3.4 AGRICULTURE AND FORESTRY RESOURCES

This section evaluates the potential effects on agriculture and forestry resources from the proposed program. The existing forestry resource characteristics are described and the relationship between the proposed program and existing plans and policies are addressed. The potential loss of forestry resources is also addressed.

No comments received on the notice of preparation were related to agricultural or forestry resources.

The program area does not contain any agricultural land or any lands classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) (DOC 2017, 2018). There is one portion of the program area in the south shore that is in Non-Renewal for Williamson Act (El Dorado County 2018). Implementation of the proposed program involves forest management treatment activities that would not result in any changes to existing land uses. For these reasons, the proposed program would not convert Farmland to non-agricultural uses and would not conflict with zoning for agricultural use or a Williamson Act contract. These issues are not evaluated further.

The later treatment activities under the Tahoe PTEIR are allowed within all zoning districts in the program area, and the Tahoe PTEIR would not result in the rezoning of any lands. The proposed program involves the treatment of forested lands to reduce forest fuel loads, but these treatments would maintain the landscape as forest and not convert forest lands to a non-forest use. Treatment activities would maintain the current use of the land and would not require rezoning of forest land or timberland to another use. In addition, implementation of treatment activities would not involve development that would conflict with existing zoning for forest land or timberland. Therefore, implementation of the Tahoe PTEIR would not conflict with existing zoning for forest land or timberland. This issue is not evaluated further.

Issues related to wildfire hazards and fuel reduction are discussed in Section 3.2, "Wildfire."

3.4.1 Regulatory Setting

FEDERAL

No federal plans, policies, regulations, or laws related to population, employment, and housing are applicable to the project.

Tahoe Regional Planning Agency

Lake Tahoe Regional Plan

Land use regulation by TRPA is guided by its Regional Plan and implementing ordinances. The Regional Plan is intended to establish a balance, or equilibrium, between the natural environment and the built environment; and attain and maintain TRPA's environmental threshold carrying capacities. The Goals and Policies of the Regional Plan establish an overall framework for development and environmental conservation in the Lake Tahoe region. The goals and policies present the overall approach to meeting TRPA's environmental threshold carrying capacities and establish guiding policy for each resource element.

The Conservation Element of the Tahoe Regional Plan includes the following policies that are applicable to the proposed program (TRPA 2012):

- **Policy VEG-1.1:** Forest management practices shall be allowed when consistent with acceptable strategies for the maintenance and enhancement of forest health and diversity, prevention of wildfire, protection of water quality, and enhancement of wildlife habitats.
- **Policy VEG-1.2:** Opportunities to improve the age structure of the pine and fir plant communities shall be encouraged when consistent with other environmental considerations.
- **Policy VEG-1.3:** Forest pattern shall be manipulated whenever appropriate as guided by the size and distribution of forest openings.

Land Use Classification System

Land in the Lake Tahoe Region is assigned to one of eight classifications: Wilderness, Backcountry, Conservation, Recreation, Resort Recreation, Residential, Mixed-Use, and Tourist. The classifications summarize major land uses that exist in the Region and are further supplemented by the plan area statements (PASs), community plans, master plans, and area plans. Land uses adjacent to the program area include Backcountry, Conservation, Mixed-Use, Recreation, Resort Recreation, Residential, Tourist, and Wilderness.

Backcountry areas are designated and defined by the U.S. Forest Service as part of their Resource Management Plans. On these lands, natural ecological processes are primarily free from human influences but provide opportunities for recreation, including hiking, camping, wildlife viewing, cross-country skiing, and other developed or mechanized activities not allowed in wilderness areas (e.g., mountain biking, snowmobiling). Backcountry areas contribute to ecosystem and species diversity and sustainability, serve as habitat for fauna and flora, and offer wildlife corridors.

Conservation areas are non-urban areas with value as primitive or natural areas, with strong environmental limitations on use, and with a potential for dispersed recreation or low intensity resource management. Conservation areas include: public land already set aside for this purpose; high-hazard lands, SEZs, and other fragile areas without substantial existing improvements; isolated areas that do not contain the necessary infrastructure for development; areas capable of sustaining only passive recreation or non-intensive agriculture; and areas suitable for low-to-moderate resource management.

