

# CHAPTER 3

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## Revisions to the Draft EIR

### 3.1 Introduction

This section summarizes text changes made to the Draft EIR initiated by County staff.

### 3.2 Text Changes to the Draft EIR

New text is indicated in underline and text to be deleted is reflected by a ~~strike through~~. Text revisions provide clarification, amplification, and corrections that have been identified since publication of the Draft EIR. The text changes do not result in a change in the analysis or conclusions of the EIR.

#### Executive Summary

Page ES-2, last bullet point is revised as follows:

- The project would provide up to three traditional, communal campfire pits interspersed around the project site. The project would provide heating within the guest tents on an as-needed basis through the use of EPA-certified wood heating stoves.

Page ES-3, fifth bullet point is revised as follows:

- Electricity and Lighting: Electric power for the camp would be provided by ~~a local utility company~~ PG&E, but most electricity demand would be met using low voltage solar systems. Lighting for the lobby tent, common areas, and guest tents would be low voltage solar lighting. All light fixtures and the use thereof would be International Dark Sky Association (IDA) compliant, while still providing safety and guidance for guests. To provide electric power to the site during power outages, a 70 kW propane-powered standby generator would be installed. The generator would be placed inside its own enclosure for protection against the elements and for noise abatement purposes.

Mitigation Measure 3.4-2 in Table S-1 on page ES-10 is revised as follows:

~~**Mitigation Measure 3.4-2:** For construction activities expected to occur during the breeding season of special status bat species (April 1 to August 31), a field survey shall be conducted by a qualified biologist to determine whether active roosts are present onsite or within 100 feet of the project boundaries. Areas off the project site that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. Field surveys shall be conducted early in the breeding season before any construction activities begin, when bats are establishing maternity roosts but~~

~~before pregnant females give birth (April through early May). If no roosting bats are found, then no further mitigation is required. If roosting bats are found, then disturbance of the maternity roosts shall be avoided by halting construction until the end of the breeding season or a qualified bat biologist excludes the roosting bats in consultation with CDFW. If construction activities begin prior to April 1, it is assumed that no bats would roost in the project site during active construction activities and no pre-construction surveys are required. If at any time during the roosting season construction stops for a period of two weeks or longer, pre-construction surveys shall be conducted prior to construction resuming.~~

**Mitigation Measure 3.4-2:** In advance of tree removal, a preconstruction survey for special-status bat habitat shall be conducted by a qualified biologist to characterize potential bat roosting habitat and identify active roost sites within the project site. Should potential roosting habitat or active bat roosts be found in trees to be removed, the following measures shall be implemented:

- Removal of trees that support potential bat roosting habitat shall occur when bats are active, approximately between the periods of March 1 to April 15 and August 15 to October 15, and outside of bat maternity roosting season (approximately April 15 – August 31) and outside of months of winter torpor (approximately October 15 – February 28), to the extent feasible.
- If removal of trees during the periods when bats are active is not feasible and active bat roosts being used for maternity or hibernation purposes are found on or in the immediate vicinity of the project site where tree removal is planned, a no-disturbance buffer of 100 feet shall be established around these roost sites until they are determined to be no longer active by the qualified biologist.
- The qualified biologist shall be present during tree removal if roosting habitat is present. Trees with roosting habitat shall be removed only when no rain is occurring or is forecast to occur for three days and when nighttime temperatures are at least 50°F and sustained wind speeds are less than 10 mph.
- Removal of trees with potentially active roost sites shall follow a two-step removal process:
  1. On the first day of tree removal and under supervision of the qualified biologist, branches and limbs not containing cavities or fissures in which bats could roost, shall be cut using chainsaws or other hand tools.
  2. On the following day and under the supervision of the qualified biologist, the remainder of the tree may be removed, either using chainsaws or other equipment (e.g. excavator or backhoe).
- Comprehensive survey results shall be submitted to CDFW and the California Department of Forestry and Fire Protection at least seven (7) days prior to the commencement of timber operations conducted in that year. Comprehensive survey results need to have sufficient detail to demonstrate to CDFW the level of survey effort including who conducted the survey, location of survey(s), habitat map, acreage/area covered per day per surveyor, timing of survey, survey methodologies, and data sheets.

