**

Proposed projects will reduce, not eliminate, the amount of vegetation. Remaining vegetation will individually take up more water as it grows at an accelerated rate, due to less competition. It has not been shown that partially removing some vegetation leads to changes in ground water levels.

**Comment 14:**

*Encouraging the use of mulches, naturally available and applied, and amending soils with moisture-holding compost should be used as a mitigation against increased watering of fire resistant plants. A bio-mass collection system should be set up and/or a composting operation should be set up.*

**Response:**

It is not anticipated that increased watering of residual vegetation will occur as a result of this project. Most of the areas to be managed are away from landscaped areas and not accessible to watering, nor would it be desirable to do so. Native vegetation is accustomed to growing in the climatic conditions that occur in the Meadow Vista area, and this includes no artificial watering. The first priority for disposal is chipping and spreading material back on the property. If economical, a biomass collection system could be set up sometime in the future by the County, but not as a direct result of this project.

**Comment 15:**

*What agency can anticipate and head off problems with disturbed soil areas being invaded by invasive plant species such as poison oak, annual European grasses and star thistle?*

**Response:**

The Placer County Agricultural Commissioner can give advice to individual landowners on how to treat undesirable plants. For most areas, maintenance mowing of any resprouting or invading vegetation will keep in check new growth.

**Comment 16:**

*What will filter and help purify air pollution caused by automobiles in the Meadow Vista area, particularly pollution drifting up from the Sacramento Valley?*

**Response:**

Living vegetation does help to filter out certain pollutants from the air through taking in of carbon dioxide and giving off oxygen and water. However, they also transpire their own volatile organic chemicals. By thinning existing vegetation, residual vegetation will be more efficient in taking up carbon dioxide from the area.

**Comment 17:**

*Removal of vegetation has changed the micro-climate of the area, causing increased electrical usage for air conditioning.*

**Response:**

The PTEIR/PTHP process will encourage landowners to be aware that large vegetation on the sunny side of a house in summer can reduce the overall heat reaching the house. That vegetation can be left as part of the fuel reduction plan while still achieving defensible fire protection goals by properly thinning out other vegetation. Each property must be managed differently, depending on the characteristics of the property and the owner's goals.

**Comment 18:**

*The PTEIR cites valley oak woodlands and riparian communities as being the most impacted by the proposed program. How will all oak species be protected, and how ill oaks be reestablished. Will any effort be made to collect seeds from trees to be removed?*

**Response:**

The PTEIR does not identify valley oak woodlands or riparian communities as being the most impacted by the proposed program. It does identify them as vegetation types that the Meadow Vista Community Plan seeks to preserve and perpetuate. Towards those ends, valley oak areas will be identified and retention encouraged by individual landowners. Residual vegetation will favor valley oaks where they currently exist. All oak species occurring within Meadow Vista will be perpetuated by the PTEIR/PTHP process because vegetation is only to be thinned to reduce densities, not to be totally removed. Oaks are an abundant tree in the area and will continue to be. There are no proposals to reestablish oaks after thinning.

No operations, including heavy equipment, will occur in riparian communities except to remove hazard trees.

Most vegetation to be removed will be intermediate and suppressed sized trees which have little seed producing capacity and are generally of poorer quality than larger trees. Some larger dominant or co-dominant trees could be removed, but because there are many thousands of trees within the area of the same species, there is no need to preserve the seeds of just a few of them.

**Comment 19:**

*Fuel reduction is removing the wildlife safety zones along the "edges" where open space meets the forest. As the Plan is to protect the environment from wildfires, recognize that removal of a plant species from an area will relocate the inhabitants.*

**Response:**

There are no proposals to remove wildlife safety zones or to completely remove a plant species from an area. See response to comment no. 6, above.

**Comment 20:**

*What became of the idea to have a chipper "visit" neighborhoods to help reduce transportation off-site? Is there assistance for older residences to help insulate their homes to be cooler in the summer? There will be a potential for water shortages if we all get busy irrigating our new fire safe landscaping.*

**Response:**

The vegetation management project encourages chipping as a first priority for vegetation removal. The Placer County Fire Department, under contract to CDF for fire protection services, is currently managing a chipper program. The program is voluntary and landowners who thin vegetation are asked to place the slash and debris near a public road so that the chipper crew can chip the vegetation and return the chips to the property as mulch. Residents in Meadow Vista, Alta, Christian Valley, Auburn, Lincoln, Colfax, and Foresthill have taken advantage of this program.

In reference to the need for additional insulation, see response to comment no. 17, above.

In reference to the need for additional water, see response to comment no. 14, above.

**Comment 21:**

*Removal of biomass can deplete soils of potential nutrients. Also burning can deplete potential soil nutrients.*

**Response:**

In most areas, slash and debris will be chipped and blown back onto the ground to naturally decompose and help hold the soil. In a few cases, chips and debris will have to be hauled away because of the volume of vegetation removed. However, most of a tree's nutrients are in its leaves and small branches. These will naturally fall after the projects are completed and will add to the soil as they decompose. Because of previous removals, general leaf fall will not create large amounts of additional fuels.

**Comment 22:**

The use of pesticides and herbicides during the initial phase and during the maintenance of the Plan has to be addressed.

**Response:**

See response to comment no. 12, above.

**Comment 23:**

*Will a greater bio-hazard from oil-laden water spray from automobiles running on wet roads occur when the amount of vegetation it gets sprayed on is reduced? Residents adjacent to shaded fuelbreaks may be exposed to increased levels of traffic related pollutants, after vegetation is thinned.*

**Response:**

Whether oil-laden water gets sprayed on vegetation or directly onto the soil, it can be considered a bio-hazard. This project will not impact the amount of oil-laden water that gets washed or sprayed off of paved road surfaces. Although most homes are set back a considerable distance from the road, residents may want to maintain a screen of vegetation between their houses and public roads at the time they agree to do a shaded fuelbreak on the their property.

Any increase in potential pollution reaching homes adjacent to roadways must be considered minor as only portions of vegetation will be removed.

**Comment 24:**

*An increase in actual local fire suppression teams may be needed.*

**Response:**

A system of defensible space and shaded fuelbreaks will potentially allow a quicker extinguishing of fires, allowing firefighters to be more efficient and better utilize their time and resources. For larger fires, it is anticipated that firefighters would be able to suppress them before they become fire storms requiring much more manpower and equipment to fight.

**Comment 25:**

*The phones and code enforcers of Air Quality will be busy monitoring the effects of all the burning -- both legal and illegal.*

**Response:**

See response to comment no. 7 from the Placer County Planning Department letter.