Mixed-Use areas are urban areas that concentrate higher intensity land uses and have been designated to provide a mix of commercial, public services, light industrial, office, and residential uses to the region or have the potential to provide future commercial, public service, light industrial, office, and residential uses.

Recreation areas are non-urban areas with good potential for developed outdoor recreation, park use, or concentrated recreation. Recreation areas include (1) areas of existing private and public recreation use, (2) designated local, State, and federal recreation areas, (3) areas without overriding environmental constraints on resource management or recreational purposes, and (4) areas with unique recreational resources which may service public needs, such as beaches and ski areas.

Residential areas are urban areas that have a potential to provide housing for the residents of the Region. These lands include: areas now developed for residential purposes; areas of moderate-to-good land capability; areas within urban boundaries and serviced by utilities; and areas of centralized location in close proximity to commercial services and public facilities.

Resort Recreation areas are the Edgewood and Heavenly parcels.

Tourist areas are urban areas that have the potential to provide intensive tourist accommodations and services or intensive recreation. This land use classification also includes areas recognized by the Bi-State Compact as suitable for gaming.

Wilderness areas are defined by the U.S. Congress as part of the National Wilderness Preservation System. These lands offer outstanding opportunities for solitude and primitive, unconfined recreation experiences, and they contain ecological, geological, and other features of scientific, educational, scenic and historic value. These lands are managed to prevent the degradation of wilderness character. Permanent improvements and mechanized uses are prohibited. Wilderness District lands within the program area includes a very small portion of the Desolation Wilderness Area.

Plan Area Statements

Plan Area Statements (PASs) provide a detailed guide for planning within discrete areas of the region. Each PAS is assigned a single land use classification and one of three management strategies: development with mitigation, redirection of development, or maximum regulation. Additionally, PASs provide planning considerations, special policies, maximum densities for residential and tourist accommodation uses, community noise equivalent levels, allowable and special uses, and the amount of additional recreation capacity permissible.

Area Plans

With adoption of the 2012 Regional Plan, local public agencies are encouraged to adopt Area Plans to supersede the older plans for specific geographic areas. Area Plans allow local agencies the opportunity to refine policies and plans for future development within specific geographic areas and identify allowable uses consistent with the Regional Plan. Within the program area, fuels treatment activities are allowable uses within the Meyers Area Plan, Tourist Core Area Plan, Tahoe Valley Area Plan, and most areas within the Placer County Tahoe Basin Area Plan (City of South Lake Tahoe and TRPA 2013, 2015; El Dorado County and TRPA 2018; Placer County and TRPA 2017a). The Placer County Tahoe Basin Area Plan does not allow fuels treatments in only a few areas, the Kings Beach Industrial, 64 Acre Tract, North Tahoe High School, and Tahoe City Golf Course subdistricts. Prescribed fire is generally only allowed by the Placer County Tahoe Basin Area Plan in the undeveloped portions of Placer County, such as within the Blackwood, Burton Creek, Lower Ward Valley, Martis Peak, McKinney Lake, Watson Creek, Lower Truckee, and North Star subdistricts.

The Conservation Element of the Meyers Area Plan includes the following policy applicable to the proposed program (El Dorado County and TRPA 2018):

- **Policy 2.1:** Live mature Sierra juniper trees within the Plan Area which are not a risk to public health and safety shall be preserved.

The Conservation Element of the Placer County Tahoe Basin Area Plan includes the following policy applicable to the proposed program (Placer County and TRPA 2017b):

- **Policy VEG-P-2:** Support forest enhancement projects being completed by land management agencies and fire districts, including selective cutting and controlled burning projects that improve forest health and reduce the risk of catastrophic wildfire.

Code of Ordinances

Chapter 61, "Vegetation and Forest Health," of the TRPA Code of Ordinances (Code) includes regulations for forest management activities and projects, which identify old growth tree protections; management objectives; cutting practices; logging roads, skid trails, and landings; removal methods; restocking; water quality protection, vegetation protection, residual stocking levels, reforestation, slash disposal, fire protection, and other appropriate considerations.

