RESOURCE CONSERVATION DISTRICT OF GREATER SAN DIEGO COUNTY
11769 Waterhill Road ● Lakeside, CA 92040
Phone: 619-562-0096 ● Fax: 619-562-4799
www.rcdsandiego.org ● www.firesafesdcounty.org

SPECIAL BOARD MEETING AGENDA

Wednesday, August 16, 2023, 12:30PM
RCD Office, 11769 Waterhill Road, Lakeside CA 92040

Land Acknowledgement Statement: Since time immemorial, the San Diego County region has been the home of the Kumeyaay, Luiseño, Cahuilla, and Cupeño Native people. We acknowledge that people have come before us and lived with care and respect on these lands. We recognize that we are now on the lands of these indigenous people who are still here and will always be. We honor the Indigenous people living today as well as their ancestors, and we deeply respect their resilience and connection to the land.

1. CALL TO ORDER, INTRODUCTION

2. ADDITIONS/CHANGES TO THE AGENDA (GOV. CODE 54954.2 (B))

3. PUBLIC COMMENT
Public may comment on agenda items when they are discussed. Speakers are asked to limit comments to three minutes. (Gov. Code 54954.3(a)).

4. BOARD ACTION AND DISCUSSION ITEMS

- **4-1** Discuss/Approve: Resolution 2023-13 Environmental review of Girl Scouts San Diego CampWinacka-Camp Whispering Oaks Vegetation Management Project
- **4-2** Discuss/Approve: Resolution 2023-14 CDFA CA Underserved and Small Producer Grant Agreement
- **4-3** Discuss/Approve: Resolution 2023-15 IERCD Disaster Recovery Grant Services Agreement
- **4-4** Discuss/Approve: Resolution 2023-16 Appointment of Michael McGrath to Seat #2 on the RCD Board of Directors
- **4-5** Informational item: County Water Authority Agricultural Water Management Program update
- **4-6** Informational item: Tijuana River Valley request for proposals

5. ADJOURNMENT
Public Notice: In compliance with the Americans with Disabilities Act and Government Code Section 54954.2, if special assistance is needed to participate in a Board meeting, please contact the RCD at (619) 562-0096. Notification of at least 48 hours prior to meeting time will assist staff in assuring that reasonable arrangements can be made to provide accessibility at the meeting.

UPCOMING EVENTS		
RCD Board Meeting	TBD	TBD
FSC Executive & General Board Meetings	September 14, 9:00am	TBD
Wild Willow Farm Volunteering	2nd Saturday of the month, 9:30 – 12:00	Wild Willow Farm

RCD Board of Directors – July 2023

Don Butz, President

Marilyn Huntamer, Vice President
Maggie Sleeper, Director
Diane Moss, Director
Neil Meyer, Director
Odette Gonzalez, Treasurer
One Vacancy

Associate Directors

D.K. Nasland, Jo MacKenzie, Lance Rogers, Michael McGrath

RCD STAFF – July 2023	
Ann Baldridge, Executive Director	Heather Marlow, Director of Forestry & Fire Prevention Projects
Chris Kelley, Financial Director	Gregg Cady, Farm Conservation Advisor
Morgan Graves, Forestry & Fire Prevention Projects Coordinator	Stan Hill, Forestry & Fire Prevention Projects Manager
Sierra Reiss, Education Coordinator	Andy Williamson, Irrigation Technician
Rachel Lloyd, Accounting Clerk	Joel Kramer, Agricultural Specialist
Joanne Sauerman, Office Coordinator	Cheyanne Piacenza, Assistant Farm Manager
Erik Rodriguez, Farmer II	Joannaluz "Joanna" Parra, Farmer
Juliann "JJ" Tidwell, Farmer	Paul Maschka, Regenerative Farming Educator
Codi Hale, Outreach Coordinator	Kim Hanson, Farm Field Trip & Volunteer Coordinator
Elizabeth Garcia, Ag Technician	Ashleyann Bacay – Grizzly Corps Fellow
Daniela Mejia, Community Garden Coordinator	Carolina Guia, Grizzly Corps Fellow

RESOURCE CONSERVATION DISTRICT
Greater San Diego County

Resource Conservation District of Greater San Diego County
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Date: August 16, 2023

Agenda Item 4-1: Resolution 2023-13 Environmental Reivew for Girl Scouts of San Diego's Camp Winacka-Camp Whispering Oaks Vegetation Management Project

Discussion / History: In September 2022, the Board of Directors authorized resolution 2022-30 for the RCD to enter into an MOU with Girl Scouts San Diego to support them with funding and conducting an environmental review under the California Vegetation Treatment Program (CalVTP) Programmatic Environmental Impact Report (PEIR). This work is funded through the RCD's Regional Forest and Fire Capacity (RFFC) grant and will support long term wildfire resilience planning and implementation of forest health projects at Girl Scouts Camp Winacka and Camp Whispering Pines.

The RCDGSDC is serving as project proponent (lead agency) for Girls Scouts San Diego in their efforts to secure CEQA compliance for the implementation of the Camp Winacka-Camp Whispering Oaks-Vegetation Management Project. This proposed project is based on and consistent with the Girl Scout San Diego Forest Management Plan. In their capacity as lead agency, the RCDGSDC hired consulting firm Black Fox Timber to write and / or subcontract services to write the necessary documents to demonstrate the proposed project is within scope and compliance with the CalVTP PEIR. These documents include a Program Specific Analysis (PSA), a Mitigation Monitoring Reporting Program (MMRP), a Significant Findings and Statement of Overriding Considerations (Findings), a biological surveying and associated report, and a cultural survey and associated report. These documents have all been drafted and are available for review by the Board of Directors. The PSA, MMRP, and Findings report are included in the Board Packet following this report. A link to the CalVTP PEIR is here: https://bof.fire.ca.gov/projects-and-programs/calvtp/calvtp-programmatic-eir/.

The Black Fox Timber team reviewed the proposed project for consistency with the CalVTP PEIR. They examined the potential environmental effects and applied Standard Project Requirements (SPR) and Mitigation Measures (MM) to reflect the proposed project is within scope of the CalVTP PEIR. The Findings Report reviews these potential impacts and provides them for the Board of Directors to assist in their determination. The Findings Report reflects that most of the environmental concerns have been deemed to have a less than significant impact, while others have impacts have been mitigated to be less than significant. The report also identifies that the proposed project could result in significant and unavoidable impacts, for which mitigation either cannot address or is not available/applicable. Consistent with the CalVTP PEIR and the Findings Report by the California Board of Forestry and Fire Protection, and in good faith disclosure, the proposed project could result in air quality and greenhouse gas emissions that are significant and unavoidable impacts, even after implementing all feasible mitigation. The Findings Report, again consistent with the California Board of Forestry and Fire Protection, reflects that the public benefit of implementing these treatments

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outweighs the potential impact. Similarly, we feel that the public benefits associated with implementing the proposed project, even with significant and unavoidable impacts, outweigh the potential negative impacts.

Once approved, the implementation of the forest management practices can begin. RCD will continue to work with Girl Scouts staff to track program progress, reporting back to the California Board of Forestry on completion of each treatment.

Financial Impact: No financial impact related to accpeting the findings of the PSA and signing the Declaration Statement.

Staff Recommendation to Board: Staff recommends that the Board accepts the findings of the PSA, approves resolution 2023-13, and authorizes the RCDGSDC Executive Director to sign the Declaration Statement on page 20 of the PSA to indicate that the Girl Scouts proposed treatments are in alignment with the CalVTP PEIR and no further CEQA documentation is needed.

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RESOLUTION 2023-13

A RESOLUTION APPROVING THE PROJECT SPECIFIC ANALYSIS AND SUPPORTING DOCUMENTS FOR THE CAMP WINACKA-CAMP WHISPERING OAKS: VEGETATION MANAGEMENT PROJECT

WHEREAS, the Resource Conversation District of Greater San Diego County ("District") is committed to the protection, conservation, and restoration of natural resources through education, information, and technical assistance programs; and

WHEREAS, the District, as stewards of the regional environment, partners with a diverse group of landowners, public and private institutions, and concerned citizens to address the diverse conservation and environmental concerns that are unique to San Diego County. RCDGSDC's programs and priorities help to restore and protect San Diego County watersheds, prevent wildfire damage through education and fuel reduction, promote nutrition and stewardship through sustainable agriculture and soil health, and revitalize pollinator habitats; and

WHEREAS, the Board of Directors ("Board") for the District recognizes the critical need for forest health and fuel reduction projects to protect natural resources, people, and property within San Diego County; and

WHEREAS, the District will treat hundreds of acres of vegetation located in the unincorporated areas of eastern San Diego County. The proposed project is strategically situated between the towns of Ramona on the west and Julian/Wynola areas on the northeast. The Cleveland National Forest directly borders the proposed project to the west, the San Deigo River Foundation on the northwest corner, and the Inaja and Cosmit Reservation on the southern boundary. The remaining adjacent parcels are private landowners; and

WHEREAS, the California Vegetation Treatment Program Programmatic Environmental Impact Report ("CalVTP PEIR") was certified by the Board of Forestry and Fire Protection in 2019 consistent with the California Environmental Quality Act to evaluate potential environmental effects of qualifying vegetation treatments to reduce the risk of wildfire in California; and

WHEREAS, the CalVTP PEIR was designed for use by state and local agencies to accelerate vegetation treatment project approvals by finding them to be within the scope of the PEIR; and

WHEREAS, the District has prepared a Project Specific Analysis and supporting documents, attached hereto as Attachment "A" and incorporated herein by this reference, for the Camp Winacka-Camp Whispering Oaks: Vegetation Management Project as supporting information to comply with the CalVTP PEIR; and

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Resource Conversation District of Greater San Diego County as follows:

1. The recitals set forth above are true and correct and are incorporated into this Resolution by this reference; and
2. The Board of Directors for the Resource Conservation District of Greater San Diego County hereby adopts the Project Specific Analysis for the Camp Winacka-Camp Whispering Oaks: Vegetation Management Project; and
3. The Board adopts the Mitigation, Monitoring and Reporting Program for the Camp Winacka-Camp Whispering Oaks: Vegetation Management Project; and
4. The Board adopts the CEQA Findings and Statement of Overriding Considerations for the Camp Winacka-Camp Whispering Oaks: Vegetation Management Project; and
5. The Board adopts the Biological Resources Report for the Camp Winacka-Camp Whispering Oaks: Vegetation Management Project; and
6. The Board adopts the Cultural Resources Inventory Report for the Camp Winacka-Camp Whispering Oaks: Vegetation Management Project; and
7. The Board approves the Camp Winacka-Camp Whispering Oaks: Vegetation Management Project.

