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Filer:	Caitlin Barns
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3.8 Forestry Resources

This section identifies and evaluates issues related to Forestry Resources in the context of the Project and alternatives. It includes information about the physical and regulatory setting and identifies the criteria used to evaluate the significance of potential impacts, the methods used in evaluating these impacts, and the results of the impact assessment. Information about Agricultural Resources is presented in Section 3.1.3, *Environmental Topics Removed from Consideration*.

In response to its notice of intention to prepare this Draft EIR, the County received scoping input noting that the site is subject to herbicide use and thinning under existing (baseline) conditions. Scoping comments also expressed concern that the development of a wind project on the proposed site would result in: (1) tree removal on a much greater scale than if commercial timber harvesting were to continue, and (2) conversion to non-timber-producing use, where the forest conversion could lead to loss of nutrient-rich topsoils, disrupted nutrient cycling, and increased erosion. These issues are addressed in Section 3.8.3, *Direct and Indirect Effects*. All scoping input received, including regarding Forestry Resources, is provided in Section 4.1 of the Scoping Report, a copy of which is provided in **Appendix J**, *Scoping Report*.

3.8.1 Setting

3.8.1.1 Study Area

The study area for the purposes of this analysis of potential impacts to Forestry Resources includes all lands within the Project Site, as defined in Chapter 2, that may be subject to temporary and permanent disturbance.

3.8.1.2 Environmental Setting

The Shasta County General Plan designates the Project Site as Timber (T); the zoning designations are Timber Production (TP) (approximately 4,457 acres) and Unclassified (U) (approximately 6 acres). Existing land uses within the Project Site consist exclusively of managed forest lands. Unpaved logging roads and transmission lines cross the Project Site. Little Cow Creek and the south fork of Montgomery Creek cross the Project Site from east to west. The Lassen National Forest lies to the southeast, and the Shasta-Trinity National Forest is to the north. Other surrounding lands are privately owned; many are used for timber harvesting purposes. Additional information on Project Site-specific ecology and vegetation composition can be found in Section 3.4 *Biological Resources*.

3.8.1.3 Regulatory Setting

Federal

No federal regulations govern Forestry Resources in the study area.

State

The Z’Berg-Nejedly Forest Practice Act of 1973 (Pub. Res. Code §§4511–4360.2) and its implementing regulations, the Forest Practice Rules (14 Cal. Code Regs. §895 et seq.), govern the management of privately owned forestlands in California. Section 4526 of the Z’Berg-Nejedly Forest Practice Act defines “timberland” as “land, other than land owned by the federal government and land designated by the 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. Commercial species shall be determined by the board on a district basis.” Under the Forest Practice Rules, landowners who wish to harvest and then sell their trees must submit and comply with an approved state-issued timber harvesting permit. The most common permit for the harvest and eventual sale of trees is a Timber Harvesting Plan (THP), which describes the scope, yield, harvesting methods, and mitigation measures that a timber harvester intends to perform within a specified geographical area over a period of five years (Taylor, 2018).

Local

Shasta County General Plan

The Timberlands Element of the Shasta County General Plan contains the following objectives pertaining to forest resource management (Shasta County, 2004):

T-1: Preservation of timberlands suitable for forest management and production to allow for the continuation of such uses or to provide opportunities for the future establishment of such uses.

T-2: Protection of timberlands from incompatible adjacent land uses which adversely impact forest management activities.

Shasta County Zoning Ordinance

Chapter 17.08, Timber Production District, in the Shasta County Zoning Ordinance (Shasta County, 2020) lists the uses permitted in the TP district if a use permit is issued, including “the erection, construction or alteration of a gas, electrical, water or communication facility, or other public improvements, in accordance with Government Code §51152.”

3.8.2 Significance Criteria

CEQA Guidelines Appendix G Section II identifies considerations relating to Agriculture and Forestry Resources. See Section 3.1.4, *Environmental Considerations Unaffected by the Project or Not Present in the Project Area*, as it relates to the County’s analysis of the potential impacts of this Project to the considerations suggested in CEQA Guidelines Appendix G Section II. Otherwise, for purposes of this analysis, a project would result in a significant impact to Forestry Resources, including timberland, if it would:

- a) Result in the loss of forest land or conversion of forest land to non-forest use.

In determining whether the Project would result in a significant environmental impact to Forestry Resources, Shasta County has considered information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land.

3.8.3 Direct and Indirect Effects

3.8.3.1 Methodology

The evaluation of potential impacts of the Project on Forestry Resources was based on a review of field conditions, aerial photographs, and policy guidance from the Shasta County General Plan and the Shasta County Zoning Code. For purposes of this analysis, permanent disturbance (and impacts) would occur in those areas that would remain cleared and in use throughout Project operations, regardless of whether they are returned to original use after decommissioning. Temporary disturbance would occur during construction in areas that would be restored to their pre-disturbance condition following construction and would remain undisturbed throughout the operation and maintenance phase of the Project. Temporary disturbance could occur again during decommissioning in advance of site restoration. In this analysis, "conversion" of timberland equates to permanent disturbance. While Project-related timber conversion would be considered permanent, the Project Site is expected to be returned to timberland use following the conclusion of the Use Permit term.