Projects, such as those that could occur under the proposed program, that meet the requirements of Section 61.1.8 for substantial tree removal (activities on projects of 3 acres or more and proposing the removal of more than 100 live trees 14 inches diameter at breast height or larger) must meet minimum stocking standards. The minimum stocking standards are included in Section 61.1.6.H, which states that a stand of timber is adequately stocked or meets minimum acceptable stocking when it has thrifty trees well distributed over the growing area (rocky areas, brush fields, meadows, and bodies of water excepted) in which the residual stocking meets the requirements of the appropriate state or federal forestry agency, and desired species composition is maintained. Substantial tree removal on private parcels requires review and approval by TRPA in accordance with Section 61.1.8.A, which includes preparation of a harvest plan and completion of the appropriate level of environmental review (e.g., initial environmental checklist, environmental assessment, or environmental impact statement). TRPA requirements for substantial tree removal on public parcels are described under Code Section 61.1.8.B and are similar to the requirements for substantial tree removal on private lands but also include coordination with TRPA at the initial planning stages.

STATE

California Public Resources Code

"Forest land" is defined in Public Resources Code (PRC) Section 12220(g) as:

- land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

"Timberland" is defined in PRC Section 4526 as:

- land, other than land owned by the federal government and land designated by the State Board of Forestry and Fire Protection (Board) as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees.

"Timberland Production Zone" is defined in Government Code Section 51104(g) as:

- an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). With respect to the general plans of cities and counties, "timberland preserve zone" means "timberland production zone."

Z'Berg-Nejedly Forest Practice Act of 1973

The Z'Berg-Nejedly Forest Practice Act of 1973 (FPA; California Public Resources Code Section 4511-4517) established the Board, whose mandate is to protect and enhance the state's unique forest and wildland resources. This mandate is carried out through enforcement of the California Forest Practice Rules (FPR; Title 14, CCR, Chapters 4, 4.5 and 10). The California Department of Forestry and Fire Protection enforces the laws that regulate logging on non-federal lands in California. Additional rules enacted by the Board are also enforced to protect forest and wildland resources.

The Forest Practice Act (FPA) is intended to achieve "maximum sustained production of high-quality timber products…while giving consideration to values relating to recreation, watershed, wildlife, range and forage, fisheries, regional economic vitality, employment and aesthetic enjoyment" (PRC Section 4513[b]). The regulations created by the FPA define factors such as the: size and location of harvest areas, include measures to prevent unreasonable damage to residual trees, and address the protection of riparian areas, water courses and lakes, wildlife, and habitat areas.

California Timberland Productivity Act of 1982

The California Timberland Productivity Act of 1982 (California Government Code - Section 51100-51104) identifies the benefits of the State's timberlands and acknowledges the threat of timberland loss via land use conversions. The law identifies policies intended to preserve timberland, including maintaining an optimum amount of timberland, discouraging premature conversion, discouraging expansion of urban land uses into timberlands, and encouraging investments in timberland. The law establishes Timberland Production Zones (TPZ) on all qualifying timberland, which is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses. The law also provides that timber operations conducted in a manner consistent with FPR shall not be or become restricted or prohibited because of any land use in or around the locality of those operations.

Timberland Productivity Act (TPA) represents the Legislature's declared intent "to fully realize the productive potential of the forest resources and timberlands of the state." The TPA imposes mandatory restrictions on parcels zoned as timberland production. Such parcels "shall be zoned so as to restrict their use to growing and harvesting timber and to compatible uses." (Gov. Code, Section 51115.) In exchange, property owners are required to pay property taxes on the land based solely on its value for timber harvest, and not for its development potential. Government Code Section 51104(g) defines "timberland production zone" as an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses. Compatible uses are defined under Government Code Section 51104(h) and include management for watershed; management for habitat or hunting and fishing; access roads and staging areas for timber harvesting; gas, electric, water, or communication transmission facilities; grazing; or a residence or other structure necessary for timber management.

California Forest Practice Rules

The California Forest Practice Rules (CFPRs) define the timber harvest activities that are regulated under Title 14, California Code of Regulations (CCR), Chapters 4, 4.5, and 10, and under the FPA, Division 4, Chapter 8, PRC. CAL FIRE is the enforcing agency responsible for ensuring that logging and other forest harvesting activities are conducted in a manner that preserves and protects fish, wildlife, forests, and streams. The purpose of the CFPRs is to implement the provisions of the FPA in a manner consistent with other laws, including but not limited to, the Timberland Productivity Act of 1982, the California Environmental Quality Act (CEQA) of 1970, the Porter Cologne Water Quality Act, and the California Endangered Species Act. The provisions of the CFPRs shall be followed by Registered Professional Foresters