THE FOREGOING RESOLUTION WAS DULY AND REGULARLY ADOPTED by the Board of Directors of the Resource Conservation District of Greater San Diego County at a special meeting held on the 16th day of August 2023, by the following roll call vote:

Ayes:
Nays:
Abstain:
Absent:
Attest:

_____ _____

Don Butz, Board President Joanne Sauerman, Board Clerk

August 1, 2023

Camp Winacka-Camp Whispering Oaks: Vegetation Management Project

A CalVTP project for Girl Scouts San Diego

Lead Agency: Resource Conservation District of San Diego

Resource Conservation District
of Greater San Diego County

In Partnership with the Fire Safe Council
of San Diego County
And Wild Willow Farm and Education Center

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Acronyms and Abbreviations

CAAQS	California Ambient Air Quality Standards
CDFW	California Department of Fish and Wildlife
CAL FIRE	California Department of Forestry and Fire Protection
CEQA	California Environmental Quality Act
CRM	Certified Rangeland Manager
CalVTP	California Vegetation Treatment Program
CNDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CRHS	California Register of Historical Resources
DPR	California Department of Pesticide Regulations
CNF	Cleveland National Forest
EPA	US Environmental Protection Agency
FGC	Fish and Game Code
FRAP	Fire and Resource Assessment Program - CAL FIRE
GHG	Greenhouse Gases
GSSD	Girl Scouts San Diego
GIS	Geographical Information System
LRA	Local Responsibility Areas
LTO	Licensed Timber Operator
MBTA	Migratory Bird Treaty Act
MSHCP	Western Riverside Multi-Species Habitat Conservation Plan
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NACL	Native American Contact List
NOA	Naturally Occurring Asbestos
NRHP	National Register of Historic Places
NWS	National Weather Service
PEIR	Programmatic Environmental Impact Report
PRC	Public Resources Code
PSA	Project Specific Analysis
RPA	Registered Professional Archaeologist
RPF	Registered Professional Forester
RCD	Resource Conservation District of Greater San Diego County
SENL	Single Event Noise Level
SDCAPCD	San Diego Air Pollution Control District
SRA	State Responsibility Areas
USGS	US Geological Survey
VMU	Vegetation Management Unit
VMT	Vehicle Miles Traveled
WLPZ	Watercourse and Lake Protection Zone
WUI	Wildland Urban Interface

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1. INTRODUCTION

A. Project Overview

Situated west of the mountain community of Julian in San Diego County, Camp Winacka and Camp Whispering Oaks, owned and managed by Girl Scouts San Diego (GSSD), provide Girl Scouts with outdoor recreational experiences. The two adjoining camps offer year-round programs, including rustic tent camping, swimming, archery, fishing, ropes course, and hiking in a wildland setting. Native vegetation in the wildland setting includes grass, shrubs, montane hardwoods, and conifers. The vertical and horizontal arrangements, density, dead/dying state, and fuel loading of the native vegetation supports the characterization of flammable vegetation or hazardous fuels. Vulnerable to damaging wildfires, flammable hazardous fuels increase the wildfire threat to life, property, and the natural resources of the camps and the nearby communities Pine Hills, Julian, and Wynola.

The GSSD camps have experienced damaging wildfires. The Cedar Fire (2003), one of California's largest and most destructive wildfires, burned over 270,000 acres, destroyed thousands of homes, and claimed the lives of fifteen people in San Diego County. On the fourth day of the fire, the Santa Ana winds reversed from off-shore to on-shore, and the fire burned through both camps and destroyed several buildings. The fire cost the GSSD over 1.5 million dollars. Since the fire, native vegetation has regrown throughout the area and exists as dense flammable fuel. In addition, Gold-Spotted Oak Borer (GSOB), an invasive oak pest, is actively attacking and killing oaks, adding heavy fuels to the hazardous fuel conditions.

The proposed project, identified as the Camp Winacka-Camp Whispering Oaks: Vegetation Management Project, builds on the Cooperative Forest Management Plan for the San Diego/Imperial County Girl Scout Council (FMP-2017). The FMP-2017 identified hazardous fuel conditions, including extensive oak mortality throughout the camps, and identified various activities (management objectives) to reduce hazardous fuels, lessen the potential of destructive wildfire impacts and increase wildfire resiliency. The proposed project is consistent with the FMP-2017's objectives and is designed to implement activities to meet these objectives.

In January 2022, Public Resource Code §4208.1 established the Regional Forest and Fire Capacity Program (RFFC), administered by the California Department of Conservation (DOC). The RFFC program supports regional leadership to build local and regional capacity and develop, prioritize, and implement strategies and projects that create fire-adapted communities and landscapes by improving ecosystem health, community wildfire preparedness, and fire resilience. The Resource Conservation District of Greater San Diego (RCDGSDC) agreed to serve as the local RFFC leader in developing the Regional Priority Plan (RPP) for San Diego County. The proposed project is consistent with the RFFC program and is identified in the RPP. The RCDGSDC has allocated RFFC grant funds to complete the environmental review and treat portions of the proposed project.

B. Project Location

Located in the unincorporated areas of eastern San Diego County, the proposed project is strategically situated between the towns of Ramona on the west and Julian/Wynola areas on the northeast. The Cleveland National Forest directly borders the proposed project to the west, the San Deigo River Foundation on the northwest corner, and the Inaja and Cosmit Reservation on the southern boundary. The remaining adjacent parcels are private landowners. The neighboring residential areas of Pine Hills and Mountain Meadows are directly northeast and southeast, respectively. The proposed project is in the Julian and Santa Ysabel US Geological Survey (USGS) 7.5-minute Quadrangles. See Map 1: Vicinity Map.

C. California Environmental Quality Act

As the public grant fund grantor, the RCDGSDC is the project proponent and serves as the lead agency for this proposed project. Before RCDGSDC approved funding, the proposed project was assessed for environmental review compliance, including utilizing the environmental checklist under the California Forest Improvement Program (CFIP). The assessment concluded that to align and assist with Governor's Newson Executive Order (3/30/21) to increase the pace and scale of forest and wildland management throughout the state and to complete projects on 250,000 acres annually by 2025, the proposed project needed to be structured in a way to not only increase the pace and scale but also be prepared as a shovel-ready project. The assessment determined that

to increase the pace and scale in San Diego County and to create a shovel-ready project, the proposed project should be reviewed for consistency with the California Vegetation Treatment Program.

In December 2019, after a lengthy period of leading a statewide effort to develop the California Vegetation Treatment Program (CalVTP) to address the wildfire crisis in California, the California Board of Forestry and Fire Protection certified the Programmatic Environmental Impact Report (PEIR). According to the CalVTP, the program is critical to the state's multi-faceted strategy to address California's wildfire crisis.

The PEIR identifies local, regional, and state agencies with land ownership or land management responsibilities, including agencies that provide grant funding support, in the State Responsibility Areas (SRA) may use the CalVTP PEIR for their proposed vegetation treatment projects to meet CEQA compliance. The CalVTP PEIR identifies a complex set of environmental settings covering the entire state. The PEIR describes the comprehensive regulatory settings applicable to the statewide program. In addition, the PEIR identifies a range of potential impacts associated with vegetation treatment projects and establishes Standard Project Requirements (SPRs) and Mitigation Measures (MMs) to address and minimize these impacts. Moreover, the CalVTP PEIR sets forth a streamlining process to evaluate the impacts of a proposed project, and the Project Specific Analysis (PSA) documents the evaluation process.

For a proposed project to be within the scope of the CalVTP PEIR, the proposed project must be consistent with the treatment types, treatment activities, and the environmental and regulatory settings described in the PEIR. All SPRs and MMs specific to a proposed project must be incorporated into the PSA. CEQA Guidelines Section §15168(c)(2) indicates that if the potential environmental impacts of a proposed project are determined to be covered by the environmental impacts analyzed in the PEIR, the project may be approved using a finding statement that indicates the proposed project is within the scope of the PEIR. Such a finding would constitute CEQA compliance under the CalVTP PEIR. Further, a project consistent with and within the scope of the PEIR would likely require no additional review.

The proposed project was reviewed for consistency with the California Vegetation Program (CalVTP). The review concluded that treatment types and activities are consistent with the CalVTP and that the proposed project is within the treatable landscape. The review recommended conducting the environmental review utilizing the PSA under CalVTP PEIR to meet CEQA compliance. This document and supporting attachments and references constitute the PSA meets CEQA compliance.

D. Treatment Type and Activities

The proposed project intends to implement two types of treatments: fuel breaks and Wildland-Urban Interface (WUI) fuel reduction. Both treatment types are described in the CalVTP. The fuel breaks are designed as shaded fuel breaks and are located next to existing roads for fire-safe ingress/egress. The WUI fuel reduction areas intend to reduce, remove and modify hazardous, flammable fuel (native and invasive vegetation) in strategic locations between wildland areas and structures within the camp facilities. The treatment types identified in the proposed project are consistent with and within the scope of the CalVTP.