The impacts of timber removal, whether temporary or permanent, are analyzed on a resource-by-resource basis throughout this EIR as an aspect of the site preparation and construction phase. Existing commercial and pre-commercial timber would be harvested, treated, and/or removed from the Project Site to allow development of the Project during this first phase of Project implementation. Areas that would be removed from timber production as a result of the Project would be harvested in accordance with TCP and THP authorization from CAL FIRE. The THP would be drafted in accordance with requirements set forth in the Forest Practice Act (Pub. Res. Code §4582) and the Forest Practice Rules (CAL FIRE, 2019), would be prepared by a Registered Professional Forester, and would be carried out by licensed timber operators. The THP would specify the location of timber to be harvested, how it would be harvested, and environmental Best Management Practices (BMPs) that would be implemented during harvesting. The Applicant would provide the County with written documentation of CAL FIRE's approval of the THP prior to the commencement of onsite activities.

3.8.3.2 Direct and Indirect Effects of the Project

a) Whether the Project would result in the loss of forest land or conversion of forest land to non-forest use.

Impact 3.8-1: The Project could result in the loss of forest land or conversion of forest land to non-forest use. (*Less-than-Significant Impact*)

Although BMPs would be implemented as part of the Project, Project implementation nonetheless would result in the temporary disturbance of up to 1,384 acres of timberland during construction and the permanent conversion of up to 713 acres of timberland as reported in Table 2-1, *Project*

Components and Disturbance Areas. Existing commercial and pre-commercial timber would be harvested, treated, and/or removed from the Project Site to allow development of the Project. Areas that would be removed from timber production as a result of the Project would be harvested in accordance with a Timberland Conversion Permit (TCP) and THP authorization from the California Department of Forestry and Fire Protection (CAL FIRE).

Trees would be replanted within temporary disturbance areas following the completion of construction. Further, as described in Section 2.4.7, *Decommissioning and Site Restoration*, the Applicant proposes to recontour and revegetate the Project Site upon completion of the Project's operational life to be as similar to preconstruction conditions as possible, including, in coordination with the land owner, replanting disturbed areas with trees or other vegetative cover consistent with the landowner's current and future land use practices.

Of the 2,428,000 total acres that comprise Shasta County (Shasta County, 2004), 59 percent or 1,454,6800 acres are dedicated to commercial forest uses (Shasta County Planning Division, 2020). Removal of up to 713 acres of forest lands would result in a reduction of less than 0.05 percent of the commercial forest lands in Shasta County. Additionally, the timber harvest within the Project Site would overlap five active or completed THPs, which could result in fewer acres of conversion by the Project than projected for purposes of this analysis (ConnectGen, 2019). Given the Project's minimal contribution to net forest loss during and after construction of the Project, the impact would be less than significant. No mitigation is required.

Mitigation: None required.

3.8.3.3 PG&E Interconnection Infrastructure

Construction of the substation, switching station, and interconnection facilities would temporarily disturb up to approximately 19 acres of the Project Site; the permanent area of disturbance would be approximately 5 acres for the collector substation and 8 acres for the switching station. This acreage is accounted for in the Project Site acreage. Construction, operation, management, and site decommissioning and restoration associated with the PG&E interconnection infrastructure would result in a less than significant impact relating to the loss of forest land or conversion of forest land to non-forest use.

3.8.3.4 Direct and Indirect Effects of Alternatives

Alternative 1: South of SR 299

Under Alternative 1, the South of SR 299 Alternative, the approximately 4,086 acres located south of SR 299, would be utilized for the Project, while approximately 378 acres of the Project Site located north of SR 299 would continue to be managed for timber production. Alternative 1 would result in similar, but slightly reduced, direct and indirect impacts as the Project. Due to the elimination of 378 acres of the Project Site from development, Alternative 1 would reduce temporary impacts to commercial forest lands by 9 percent, from 1,384 acres to 1,259 acres.

Permanent impacts would be reduced by 8 percent, from 713 acres to 652.5 acres. Therefore, although the impacts of Alternative 1 would be slightly reduced relative to the Project, the impact conclusion would remain the same: less than significant.

Alternative 2: Increased Setbacks

Under Alternative 2, proposed setbacks would be increased relative to the Project to preclude turbine construction within three times the height of the turbine (i.e., within 2,037 feet) of a residential property line and within 1.5 times the height of the turbine (i.e., within 1,018.5 feet) of State Route 299, any other publicly maintained public highway or street, and of Supan Road or Terry Mill Road. The remaining turbines, infrastructure and other improvements would be the same as proposed for the Project. Due to the increase in setbacks, Alternative 2 would reduce temporary impacts to commercial forest lands by 9 percent, from 1,384 acres to 1,282 acres. Permanent impacts would be reduced by 8 percent, from 713 acres to 664 acres. Therefore, Alternative 2, would result in a slightly reduced impact to Forestry Resources compared to the Project, but the impact conclusion would remain the same: less than significant.