(RPFs) in preparing Timber Harvest Plans (THPs), and by the Director in reviewing such plans to achieve the policies described in PRC Sections 4512, 4513, 21000, 21001, and 21002, and Government Code Sections 51101, 51102 and 51115.1. A THP or Program THP (PTHP) would be prepared for a later treatment activity that meets the definition of timber operations for commercial purposes in PRC Section 4527(a) (i.e., projects that involve the sale, barter, exchange, or trade of forest materials). Section 2.8.1, "Timber Operations for Commercial Purposes," further discusses the later treatment activity review process under the Tahoe PTEIR, including the requirements for THPs and potential exemptions from the FPA and CFPRs and where CEQA categorical and statutory exemptions from CEQA could apply.

It is the Board's intent that no THP shall be approved that fails to adopt feasible mitigation measures or alternatives from the range of measures set out or provided for in the CFPRs, which would substantially lessen or avoid significant adverse impacts which the activity may have on the environment. As described in 14 CCR 896(a), the THP process substitutes for the EIR process under CEQA because the timber harvesting regulatory program has been certified pursuant to PRC Section 21080.5. In recognition of that certification and PRC Section 4582.75, the CFPRs are intended to provide the exclusive criteria for reviewing THPs. If the Director believes that there are significant adverse environmental impacts not covered in the CFPRs, matters should be referred to the Board as otherwise specified in the CFPRs.

One of the goals of the FPA is achieving maximum sustained production (MSP) of high-quality timber products. Per 14 CCR 953.11(c), for timber harvest documents, MSP is achieved by complying with the stocking requirements of the individual treatment or prescription. In this instance, the Tahoe PTEIR silvicultural prescription is considered a special prescription by the CFPRs (14 CCR 953.4[c]) because it meets the definition of a fuelbreak prescription and is not required to demonstrate MSP (14 CCR 953[d]). However, all later treatment activities are required to meet the minimum stocking standards as required by 14 CCR 953.4(c) and set forth in 14 CCR 952.7, "Resource Conservation Standards for Minimum Stocking," immediately following timber operations. The Resource Conservation Standards establish minimum acceptable stocking levels after timber operations have been completed, based on Site Class. The growth rate of trees is largely determined by what is referred to as "site," or the measure of productivity based on how trees respond to the soil and climate of the immediate area. Site classification correlates to this production, with Site Class I being of highest production, and Site Class V being lowest.

The Resource Conservation Standards are designed to ensure that a cover of trees of commercial species, sufficient to adequately utilize the available growing space, is maintained or established after timber operations. The area of timber operations must meet one of two conditions after the completion of operations. Under the first alternative, the area must contain an average point count of at least 300 trees per acre on Site Class I, II, and III lands, or at least 150 trees per acre on Site IV and V lands. In this point count, a tree counts for one to six points, depending on diameter, with larger trees worth more points. Under the second alternative, a minimum average basal area of 85 square feet per acre (sq. ft./ac.) on Site I and 50 sq. ft./ac. on Sites II and lower is required. Basal area refers to the cross-sectional area of a tree at breast height, and is a common method used to quantify stand density.

LOCAL

El Dorado County General Plan

The Agriculture and Forestry Element of the El Dorado County General Plan contains goals that support the conservation of forest land and sustainable and efficient forest production (Goals 8.3 and 8.4; El Dorado County 2019). The following policies in the El Dorado County General Plan are applicable to the proposed program:

- Policy 7.4.4.1: The Natural Resource land use designation shall be used to protect important forest resources from uses incompatible with timber harvesting.
- Policy 8.3.1.1: Lands suitable for timber production which are designated Natural Resource (NR) on the General Plan land use map and zoned Timber Production Zone (TPZ) or Forest Resource (FR) are to be maintained for the purposes of protecting and encouraging the production of timber and associated activities.
- Policy 8.3.3.1: Forest lands are reserved for multiple use purposes directly related to timber production, mineral resource extraction, wildlife, grazing, and recreation.

- **Policy 8.3.3.2:** The Natural Resource land use designation shall be applied for the purposes of conserving and protecting important forest lands and maintaining viable forest based communities. In determining whether particular lands constitute important forest lands, the Board of Supervisors shall consider the advice of the Agricultural Commission.