## Chapter 2, Project Description

The third paragraph on page 2-8 is revised as follows:

Construction of the project is expected to take one construction season, starting in Summer ~~2020~~ 2021 and extending to October ~~2020~~ 2021, for about five months of construction activity. Though the County does not have a specific noise ordinance that defines acceptable working hours, construction activity would comply with standards that are typical for other jurisdictions in California, which relegate noise-producing construction activities in non-residential areas to the hours of 7:00 a.m. to 7:00 p.m., Monday through Saturday.

The first paragraph on page 2-10 is revised as follows:

The project would provide heating within the guest tents on an as-needed basis through the use of EPA 2020-certified wood heating stoves. ~~The current specification wood stove used at most of the existing Under Canvas facilities is the “Hunter” stove, manufactured by Cylinder Stoves.<sup>+</sup> The stove currently under consideration by the project applicant is the TN10 model wood stove, manufactured by True North.<sup>1</sup>~~

The footnote at the bottom of page 2-10 is revised as follows:

<sup>+</sup> ~~Cylinder Stoves, Inc. Hunter Stove: <https://www.cylinderstoves.com/hunter-stove.html>.~~

<sup>1</sup> True North. TN10 Wood Stove: [https://www.truenorthstoves.com/wp-content/uploads/sites/3/2019/04/TN10\\_Wood\\_Stove\\_Manual.pdf](https://www.truenorthstoves.com/wp-content/uploads/sites/3/2019/04/TN10_Wood_Stove_Manual.pdf).

The last paragraph on page 2-11 is revised as follows:

Based on this analysis, the water source(s) would need to be developed to supply an average demand of 7,755 gpd. Accordingly, the proposed groundwater source wells would be developed to supply 20 to 30 gpm. Wells 1 and/or 2 would be used to supply water for the project, with Well 3 ~~retained as a backup~~ capped. The locations of the wells are shown in Figure 2-3. The wastewater and water use quantities would be monitored and submitted to the Tuolumne County Community Development Department, Environmental Health Division.

The first sentence of Section 2.4.5 on page 2-13 is revised as follows:

Electric power for the camp would be provided by ~~a local utility company~~ PG&E, but most electricity demand would be met using low voltage solar systems.

At the end of the last bullet point on page 2-16, the following text is inserted:

### **Fire Prevention Plans**

During construction and operation of the project, the project would implement a number of design elements and activities that would reduce impacts associated with accidental ignitions on the project site.

### **Construction Phase Fire Prevention Plan**

Prior to initiation of construction, the project would be required to prepare and submit a Construction Fire Prevention Plan (CFPP) for review by relevant service providers such as The Tuolumne County Fire Department, Groveland Community Services District, and CAL FIRE. The plan would include, but would not be limited to, the following:

- Identification of a Site Safety Officer;
- Provision of fire safety training for personnel;
- Implementation of emergency notification procedures;
- Imposition of restrictions on use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, and torches to periods with higher humidity (15 percent or higher) and low winds (less than 10 mph);
- Use of Red Flag Warning protocols (suspend construction activities during warning periods);
- Provision of safe storage of combustible or flammable materials in enclosed storage areas, away from combustible material;
- Implementation of mitigation to prevent arcing and sparking, and vegetation clearance where such activities could take place;
- Provision of onsite water truck, equipped with fast response hose and fog nozzles;
- Provision of fire tools and equipment (fire extinguishers, fire tools, backpack pump fire extinguishers, etc.);
- Implementation of emergency response and evacuation procedures; and
- Use of other measures as recommended by the fire safety consultant and/or the relevant firefighting service providers.

### **Operational Phase Fire Prevention Plan**

Prior to the commencement of operations, the project would be required to prepare and submit an Operational Fire Protection Plan (OFPP) for review by relevant service providers such as the Tuolumne County Fire Department, Groveland Community Services District, and CAL FIRE. The plan would include, but would not be limited to, the following:

- Implementation of procedures for minimizing potential ignition during operations;
- Modifications to operations during Red Flag Warnings and High to Extreme Fire Danger days;
- Compliance with defensible space/vegetation management area maintenance requirements;
- Use of fire suppression water/equipment inventory (fire extinguishers, fire tools, backpack pump fire extinguishers, etc.);