No Project Alternative

If the No Project Alternative is implemented, the Project Site would not be cleared, Project infrastructure would not be constructed and the Project Site would continue to be operated as managed forest timberlands. Harvesting practices and the associated noise, dust, erosion, and traffic that can occur as a result of forest management would continue to occur. Because there would be no change relative to baseline conditions, the No Project Alternative would create no impact related to Forestry Resources.

3.8.4 Cumulative Analysis

The geographic scope considered for the evaluation of cumulative impacts on Forestry Resources is Shasta County. Construction, operation and decommissioning activities are the only phases of the Project expected to impact Forestry Resources. As described in General Plan Section 6.2.2, “[o]ne of Shasta County’s most valuable resources is its timberland.” Of the County’s 2,428,000 total acres (Shasta County, 2004), 59 percent or 1,454,680 acres are dedicated to commercial forest uses (Shasta County Planning Commission, 2020). From a land use planning perspective, the County’s timberland supply is negatively affected by the conversion of timberland to other land uses that are incompatible with timber operations and management, such as rural residential uses and parcelization into lot sizes that are inefficient for economic timber production (Shasta County, 2004).

The Project would temporarily impact up to 1,384 acres of commercial forest land, harvesting the trees to allow for construction activities. Permanent impacts due to tree removal would be minimal and further reduced due to the proposed plan to replant trees after construction and restore the site as part of decommissioning in coordination with the landowner and in accordance with requirements of the Z’Berg-Nejedly Forest Practice Act, the Forest Practice Rules, and CAL

FIRE's requirements for timber harvesting. Additionally, timber harvesting that would occur within the Project Site for purposes of site preparation and construction would overlap five active or completed THPs, which could result in fewer acres of conversion by the Project than projected for purposes of this analysis (ConnectGen, 2019). The Project would have a relatively small permanent footprint, permanently converting less than 0.06 percent of commercial forest lands or less than 0.03 percent of total timberland Countywide. The Project would not significantly encroach upon forested areas or interfere with the long-term management of resources surrounding the Project Site for the growing and harvesting of timber. The Project would not involve any actions that would directly affect the forestry industry.

Shasta County Code Section 17.08.030(D) allows the construction of "gas, electrical, water, or communication transmission facility, or other public improvements, in accordance with Government Code Section 51152" with the approval of a Use Permit. In accordance with County Code Section 17.64.040, a wind energy system is allowed with approval of a use permit in the Unclassified (U) zoning district as long as it is not otherwise prohibited by law and not inconsistent with the General Plan. The site would be restored during decommissioning and, while Project-related timber conversion would be considered permanent as defined above, the Project Site is expected to be returned to timberland use following the conclusion of the Use Permit term.

Despite past and ongoing conversion of land within Shasta County to uses that are incompatible with timber operations and management, the Project would not significantly contribute to the condition of Forestry Resources. The less-than-significant impact of the Project, considered together with the incremental impacts of other development detailed in Section 3.1.3.1, *Cumulative Scenario*, would not result in a significant impact to Forestry Resources. For example, while development projects potentially including the eleven lot subdivision identified as project #3 in Table 3.1-4, *Potentially Cumulative County Projects*, could result in permanent impacts on Forestry Resources within Shasta County, other projects identified in Table 3.1-4 and Table 3.1-5, *Other Potentially Cumulative Projects within Shasta County*, are sited on land that currently is used for residential, commercial, or other developed purposes and so would not cause or contribute to any significant cumulative effect on Forestry Resources. See, e.g., the amendment to an existing use permit (project #1, Table 3.1-4), and Dignity Health North State Pavilion Project (project #1, Table 3.1-5). Even if the cumulative impacts of all potential projects in the County were significant, the Project's contribution would not be cumulatively considerable due to its *de minimis* contribution to conversion (i.e., permanently converting less than 0.06 percent of commercial forest lands and less than 0.03 percent of total Shasta County timberland).

3.8.5 References

- California Department of Forestry and Fire Protection (CAL FIRE), 2019. California Forest Practice Rules 2019. Available online at: http://calfire.ca.gov/resource_mgt/downloads/2019%20Forest%20Practice%20Rules%20and%20Act_FINAL.pdf. February 2019.
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- Shasta County, 2020. Title 17 – Zoning. Chapter 17.08 of the Shasta County Code of Ordinances, as amended through October 1, 2019. Available online at: https://library.municode.com/ca/shasta_county/codes/code_of_ordinances?nodeId=CD_ORD_TIT17ZO. Accessed March 17, 2020.
- Shasta County Planning Commission, 2020. GIS query of Mapping Specialist, Kirk Kirby, for TP Zoning. April 10, 2020.
- Taylor, M. 2018. Report of the Legislative Analyst’s Office: Improving California’s Forest and Watershed Management. Available online at: <https://lao.ca.gov/reports/2018/3798/forest-watershed-management-040418.pdf>. April 2018.

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