Placer County General Plan

The Agricultural and Forestry Resources section of the Placer County General Plan includes a goal that supports conservation of the county's forest resources (Goal 7.E; Placer County 2013). The following policies that are applicable to the proposed program:

- **Policy 7.E.1:** The County shall encourage the sustained productive use of forest land as a means of providing open space and conserving other natural resources.
- **Policy 7.E.3:** The County shall work closely and coordinate with agencies involved in the regulation of timber harvest operations to ensure that County conservation goals are achieved.
- **Policy 7.E.4:** The County shall encourage qualified landowners to enroll in the Timberland Production Zone (TPZ) program.
- **Policy 7.E.5:** The County shall review all proposed timber harvest plans (THPs) and shall request that the California Department of Forestry and Fire Protection (CDF) amend THPs to address public safety concerns, such as requiring alternate haul routes if use of proposed haul routes would jeopardize public health and safety or result in damage to public or private roads.
- **Policy 7.E.6:** The County shall encourage and promote the productive use of wood waste generated in the County.

South Lake Tahoe City Code

Chapter 6.50 of the South Lake Tahoe City Code includes a tree preservation ordinance, which controls tree removal and limits the unnecessary destruction of existing trees on private and public property.

3.4.2 Environmental Setting

LAND USES

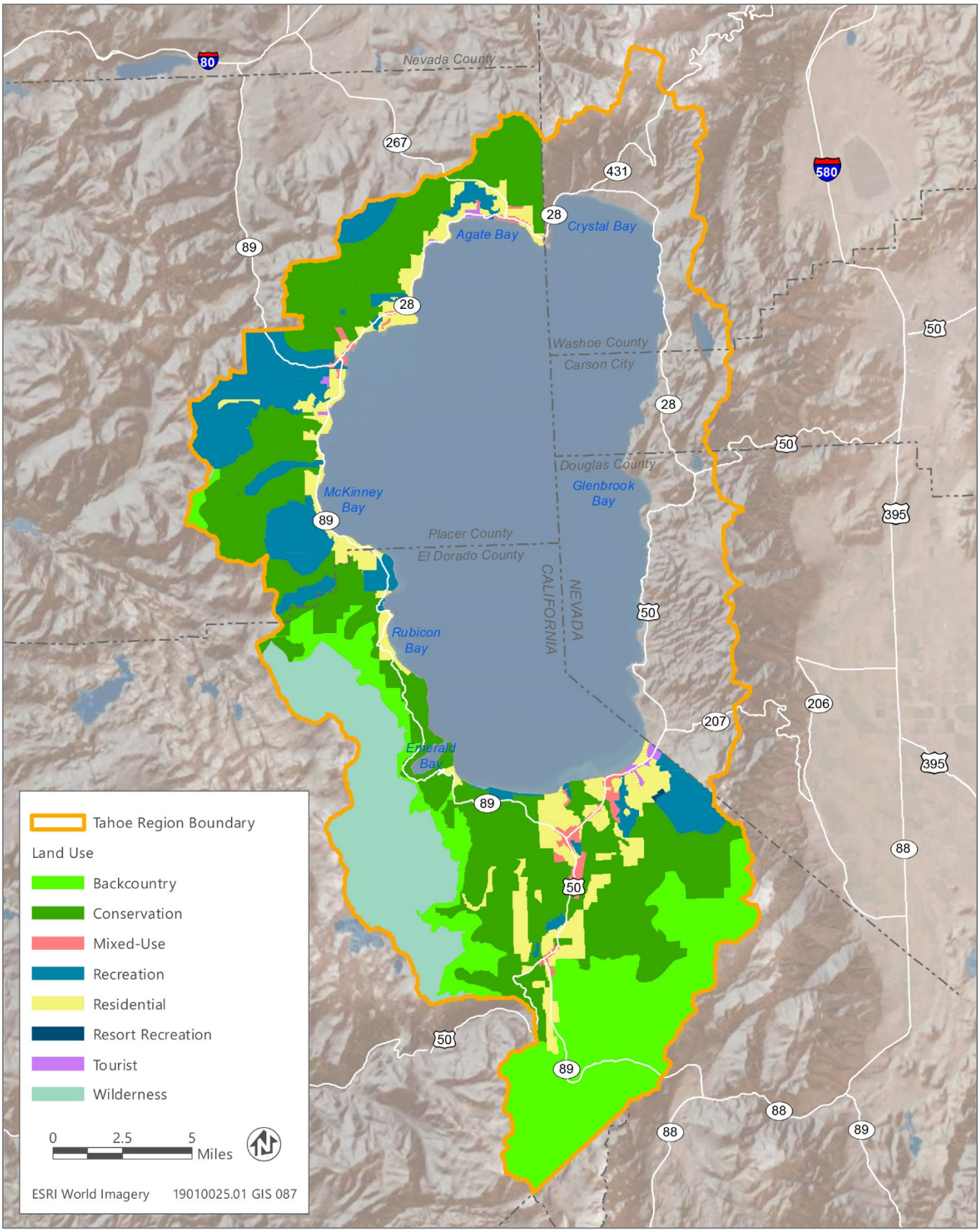
As described above, land in the Tahoe region is assigned to one of eight classifications: Backcountry, Conservation, Mixed-Use, Recreation, Residential, Resort Recreation, Tourist, and Wilderness. The amounts of these uses within the Planned CWPP Projects area and the Community Fuel Reduction Areas are shown in Table 3.4-1. The majority of the land in Community Fuel Reduction Areas is classified as residential, and conservation and recreation lands comprise the majority of the lands in the Planned CWPP Project areas.