The proposed project intends to apply the following treatment activities to reduce, remove and modify vegetation: mechanical, manual, herbivory, herbicides, pile burning, and prescribed broadcast burning. All six treatment activities are described in the CalVTP. The area of application of treatment activities within the treatment areas varies to allow flexibility to reduce, modify or remove vegetation within the given site conditions, fuel loading, topography, access, cost, timing, operational constraints, environmental effects, and other associated implementation factors. The treatment activities identified in the proposed project are consistent with and within the scope of the CalVTP.

In addition to prescribed broadcast and pile burning, the proposed project intends to use Air Curtain Burners (ACBs) as an alternative burning method to dispose of woody biomass, primarily GSOB-infested oak wood. ACBs were not directly identified in the PEIR as a treatment activity; therefore, the use of ABCs was not analyzed. However, the PEIR includes a greenhouse gas (GHG) mitigation measure that applies GHG reduction techniques for prescribed burns activities (MM GHG-2). The mitigation measure identifies that "other feasible methods or technology to sequester carbon" could be incorporated into the project. ACBs are consistent with the classification as an "other feasible method or technology to sequester carbon.

Typically, ACBs are powered by a diesel engine that generates a continuous airflow channeled and piped across the top of the burn chamber (burn box). During burning operations, the continuous top airflow, the air curtain,

reduces the release of smoke, ash, and black carbon (Particulate Matter 2.5 or $PM_{2.5}$) and revectors this material back into the burn chamber for further burning to maximize recapturing of carbon as ash and biochar.

While the ACB requires diesel fuel, the proposed use of ABC as an "other feasible method or technology" that generates carbon-sequestered materials (ash and biochar) would not exceed the carbon released from a large and damaging wildfire. Further, the ash and biochar generated from the ABC can be collected and redistributed into soils to improve soil-carbon storage. Functionally, the use of the ABCs meets the intent of MM GHG-2. Further, through engineering and technology, studies have shown that ABCs have evolved as air-controlled combustion chambers to burn and reduce woody biomass in a controlled environment, reduce black carbon smoke, and lessen the release of $PM_{2.5}$. Effectively, the use of ABCs is consistent with the PEIR and MMs and is within the scope of the CalVTP.

E. Treatable Landscape

The CalVTP evaluation process includes determining if the proposed project is within the "treatable landscape." The Treatable Landscape is a specialized map produced by a computer model based on the State Responsibility Area (SRA) and the California Wildlife Habitat Relationship (CWHR) dataset for likely vegetation types susceptible to wildfires. The model does not include Local Responsibility Areas (LRA) except for potential isolated ridgeline fuel break locations. Given the SRA's complex nature across California and vegetation types, the computer model generates a mix of homogenous and heterogeneous units or pixel areas to create the Treatable Landscape (map). For a project to be within the scope of the PEIR, a proposed project must be within the boundary (scope) of the Treatable Landscape. When a proposed project includes areas outside the Treatable Landscape, an additional review is necessary to determine consistency with the PEIR.

The placement (layout) of the proposed project was digitized utilizing a Geographic Information System (GIS) platform, including topographic maps and aerial imagery. The proposed project maximized the treatment areas near roadways to minimize edge effects, developed areas, and the property boundary. The proposed project is entirely within the SRA, and nearly all the proposed treatment activities, 99% of the proposed treatment area, are within the Treatable Landscape. Map 2: Proposed Project Area shows the proposed project area within the property boundary and Map 3: Proposed Boundary – Treatable Landscape shows the property boundary with within the Treatable Landscape, and Map 4: Proposed Project – Treatable Landscape shows the proposed project within the Treatable Landscape. Small pixel areas within the proposed project boundary, totaling 3.5 acres, are outside the treatable landscape but directly adjacent to treatable landscape areas. One areas is directly associated with a lake and is classified as water by the CWHR dataset. The lake (0.75 acres) is excluded from treatment. According to the CWHR, the other areas are classified as annual grassland (herbaceous) or montane hardwood, and these areas are consistent with the surrounding site and vegetation conditions.

Map 5: Treatable Landscape – Fuel Type identifies the proposed project area by fuel types as a mix of grass, shrubs, and trees. Further, field inspection confirms that these areas resemble adjacent vegetation conditions within the Treatable Landscape. Essentially, the areas outside the treatable landscape are the same as those within the treatable landscape.

Under limited conditions, a proposed project with portions of the project area outside the Treatable Landscape can be evaluated for consistency with the CalVTP PEIR if site conditions are similar to the neighboring areas under the Treatable Landscape. Further, it is reasonable to assert that if the site conditions outside the Treatable Landscape are similar to site conditions within the Treatable Landscape, then the proposed project is entirely within the scope of the CalVTP, and it is reasonable to conduct the environmental review utilizing the CalVTP PEIR for the entire proposed project area. The proposed project area, including the small pixeled areas outside the Treatable Landscape, is consistent with and within the scope of the CalVTP.

F. Project Specific Analysis

The CalVTP indicates that local agencies may utilize the CalVTP PEIR for vegetation treatment projects. The PSA is an environmental evaluation process to assess whether a proposed project is in scope and consistent with the CalVTP PEIR. As a streamlined process, the PSA evaluates the potential environmental effects of a proposed project's treatment type and activities and determines if those impacts are consistent with those identified in the CalVTP PEIR.

The proposed project was evaluated according to the parameters of the CalVTP PEIR. The analysis of the potential environmental effects reflects that the environmental impacts were sufficiently evaluated and consistent with the analysis identified in the CalVTP PEIR. Further, the analysis identified and applied the SPRs and MMs specific to the proposed project, reflecting that the proposed project addresses and minimizes those impacts and is consistent with the PEIR.

F. Addendum – Air Curtain Burners

Although the proposed project intends to apply a treatment activity that is an alternative method to one of the treatment activities, that alternative method, ACBs, as identified above (Section 1.D), is similar, but not identical, to the treatment activity, prescribed pile burning. However, the alternative treatment method is consistent with mitigation measures for GHG (MM GHG-2). While the alternative treatment activity conditions are similar but not identical to the prescribed pile burning identified in the PEIR, the alternative treatment activity is consistent with mitigation measures (MM GHG-2) as "other feasible methods or technologies to sequester carbon." The technical paper *Evaluation of Air Quality and Climate Change Impacts from Specialized Biomass Processing Technologies under the California Vegetation Treatment Program* provides substantial evidence that the specialized technologies, such as ACBs, can be used as a CalVTP treatment activity because new significant environmental impacts or substantially more serve significant impacts would not occur beyond the effects already identified in the PEIR. The analysis concluded that GHG, criteria pollutants, and smoke/odor emissions from biomass processing by pile burning could be reduced through specialized technologies, such as ACBs. Therefore, it is reasonable to state that the use of ACBs is consistent with the CalVTP PEIR.

G. Addendum – Treatable Landscape

Although small portions of the proposed project are outside the treatable landscape, as identified above (Section 1.E), site conditions indicate these areas are similar to adjacent areas within the treatable landscape. Given that site conditions with the proposed project are consistent with concepts of treatable landscape, it is reasonable to assert that the proposed project is consistent with the scope of the CalVTP, and it is reasonable to conduct the environmental review utilizing the CalVTP PEIR for the entire proposed project area.

H. Use of the CalVTP and PEIR by Other State Agencies or Public Agencies

The CalVTP indicates that using the CalVTP and the CalVTP PEIR is permissible by other state agencies or public agencies with land ownership, land management, or other regulatory responsibilities for a proposed vegetation treatment project consistent with the PEIR and treatable landscape. The CalVTP PEIR directs that if an agency opts to utilize the CalVTP PEIR, it may apply its review and approval process to meet the CEQA compliance, including filing the Notice of Determination through the State Clearinghouse or applicable County Clerk's office.

I. Implementing Entity

The RCDGSDC serves as the project proponent, and the GSSD serves as the implementing entity. The implementing entity is responsible for securing funding for their project. GSSD has invested its resources to support past vegetation management activities and expects to do so in the future. Cost-share funding provides incentives to carry out vegetation management activities, including maintenance.

J. Mitigation Monitoring and Reporting Program

The California Environmental Quality Act (CEQA) and the State CEQA Guidelines (PRC Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies "to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment." A Mitigation Monitoring and Reporting Program (MMRP) is required for approval of the proposed project because the proposed project, as a later treatment activity under the CalVTP PEIR, identifies potential significant adverse impacts, and all feasible mitigation measures have been incorporated into the proposed project. Standard project requirements (SPRs), which are part of the proposed project description, have been defined to avoid or minimize adverse effects. Where potentially significant impacts remain after the application of SPRs, Mitigation Measures (MMs) have been identified to further reduce and/or compensate for those impacts. While only MMs are required to be covered in an MMRP, both SPRs and MMs are included in

the MMRP to assist in implementing all environmental protection features. The MMRP is included in the Attachment Section – Attachment A.

K. Project Specific CEQA Findings and Overriding Considerations

As the project proponent and lead agency, the RCDGSDC is responsible for approving the CEQA documents for projects within their jurisdiction, including the proposed project within scope of the CalVTP PEIR. Additionally, the RCDGSDC is responsible for adopting CEQA findings (under Section 15091 of the State CEQA Guidelines) and, if needed, adopting a statement of overriding considerations (under Section 15093 of the State CEQA Guidelines). While the RCDGSDC must adopt findings (see CEQA Guidelines section 15096(h)), the RCDGSDC has the option of reusing, incorporating, or adapting all or part of the findings adopted by the Board for the CalVTP PEIR to meet the RCDGSDC's requirements to the extent the findings apply to the proposed vegetation treatment project. The CEQA Findings and Overriding Consideration Statement is included in the Attachment Section – Attachment B.