**Comment 26:**

*Are PG&E's 20+ foot brush free powerline corridors part of the fuelbreak plan?*

**Response:**

These limited clearance corridors are designed to prevent fires started by the powerlines and are not generally part of the overall defensive plan to fight area fires. Such corridors, however, are a worthwhile fire protection measure and could be incorporated into the shaded fuelbreak system where appropriate.

**Comment 27:**

*There will be increased demand from existing water customers to irrigate replanting of vegetative screening along roads and maintain all fire-safe landscaping.*

**Response:**

See response to comment no. 14, above.

**Comment 28:**

*Who oversees plan development, implementation, and follow-up of projects under the PTEIR/PTHP? The Winchester project has a 75' vegetation buffer zone required along Placer Hills Road and Sugar Pine Road. How does this dovetail with the shaded fuelbreaks along ridges and routes?*

**Response:**

A Registered Professional Forester must write any program timber harvest plan (PTHP) associated with the PTEIR. The PTHP is based on the individual characteristics of the property it covers. CDF is the lead agency in reviewing the PTHP, assisted by other resource professionals, to make sure the plan is in conformance with the PTEIR. CDF is also empowered with enforcement and inspection responsibilities to make sure the plan is carried out on the ground, according to the PTHP. It is the responsibility of individual landowners for maintenance of defensible fire protection zones.

According to Winchester's Fuel Management Plan, as approved by CDF and Placer County, a system of shaded fuelbreaks is to be installed where the subdivision abuts public roads. This includes Sugar Pine Road and Placer Hills Road. Within these areas, existing vegetation will be managed and thinned, just as shaded fuelbreaks proposed under the PTEIR will be. There is to be no revegetation after thinning.

**Comment 29:**

*Who will assist in a more thorough survey of archaeological resources in the area?*

**Response:**

As part of every PTHP, an archaeological survey must be prepared by either a professional archaeologist or a trained individual acceptable to CDF. According to Forest Practice Rules, any potentially significant site must be protected by avoiding the site.

**Issues from the July 8, 1999 Public Hearing on the Draft PTEIR**

**Comment 1:**

*Potential abuse of "Plan" such as a landowner that cuts down trees for profit.*

**Response:**

Please see response to comment no. 1 from the Placer County Planning Department.

**Comment 2:**

*Need for a graphic presentation for the unsophisticated landowner to assist the landowner in making informed decisions.*

**Response:**

There will be a continuing public information program by the Placer Hills Fire District and the Fire Safe Council established for Meadow Vista. Land owners will be made aware of their options, including the PTEIR/PTHP process.

**Comment 3:**

*Concern that the "Plan" will make it easier and less expensive for the sale of timber on private land.*

**Response:**

See response to comment no. 1, above.

**Comment 4:**

*The PTEIR picked up where the "General Plan" left off in regards to listed species and archaeological resources as the program's review identifies such resources.*

**Response:**

It was not within the scope of the PTEIR to survey nearly 7,000 acres for biological and archaeological resources. The PTEIR/PTHP process, however, requires identification of biological and archaeological resources for each proposed parcel including protective measures for such resources.

**Comment 5:**

*Need clarification if there is a difference in terms "vegetation management" and "fuel load reduction."*

**Response:**

The two terms are interchangeable and refer to the types of silvicultural practices discussed in the document to provide defensible space and shaded fuelbreaks.

**Comment 6:**

*What would the impact be to Meadow Vista if this program were implemented on the largest scale possible? How would it impact habitat and what would the ramifications be for wildlife?*

**Response:**

See response to comment no. 6 from Patrice Taylor letter.

**Comment 7:**

*The program does not require the maintenance of fuel load reduction after the initial effort.*

**Response:**

Maintenance would be responsibility of the landowner. It may also be possible that the Placer Hills Fire District or CDF would provide maintenance in some fuelbreak areas.

**Comment 8:**

*Is implementation structured on a time frame or is it self limiting in some way?*

**Response:**

The program is voluntary. The requirements for defensible space around structures and the shaded fuelbreak system will continue to be enforced and encouraged by the Placer Hills Fire District and CDF. The PTEIR/PTHP process will be a tool available to property owners to implement these programs.

**Comment 9:**

*Chipper program's limited use to roads and driveways and not off road creates a burden for the landowner to move slash and debris to the chipper.*

**Response:**

The use of a licensed timber operator provides equipment to move debris to the road to access chipper or to use chippers which are not a part of the current program. As the use of chippers becomes more common, the current program may be expanded to serve interior properties.

**Comment:**

*Need to address the problem of invasive species, such as star thistle, taking over in the absence of vegetation that is removed in fuel load reduction efforts.*

**Response:**

See response to comment no. 15 from Patrice Taylor letter.

# Appendix "A"

## Comment Letters
## Issues from 7/8/99 Public Hearing

STATE OF CALIFORNIA - THE RESOURCES AGENCY

GRAY DAVIS, Governor

DEPARTMENT OF FISH AND GAME
SACRAMENTO VALLEY and CENTRAL SIERRA REGION
1701 NIMBUS ROAD, SUITE A
RANCHO CORDOVA, CALIFORNIA 95670
Telephone (916) 358-2900

July 27, 1999

Mr. Russ Henly
California Department of Forestry and Fire Protection
Post Office Box 944246
Sacramento, California 94244-2460

Dear Mr. Henly:

The Department of Fish and Game (DFG) has reviewed the Draft Program Timberland Environmental Impact Report (DPTEIR) for the Meadow Vista Vegetation Management Project (SCH# 98042025). This project is designed to allow both commercial timber harvest and understory removal as part of an overall fuels reduction program within the Meadow Vista community of Placer County. The plan area includes about 6,980 acres with an ultimate holding capacity of 2,988 dwelling units and a population of 7,471. The current population of the plan area is about 5,000. The DFG recognizes the complexity of developing such a plan and supports, in concept, this effort.

Existing habitat values within the project area are compromised due to existing urban uses. Future urbanization will continue to degrade wildlife values. The proposed fuels reduction program will not significantly alter this trend. Opportunity, however, exists on the area's larger parcels to enhance habitat values. Additionally, opportunity exists to assure that adequate linkages remain within the plan area, thus allowing for continued animal movement both within the plan area, and to adjacent sites of suitable and available habitat. The retention and enhancement of these existing riparian systems can provide habitat linkages, and protect critical habitats to assure continued animal movement through time by reducing of habitat fragmentation.

1 As proposed, the DPTEIR fails to incorporate specific and adequate measures designed to assure that direct, indirect, and cumulative impacts to fish and wildlife resources will be mitigated to less than significant levels.

We recommend that the following additional items and issues be included and evaluated in subsequent environmental documents:

a. Appropriate measures should be developed to assure that potential impacts to the federally-threatened valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*) are identified, evaluated and fully mitigated.