- Permanent provision of an onsite fire-fighting water truck, equipped with fast response hoses and fog nozzles;
- Implementation of communication and reporting procedures with CAL FIRE, Tuolumne County Fire Department, and Groveland Community Services District;
- Use of an annual risk assessment with CAL FIRE, Tuolumne County Fire Department, and Groveland Community Services District;
- Provision of an onsite fire safety coordinator;
- Provision of staff education and training for fire prevention, basic initial attack firefighting, and fire reporting, with ALL employees provided with basic first aid training, and a requirement that at least one employee be onsite at any given time with advanced first aid training (EMT or equivalent);
- Use of orientation briefings for all guests concerning potential hazards and what to do in the event of an emergency incident;
- Provision of an onsite fire and emergency alert system to notify site occupants in the event of an emergency;
- Use of tent materials with required fire resistance, provision of spark arrestors for woodstoves, treatment of firewood and stove ashes, implementation of smoking restrictions, use of safety measures for group fire ring operations, and use of design and safety criteria for the onsite kitchen (provision of chemical hood, fire extinguishers, etc.);
- Implementation of routine and emergency communications procedures;
- Relocation and evacuation procedures, to include staging areas, accountability, routes of ingress/egress, etc.; and

Demonstrated compliance with applicable sections of the California Fire Code and California Building Code, National Fire Protection Association (NFPA) standards, and other local requirements.

## Section 3.0, Introduction to Environmental Analysis

The fourth paragraph on page 3-8 is revised as follows:

Operation of the project is not anticipated to substantially increase the demand for electricity or natural resources. Electric power for the camp would be provided by ~~a local utility company~~ PG&E, but most electricity demand would be met using low voltage solar systems. Lighting for the lobby, common areas, and tents would be low voltage solar lighting. All light fixtures and the use thereof would be International Dark Sky Association compliant, while still providing safety and guidance for guests. Heating within the guest tents would be provided on an as-needed basis through the use of EPA-certified wood heating stoves using locally-sourced wood supplies. To provide electric power to the site during power outages, a 70 kW propane-powered standby generator would be installed, but would be used only as-needed.

The fourth paragraph on page 3-11 is revised as follows:

**Table 3.0-1** summarizes the GHG emissions that would result from operation of uses under the project. The table includes those emission sources such as area sources (EPA-certified heating stoves), transportation, operational electricity consumption, solid waste disposal, water usage and wastewater generation. These emission estimates are conservative as the modeling effort assumed a motel land use as a proxy for the proposed campground. As there would be no natural gas service from the local utility at this rural site for the proposed project, no natural gas demand was considered. Energy demand associated with the assumed motel use would consider air conditioning and other sources that would not be present in the campgrounds and, hence, the emissions associated with the energy component are very conservative.

### Section 3.3, Air Quality

The third paragraph on page 3.3-11 is revised as follows:

Table 3.3-3 also presents the operational emissions associated with vehicle trips and natural gas combustion, including a backup, propane-fueled generator. As shown in the table, all project-related criteria pollutant emissions would be well below TCAPCD thresholds. In addition, a separate CalEEMod model run was performed to estimate emissions associated with the EPA-certified wood-burning heating stoves proposed for use in the guest tents. The modelling conservatively assumed that all 99 tents would operate a woodstove simultaneously at the default model usage rate of 82 days per year, a scenario which is unlikely to occur, given the project's operating season and likely occupancy rates.

The first paragraph under Impact 3.3-3 on page 3.3-12 is revised as follows:

The project would generate TACs in the form of diesel particulate matter during construction activities and, once operational, (wood smoke) particulate matter from proposed EPA-certified wood burning associated with up to 99 woodstoves and three group fire rings.

Table 3.3-4 on page 3.3-13 is revised as follows:

**TABLE 3.3-4  
MAXIMUM PM<sub>2.5</sub> CONCENTRATIONS (UG/M<sup>3</sup>)**

Emissions Category	Annual	24-Hour <sup>a</sup>
<b>Operational Emissions</b>		
Existing Conditions, 3-year average	9.68	31.6
Project Contribution	0.44	<del>3.29</del> <u>1.12</u>
Combined Estimated Impact	10.1	<del>34.9</del> <u>32.7</u>
TCAPCD Thresholds	12.0	35.0
Exceed Thresholds?	No	No

NOTE:

<sup>a</sup> 24-hour PM<sub>2.5</sub> concentrations were modeled under worst-case scenario conditions, which assume 24-hour use of emergency generators in the event of a PG&E PSPS event.