2. PROPOSED PROJECT

A. Background and Project Setting

Camp Winacka and Camp Whispering Oaks are adjoining Girl Scouts camps in eastern San Diego County that provide Girl Scouts with day-use and overnight outdoor recreational experiences. Scouts have owned the camps for nearly sixty years. In 1959, GSSD acquired a 38-acre parcel known as Camp Davidson from the Armed Forces YMCA. The Armed Forces used the facility as a rest and recovery location for military troops during World War II and the Korean Conflict. After GSSD purchased the property, the Camp was renamed Camp Whispering Oaks. Nearly ten years later, in 1968, Girl Scouts acquired a portion of the Rutherford Ranch and was named Camp Winacka. Then in 1995, additional acres were purchased to bring Camp Winacka to 594 acres. The combined acreage totals 632 acres.

Each camp operates as a separate facility, and each camp has a camp kitchen, main lodge, rustic tent sites, cabins, maintenance buildings, and various recreational sites and facilities. Camp Winacka can host 240 day-use guests and 200 overnight guests. Camp Whispering Oaks can accommodate up to 150 day-use guests and 188 overnight guests. Resident camp managers oversee operations and maintenance, including defensible space around buildings. Roads and trails provide access to most areas of the camps, except for the steep lower section of the Dehr Creek canyon area. Wells provides water for the facilities and the fire hydrant system. The total developed area encompasses approximately 55 acres; the remaining areas are undeveloped.

Camp Winacka has two lakes, and Camp Whispering Oaks has one pond. Upper Lake is a 1.5-acre reservoir that tends to hold water year-round. Lower Lake is a smaller lake, about 0.75 acres, and tends to dry up during drought. Chocolate Pond, located at Camp Whispering Oaks, is 0.50 acres and tends to dry up during droughts. Upper Lake is sufficient in size for helicopter firefighting operations. For emergencies, Camp Winacka has a helipad.

The Cleveland National Forest borders the proposed project to the west, the San Deigo River Foundation on the northwest corner, and the Inaja and Cosmit Reservation on the southern boundary. The remaining neighboring parcels are private landowners. The adjacent residential areas of Pine Hills and Mountain Meadows are directly northeast and southeast, respectively. Approximately 500 developed parcels, primarily homes, are dispersed between these two communities. Within five and seven miles, another group of 2,000 homes and businesses scattered and clustered in the Julian and Wynola communities, east and north of the proposed project.

Before the GSSD owned the property, cattle grazing was commonly practiced, and it is thought that grazing may have minimized the destructive wildfire impacts before the late 1960s. After GSSD acquired the property, cattle grazing stopped, and native vegetation was permitted to grow unchecked. Incrementally, over thirty years, the growth of vegetation increased fuel loading. The bark beetle epidemic also killed thousands of pines within the camp and surrounding area during the 2001-2005 drought. High fuel loading and standing dead trees aided the Cedar Fire in rapidly spreading through the camp and the surrounding community.

Twenty years post Cedar Fire, vegetation has regrown and increased fuel loading. In recent years, GSOB, a relatively new invasive oak pest detected in eastern San Diego County, spread throughout the county, including the camps. The oak pest has caused extensive oak mortality throughout the camp, and fuel loading exceeds thousands of tons of dead oak biomass. Infested oak wood requires special handling. Onsite management, including burning infested oak wood, is the most efficient and effective way to reduce heavy fuel loading and minimize the GSOB population.

In the San Diego Unit Fire Plan (2022), the California Department of Forestry - San Diego Unit recognizes heavy hazardous fuels throughout the area. The Unit Fire Plan identifies that the area has the potential for extreme fire behavior under Santa Ana wind conditions and plume-dominated/fuel-driven fire behavior under non-Santa Ana wind conditions. Consistent with Unit Fire Plan, the proposed project includes fuel reduction along Boulder Creek Road to maintain a key evacuation corridor for the areas.

The Julian Community Planning Area (Julian CP) (2011) is part of the San Diego County General Plan. The camps are within the Julian CP. The Julian CP recognizes the area as one of the highest fire danger areas in San Diego County and has identified several policies and recommendations to address the fire hazard concerns, including managing wildland vegetation. The proposed project is consistent with the Julian CP.

The camps are also within the boundary of the Julian Fire Safe Council (Julian FSC). The Julian FSC serves as the community leader of the Julian Community Wildfire Protection Plan (Julian CWPP). The Julian CWPP, developed

under a collaborative process, identifies the role of community engagement and education, adopting structure hardening, maintaining defensible space, increasing fuels treatment, planning for evacuation, and other preparedness projects. Consistent with the Julian CWPP, the camps maintain defensible space around buildings, apply recommendations to structure-harden to new buildings, maintain open communication with the local FSC, RCDGSDC, and fire officials, and are active in preparedness projects. The proposed project aligns with the Julian CWPP by reducing hazardous fuels and maintaining roadside clearance for evacuation.

The FMP-2017, approved by CAL FIRE and the Natural Resources Conservation Service (NRCS), is the guiding forest management plan for the camps. Treatment was initiated in two of the treatment units under NRCS funding, and an environmental review was conducted under the National Environmental Protection Act (NEPA) for these two units. Approximately 90 acres were treated between 2019-2023. Under this proposed project, these treatment units are planned as maintenance treatment units.

B. Treatment Units and Vegetation Description

Because the proposed project is aligned with the FMP-2017, the proposed project has been organized into similar units. Treatment Unit 1 in the FMP-2017 was identified as a Defensible Space treatment area around structures. This unit is not included in the proposed project because the CalVTP does not include Defensible Space around structures. Treatment Unit 7 in the FMP-2017 was a stand-alone unit. This area is incorporated into the proposed project as Treatment Unit 6. Treatment Unit 3, in the FMP-2017, was a stream improvement project funded by NRCS. Treatment Unit 3 has been assigned as the treatment area in Camp Whispering Oaks. The remaining treatment units identified in the FMP-2017 are approximately similar in the layout and treatment activities in the proposed project.

All fuel types, grass, shrubs, and trees are present throughout the project area. The general distribution of vegetation type across the treatment units is reflected in Table 1: Fuel Type and Vegetation Classification by Treatment Unit. Trees and shrubs are the dominant fuel types; grass fuel type represents about one-fifth of the area. Table 1 also shows that most grass fuel types are classified as Coastal Oak Woodland, indicating that the fuel type classification focused on the understory vegetation rather than the tree component.

The tree component, comprised of Coastal Oak Woodland, Sierra Mixed Conifer, Montane Riparian, and Montane Hardwood, is distributed approximately across 68% of the proposed treatment area. Most of the tree species in these vegetation classifications are conifers and oaks. Oak species, particularly red oak species (California black oak, coast live oak, canyon live oak, and Engelmann oak), is a concern. GSOB has caused severe oak mortality, contributing to heavy fuel loading throughout the treatment areas. The GSSD has estimated that the total volume of dead or dying oaks due to GSOB exceeds 40,000 tons of biomass.

Table 1: Fuel Type and Vegetation Classification by Treatment Unit

Fuel Type Classification			Vegetation Classifications	Treatment Units							Acres*	
Fuel Type	Acres	Percent	CWHR	2A	2B	3	4	5	6	8	Grand Total	Percent
Grass	106.1	21.9%	Annual Grassland				11.2	1.3	1.8	1.1	15.4	3.0%
Grass			Coastal Oak Woodland	3.5	2.4	4.8	0.8	13.0	34.9	31.3	90.7	17.8%
Shrubs	145.2	28.5%	Chamise-Redshank Chaparral						0.2		0.2	.03%
Shrubs			Coastal Scrub				0.2		6.5		6.7	1.3%
Shrubs			Mixed Chaparral	0.8	1.0	19.6	18.1	19.7	31.8	47.3	138.3	27.2%
Trees	257.5	50.6%	Sierran Mixed Conifer		4.0	2.2		0.3	5.7	3.3	15.5	3.1%
Trees			Montane Riparian	17.6	6.3	8.6		16.8	40.3	21.9	111.5	21.9%
Trees			Montane Hardwood		3.3		27.4	25.2	36.1	38.5	130.5	25.6%
Grand Total	508.8	100%	Grand Total	21.9	17.0	35.2	57.7	76.2	157.4	143.4	508.8	100%

* The Treatment Units cover 512.3 Acres. The Treatable Landscape did not cover small areas within Treatment Units 5, 6, and 8. These areas total 3.5 acres. One of the small areas is associated with Lower Lake (.75 acres). The other areas outside the Treatable Landscape are consistent with adjacent Treatable Landscape classifications.

Shrub vegetation types include mixed chaparral, coastal scrub, and chamise-redshank chaparral. A small area of coastal scrub, approximately 6.7 acres, is found on the west slope of Treatment Unit 6. Chamise-redshank chaparral classification is noted at the southern end of the same unit on less than a quarter of an acre. The Chamise-Redshank Chaparral area is part of a larger area outside the proposed project area but within the GSSD property. Like Coastal Oak Woodland, Mixed Chaparral is found in all treatment units. Whitethorn ceanothus, big berry manzanita, and scrub oaks are the dominant shrub species. Whitethorn ceanothus is one of the leading species that sprouted post-Cedar Fire.

Treatment Units 2A (21.9 acres) and 2B (17.0 acres) are along roadways. Treatment Unit 2A is along Boulder Creek Road, and Treatment Unit 2B is along the service road between Boulder Creek Road and Eagle Peak Road. Treatment Unit 2A is mostly Montane Riparian (80%), with Coastal Oak Woodland (16%) dominating the area. A small percent of the vegetation is classified as Mixed Chaparral; whitethorn ceanothus is scattered along the road throughout all classifications. Treatment Unit 2B parallels the service road near the western boundary. The unit consists of Montane Hardwood, Montane Riparian, Coastal Oak Woodland, and Sierra Mixed Conifer, with a small component of Mixed Chaparral. The unit has significant oak mortality and heavy fuel loading.