2 b. Shrub removal within the Water course and Lake Protection Zone (WLPZ) should be excluded on all perennial and intermittent watercourses. The WLPZ should be expanded to a minimum of 100 feet on all perennial streams and a minimum of 50 feet on all intermittent streams.

3 c. Snags posing no direct hazard should be retained within the WLPZ.

4 d. Projects on parcels greater than five acres should retain a minimum 40% of the existing shrub community within that parcel through time. These projects should be designed, where feasible, to incorporate irregular edges and islands consistent with landowner objectives.

We remain committed to assisting you in the development of an ecologically sound fuels reduction program. We believe the suggested measures can significantly enhance the merits of your project, and assure that the area's long-term natural resource values are retained to the maximum extent possible.

Thank you for the opportunity to review this project. If the DFG can be of further assistance, please contact Mr. Jeff Finn, Associate Wildlife Biologist, at (530) 477-0308.

Sincerely,

Larry L. Eng
Assistant Regional Manager,
Wildlife, Fisheries & Environmental Programs

Mr. Jeff Finn
Ms. Terry Roscoe
Department of Fish and Game
1701 Nimbus Road
Rancho Cordova, California 95670

# PLACER COUNTY
# PLANNING DEPARTMENT

11414 B Avenue/Auburn, California 95603/Telephone (530) 889-7470/FAX (530) 889-7499
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July 27, 1999

Russ Henly, Policy Analyst
The Resources Agency
California Department of Forestry & Fire Protection
1920 20th Street
Sacramento, CA 95814

**SUBJECT: COMMENTS ON *DRAFT PROGRAM TIMBERLAND ENVIRONMENTAL IMPACT REPORT* for the *MEADOW VISTA VEGETATION MANAGEMENT PROJECT***

Dear Mr. Henly:

Thank you for the opportunity to comment on the *Draft Program Timberland Environmental Impact Report for the Meadow Vista Vegetation Management Project* (DPTEIR). The Placer County Planning Department offered comments on the Notice of Preparation for this document in a letter to you dated May 14, 1998. These comments listed a number of issues that the PTEIR should address, among them being the effects on wildlife, visual impacts, and enforcement and monitoring of vegetation removal practices. It was encouraging to note that the DPTEIR attempted to address the concerns expressed in our letter; however, the DPTEIR has several serious inadequacies.

**Chapter 1 – Project Description:**

1. How can the removal of fire hazardous fuels be facilitated under the provisions of the *Meadow Vista Vegetation Management Project (MVVMP)* without inadvertently providing for abuse of the process by those property owners who simply want to realize some monetary return from the trees on their property?

2. Will this Program supercede local land use regulations and allow for commercial logging operations within zone districts that do not otherwise permit "Forestry" uses? Most of Meadow Vista is zoned Residential Single-Family (RS) which does not permit "Forestry" uses.

3. Is expenditure of the Proposition 204 implementation money contingent upon the adoption of the PTEIR?

**Chapter 3 – Geology & Soils**

4. USGS topographic maps are not sufficiently detailed to provide an accurate representation of the slopes that may occur on an individual lot or parcel. Any implementation measures that rely upon the maps in the DPTEIR for such a determination run the risk of being substantially inaccurate. Will individual slope maps be prepared for each lot that takes advantage of the Program?

5. High erosion hazard occurs on slopes that are much less steep than 50%. 30% is a common slope standard for caution in soil disturbance throughout Placer County. Should not this more conservative standard be used in implementing the Program? Where some more highly erosive soils exist within the Meadow Vista community, shouldn't an even more conservative standard be used (*e.g.* 20 – 25%)?

**Chapter 5 – Visual Resources**

6. Although the ability to maintain visual privacy while complying with the Program's requirement to remove vegetation is mentioned several times throughout the DPTEIR, no specific strategies are proposed and no examples are given as to how this can be successfully accomplished. The Program should include a number of very specific examples, formulae and strategies to provide for visual privacy while attempting to meet the intentions of the MVVMP.

   The level of significance for the impact to visual resources should be listed as "Significant and unmitigable" due to the lack of a specific prescription that will guarantee the preservation of visual privacy and the protection of existing scenic vistas. The fact that individual property owners may undertake vegetation removal without regulatory oversight in many instances may result in significant and unmitigated destruction of these scenic resources.

**Chapter 6 – Biological Resources**

7. In order to address a significant concern of the community that was expressed during the adoption proceedings for the Meadow Vista Community Plan, disposal of slash should be limited to chipping or removal. Burning should be avoided so that the residents are not subjected to excessive smoke. The chipped material should be returned to the site as mulch to reduce the erosion hazard potential, to retain soil moisture (thereby enhancing the organic decomposition process), and to retard the growth of noxious native and exotic plants (*e.g.* poison oak, star thistle, Scotch broom, etc.).

8. In order to avoid the destruction of sensitive wildlife habitat within the riparian areas throughout Meadow Vista, heavy equipment (this term needs a specific and detailed definition somewhere within the implementation measures of the

Program) should be prohibited from streamside buffer zones (no exceptions, no crossings).

9. Several places within the document the term "minimum amount" of mature trees is mentioned. What is the "minimum amount" of mature trees? Given various goals and policies of the MVCP to preserve the forest backdrop and the aesthetics of the forested landscape, shouldn't the "minimum amount" standard be higher for the residential areas of Meadow Vista than a standard that might be appropriate for restocking purposes at a commercial timber production area elsewhere in the County?

10. The discussion regarding the effects of native hardwood tree removal is inadequate in its identification of the importance of these trees for wildlife habitat, wildlife food sources, microclimate temperature maintenance, soil moisture retention, reduction of erosion hazard potential, etc. Especially absent is a discussion of the effects of the loss of black oaks (*q. kelloggii*), a predominant species within the Ponderosa Pine woodlands.

11. In discussing the effects of tree removal resulting from implementation of the MVVMP *vs.* the effects of tree removal resulting from "urbanization" (an undefined term), the DPTEIR reaches the conclusion that the effects of MVVMP implementation are less significant than those resulting from "urbanization". While the conclusion may be correct insofar as it goes, the real effect to be evaluated by the DPTEIR should be the cumulative effects of both.

12. As thorough as the California Wildlife Habitat Relationships (CWHR) analysis was for the DPTEIR, it failed to address the essential change in wildlife species within the Meadow Vista community. In addition, the analysis needs to assess the cumulative effects of "urbanization" and full implementation of the MVVMP. A more comprehensive discussion of the "improved wildlife habitat" should be provided, including the assumptions of the model, so that an independent review of the data can be undertaken by the DPTEIR reader. As currently constituted, the reader has to accept on faith the fact that the CWHR model is directly applicable to the Meadow Vista project area and that its results have been correctly interpreted by the DPTEIR author. The mitigation measures proposed for the Biological Resources section of the DPTEIR (page 6-26) generated the following questions:

    (1) Do Registered Professional Foresters (RPFs) have the knowledge to identify any and all listed, threatened or endangered plant and animal species? If not, how can they prevent impacts on these species? If so, how can they prevent impacts on these species (*i.e.* are there specific protocols for dealing with every listed, threatened or endangered species in every situation, or must a qualified wildlife biologist be consulted for a site specific analysis and recommendation)?