SOURCE: ESA, 2019 (Appendix E)

## Section 3.4, Biological Resources

Impact 3.4-2 on and Mitigation Measure 3.4-2 on page 3.4-32 is revised as follows:

Forest habitats within the project site provide suitable roosting and foraging habitat for four special-status bat species, including pallid bat (*Antrozous pallidus*), spotted bat (*Euderma maculatum*), western mastiff bat (*Eumops perotis californicus*), and western red bat (*Lasiurus blossevillii*). These and other bat species could use trees with suitable cavities, crevices, exfoliating bark and/or bark fissures on and near the project site for roosting. The project could result in the removal of trees potentially used for roosting by special-status bats or other modifications to bat habitat. In addition, construction-related activities would temporarily elevate noise levels in areas on and surrounding the construction zone. Special-status bat species may be adversely affected if roosting sites are physically disturbed or are exposed to a substantial increase in noise or human presence during project activities. If construction activities occur during the bat ~~breeding~~ maternity roosting season (approximately April 15<sup>th</sup> to August 31<sup>st</sup>) or winter torpor season (approximately October 15<sup>th</sup> to February 28<sup>th</sup>), disturbance to roosting sites could have a significant effect on special-status bat species if active ~~maternity~~ roosts are present. Because project implementation could adversely affect these species, this impact would be considered **potentially significant**. Implementation of **Mitigation Measure 3.4-2** would reduce potential impacts to special-status bats to **less than significant**.

### Mitigation Measure

~~**Mitigation Measure 3.4-2:** For construction activities expected to occur during the breeding season of special status bat species (April 1 to August 31), a field survey shall be conducted by a qualified biologist to determine whether active roosts are present onsite or within 100 feet of the project boundaries. Areas off the project site that are inaccessible due to private property restrictions shall be surveyed using~~

~~binoculars from the nearest vantage point. Field surveys shall be conducted early in the breeding season before any construction activities begin, when bats are establishing maternity roosts but before pregnant females give birth (April through early May). If no roosting bats are found, then no further mitigation is required. If roosting bats are found, then disturbance of the maternity roosts shall be avoided by halting construction until the end of the breeding season or a qualified bat biologist excludes the roosting bats in consultation with CDFW. If construction activities begin prior to April 1, it is assumed that no bats would roost in the project site during active construction activities and no pre-construction surveys are required. If at any time during the roosting season construction stops for a period of two weeks or longer, pre-construction surveys shall be conducted prior to construction resuming.~~

**Mitigation Measure 3.4-2:** In advance of tree removal, a preconstruction survey for special-status bat habitat shall be conducted by a qualified biologist to characterize potential bat roosting habitat and identify active roost sites within the project site. Should potential roosting habitat or active bat roosts be found in trees to be removed, the following measures shall be implemented:

- Removal of trees that support potential bat roosting habitat shall occur when bats are active, approximately between the periods of March 1 to April 15 and August 15 to October 15, and outside of bat maternity roosting season (approximately April 15 – August 31) and outside of months of winter torpor (approximately October 15 – February 28), to the extent feasible.
- If removal of trees during the periods when bats are active is not feasible and active bat roosts being used for maternity or hibernation purposes are found on or in the immediate vicinity of the project site where tree removal is planned, a no-disturbance buffer of 100 feet shall be established around these roost sites until they are determined to be no longer active by the qualified biologist.
- The qualified biologist shall be present during tree removal if roosting habitat is present. Trees with roosting habitat shall be removed only when no rain is occurring or is forecast to occur for three days and when nighttime temperatures are at least 50°F and sustained wind speeds are less than 10 mph.
- Removal of trees with potentially active roost sites shall follow a two-step removal process:
  1. On the first day of tree removal and under supervision of the qualified biologist, branches and limbs not containing cavities or fissures in which bats could roost, shall be cut using chainsaws or other hand tools.
  2. On the following day and under the supervision of the qualified biologist, the remainder of the tree may be removed, either using chainsaws or other equipment (e.g. excavator or backhoe).
- Comprehensive survey results shall be submitted to CDFW and the California Department of Forestry and Fire Protection at least seven (7) days prior to the commencement of timber operations conducted in that year. Comprehensive survey results need to have sufficient detail to demonstrate to CDFW the level of survey effort including who conducted the survey, location of survey(s), habitat map, acreage/area covered per day per surveyor, timing of survey, survey methodologies, and data sheets.