Table 3.4-1 Land Uses in the Program Area

Land Use Classification	Planned CWPP Projects (acres)	Community Fuel Reduction Areas (acres)	Total[1] (acres)
Backcountry	54	0	54
Conservation	7,243	72	7,315
Mixed-Use	104	755	859
Recreation	4,130	50	4,180
Residential	103	4,740	4,843
Resort Recreation	0	45	45
Tourist	2	181	183
Wilderness	4	0	4
Total[1]	11,640	5,843	17,483

[1] The land use data excludes a small portion of the program area due to mapping discrepancies along the shoreline, resulting in the total acres shown here being less than the actual size of the program area.

Source: Compiled by Ascent Environmental in 2019



Source: Data received from TRPA in 2018

Figure 3.4-1 Land Use Designations in and near the Program Area

Forest Characteristics in the Program Area

A description of vegetation types in the program area are provided in Section 3.6, "Biological Resources."

The Landscape Resilience Assessment for Lake Tahoe West provides details on forest characteristics for a portion of the program area and provides information on typical forest characteristics in the vicinity of the program area. It evaluates the current condition of the natural environment of the west side of the Lake Tahoe Basin and the resilience of those environmental characteristics, values and ecosystem services to a variety of disturbances (Gross et al. 2017). The existing conditions of the general forest in the Lake Tahoe West planning area are described in the Landscape Resilience Assessment in comparison to historic and/or contemporary reference conditions to determine which portions of the landscape and which landscape values and services are the least resilient to disturbances. The planning area for Lake Tahoe West includes approximately 59,000 acres of federal, state, local, and private lands, from Emerald Bay to Squaw Valley, and includes a portion of the Tahoe PTEIR program area on the west shore of Lake Tahoe. The program area is located within the Wildland-Urban Interface (WUI), which contains general forest but also contains more development and urban areas than in the Lake Tahoe West planning area.

In the Lake Tahoe West planning area, 24 percent of the forested landscape has a resilient forest density, meaning these areas have the number of trees per acre that are consistent with historic and/or contemporary reference conditions. Forty-nine percent of the planning area is considered less resilient and 27 percent of the landscape is considered least resilient, indicating greater numbers of trees per acre than historic or contemporary reference conditions. Resilient areas are located at higher elevations and in the wilderness, while least resilient areas are typically located in canyons and are intermixed with less resilient areas (Gross et al. 2017). Because the Tahoe PTEIR program area includes more developed and urban areas and at lower elevations than in the Lake Tahoe West planning area, the number of trees per acre and proportion of resilient, less resilient, and least resilient areas may be somewhat different.

Across all vegetation types in the Lake Tahoe West landscape, early development stands are located primarily in higher elevations, while late development stands are scattered throughout the landscape. Mid-development stands are over-represented while late seral stands tend to be under-represented In the Lake Tahoe West planning area, mid-seral forests are overrepresented in the vast majority (87 percent) of the west shore and late seral stages (i.e., old growth) are underrepresented, while 10 percent of the landscape is characterized as resilient (i.e., seral stages are appropriately represented) (Gross et al. 2017).