    (2) Who decides the appropriate timing? Do RPFs have sufficient background in wildlife biology to identify actively nesting birds, etc.? Will a RPF actually

reschedule logging activity in an instance where a property owner wants to have trees removed and/or if a tree removal crew is available and ready to begin the job?

(3) Who identifies these? Exactly what mechanisms are utilized to accomplish this proposed mitigation measure and to insure that any identified areas that are to be protected are not disturbed?

(4) Who inspects and verifies compliance with this mitigation measure? When?

(5) How can individual landowners be expected to identify valley oaks (*q. lobata*) as opposed to black oaks (*q. kelloggii*), blue oaks (*q. douglasii*), etc.? What sort of "encouragements" can be offered to a property owner to retain valley oaks? Why only valley oaks?

(6) Depending upon who decides what is or is not a "public safety purpose" or what is required for "fire protection" or which tress are "dead or dying", this exception could permit almost any amount of tree removal within any WLPZ. Who makes these decisions? Based upon what criteria? Allowing any encroachment within a WLPZ violates mitigation measures suggested in several other parts of the DPTEIR (*e.g.* Chapters 3, 4 and 5)

(7) How is this accomplished? Who decides what silvacultural harvest methods shall be restricted, what is a "significant stand structure", and if wildlife needs are being satisfied?

Given the discussion above, the level of significance for the impacts to biological resources should be noted as "Significant and unmitigable".

**Chapter 9 – Air Resources**

13. Please see the comment #7 under the Chapter 6 heading above. The issue of smoke and the dooryard burning of vegetation was a topic of much discussion during the Meadow Vista Community Plan public hearings. Any proposal to increase the amount of smoke that is currently produced within the project boundaries should be noted as "Significant and unmitigable". The mitigation measures proposed in the DPTEIR depend upon voluntary compliance (there is not a good track record for such compliance in the Meadow Vista area), and the Program encourages the creation of significant new amounts of vegetative material that requires disposal; therefore, there will be a significant and unmitigated impact upon the community.

**Chapter 12 – Environmental Information**

14. The proposed DPTEIR project (MVVMP) <u>cannot</u> be designated as the environmentally preferred alternative. Because the "PTEIR with Reduced Vegetation Management" alternative would, if implemented, result in fewer significant environmental impacts, it has to be the environmentally preferred alternative. The fact that it doesn't completely accomplish the initial goals of the MVVMP does not rule it out as an alternative that might be implemented if the lead agency has a change of heart. The PTEIR is an informational document to assist

the decision-making process. If the decision-making process were to be based upon a policy requiring minimal adverse environmental effects, the "environmentally preferred alternative" would have to be the alternative that results in the least adverse environmental impact.

In summary, the ***Draft Program Timberland Environmental Impact Report for the Meadow Vista Vegetation Management Program*** is generally adequate, except for the issues discussed above, to meet the requirements of the California Environmental Quality Act (CEQA). With the suggested changes, the document should function as an effective source of information to guide the lead agency in its decision-making process.

Again, thank you for the opportunity to provide comments on this important document. Please feel free to contact me if you have any questions regarding the comments offered by the Planning Department.

Sincerely,

G. Dean Prigmore, AICP
Asst. Director of Planning

GDP:dp

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cf: Rich Gresham, Placer County Resource Conservation District
PTEIR for the MVVMP file
Chron file

July 28, 1999

Russ Healy
Calif. Division of Forestry
1920 20th St.
Sacramento Ca. 95814

Dear Mr. Healy,

The following contains my great concern and comments on the Draft Program Initial Environmental Impact Report for the Meadow Vista Vegetation Management Project.

My two main concerns with the project is that one, implementation "could result in a change in the visual character of the area" pg. v. How would we ever know how drastic the change could be? This is to risk of an unknown and therefore unacceptable in my opinion to take the chance. We live in a beautiful area and we must maintain that beauty, not take it away or degrade it. Use of heavy equipment, loping of slash etc. only ends up as loss of the natural beauty. Loss of property value could also result.

1

My second concern is one in which I cannot give support to the plan with this language in place. On pg. 1-4 the sentence which states "Private landowners may be able to harvest trees with commercial value to generate revenue for proper forest fuels management and other purposes". I can't help but question whether there is another plan within the plan and that is to obtain commercial value trees off of private property in the name of making an area more fire safe. I would also ask what is alluded to by the phrase "other purposes"? Meadow Vista does not want to lose its trees and to put the

2

idea "out there" that money can be made by ①
cutting these trees is extremely scary idea!
If our homeowners are to be educated in fire-
safe methods, the cutting down of marketable trees
2 (cont.) must not be a part of the program. Only obviously
dead trees or groups of tightly packed trees should
be considered for removal or thinning.
On pg. 6-27 #5 states, "Encourage retention of Valley
Oak areas within the community." I would hope
that this statement is strongly encouraged and also
plainly state that, all other species of oaks and
Pines should also be encouraged for retention in
our community. It is this mix of trees that
creates the beauty of Meadow Vista.
Manzanita and Buckeye and Toyon are important shrub
3 like growth that is important to maintain the beauty
of the area. Drastic removal of these shrubs will,
I am sure, allow undesirable growth such as star
thistle to flourish. Removal also takes away valuable
habitat for the animals we enjoy seeing and having
live in the area. Loss of these bushes also cause
loss of privacy between neighbors. We live in
an area such as Meadow Vista because of this
rural environment and privacy.
I am advocating for the Meadow Vista Area
the Reduced Vegetation Management Alternative.
Less vegetation would be removed with less land
disturbance, fewer impacts to wild life, reduced
visual impacts and reduced potential for air quality
4 impacts. The area would remain and maintain
the look of the natural landscape we all live here
for. High fire potential has not proven as
obstacle to growth. Elected officials keep approving
growth in these areas as well as in floodplain
areas of earthquakes, tornadoes, hurricanes etc

4 (cont)

People that live in all high risk areas cannot be protected completely and must live in these areas with that in mind.