## Section 3.5, Hydrology and Water Quality/Utilities and Service Systems

The fifth paragraph on page 3.5-4 is revised as follows:

There are no municipal water supplies in the immediate area. As such, the project's water supply would be provided to the project site by Wells 1 and 2, with Well 3 being capped ~~but retained for backup purposes~~. The volume and water quality of groundwater from those wells were discussed above, which noted that the wells have more than sufficient capacity to supply the proposed project and that the water quality is within drinking water standards.

The last paragraph on page 3.5-17 is revised as follows:

To evaluate project impacts to water supply, and as described above in Section 3.5.2, Environmental Setting, Groundwater Resources, a hydrogeological investigation was conducted that included the installation, aquifer pump testing, and chemical testing of three onsite groundwater wells (WRA, 2020). The onsite Wells 1, 2, and 3 are shown on Figure 2-3. Wells 1 and/or 2 would be used to supply water for the project, with Well 3 ~~retained as a backup~~ capped. Based on the results of the aquifer pumping tests, Wells 1 and 2 are capable of providing 40 gpm, which is twice the project's needs for water supply. The aquifer pumping tests indicated that maximum distance that pumping at 40 gpm would affect is about 1,256 feet, the distance from Well 1 to Well 3, which experienced a negligible drawdown of less than one foot. However, the proposed pumping rate for the Under Canvas project is only 20 gpm, and not the 40 gpm that was tested. This means that the effects of onsite pumping would be less than 1,256 feet from Wells 1 and 2.

The third paragraph under Impact 3.5-5 on page 3.5-20 is revised as follows:

The construction and operation of the onsite wastewater treatment and disposal system would ensure that wastewater would be adequately treated and that groundwater quality would not be adversely affected, which would be consistent with the Basin Plan. In addition, because wastewater would be treated onsite and routed to two leach fields, some portion of the water used onsite would be infiltrated back to the aquifer after treatment. Finally, the project site is not located within a basin that is subject to a sustainable groundwater management plan because it is not in a state of overdraft. Operation of the project would not utilize a volume of water that would send the basin into a condition of overdraft or stress; ~~Therefore~~, the impact relative to the Basin Plan and a sustainable groundwater management plan would be **less than significant**.

The sixth paragraph under Impact 3.5-5 on page 3.5-20 is revised as follows:

Wastewater resulting from food handling and preparation and laundry operations produces high strength wastewater. Therefore, ~~the food facility wastewater~~ this would be treated with a grease interceptor, post-grease interceptor septic tank, followed by a

moving bed biofilm reactor (MBBR). The treatment process would reduce the BOD to less than 250 mg/l prior to dispersal, as required by regulations and best practices. Effluent dispersal would use a duplex pumping system (with lead/lag configuration) to a pressure dosed gravel loaded leach system.

The second paragraph on page 3.5-22 is revised as follows:

Although the campground would be connected to the public electrical system, the use of solar power would reduce the project's electricity demand substantially. In addition, the campground would not operate during winter months, reducing the electrical power demand to zero during those periods. The minimal campground electricity demands are anticipated to be well within PG&E's capacity. To verify the availability of sufficient electrical service, implementation of **Mitigation Measure 3.5-1** would result in an impact that would be **less than significant**.

The first paragraph under Impact 3.5-24 on page 3.5-24 is revised as follows:

Solid waste generated during Construction and operation of the proposed project would be disposed of at permitted landfills, which by the terms of their permits are required to ~~would~~ comply with all federal, state, and local statutes and regulations related to solid waste. Therefore, there would be **no impact**.