Treatment Unit 3, 35.2 acres, is accessed from Pine Hills Road and encompasses Camp Whispering Oaks. Over half of the vegetation in Treatment Unit 3 is Mixed Chaparral. The tree component is a mixture of Montane Riparian, Coastal Oak Woodland, and Sierran Mixed Conifer. An invasive species, Scotch broom, is scattered along the service road from the camp to Chocolate Lake and the hillside above the storage yard. The property's northern border is along Pine Hills Road and is adjacent to developed residential properties. A small 2.5-acre parcel on the north side of Pine Hill and west of Pine Ridge Way is assigned to Treatment Unit 3. The unit has moderate oak mortality but heavy fuel loading.

Treatment Unit 4, 57.7 acres, is a ridge line treatment area bordered by Treatment Unit 6 on the west slope and Treatment Unit 5 on the east slope. Nearly 50% of Treatment Unit 4 consists of Montane Hardwood and Coastal Oak Woodland. Mixed Chaparral and Annual Grasses make up the remaining vegetation classification. The treatment unit is on a ridge top, so the area tends to be exposed to more wind and drier conditions. Fuels reduction occurred in 2019 under an NRCS grant. The oak mortality is low to moderate, and the fuel loading is relatively low.

Treatment Unit 5, 76.2 acres, is bordered by Treatment Unit 4 on the western ridge top, Treatment Unit 8 on the east, Treatment Unit 2A on the south, and private property on the north. In the upper eastern section, the treatment unit is adjacent to a meadow area not included in the proposed project. Treatment Unit 5 is primarily a tree component (55 acres, or 72% of the treatment unit) of Coastal Oak Woodland, Montane Riparian, Montane Hardwood, and Sierra Mixed Conifer. Mixed Chaparral is primarily found on the lower southern slope. Fuels reduction occurred in 2022-2023 under an NRCS grant. Currently, both oak mortality and fuel loading are low.

Treatment Unit 6 is the largest, 157.4 acres, and borders CNF on the west, Treatment Unit 4 on the east, Eagle Peak Road and San Diego River Park Foundation on the north, and Treatment Units 2A and 2B, Boulder Creek Road and private property parcels on the south. Treatment Unit 6, like Treatment Unit 5, is primarily a tree component (117 acres, or 74% of the treatment unit) and consists of Coastal Oak Woodland, Montane Riparian, Montane Hardwood, and Sierra Mixed Conifer—pockets of Mixed Chaparral intermix with the tree components. The unit has significant oak mortality and heavy fuel loading.

Treatment Unit 8, 143.4 acres, is bordered by Treatment Unit 5 and Camp Winacka facilities on the west, Treatment Unit 3, and private property on the east and north. The southern boundary connects with the upper segment of Treatment Unit 2A. Treatment Unit 8 is similar to Treatment Unit 5 regarding vegetation classifications and ratios. Like Treatment Unit 3, the northern boundary of Treatment Unit 8 is the interface with developed areas of the Pine Hills community. The unit has significant oak mortality and heavy fuel loading.

C. Project Description

The proposed project intends to reduce wildfire impacts and restore and maintain wildfire resiliency within the boundaries of the GSSD camps by treating hazardous fuels on 512 acres, or 81% of the GSSD property. The proposed project establishes two treatment types: fuel breaks and WUI fuel reduction to reduce hazardous fuels. Operationally, the fuel

breaks and WUI-fuel reduction treatment types are strategically divided into treatment units to manage the workload and operational timeframes. Table 2, shown below, reflects the treatment unit by treatment activities and acres.

Table 2: Treatment Units and Treatment Activities

	Treatment Type	Fuel Breaks		WUI- Fuel Reduction					
	Treatment Units	**2a**	**2b**	**3**	**4**	**5**	**6**	**8**	**Total Acres**
	Acres	22	17	35	58	77	159	144	**512**
Treatment Activities	Manual	22	17	35	58	77	159	144	512
	Mechanical		17	35	58	77	124	144	455
	Pile Burn		17		58	77	139		291
	Broadcast Burn		17		58	77	124		276
	Herbicide			24				13	37
	Herbivory			35	58	77	159	144	473

Fuel breaks are next to roadways, and WUI fuel reduction areas are strategically located throughout the property boundary and organized as treatment units. The fuel break prescription reduces, removes, and modifies hazardous fuels to improve fire-safe ingress/egress next to roadways and provide an operational area to fight fires. The WUI fuel reduction prescription reduces, removes, and modifies hazardous fuels to reduce fuel loading to change fire behavior, lessen fire impacts and restore wildfire resiliency. Not every acre expects to be treated with the same treatment activity or intensity. Further, the WUI fuel reduction prescription includes retention areas to conserve habitat that creates mosaic patterns with the treatment areas. The long-term goal is maintaining wildfire resiliency with heterogeneous habitat, structure, and diversity.

The treatment activities to treat hazardous vegetation include manual treatment, mechanical treatment, prescribed and pile burning, herbivory, and herbicides. The range of treatment activities allows flexibility to apply treatment based on site-specific conditions, fire and treatment history, insect and disease, plants, habitat, soil characteristics, weather, cultural resources, sensitive areas, costs, funding, and other factors. Given the volume of GSOB-infested oak wood, ACBs are the primary method to dispose of woody biomass. See Maps 5 – 10 for the specific treatment activity maps.

The treatment activity or activities for each treatment unit are selected and applied based on several factors, including contracting, funding, workforce availability, and equipment. Treatment activities may be used at different times throughout the year or over several years. For example, manual treatment may occur during summer, followed by late autumn or early winter pile burning. Mechanical treatment might occur in late spring/early summer, followed by herbivory two years later to minimize the regrowth of brush species. Alternatively, after the initial treatment, prescribed broadcast burning could be applied to maintain the effectiveness of the treatment.

Fuel Break Prescription

Treatment Units 2a and 2b are fuel breaks strategically located near roadways. Treatment Unit 2a centers along Boulder Creek Road and applies manual treatment methods. Treatment Unit 2b centers along a service road between Boulder Creek and Eagle Peak Road. Besides manual treatment, mechanical, pile, and broadcast burning may be applied within this unit. The fuel breaks are intended to reduce, remove, and modify hazardous fuels to create a safe travel route for ingress-egress for civilians and firefighters and to provide a strategic area for firefighters to conduct safe firefighting operations. The fuel break assists with minimizing roadside ignitions.

The fuel breaks centered along the roadway or service road are 200 feet wide. Unit 2A is approximately 0.90 miles, and Unit 2B is approximately 0.75 miles long. The prescription intends to reduce hazardous fuels by removing ladder fuels under tree canopies, removing dead and dying trees, including GSOB-infested oaks and bark beetle-killed conifers, and removing live trees less than 10-inches in diameter (only in overstocked, densely forested areas). The work includes pruning trees, spatially separating shrubs or groups away from trees, and weed-whacking grasses and light shrub species. The spatial separation of vegetation ranges from four to six (4-6) times the height of vegetation or a reduction of 40% to 60% of the current hazardous fuel cover. Visually, the fuel break would appear as an open montane forested

area of oaks and conifers in the overstory, scatterings of single and groups of shrubs spatially separated in open areas in the understory, and light grasses and forbs at ground level. The outer perimeter or edge of the fuel break would appear as a feathered and scalloped edge to naturally blend into the adjoining unit or untreated areas. Chipped and masticated material may cover bare or exposed soils or minimize the grasses beside roadways.

WUI Fuel Reduction Prescription

WUI fuel reduction intends to create a wildfire-resilient environment that balances fire safety and habitat values with reducing catastrophic wildfire conditions. In the event of a wildfire, the wildfire-resilient environment, a wildfire would burn through the area without causing significant impacts on life, property, and the natural environment.

Treatment Units 3, 4, 5, 6, and 8 are WUI fuel reduction areas. The WUI fuel reduction prescription reduces, removes, and modifies hazardous fuels to reduce fuel loading to change fire behavior, lessen fire impacts and build wildfire resiliency. Not every acre expects to be treated with the same treatment activity or intensity. Further, the WUI fuel reduction prescription includes retention areas to conserve habitat, creating mosaic patterns within the treatment areas. The long-term goal is maintaining a wildfire-resilient area with heterogeneous habitat, structure, and diversity.

Treatment Unit 3 may utilize manual, mechanical, and herbivory treatment methods to reduce hazardous fuels and fuel loading. In addition, herbicides may be used to treat the invasive scotch broom found in this area. Due to the proximity of neighboring developed parcels, prescribed pile and broadcast burning were not included in this treatment unit.

Treatment Units 4, 5, and 6 may apply manual, mechanical, prescribed broadcast burn, pile burn, and herbivory treatment methods. These treatment units are located furthest from developed areas, where prescribed pile and broadcast burning are potential treatment activities.

Treatment Unit 8 may use manual, mechanical, and herbivory treatment methods. Like Treatment Unit 3, due to the proximity of neighboring developed parcels, prescribed pile and broadcast burning were not included in the treatment unit. Herbicides may be applied to treat this unit's small patches of the invasive scotch broom.

The WUI fuel reduction prescription is similar to the fuel break prescription, which intends to reduce hazardous fuels but includes the higher retention of healthy brush and trees. The spatial separation of vegetation ranges from two to six (2-6) times the height of vegetation depending on slope, aspect, and health of vegetation. Given the extensive oak and pine mortality throughout the property, removing dead and dying trees takes priority. Snag and down woody log retention are acceptable in suitable locations. Snags with habitat characteristics may be retained at a proportion of 4-6 snags per acre located outside the fall or strike zone of roadways, trails, or structures. Large-diameter down woody logs may be retained at a proportion of 5-10 logs per acre in scattered patterns. Size, height, or length of snags and down woody logs may vary over the treatment area, and retention proportions may also vary.