For the Meadow Vista area I would adovcate strategically placed shaded fuel breaks that would protect to some extent the areas adjoining them. I would start a vigorous program of education of our homeowners to create a defensible space around their homes. I would not adovcate defensible landscapes practices except in areas where for instance manzanita is so tightly packed that a person cannot walk through. Thinning should then be done without great disturbance to the ground beneath and all stumps should be laped to ground level. Protection of all native tree species should be a top priority with only removal of dead or thinning of tightly packed trees encouraged when creating the shaded fuel breaks or defensible space. Trees have many benefits to our area such as creation of shade, provision for wildlife habitat, they help filter out pollution and create a beautiful area. Trees also filter out neighbors lights at night and you actually see the stars from your own yard if you choose darkness over light.

To conclude, we in Meadow Vista have chosen to live here because of the rural and natural environment. We realize the dangers of wildfire. We also realize that you cannot have it all. We cannot have a high level of safety and retain all the other features that we so greatly enjoy in Meadow Vista.

Sincerely,

Donna Ford
204 Black Oak Ct
Auburn, Ca
95602

*PATRICE TAYLOR*
3223 SUGAR RIDGE ROAD, MEADOW VISTA, CA 95722
(530) 878-7236 e-mail: ecotypes @ foothill.net

July 29, 1999

Russ Henly, Policy Analyst
The Resources Agency
California Department of Forestry and Fire Protection
1920 20th Street
Sacramento, CA 95814

SUBJECT: Comments on the June 3, 1999 Draft Program Timberland Environmental Impact Report for the Meadow Vista Vegetation Management Project

Dear Mr. Henly:

In addition to my still unanswered questions and comments on the "Notice of Preparation of a Draft Program Timberland Environmental Impact Report" dated May 12, 1998, which are now included in the June 3 Draft PTEIR, I would also like the following comments and concerns about the Draft PTEIR dated June 3, 1999, addressed.

If the community of Meadow Vista's "vegetation" is to be the first "guinea pig" for such a streamlined paperwork and reduced-cost management program as presented in the PTEIR, it is of great concern that the public hearings have not been well attended. For this "volunteer" program to be successful, public understanding and awareness is critical. It is troubling to believe that such a lengthy document with still uncompleted items as the Special-Status Plant Species study
1 for MV would be "the" tool for individuals much less the Registered Professional Foresters that are to help implement the plans that will affect the entire community. The July 8, 1999, public hearing on the Draft PTEIR of June 3, 1999, was attended by just 6 "public" (non-agency) people, and even those few have been previously involved in the process. It is indicative that the present document/PTEIR still does not clarify, mitigate or resolve many issues as the "Public" in attendance still has concerns after this Draft PTEIR of June 3, 1999, supposedly addressed their initial comments made on the May 12, 1998 NOP Draft.

Why is any part of the American River Watershed going to be "treated" (ex. fuel load reduction, shaded fuel breaks) under Prop.204 prior to any monitoring or studies of the current Watershed which might identify why the water reaching the Delta is of such high quality? Implementing this Vegetation Management Plan puts the cart before the horse, a practice that will possibly
2 cause irreparable, at least in our life time, damage the present health of the Watershed. Studies (see Science June 11, 1999) in Southern California indicate that past fire suppression practices and current fuel reduction treatments still need to be assessed before wide-spread implementation, and its high cost is incurred. What such studies exist, or need to be done and when will they be conducted, for our Watershed?

Not only is there a need for pre-treatment monitoring, but also post-treatment monitoring and response—not just for any mitigation that takes place, but long-term evaluation for modifications
3 and corrections to the plans in the future. This is not clearly addressed in the PTEIR. For example, the overall affect of the use of herbicides and pesticides for the control of unwanted

"new pests" of the plant and animal varieties is not mitigated. I can not imagine that the gardeners of Meadow Vista will be thrilled that there will be an habitat increase of 420% for Broad-footed Moles (see PTEIR 6-24)—perhaps in those new lawns for fire resistant plantings. Like any new subdivision plopped in or on the edge of grasslands, poisoning and trapping to eliminate the pest will occur. What residues will affect the runoff and soil organisms? What will move in when the mole population is decimated? Nature does not leave voids, so care should be taken to replace a "Wanted" in the place of an "Unwanted" producer or consumer in the chain! Will the specifics be provided to the landowner by the RPF? How about an appendix with post-treatment plans offered by a "team" of wildlife biologists, native plant specialists, landscape designers along with the RPF who are conducting the modifications to the landscape in the first place?

3 (cont.)

Will there be an increase in man/equipment started fires? Maintenance of brush-free areas is usually to weed-eat or mow grasses, and historically, not always at the safest time in a fire season. Just what will that increase mean to local fire districts, homeowners' insurance premiums, etc? Recent control and prescriptive burns that have leapt out of control have the public skeptical of these maintenance methods, too, whether specifically for star thistle control or general fuels reduction.

4

Tree "number" (population/coverage) reduction and its impact on air quality has not been mitigated. Already in the Meadow Vista area, tree communities have been greatly reduced by the Winchester Project. PG&E also plans to do major removal of trees near and under power lines in our community (also in the name of fire prevention) both along roadways and on private property once they obtain approval, projected by the end of July, 1999. Has the PTEIR anticipated and included these impacts in not only its habitat, soil and water retention mitigations, but also in the air quality mitigations? A mature tree can process about 14 pounds of carbon dioxide per year. With 16.68 pounds of CO2 produced per gallon of gasoline burned, the number of car trips from Winchester alone will increase the number of trees needed dramatically. With Placer County's projected population increase, as well as those of Northern California Counties in general, the ozone layer and the pollutants blown over Placer County foothill regions will be ever on the increase.

5

In light of the County General Plan and the Meadow Vista Community Plan as well as the more recent efforts of the Placer Legacy/Open Space Committee, it is difficult to see that there can ever be an implementation of a fuel load reduction project that will not affect irreversibly the rural character--habitats, biodiversity, air and water quality, scenic corridors and viewscapes, etc.--of the Meadow Vista. Urbanization may be the "greatest threat to wildlife habitat", but despite the retirement homes, residences both primary and secondary, and businesses that have been introduce slowly into this "interface" with the mixed oak and pine forest, the wildlife community of deer, fox, coyote, raccoon, skunk, lizards, birds, pink glow worms, etc. to date have seemingly been able to adapt. Vegetation for screening between houses and roadways, open space and even the scenic corridors have provided their shelter, nesting and food sources—all of which will be heavily impacted by the proposed vegetation management project, especially over its shorter time span if it is to be effective as a measure to reduce a catastrophic wildfire. Removal of native plants is swift; to replant in a defensible landscape where the soils and plant relationships have been modified is at best a slow and chancy proposition so more than likely, exotics will be introduced further modifying wildlife habitat. What a way to increase biodiversity in an area!