The last paragraph under Impact 3.5-12 on page 3.5-27 is revised as follows:

As discussed in the hydrogeologic report (WRA 2020, provided in Appendix G of this DEIR), the aquifer pumping tests for onsite Well 2 and the two Terra Vi site wells (TV-1 and TV-2) were conducted at the same time, with the Terra Vi aquifer pumping tests starting about one day prior to the Well 2 aquifer pumping test (see Figure 14 in WRA 2020 in Appendix G). Thus, the aquifer pumping tests were conducted in such a manner to quantify the cumulative impact of both sites being operational at the same time. Prior to beginning the Well 2 aquifer pumping test, Well 1, the well closest to the Terra Vi site, experienced a water level drawdown of about a one foot due to the Terra Vi pumping test; no drawdown was observed in Wells 2 and 3 (see Figure 15 in WRA 2020 in Appendix G). This indicates that the pumping of the Terra Vi wells has a negligible effect on the proposed project site. A drawdown on one foot or less is considered negligible because well pumps are set in wells at depths well below pumping water levels to prevent exposing the pump to air that could damage the pump. A decrease of one foot or less of drawdown would not expose the pump. Further, the commencement of the aquifer pumping test on Well 2 and the later pumping test on Well 1 did not produce observable drawdowns in the two Terra Vi wells. Therefore, the aquifer pumping tests results indicate that the proposed project and the Terra Vi project would be able to operate simultaneously without adversely affecting each other's operations. Finally, because the proposed project would operate at 20 gpm rather than the 40 gpm used for the aquifer pumping tests, and would also not operate in the winter, the cumulative impact would be even smaller. Therefore, the two projects would not combine to result in a cumulatively considerable impact to groundwater in the area. (**less than significant**).

The first paragraph under Impact 3.5-15 on page 3.5-29 is revised as follows:

As described in Section 2.4, *Project Description*, the proposed project would not use natural gas, ~~propane~~, or telecommunication facilities. Accordingly, these topics would not result in cumulative impacts and are not considered further.

## Section 3.9, Wildfire

Beginning on page 3.9-8, Impact 3.9-2 is revised as follows:

**Impact 3.9-2: Implementation of the project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. (*Less than Significant*)**

Adjacent land uses include scattered private residences, recreation facilities, and undeveloped federal lands under the jurisdiction of the USFS. Most of the project site and surrounding vicinity was burned during the 2013 Rim Fire. Since that time, much of the federal and private lands adjacent to the project site have undergone roadside hazard tree removal, timber salvage, fuels management, and reforestation activities to remove excess dead and downed wood that resulted from the fire, and to restore fire-impacted landscapes where appropriate. Similar activities have taken place on the project site. A salvage of fire-killed trees was conducted on the project site in 2014. In areas where tree cover was lost, the landowner replanted trees or facilitated successful natural reestablishment of young trees. However, in spite of these efforts, drought and decline of fire-damaged trees since the initial salvage has led to additional mortality of overstory trees. As a result, significant quantities of downed wood and standing snags remain on the site. In its current state, fuel conditions on the site present a heightened risk to the local area.

Development of the site would begin with an extensive timber salvage program, concurrent with implementation of a hazardous fuel reduction effort, to make the site accessible and safe for use. Much of this work would occur as part of the project's Timber Harvest Plan (THP), which would be subject to review and approval by CAL FIRE before issuance of a permit. In addition to the fuel reductions that would be undertaken as part of the THP, the site would be subject to ongoing fuel and vegetation management treatments as prescribed in the project's Wildfire Mitigation Plan. The plan would consider site-specific attributes such as slope, prevailing winds, and fuel loads, and would be subject to review and approval by the Tuolumne County Fire Department (TCFD) in cooperation with CAL FIRE. The plan would include a number of standard prescriptions, including, but not limited to:

- Removal of ~~all~~, necessary dead, down, dying, diseased, and hazard trees.
- Removal of ladder fuel and dead limbs in trees to a minimum of 20 feet above ground level.
- Implementation of a ground litter reduction and removal program.

- Potential thinning of the trees and other vegetation that have grown since the 2013 Rim fire.
- ~~Establishment~~ Where necessary, establishment of defensible space, ~~around property lines,~~ to include vegetation removal, thinning and eliminating ladder fuels within a the site perimeter to a distance of 100 to 200 feet, depending on the slope.
- Provision of defensible space around all areas of proposed development.
- Provision of defensible space on each side of project roadways.
- Fuel reduction and mitigation on and around an area recommended for designation as a temporary Refuge Zone Area for project guests and staff.

CAL FIRE has reviewed the proposed fuel breaks and other wildfire mitigation components of the project as they relate to the THP, and has determined that those plan elements will complement other fuel reduction work that is ongoing, completed, and planned in the vicinity, and that the proposed fuel breaks would help protect communities and critical infrastructure along the SR-120 corridor. CAL FIRE has also determined that the plan is consistent with its Tuolumne-Calaveras Unit Pre-Fire Management Plan. See **Appendix J** for relevant correspondence with CAL FIRE on these matters.