Understory fuel reduction retains healthy brush species and younger, vigorous-growing trees to become the future forest. The prescription allows for closer spacing of trees and shrub species and additional retention areas (untreated or lightly treated areas) to create heterogeneous habitat, structure, and diversity while achieving the fuel reduction objective. Visually, the WUI fuel reduction would appear as a mixture of open and partially closed montane forested areas of oaks and conifers in the overstory, scatterings of a single isolated specimen or a clustering of brush and small trees in the understory, and grasses and forbs at ground level. Chipped and masticated material may cover bare or exposed soils. Preferable for chip depth not to exceed 3 inches in depth and are broadcasted and spread over soils in discontinuous random patterns that create gaps in chip coverage to expose soils. Chip coverage should not exceed 70%; where 30% of the soil is not covered with chips breaks up the compacted surface fuels and provides potential habitat for ground-nesting species, such as bees.

Buffer zones or retention areas, which are untreated areas, may occur within the fuel break and the WUI fuel reduction areas. Typically, buffer zones or retention areas within fuel breaks are associated with protection measures for other resource values, such as biological or cultural resources. Buffer zones or retention areas within the WUI fuel reduction area include protection measures for other resource values and untreated areas to retain habitat, structure, and diversity that balances aesthetics with the fuel reduction objective. The size or distance of the buffer zone or retention area may vary depending on the resources. A qualified archaeologist sets protection measures for cultural resources according to the SPRs for cultural resources. Recommendations from culturally affiliated tribes are also considered and usually incorporated into the protection measures. A qualified biologist sets protection measures for biological resources according to the SPRs for these resources. Recommendations from wildlife agencies are considered and incorporated into the protection measures.

Treatment Activity - Implementation

Implementation primarily would occur through manual treatment methods, meaning handcrews using chainsaws and chippers. Tow-behind or track chippers may be used to chip branches and limb wood. In favorable terrain situations, mechanical treatment, such as masticators, or skid steers with masticating heads, may be used to cut and process hazardous fuels into chips or shreds. Chipped or shredded material remains on site and is spread or dispersed over soils. Alternatively, cut biomass may be piled and burned, relocated to a designated location within the property, utilized as firewood, milled into non-structural lumber, or burned in the ACB. Herbivory and herbicides may be applied to maintain the effectiveness of the initial treatment.

A Registered Professional Forester (RPF) or designee would be consulted to ensure the treatment activities are implemented consistent with the project description and the PSA. All prescribed, piled, or air curtain burning requires a burn and a smoke management permit from the California Department of Forestry and Fire Protection (CAL FIRE) and the San Diego Air Pollution Control District (APCD). A certified range manager would be consulted regarding the application of herbivory in terms of types of animals, numbers of animals, and the timing and duration of grazing. A pest control advisor would be consulted regarding the application of herbicides.

Treatment Activity Description

The treatment methods are primarily manual and mechanical operations. Access, slope, soil conditions, and other site factors determine the treatment method. Most treatment areas (70-80%) would occur through manual or hand treatment. Approximately 20-30% of the area is suitable for mechanical treatment. Steep slopes and soil conditions limit the size of mastication equipment to small or medium-sized masticators. Hand tools, such as chainsaws, axes, shovels, and weedeaters, are likely tools for manual or hand-treatment operations. Other support vehicles, such as dump trucks, loaders, and trailers, may be necessary to complete the job. Access limits the use of these vehicles to paved or natural surfaced roads.

The proposed project includes using herbicides, herbivory, and prescribed burning to provide additional activities to support the project. Herbicide application would be used for targeted invasive/non-native species contributing to hazardous fuel loading. Herbivory practices would be an option for initial treatment and maintenance in suitable locations. Prescribed burning is limited to pile burning in isolated locations that are not accessible for equipment to dispose of cut vegetation.

Herbicides would be an option for treating invasive/non-native vegetation in isolated locations. This treatment intends to reduce the competition of invasive/non-native species, retaining native, healthy vegetation (shrubs and trees) spatially separated to lessen fuel loading. The project manager would consult a Pest Control Advisor (PCA) for a written herbicide recommendation. The written herbicide recommendation would identify the target species, the appropriate herbicide, and the application methods and equipment. Application of herbicides must follow the label instructions. Herbicides that could be used are those listed in the CalVTP. Herbicides would only be applied through all-terrain vehicles or backpack-style sprayers. Aerial herbicide application is not permitted. To ensure herbicides are applied appropriately on the target species under the prescribed site conditions, including weather conditions, all personnel applying herbicides would receive herbicide use and safety training. Additionally, herbicide applicators would be required to wear the appropriate level of personal protective equipment as guided by the label and written instructions by the PCA.

Herbivory practices would be an option for initial treatment for some locations within the treatment area. Further, herbivory practices would help maintain the fuel break. The project manager would consult with a Certified Rangeland Manager (CRM) to develop an herbivory treatment plan. The herbivory treatment plan would consider the project site conditions, the type and number of grazing animals, target vegetation for grazing (shrubs and invasive grass/forbs), and the ability to manage the grazing herd to stay within the fuel reduction prescription. Factors such as fencing, access, capacity and facilities for loading/offloading animals, proximity to developed areas, and water availability would need to be considered. The grazing stock would need to be weed-free before arriving at the project site and then moved off-site to release any weed seeds from their digestive tract. Herders would be required to implement this treatment activity.

Burning could be prescribed as pile burning, broadcast burning, or ACB burning operations. The project manager would consult with CAL FIRE to determine the most appropriate burn treatment activity (method) to treat the biomass within the treatment area. In consultation with CAL FIRE, the burn boss would be identified; a written Burn Plan and Incident Action Plan (IAP) would be completed before burning. A burn permit, a Smoke Management Plan (SMP), would be completed and approved by San Diego Air Pollution Control Board (SDAPCD). Burning in

San Diego County is restricted to permissible burn days. GSSD staff would conduct ACB operations and, potentially, pile burning. Broadcast burning would be conducted in partnership with CAL FIRE.

Biomass

Biomass would be treated onsite by chipping, masticating, or prescribed burning. Where access is limited, the lop and scatter practice is permissible and coordinated with the project manager. When the onsite treatment of biomass is not feasible, excessive biomass may be transported off-site to a biomass/greenwaste facility. An Organic Solid Waste Plan would be required to describe the details of biomass/greenwaste.

Workforce, Manual, and Mechanical Operations

Conservation crews (CAL FIRE, CCC, or other trained workforces) or a Licensed Timber Operator (LTO) would serve as the workforce for implementing manual and mechanical treatments. The workforce would use various vehicles, equipment, and tools to conduct manual and mechanical treatments and prescribed pile burning. Vehicles include pickup trucks, crew carriers, chip trucks, dump trucks, trailers, fire engines, and other associated types of vehicles. Equipment includes masticators, chippers, loaders, winches, and other associated types of equipment. Tools include chainsaws, weedeaters or weed-whips, axes, rakes, shovels, and other hand tools.

The workforce is expected to be a combination of private contractors and conservation crews. Private contractors may use equipment such as masticators and tract chippers, while conservation crews would use tools such as chainsaws, weedeaters, pruners, and chippers. Conservation crews may be used for prescribed pile burning, while firefighting crews may be used for prescribed broadcast burning. The GSSD camp staff would operate the ACB operations.

Pre-implementation Training

Conservation crew, LTOs, or other workforces approved by the project manager to work on the proposed project would be required to attend a training workshop before the commencement of work. The training workshop includes specific details about the appropriate work practices to effectively implement the SPRs and MMs, including those SPRs and MMs for biological and cultural resources identified in the PSA.

D. Maintenance

The implementing entity expects to maintain long-term property ownership and expects to maintain the initial treatment. The treatment activities for the initial treatment are expected to be the same for maintenance treatment. Maintenance activities are expected to treat less volume and involve less time and cost.

To maintain the effectiveness of the initial treatment, the implementing entity would conduct maintenance on a 5-7 year cycle based on site conditions, regrowth, wildfires, pest outbreaks, or other factors. In coordination with the project proponent, the implementing entity would consult an RPF or environmental professional knowledgeable in the CalVTP and conduct an onsite evaluation to determine maintenance treatment needs. In addition, the project proponent, in coordination with the implementing entity, is expected to review the PSA at least ten years after the approval of the proposed project. The review of the PSA would include, among other PSA items, a review of the CNNDB database for the current listing of protected species and a review of the archaeological record search for new cultural records. Adjusting biological and/or cultural resource protection measures may be necessary to adapt to the new information. Absence of conditions that would render the PSA deficient with CEQA or environmental regulations, then a 10-year review cycle and reassessment of the PSA would be sufficient to expect this document to serve long-term. Table 3 reflects the potential maintenance schedule for the next twenty years.

Table 3: Potential Treatment and Maintenance Schedule

Treatment Unit	Acres	Initial Treatment Year	Potential Prescribed Broadcast Burn Year	Maintenance Year	Review and Reassess PSA	Maintenance Year	Potential Prescribed Broadcast Burn Year	Review and Reassess PSA
Treatment Unit - 4	58	2020*	2024	2026	2033	2034	2036	2043
Treatment Unit - 5	77	2022*	2024	2027		2035	2036	
Treatment Unit - 6	159	2023	2026	2028		2036	2038	
Treatment Unit - 2b	17	2024	2026	2029		2037	2038	
Treatment Unit - 2a	22	2024	NA	2030		2037	NA	
Treatment Unit - 8	144	2025	NA	2031		2038	NA	
Treatment Unit - 3	35	2025	NA	2031		2038	NA	
* NRCS funded treatment in portions of Units 4 and 5 under EQIP.								