6

I have a question about the CWHR "trade-off" species lists—just where will a reptile, a Coachwhip (snake) "come from"? It is not listed in Storer and Usinger's Sierra Nevada Natural

7

History, or in The Outdoor World of the Sacramento Region (Sacramento County Office of Education). When asked, local foresters and CDF personnel are not familiar with such a reptile, so part of the PTEIR should be a picture ID chart of CWHR predicted newcomers. Should this list be reviewed for relevance and likelihood in light of a Special-Status Wildlife Species study specifically for Meadow Vista?

7. (cont.)

Because this is a "new" design for a PT plan, I appreciate your efforts to address specifically my, and others' concerns and incorporate the answers to make this an EIR as complete a document as possible prior to any certification.

If you have any further questions for me, please do not hesitate to contact me (see letterhead).

I trust that the e-mail with the attachments did arrive! These "hardcopies" are following the e-ing.

Sincerely,

Patrice Taylor

Patrice Taylor

enclosures

3223 Sugar Ridge Road
Meadow Vista, CA 95722

May 12, 1998

Russ Henly, Policy Analyst
The Resources Agency
Department of Forestry and Fire Protection
1920 20th Street
Sacramento, CA 95814

SUBJECT: Comments on Notice of Preparation of a Draft Program Timberland Environmental Impact Report

RE: PROJECT TITLE: Program Timberland Environmental Impact Report for the Meadow Vista Fuel Reduction Program

Dear Mr. Henly:

As Rich Gresham indicated at the Meadow Vista MAC meeting on May 7, 1998, the time frame for receiving comments on the above noted NOP has been extended to May 15, 1998.

Within the limited time allocated by the MAC chairperson, much information was presented about the proposed Program Timberland EIR. emphasizing that "the PTEIR process will reduce additional paperwork and costs to individual landowners while achieving fire protection goals." For those landowners wishing to sell or barter trees as a "timber product", the PTEIR provisions will provide the basis of the checklist of mitigation measures for the "streamlined" timber harvest plans. With this very abbreviated overview, I would like to comment on the NOP.

Re: PART III, 1.b) What is the mitigation monitoring program? Is it referred to in the PTEIR? What is the process by which "modification of mitigation measures contained in the Meadow Vista Community Plan Final EIR" would be accomplished? Is a public hearing a part of the
8 process? Who oversees any compliance with the stated mitigations and the PTEIR? My concern comes from a personal experience with a neighbor at the time of implementing his fuel reduction Conservation Plan who had fuels removed on neighboring properties without the owners' permissions, as well as doing it in a manner that was contrary to the advise we had all received from CDF.

Re: 3.e) and f) Living near the ridge top of Sugar Pine Mountain, the southern border of the current program area and scheduled for "shaded fuelbreak" treatment, this item on the checklist warrants attention. This proposal could impact roadways as well as structures, as well as vegetation. Our experience within a twenty acre "neighborhood" that has undergone fuel reduction by various plans and means—men + chainsaws, mechanical masticator and front-
9 loaders uprooting brush—has given us a first hand look at the processes, and the results. Disturbed soils have led to lost topsoil and clouding the increased water run-off after non-tree vegetation removal both along road cut banks and on broad slopes. Soils saturated with water and "shut tight" with shrink-swell potential maxed out have allowed French drains to backup and flood ground-level rooms as well as affected well-water quality due to hydrostatic pressures. With only the thin layer of topsoil over granite just down slope from the ridge top's deeper soils,

subterranean water courses find their way down hill in the most curious of routes along and under rocks to fountain and bubble out midway in cut banks. Collapsed and eroded soil on embankments and slopes is not just from the attack of "surface" elements like wind and rain, but from uprooted vegetation. Changes in drainage due to new driveways and culvert placements aside (we lost a large, older pondersoa pine when a neighbor focused a driveway drainage to a single culvert), the mountain side has lost smaller trees, toyon and manzanita bushes due to
9 (cont.) changes in amounts of surface and subterranean water, redirected watercourses, and to more rapid drainage amounts that undermine root holds as well as the destruction of the root networks between bushes when neighboring bushes were removed. "Landslides and mudflows" types of concern increase with every rainstorm as rapid and often high run-offs increase the mountain's intermittent streams, and can easily close culvert crossings, and potentially undermine these and the banks along routes used for "health and safety" passage as well as every day events. Water quality is also of concern. What are the possible mitigations?

Re: 3.i) Sugar Pine Mountain is granodiorite pluton unique to this region of the Sierra Foothills. From the lichen and moss specific to its granitic composition to those outcroppings providing
10 panoramic views, the ridge is based on a unique treasure. "Please do not disturb" is the sign that equipment and operators need to heed, and not scar these beauties that are already fire-safe barriers. (See comments re: Cultural Resources re: possible bedrock mortars on Wooley Creek.)

Re: 4. Water. As noted in the NOP, there are considerable concerns about this element.

See Comments Re: 3.e) and f)
Re: 4.a) An appropriate place for "public awareness" and education is the Shaded Fuelbreak being created along Placer Hills Road near the I-80 interchange. Areas where fuel was removed in June, 1997 (scary in that the debris piles stayed along the roadway most of the summer) had
11 grasses return and have not shown very much erosion and minimal sediment in the run off during this endless El Nino rainy winter. Areas nearer the freeway that were cleared this winter and the brush has been burned this month and last exhibit many more "debris-slides" into the new paved gutters exposing wet channels down the face of these old cut banks.

Re: 4.c) The sediment levels in many streams and creeks leaving the Winchester subdivision currently under construction have risen to the point of "red-orange" alerts. Granted, the timing of these major openings in the soils and the lack of implementing methods to minimize soil
12 erosion have contributed to the degradation of water quality. How will the PTEIR and the checklist THP prevent such lapses--supervise and minimize extensive cuts or excavations? What measures will be put in place to monitor and correct the run-off of pesticides, herbicides and fertilizers that will be used in any maintenance and revegetation measures?

Re: 4.f) and h) Will the change in quantity of ground waters adversely affect local septic systems? Those already in place in low-lying areas are a concern of the Environmental Health
13 Department. When soils are supersaturated from increases in runoff, septic system failures could affect the quality of ground water, and well water. Also, too much ground water recharge can threaten the health of native black oaks, for example.

Re: 4.i) As Maureen Gilmer in California Wildfire Landscaping emphasizes, water to the plants is critical for any fire resistance. Increases in irrigation will affect demand on public water
14 supplies as well as private wells. With the increase in sun exposure as the tree canopies are opened and the loss of cooling transpiration from the removal of all levels of vegetation, soils themselves are now exposed to higher temperatures and will dry out, pulling out ground water. Encouraging the use of mulches, naturally available and applied, and amending soils with

moisture-holding compost should definitely be a "mitigation". Any plans to create a bio-mass collection and/or composting operation at the transfer station for the non-lumber debris that is removed from the plan site? Making the decomposed materials available to local residents would save on transport costs, reduce use of fossil fuels and landfills. And help Air Quality--see below.