In the vicinity of the program area, there is a lack of forest stage diversity and high tree densities that, among other factors, decrease the resilience of the forest to many disturbance types (e.g., fire, drought, insect, and disease) and may impact the quality and quantity of wildlife habitat.

3.4.3 Environmental Impacts and Mitigation Measures

METHODOLOGY

The analysis of environmental impacts on forestry resources focuses on the potential for conversion of forest land to non-forest uses, and potential conflicts with policies or regulations intended to protect forest land. Significance determinations account for the influence of relevant SPRs, CFPRs, and TRPA regulations, which are incorporated into treatment design.

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the State CEQA Guidelines, an impact on agricultural and forestry resources is considered significant if implementation of later projects under the Tahoe PTEIR would:

- result in the loss of forest land or conversion of forest land to non-forest use; or
- involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use.

IMPACTS AND MITIGATION MEASURES

Impact 3.4-1: Potential to Result in the Loss of Forest Land or Conversion of Forest Land to a Non-Forest Use

The forest management and fuel reduction activities of the proposed program would retain sufficient vegetation within treatment areas. Although, treatment activities would alter forest land through vegetation removal, the area would generally support more than 10 percent of native tree cover thereby maintaining consistency with the definition of forest land as defined by PRC Section 12220(g). Additionally, later treatment activities would be required to obtain tree removal permits from TRPA and comply with the minimum average residual basal area requirements of PRC Section 952.7(b) to maintain postharvest conifer stocking levels and achieve maximum sustained production. Treatment activities under the proposed program would not result in the loss of forest land or conversion of forest land to a non-forest use. This impact would be **less than significant**.

As described under the heading "Land Uses," above, the program area predominately includes general forest area, recreation lands, and residential areas. The proposed program would implement a long-term, vegetation management program for the primary purpose of reducing the risk of wildfire through mechanical thinning, manual thinning, and prescribed understory burning. Treatment activities would consist of strategic removal of vegetation to prevent or slow the spread of wildfire between structures and wildlands and vice versa, which would protect forested areas in the program area by reducing the risk of catastrophic wildfire that could drastically alter the vegetation of the forest. Additionally, the fuel treatment activities under the proposed program would meet the program objectives related to increasing Lake Tahoe Basin forest resilience to effects of climate change, including prolonged drought, pest and disease outbreaks, and increased tree mortality. The fuel treatment activities would also implement all-lands fuel reduction, forest health improvement, and restoration projects that deliver multiple community and ecosystem service benefits.

In addition to shaded fuel break/defensible space, sanitation-salvage, and restoration prescriptions, the proposed program would utilize single-tree, group selection, and tree thinning prescriptions that would hasten the growth of residual trees; reduce inter-tree competition for water, sunlight, and soil nutrients; support stand health and vigor; and support site conditions required for natural regeneration of the stand. As described in Section 2.3.1, "Silvicultural Prescriptions," the prescriptions for later treatment activities would achieve and maintain residual basal areas of 70 to 120 sq. ft./ac., with some treatments potentially resulting in minimum residual basal area of 50 sq. ft./ac., where warranted by site conditions. Prior to implementation of each later treatment activity, a forester would determine the site condition(s) within the treatment site and develop a silvicultural prescription tailored to the project objectives and conditions at the treatment site. As part of the prescription, the forester would ensure that the prescription complies with the Resource Conservation Standards of PRC Section 952.7(b) for meeting minimum average basal area requirements of 85 sq. ft./ac. on Site I lands and 50 square feet on lands of Site II classification and lower immediately following timber operations. Thus, the proposed program would maintain postharvest conifer stocking levels that were specifically developed to maintain maximum sustained production for fuel reduction projects.

Although later treatment activities would alter forest land through vegetation removal, the area would generally support more than 10 percent of native tree cover throughout the program area thereby maintaining consistency with the definition of forest land as defined by PRC Section 12220(g). Additionally, as applicable, later treatment activities would obtain the necessary tree removal permits from TRPA. For the reasons described herein, implementation of the proposed program would not directly result in the loss of forest land or convert forest land to a non-forest use or involve other changes in the existing environment that would conflict with regulations that protect forest land or could result in conversion of forest land to non-forest use. This impact would be **less than significant**.

Mitigation Measures

No mitigation is required for this impact.

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