3. ENVIRONMENTAL CHECKLIST

VEGETATION TREATMENT PROJECT INFORMATION

1.	Project Title	**Camp Winacka-Camp Whispering Oaks: Vegetation Management Project**
2.	CaVTP ID	2023-15
3.	Project Proponent Name and Address	Resource Conservation District of Greater San Diego County Address: 11769 Waterhill Road, Lakeside, CA 92040 Office: (619) 562-0096
4.	Contact Person Information and Phone Number	• Heather Marlow - Director of Forestry & Fire Prevention Programs Email: heather.marlow@rcdsandiego.org Phone: (619) 562-0096 Ext. 108 • Stan Hill - Forestry & Fire Prevention Project Manager Email: stan.hill@rcdsandiego.org Phone: (619) 562-0096 Ext. 110
5.	Project Location	Girl Scouts San Diego • Camp Winacka: 4720 Boulder Creek Rd, Julian, CA, 92036 Latitude: 33.038002° -- Longitude: -116.640975° • Camp Whispering Oaks: 4949 Pine Hills Rd, Julian, Ca, 92036 Latitude: 33.039096° -- Longitude: -116.627696°
6.	Total Acres to be Treated	512.3 Acres
7.	Project Description	See Section 2C: Project Description

7a.	Treatment Types	**Treatment Type**	**Check all that applies**
		Ecological Restoration	☐
		Fuel Break	☒
		WUI – Fuel Reduction	☒

7b.	Treatment Activities	**Treatment Activity**	**Acres**
		Prescribed Burning (Broadcast)	276
		Prescribed Burning (Pile Burning)	292
		Mechanical Treatment	455
		Manual Treatment	512
		Prescribed Herbivory	490
		Herbicide Application	37

7c.	Fuel Type	**Fuel Type**	**Check all that applies**
		Grass Fuel Type	☒
		Shrub Fuel Type	☒
		Tree Fuel Type	☒

7d.	Maintenance	See Section 2D: Maintenance

8. Geographic Scope

Geographical Scope	Check only one box
The treatment site is entirely within the CalVTP treatable landscape.	☐
The treatment site is NOT entirely within the CalVTP treatable landscape.	☒

Nearly all the project area (99%) is within the treatable landscape. Six small pixels, totaling 3.5 acres, are outside the treatable landscape. Vegetation outside the treatable landscape is similar to the vegetation directly adjacent to areas within the treatable area. One small area outside the treatable landscape is associated with a lake of 0.75 acres and will not be treated. The remaining 2.75 acres are expected to be treated.

9. Regional Setting and Surrounding Land Uses

The project is in San Diego County, west of Julian and east of the Cleveland National Forest. The property is an outdoor camp/reactional facility for Girl Scouts in San Diego. The land use is designated as "recreation-low," and the surrounding properties as rural residential, open space park or preserve, or vacant/undeveloped land. Within the property boundary, but outside the project area, several camp buildings/structures, such as cabins, kitchens, maintenance facilities, pools, and recreational areas. There are three lakes/ponds, a helipad, and hydrant systems.

Elevation ranges from 3,400 to 4,100 feet ASL. Montane hardwood (pines/oaks) is the dominant vegetation, with a mix of chaparral and shrub species and meadow/grasslands. The slope ranges from 5-75%, with a few sites exceeding 60%. Most of the project area is classified as a Very High fire hazard, with the northern portion classified as a moderate fire hazard. The primary public access road is paved. The entry roadways into the facilities are paved, and all other roads are natural-surfaced or graveled. The property is fenced and gated.

10. Other Public Agencies Whose Approval is Required, Consulted, or Notified

Public Agencies	Notified	Consulted	Required
Department of Fish and Wildlife (CDFW)	☒	☒	☐
US Fish and Wildlife Service (USFWS)	☒	☐	☐
San Diego Air Pollution Control District (SDAPCD)	☐	☐	☒
San Diego Regional Water Quality Board (SDRWQB)	☒	☐	☐
CAL FIRE San Diego Unit (MVU)	☒	☐	☐
Cleveland National Forest	☒	☐	☐

- CDFW commented on the project regarding protecting Engelmann Oaks. The representative has been invited to the project area for a site visit.
- SDAPCD requires a burn permit before burning. GSSD has secured a burn permit for the use of ACB. Before prescribed pile or broadcast burning, another burn permit will be required from SDAPCD.
- SDRWQB was contacted to confirm that the statewide General Order applies in place of Conditional Waiver No. 5.
- Consulted with the Cal Fire San Diego Unit. Met the Unit Forester in the field and discussed the project and their role in the fuel break.
- CNF is expected to be notified before implementing the project.

11. Coastal Act Compliance

Coastal Act Compliance	Check all that applies
The proposed project is NOT within the Coastal Zone.	☒
The proposed project is within the Coastal Zone.	☐
For proposed projects within the coastal zone, check one of the following boxes.	
• A coastal development permit has been applied for or obtained from the local Coastal Commission district office or local government with a certified Local Coastal Plan, as applicable.	☐
• The local Coastal Commission district office or local government with a certified Local Coastal Plan (in consultation with the local Coastal Commission district office) has determined that a coastal development permit is not required.	☐

12. Native American Consultation

The environmental consulting company, Dudek, completed a Cultural Resources Inventory Report (CRIR) on behalf the project proponent. The non-confidential report is found in Attachment D.

In summary from the CRIR, on August 5, 2022, Dudek contacted the NAHC for a search of Sacred Lands related to the project. The NAHC recommended contacting the Kwaamii Laguna Band of Mission Indians for more information on the resources and provided contact information on those tribes and other Native American tribes that may have additional information. On November 28, 2022. On October 25, 2022, the San Pasqual Band of Mission Indians stated that the project was not within the boundaries of the San Pasqual Indian Reservation but considered the area as their Traditional Use Area (TUA). They requested government-to-government consultation under Assembly Bill-52 and access to cultural resource reports during the environmental review process. On October 27, 2022, the Fort Yuma Queschan Tribe responded and would to defer to more local Tribes and support their determination for this project.

The project proponent received the latest Native American Contact List from the Native American Heritage Commission, and with Dudek's assistance, on November 28, 2022, notified geographically affiliated Native American Tribe. The notification letters requested information regarding the potential impacts on cultural resources from the proposed project. Two responses were received. On December 12, 2022, the Viejas Band of Kumeyaay Indians stated that the project might contain many sacred sites and requested that these sacred sites be avoided with adequate buffer zones. Further, they requested that all NEPA/CEQA/NAGPRA laws be followed and to contact Viejas on any changes or inadvertent discoveries immediately. On December 19, 2022, the Quechan Indian Tribe responded and indicated they do not wish to comment on this project and defer to more local Tribes and support their determination.

4. DETERMINATION STATEMENT

DETERMINATION

On the basis of this PSA and the substantial evidence supporting it:

☐ I find that all of the effects of the proposed project (a) have been covered in the CalVTP PEIR, and (b) all applicable Standard Project Requirements and mitigation measures identified in the CalVTP PEIR will be implemented. The proposed project is, therefore, WITHIN THE SCOPE of the CalVTP PEIR. **NO ADDITIONAL CEQA DOCUMENTATION** is required.

☐ I find that the proposed project will have effects that were not covered in the CalVTP PEIR. These effects are less than significant without any mitigation beyond what is already required pursuant to the CalVTP PEIR. A **NEGATIVE DECLARATION** will be prepared.

☐ I find that the proposed project will have effects that were not covered in the CalVTP PEIR or will have effects that are substantially more severe than those covered in the CalVTP PEIR. Although these effects may be significant in the absence of additional mitigation beyond the CalVTP PEIR's measures, revisions to the proposed project or additional mitigation measures have been agreed to by the project proponent that would avoid or reduce the effects so that clearly no significant effects would occur. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

☐ I find that the proposed project will have significant environmental effects that are (a) new and were not covered in the CalVTP PEIR and/or (b) substantially more severe than those covered in the CalVTP PEIR. Because one or more effects may be significant and cannot be clearly mitigated to less than significant, an **ENVIRONMENTAL IMPACT REPORT** will be prepared.

_____ _____
Signature Date

Ann Baldridge Executive Director
Printed Name Title

Resource Conservation District of Greater San Diego County
Agency

5. PROJECT SPECIFIC ANALYSIS/ADDENDUM

5.1 AESTHETICS AND VISUAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities	LTS	Impact AES-1, pp. 3.2-16 – 3.2-19	No	AES-1, AES-2, AES-3, & AQ-2	N/A	LTS	No	Yes
Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types	LTS	Impact AES-2, pp. 3.2-20 – 3.2-25	Yes	AD-3, AD-4, AES-1, AES-2, AES-3, AQ-2 & AQ-3	N/A	LTS	No	Yes
Impact AES-3: Result in Long-Term Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from the Non-Shaded Fuel Break Treatment Type	SU	Impact AES-3, pp. 3.2-25 – 3.2-27	No	N/A	None	N/A	N/A	N/A

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Aesthetic and Visual Resource Impacts: Would the treatment result in other impacts to aesthetics and visual resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

DISCUSSION

The proposed project is in a rural wildland area between located Julian, Pine Hills, and Mountain Meadows community areas on the east and Cleveland National Forest (CNF) on the west in San Diego County. The proposed project would occur on private property. The public would have occasional, intermittent, filtered views of the treatment areas along Boulder Creek Road and Eagle Peak Road. There are no state scenic highways or county-designated scenic within the viewshed of the proposed project. Within the boundary of the proposed project boundary, the GSSD maintains a private trail system for their clients (Girl Scouts) and is not open for public use. Public recreation may occur on neighboring properties, but the private trails system does not connect to public trails.