14 (cont)

Re: 5. a, b, d) Disturbed soil problems discussed above apply to areas that have experienced burns--controlled or otherwise. In addition, most invasive natives like poison oak and non-native plant populations like annual European grasses and star thistle prefer such conditions of reduced competition, so you open up the landscape to competition from less desirable sorts. What agency can help anticipate and head them off? The poison oak has flourished especially in our fuel reduction/vegetation clearings. I would hate to be exposed to the oils in the smoke when any type fire occurs. Or cut a fire line or horse trail through star thistle! Do the firefighters have any suggestions?

15

Presettlement emissions in Meadow Vista were probably minimal from smoke from campfires, fires started by lightening, or even set by resident Nisenan after they had protected the trunks of ponderosa pines with wet sand at the bases or cleared the tall grasses under the acorn-bearing oaks. Such is not the case today with the network of roads for this bedroom community. The more odiferous automobile emissions are detectable at the MV park when the wind is right or when you are walking along one of the trails along our roads. Residents are still burning on "no burn" days. Removing fuels will prevent the major and widespread occurrence of air pollution that usually accompanies a wildfire. But what will filter and help to purify our local atmosphere daily as it is subjected to our pollutants and those of the Sacramento valley? TIME, May 4, 1998: "60,000 sq. mi. Expanse of forest destroyed around the globe each year." "Think globally, act locally." And trees are not the only plants that filter the air, produce the oxygen we depend on or fix the minerals and soils.

16

Re: 5.c) Removal of vegetation has affected our micro-climate and that of the neighbors. The "cool evening breezes" of summer are not as cool. As the air tumbles down slope to the river from the ridge, it crosses the superheated rock mass now less shaded since the tree-sized manzanita and toyon were removed uphill. The thermal mass heats and cools now in a "shallower" cycle, but our energy usage to cool the house in the summer is increasing markedly. More and more, we have had to use the central air conditioning and not the "open windows" method. More smoke from burning debris would have the same affect on A/C usage, I would guess. Reduced transpiration and moisture loss from fuel reduction measures should be offset with increased irrigation with increased landscape management practices. We have not had success fending off the rabbits, deer, and noisy skunks, so we have not had much luck introducing higher moisture landscaping. So, we just manage the native communities that are adapted to no or low water. Not as fire smart, but watering would kill them and create a greater hazard.

17

Re: 7.a) – c) "Wildland/rural intermix" is the description that the Meadow Vista area has received in the Fuel Reduction Program's The Defensible Space and Healthy Forest Handbook. This handbook also lists and maps MV's multiple vegetation classifications, based upon the California Department of Fish and Game's Wildlife Habitat Relationships System (WHRS). See Handbook pages 103-104. Multiple agencies worked to on this survey. The PTEIR cites valley oak woodlands and riparian communities as those most impacted by the program. Please explain what are the specific mitigations that will protect oaks of all species? And what is being done to reestablish oaks? The initial removal of browse for the resident deer has them eating wildflowers, the new leaves on the resprouting toyon, and young oak trees. If only they would

18

gorge themselves on the prolific poison oak. Will any effort be made to collect seeds from the trees to be removed from the shaded fuelbreaks to provide for species diversity when these nursery and mother trees die and few of their youngest offspring will have survived in the fuel removal process that is altering their habitat? In the February, 1990 snow storm, over 30" of
18 cold, wet, heavy snow fell in less than a day at our 2,000' elevation. Almost an entire generation
(cont.) of middle-aged pondersoa pine trees in the 20 acre area surrounding our house were wiped out when they snapped off half way up. As other area pines have succumbed to bark beetle infestations and mechanical damage, we appreciate the need for "resistant" strains to be protected and perpetuated.

Re: 7.d) So the PTEIR will defer to Section 404 of the Clean Water Act? See comment re 9.e).

Re: 7.e) Along Placer Hills Road, we should start our own version of the Calaveras County Jumping Frog Jubilee--only with squirrels. To leap from treetop to treetop in a Shaded Fuel Break will be no mean feat. I am afraid there will be even more "sail" (read squashed) squirrels along Meadow Vista Road if the border of trees that exists is further thinned and opened (25' of roadway + shoulders + cleared canopy). Worse will be the typical wild gyrations and multiple changes in directions a squirrel can go through just to cross the road. Cars usually win—if deer are not contestants, too. Fuel reduction is removing the wildlife safety zones along the "edges" where open space meets the forest. Meadows will be visited by those insect and seed foraging
19 birds that can find cover quickly from overhead predators in shrubs and trees. Stand-alone trees whose lower 9-19 feet of branches have been removed just do not present the same safe haven. As the Plan is to protect the environment from wildfires, recognize that removal of a plant species from an area will relocate its inhabitants. A beetle that lived in the manzanita now lives in and on our house; the quail have only one corridor up and down our mountain left that provides them the shrub coverage and snacks in the leaf litter. Ants nesting in the dead wood and hollows of trees head for your house and hose water when the water source in the hollow is removed with their "unhealthy" tree. Termites are everywhere so supersaturated soils send them into a house's wood. Out come the pesticides and sprays that will wipe out even the beneficial pollinators your vegetable garden needs, or contaminate your watershed. Addressing the problems in the PTEIR is to help "look before you leap" and avoid creating a more unmanageable set of problems, and have to spend more money than a harvested tree(s) will "earn" for you at a lumber mill to correct the new problem.

Re: 8.a) Who will pay for transport of brush chips to a bio-mass plant? Will more trees be cut/marketed just to cover costs? To help reduce costs and pollution from transport vehicles, could the chips be safely stored and loaded in big batches? What became of the idea to have a chipper "visit" neighborhoods to help reduce transportation off-site? Any sales to nurseries and landscapers as mulch? Investigate those possibilities! Would the CCC aid those with older
20 residences that are not designed to take advantage of the "increase in passive solar potential" from more open defensible space, or at least help insulate their homes to be cooler in the summer? Unfortunately, there will be a potential for water shortages if we all get busy irrigating our new fires safe landscaping. Will the Meadow Vista Water Agency have sufficient summer storage for both the increase in population at Winchester and its golf course and the Plan implementation?

Re: 8.c) I have come to regard topsoil as a mineral resource. Secure what we have. A hundred years of passive decomposition in our climate to create about an inch of soil makes it a valuable
21 resource. The removal of the "future" nutrient sources and their burning seems counterproductive to the health of the forest. Pine branches contain 60% of the tree's nitrogen (see Handbook). How can we best make this available on site from the "slash"?