Treatments undertaken as part of the above activities would greatly lessen the risk of wildfire on the site, and would also lessen the severity of such an event should it occur. All plans and executed work would meet or exceed the fire safety standards set forth in Title 14 of the Public Resources Code, and would be subject to review and inspection by CAL FIRE and the TCFD per the requirements of 14 CCR 1270, et seq.

Once operational, the project would implement a number of project design features and operational practices to prevent ignition of wildfires at the project site. These measures are listed in Chapter 2, *Project Description*, of this EIR, but are listed again here for the convenience of the reader. These measures would include:

- All tent fabrics would be California State Fire Marshall approved.
- All heating stoves on the site would be equipped with spark arrestors, which would be constructed of woven or welded wire screening of 12 USA standard gauge wire (0.1046 inch) having openings not exceeding 1/2-inch. The net free area of the spark arrestor would not be less than four times the net free area of the outside of the chimney outlet.
- The ashes from the stoves would be removed by camp staff in metal containers and disposed of in a steel container. Firewood and combustible materials would not be stored in unenclosed spaces beneath tents or on decks under eaves, canopies or other projections or overhangs. Fire wood and combustible material would be stored in defensible space, and separated from the crown of trees by a minimum horizontal distance of 15 feet.

- Smoking would be restricted to designated areas, with a minimum of 50-foot radius of all vegetative material cleared to bare mineral soil. Smoking butt disposal container towers would be provided.
- Community campfire rings would be enclosed within a large metal ring to contain burning material, and would be installed 12 inches into the ground, with and a minimum of 12 inches extending above the ground., ~~with a~~ A-mesh screen would be installed to encompass and cover the fire as a spark arrestor. Branches and other vegetation above each fire area would be removed, and a cone of clearance to the sky would be established. A large metal cover would be provided to cover the fire ring when not in use and nightly after the fire is extinguished by camp staff. A hose bib would be provided in proximity to each fire ring to extinguish fires prior to covering. Remote web cameras of fire pit areas would be installed to monitor each fire pit, and would be monitored from the campground office and mobile devices. ~~Due to the proximity of the Forest boundary,~~ Fires would not be allowed whenever the USFS imposes restrictions on campfires due to the proximity of the Forest boundary.
- The mobile kitchen facility would be equipped with a hood and range dry chemical extinguishing system.
- Fire tool lockers and fire extinguishers would be provided throughout the site, ~~and in a manner~~ meeting the requirements of Public Resources Code (PRC) Sections 4428 and 4429. Fire extinguishers would be located in each guest tent structure, as well as in all other facilities.
- Fire hose stations with fire hoses and nozzles would be provided within the site, with 200 feet of fire hose provided at each station. These stations would be located in such a manner that no tent structure would be greater than 150 feet from a fire hose station.

These features would help to prevent wildfires from igniting on the site, and the provision of basic firefighting equipment and training would allow for an initial response to an ignition before professional firefighters could arrive.

During construction and operation of the project, the project would implement a number of design elements and activities that would reduce impacts associated with accidental ignitions on the project site.

### **Construction Phase Measures**

Prior to initiation of construction, the project would be required to prepare and submit a Construction Fire Prevention Plan (CFPP) for review by relevant service providers such as The Tuolumne County Fire Department, Groveland Community Services District, and CAL FIRE. The plan would include, but would not be limited to, the following:

- Identification of a Site Safety Officer;
- Provision of fire safety training for personnel;
- Implementation of emergency notification procedures;

- Imposition of restrictions on use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, and torches to periods with higher humidity (15 percent or higher) and low winds (less than 10 mph);
- Use of Red Flag Warning protocols (suspend construction activities during warning periods);
- Provision of safe storage of combustible or flammable materials in enclosed storage areas, away from combustible material;
- Implementation of mitigation to prevent arcing and sparking, and vegetation clearance where such activities could take place;
- Provision of onsite water truck, equipped with fast response hose and fog nozzles;
- Provision of fire tools and equipment (fire extinguishers, fire tools, backpack pump fire extinguishers, etc.);
- Implementation of emergency response and evacuation procedures; and
- Use of other measures as recommended by the fire safety consultant and/or the relevant firefighting service providers.