Re: 9.a) The use of pesticides and herbicides during the initial phase and during the maintenance phase of the Plan has to be addressed. This will be difficult as the affects and accumulations of these chemicals in soils, in the food web and in the watershed are still under study. Chemicals
22 will be used to treat tree stumps to stop resprouting—herbicide use is less labor intensive and erosive than grubbing them out. Foliar applications are even easier though not recommended as overspray can create more dead matter.

Re: 9.c) See comment Re 9.a). With fewer plants along our roadways to filter and process pollutants, will the oil-laden water spray from the roadway then become a greater bio-hazard as it will enter the watershed directly? Any continued chemical treatment or burning for the maintenance of the Plan will also present health hazards--increased number of exposures, cumulative affects, and new exposures to old and new threats. Poison oak lurks in all three forms and its herbicidal controls need to be reapplied over the years. You are exposing yourself
23 to possible contact with its oils while trying to eradicate it as well as to possible inhalation of the toxic chemicals of a spray or skin contact with the solution. Allergens abound. Inviting in the non-native grasses and opening up our "air routes" with less plant material to trap pollens may see an increase in reactions, unless the sources are removed in the process. Residents along the Shaded Fuelbreak routes may be exposed to greater levels of traffic-related pollutants (combustion emissions, noise and light) after the initial phase. See NOP item 13 as "peace of mind" and "sense of security" will be altered.

Re: 11.a) Increase in actual local fire suppression teams may be needed. See CDF logs for late June, 1997. Two wildland fires stemming from two MV residents conducting fuel reduction debris burning—one rekindled from a legal burn and one direct from an illegal burn—required full CDF ground crews and borate bombers to extinguish them. Luckily, the outbreaks were
24 within hours of each other so the crews and heavy equipment where still in the area. The illegal one less than a quarter of a mile downslope from our house sent me packing, and showed how ineffective our roof and downslope sprinklers are against the quantities of smoke. Cringe at the mere thought of flames approaching. And just how terrific it is to have accurate borate bombers and great hardworking ground support when you need them. ☺

25 Re: 11.e) The phones and code enforcers of Air Quality will be busy monitoring the effects of all the burning--both legal and illegal.

26 Re: 12.a) Do the 20'+ brush-free swathes that PGE now maintain either side of their lines count as "Unshaded Fuelbreaks" any where in the Plan?

Re: 12.c) Increased demand from existing water customers to irrigate initial replanting of
27 vegetative screening along roads and maintain all fire-safe landscaping. Even to reestablish native species requires 2-3 years of drip irrigation.

Re: 12.f) See comment Re: 8.a) above

Re: 12.g) See comment Re: 12.c) above for well water use

Re: 13.a,b,c) The NOP PTEIR response says it well. For most of the residents and visitors to our community, the most far-reaching and greatest area of impact of the Plan is probably on
28 "aesthetics". Already noticeable is the glow of the Auburn lights at night, silhouetting the trees on the ridgeline. That may the only redeeming merit of night lights—to silhouette the trees. It does not help star gazing. You would be amazed at the number of yard lights near and far whose

beams penetrate the rural nights. But remove trees and brush, and you may go into a fit of remorse when you see your neighbor's lights as bright as your own. You may even be surprised that the driver of the car in your front yard is there when he came around the corner and was blinded by your neighbor's lights. So much for a sense of security from well-lit places. And it sounded like he was driving into your bedroom with the sound waves now able to travel uninterrupted from the road to your house. I will not dwell on the screening of "yard art" as there are ways to impound added vehicles and measures already in place to screen assorted rural collections over a certain proportion. Good fences build good neighbors, but not after you have to report them to the County to get cooperation. Any landscaping to recreate visual barriers costs money and resources—irrigation systems and water, deer and rabbit deterrents, replacement plants, labor for installation and maintenance including poison oak eradication. While 28 (cont.) participation in the Plan is voluntary, who oversees plan development, implementation, and follow up so that we do not have a subdivision street-view of just homes? The "conditions of approval of the master plan use permit" for the Winchester subdivision states that along roads such Meadow Vista and Sugar Pine, there is to be a buffer of 75' of natural vegetation, with a landscape plan to recreate such a buffer if any vegetation is removed. How will this dovetail with Shaded Fuelbreaks along routes and ridges? Compliance has been an issue in the past with the project and hopefully the PTEIR will not undermine the County and community's directives. What will the rest of Meadow Vista look like? Hopefully we will be able to retain our Bird Sanctuary status for many years to come. But when many have expressed concerns and displeasure at the work along Placer Hills Road, and queried "Are they getting ready to widen the road?," the desired "Welcome to Meadow Vista" falls short of "inviting".

Re: 14.b & c) Increasing the visibility of archaeological resources such as possible Nisenan bedrock mortars along Wooley Creek and the granite outcroppings on Sugar Pine Mountain 29 could cause increased vandalism, if not trespassing. Who could assist in a more thorough survey of the cultural resources? Let us respect and manage ethically sensitive sites and not desecrate them.

Re: 15.b) "Beware the unschooled public gaining access to fire-sensitive areas."—Smokey Bear☺

Thank you for your time and responses to my inquiries about the safety and conservation elements of the NOP PTEIR and the ever-evolving fuel reduction program for our area. Hopefully, we can pattern our stewardship of the environment after the Nisenan who did not "own" trees, but tended them.

Sincerely,

Patrice Taylor

Patrice Taylor

PROGRAM TIMBERLAND ENVIRONEMENTAL IMPACT REPORT
PUBLIC HEARING COMMENTS

Date: 7-8-99
Location: Sierra Hills School, Meadow Vista

Issues:

- Potential abuse of "Plan" such as a landowner that comes in a cuts down trees for profit, then moves elsewhere after sale of resources.
- Need for a graphic presentation for the unsophisticated landowner in order to assist the landowner in making informed decisions.
- Concern that the "Plan" will make it easier and less expensive for the sale of timber on private land.
- Looks like the PTEIR picked up where the "General Plan" left off in regards to listed species and archeological resources as the program's review identifies such resources.
- Need clarification if there is a difference in terms "vegetation management" and "fuel load reduction".
- The program seems serious about fuel load reduction.
- What would the impact be to Meadow Vista if this program were implemented on the largest scale possible? How would it impact habitat and what would the ramification be for wildlife?
- The program does not require the maintenance of fuel load reduction after the initial effort.
- Is the implementation phase structured on a time frame or is it self limiting in some way?
- Chipper program's limited use to roads and driveways and not off road creates a burden for the landowner to move slash and debris to the chipper.
- Need to address the problem of invasive species, such a star thistle, taking over in the absence of vegetation that is removed in fuel load reduction efforts.