#### **Operational Phase Measures**

Prior to the commencement of operations, the project would be required to prepare and submit an Operational Fire Protection Plan (OFPP) for review by relevant service providers such as the Tuolumne County Fire Department, Groveland Community Services District, and CAL FIRE. The plan would include, but would not be limited to, the following:

- Implementation of procedures for minimizing potential ignition during operations;
- Modifications to operations during Red Flag Warnings and High to Extreme Fire Danger days;
- Compliance with defensible space/vegetation management area maintenance requirements;
- Use of fire suppression water/equipment inventory (fire extinguishers, fire tools, backpack pump fire extinguishers, etc.);
- Permanent provision of an onsite fire-fighting water truck, equipped with fast response hoses and fog nozzles;
- Implementation of communication and reporting procedures with CAL FIRE, Tuolumne County Fire Department, and Groveland Community Services District;
- Use of an annual risk assessment with CAL FIRE, Tuolumne County Fire Department, and Groveland Community Services District;
- Provision of an onsite fire safety coordinator;

- Provision of staff education and training for fire prevention, basic initial attack firefighting, and fire reporting, with ALL employees provided with basic first aid training, and a requirement that at least one employee be onsite at any given time with advanced first aid training (EMT or equivalent);
- Use of orientation briefings for all guests concerning potential hazards and what to do in the event of an emergency incident;
- Provision of an onsite fire and emergency alert system to notify site occupants in the event of an emergency;
- Use of tent materials with required fire resistance, provision of spark arrestors for woodstoves, treatment of firewood and stove ashes, implementation of smoking restrictions, use of safety measures for group fire ring operations, and use of design and safety criteria for the onsite kitchen (provision of chemical hood, fire extinguishers, etc.);
- Implementation of routine and emergency communications procedures;
- Relocation and evacuation procedures, to include staging areas, accountability, routes of ingress/egress, etc.; and
- Demonstrated compliance with applicable sections of the California Fire Code and California Building Code, National Fire Protection Association (NFPA) standards, and other local requirements.

The project would not contain traditional structures such as buildings with framed construction or shingled roofs. As such, requirements related to the provision of fire sprinklers, fire hydrants, and a dedicated standby water supply do not apply to the project. As noted above, however, and exceeding County requirements, the project Applicant has elected to provide a standby fire-fighting water truck with appropriate hoses and nozzles that could be deployed to provide an initial response in the event of a fire ignition.

Implementation of these design elements and the requirements within each plan would meet or exceed applicable regulations as established by CAL FIRE and other relevant agencies and organizations to reduce the risk of accidental ignitions during project construction and operation activities, and to provide for an effective emergency response if a fire were to ignite either on or off the project site. The project would meet these requirements, and in many cases would exceed them.

Based on each of these considerations, development of the project would not exacerbate wildfire risks, nor would it substantially increase the likelihood that the project would expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Rather, the required fuel reductions and operational features of the project would present an improvement over current conditions, since the risks associated with the site's existing conditions would be substantially reduced. Accordingly, the impact would be **less than significant**.

Mitigation Measure

None required.

The first paragraph under Impact 3.9-3 on page 3.9-11 is revised as follows:

As discussed above, the infrastructure improvements associated with the project, and the fuel breaks and other wildfire mitigation strategies proposed would result in an improved condition ~~with respect to~~ over the site's existing wildfire preparedness and the ability to lessen the overall severity of future wildfires in the area. Therefore, the project would not exacerbate fire risk, but would instead improve conditions related to wildfire risk. With respect to these improvement's effect on the environment, all project improvements associated with wildfire risk reduction and management would occur on the project site as part of the project's development and operation. An evaluation of the environmental effects associated with the project's development, including those portions of the project that relate to abatement of wildfire risk (hazardous fuel reductions, etc.), are evaluated in the various topical sections of this EIR. In all instances, the effects of project implementation were determined to be less than significant. Accordingly, the impact would also be **less than significant**.

## Appendix F – Biological Resources

The cover page to Appendix F – Biological Resources is corrected to read as follows:

~~Appendix E~~  
~~Air Quality and Greenhouse Gas~~

Appendix F  
Biological Resources