The proposed project intends to reduce the density and spatial composition of the native vegetation, which shifts the visual character but does not permanently convert the native vegetation or change the environment. The reduction of density and spatial composition of native vegetation would not introduce a new visual element or substantially degrade the visual character, scenic views, scenic resources, or quality of public views. Generally, the visual character and quality within the proposed project area and adjacent lands are moderate.

Impact AES-1 - Less Than Significant

The proposed project includes manual and mechanical treatment activities, herbivory, herbicide, and prescribed burning, which would be applied for initial and maintenance treatments. These treatment activities would generate short-term, substantial degradation of scenic vista or visual character or quality of public views impacts that are periodic and temporary, lasting a month to six months during the initial treatment phase. The maintenance treatment phase could generate short-term impacts lasting a few weeks to three months. Because there are no state scenic highways or county-designated scenic roads, the project has no impact on scenic highways or roads. Short-term aesthetic impacts would occur from crews, equipment, vehicles, or grazing animals working in the interior portions of the project or along Boulder Creek Road. On permissive burn days, smoke generated from prescribed burning, including the ACB, could be visible to the local public.

The potential for the treatment activities to result in short-term degradation of the scenic resources was examined in the PEIR. The project proponent would apply **SPRs AES-1, AES-2, AES-3, and AQ-2** to minimize short-term visual impacts. **SPR AES-1** addresses the perimeter of the treatment area. Vegetation near the perimeter is scalloped or feathered to blend into the adjacent untreated vegetation to minimize blunt or sharp edges. **AES-2** directs the storing of project equipment and tools in staging areas outside the viewshed of public trails, parks, recreational areas, and roadways to the extent feasible. **AES-3** guides the treatment activities to retain sufficient vegetation to screen the view near parks, trails, recreational areas, and roadways to the extent feasible. **AQ-2** requires, for prescribed burning, the submittal of a smoke management plan to the local agency (SDAPCD). The smoke management plan includes the public notification requirements before implementing pile burning. Therefore, the short-term impacts on scenic vistas or visual resources would be less than significant.

The potential for the proposed project to result in short-term, substantial degradation of the visual character of the project area is within the scope of the PEIR analysis as the scenic resources are essentially the same within and outside the treatable landscape, and the proposed treatment type and activities are consistent with those analyzed in the PEIR. The small inclusion areas of land outside the treatable landscape constitute a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of short-term degradation of scenic resources is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact AES-2- Less Than Significant

The proposed project would establish two treatment types, WUI fuel reduction areas and shaded fuel breaks. After establishing the treatment types, the treated areas would be maintained on a 5-7 year maintenance cycle. Because there are no state scenic highways or county-designated scenic roads, the proposed project has no impact on scenic highways or roads. Both treatment types could potentially generate long-term impacts on scenic vistas, visual character, or quality of public views resources; however, the removal of native vegetation would focus on removing hazardous fuel and retaining healthy to create wildfire-resilient treated areas. Essentially, the fuel reduction prescriptions for both treated areas retain healthy, native vegetation in mosaic patterns that minimize wildfire behavior. The difference between the treatment areas is the spacing distance between retained vegetation. The WUI fuel reduction areas retain closer spacing between retained vegetation than the shaded fuel break prescription. Retention areas (untreated areas) are expected to be scattered throughout both treatment types, most likely associated with watercourse buffers, habitat areas, cultural resources, steep slopes, or aesthetics. The long-term scenic or visual impact from broadcast burning would periodically generate a larger footprint than pile burning, up to 124 acres for any given year. Surface ash generally dissipates and fades away in less than a few years, and native vegetation is expected to regrow/ resprout within six months of treatment. For any treatment unit, smoke generated from prescribed burning may linger in the area for a day or two.

The potential long-term degradation of the scenic resources was examined in the PEIR. The project proponent would apply the **SPRs AES-1, AES-2, AES-3, AQ-2, AD-3, AD-4, and AQ-3** to minimize long-term scenic or visual impacts. **SPRs AES-1, AES-2 and AES-3, and AQ-2** are described in Impact AES-1. **AD-3** directs the proponent to design and implement the proposed project consistent with local plans, policies, and ordinances. **AQ-3** requires a burn plan prepared by a qualified technician or certified State burn boss. **AD-4** directs public notifications before prescribed burning. Therefore, the long-term impacts on scenic vistas or visual resources would be less than significant.

The potential for the project to result in a long-term degradation of scenic resources is within the scope of the PEIR analysis as the scenic resources are essentially the same within and outside the treatable landscape, and the proposed treatment type and activities are consistent with those analyzed in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on the long-term degradation of scenic resources is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact AES-3 – N/A

The proposed project does not propose a non-shaded fuel break. No impact would occur.

New Aesthetic and Visual Resource Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.2.1 "Environmental Setting" and Section 3.2.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the small inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts related to aesthetics and scenic resources would occur that are not covered in the PEIR.

5.2 AGRICULTURE AND FORESTRY RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AG-1: Directly Result in the Loss of Forest Land or Conversion of Forest Land to a 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	LTS	Impact AG-1, pp. 3.3-7 – 3.3-8	Yes	N/A	N/A	LTS	No	Yes

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Agriculture and Forestry Resource Impacts: Would the treatment result in other impacts to agriculture and forestry resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

Discussion

Impact AG-1 - Less Than Significant

The proposed project intends to reduce the hazardous fuels in the WUI fuel reduction areas and shaded fuel break areas. The fuel reduction prescription would include the removal of dead, dying, or diseased trees. Removal of dead, dying, or diseased trees is necessary because these trees are classified as hazardous fuels or public hazards trees. Further, the removal of hazardous fuels or public hazards trees improves wildfire resilience and protects the health and vigor of

The proposed project is in a wildland setting where the native vegetation consists of tree, shrub, and grass cover types. Forest lands, designated under Public Resources Code 12220(g), is defined as land that can support 10% native tree cover of any species under natural condition. Nearly 347 acres, 68% of the proposed project area is tree covered, and as such, the tree-covered area is consistent with the forest land definition. The remaining areas are shrubs and grasslands (see Section 2, Vegetation Description). The tree or forest composition is primarily hardwood (oaks) and a scattering of conifers (pines and cedar). Oak and pine mortality exist throughout the treatment areas. Drought and bark beetles caused pine mortality, and GSOB, an invasive oak pest, has caused oak mortality. Tree mortality creates heavy fuel loading. Consistent with several local plans and programs throughout San Diego County, dead, dying, or diseased trees near roadways, infrastructure, and buildings are deemed public hazard trees.

Further, the California Board of Forestry and Fire Protection has declared a Zone of Infestation for the invasive pest. Removal of dead or dying oak trees is necessary to protect the remaining trees and conserve the overall forest resources. The proposed project intends to fell, buck, and treat dead and dying trees onsite. Biomass from felled dead or dying trees would be burned in the ACB or through pile burning. Commercialization of forest resources is not permitted under this project. While the proposed project removes dead, dying, or diseased trees, the fuel reduction prescription retains healthy trees and habitat elements consistent with the natural forest setting, thus retaining at least 10% native tree coverage. Therefore, the proposed project does not result in the loss or conversion of forest resources.

The potential for the treatment area to result in the loss or conversion of forest lands was examined in the PEIR. The fuel reduction prescription applies forest conservation principles for the overall retention of forest resources. There are no applicable SPRs or MMs for this impact. Therefore, the impact on forest resources is less than significant.

The potential impact for the proposed project to result in the loss or conversion of forest lands is within the scope of the PEIR analysis as the agriculture and forest resources are essentially the same within and outside the treatable landscape, and the proposed treatment type and activities are consistent with those analyzed in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on loss or conversion of Forest Land is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Agriculture and Forestry Resource Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.3.1 "Environmental Setting" and Section 3.3.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the small inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts on agricultural and forest resources would occur that are not covered in the PEIR.

5.3 AIR QUALITY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed CAAQS or NAAQS	SU	Table 3.4-1; Impact AQ-1, pp. 3.4-26 – 3.4-32; Appendix AQ-1	Yes	AD-4, AQ-1, AQ-2, AQ-3, AQ-4, and AQ-6	None (No feasible mitigation available)	SU	No	Yes
Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk	LTS	Table 3.4-6; Impact AQ-2 pp. 3.4-33 – 3.4-34; Appendix AQ-1	Yes	HAZ-1, NOI-4, and NOI-5	N/A	LTS	No	Yes
Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk	LTS	Section 3.4.2; Impact AQ-3, pp. 3.4-34 – 3.4-35	No	N/A	N/A	LTS	No	Yes
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	SU	Section 3.4.2; Impact AQ-4, pp. 3.4-35 – 3.4-37	Yes	AD-4, AQ-2, AQ-3, and AQ-6	None (No feasible mitigation available)	SU	No	Yes
Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust	LTS	Impact AQ-5, pp. 3.4-37 – 3.4-38	Yes	HAZ-1, NOI-4, and NOI-5	N/A	LTS	No	Yes
Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	SU	Section 2.5.2; Impact AQ-6; pp. 3.4-38	Yes	AD-4, AQ-2, AQ-3, and AQ-6	None (No feasible mitigation available)	SU	No	Yes

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Air Quality Impacts: Would the treatment result in other impacts to air quality that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

Discussion

The proposed project is approximately centered in San Diego Air Basin and within the San Diego Air Pollution Control District (SDAPCD) jurisdiction. Salton Sea Air Basin is east of the proposed project, the South Coast Air Basin is north, the Pacific Ocean is west, and the county of Mexico is to the south.

Impact AQ-1 - Significant and Unavoidable

The proposed project includes manual and mechanical treatment activities, herbivory, herbicide, and prescribed burning, which would be applied for initial and maintenance treatments. The proposed project would use equipment, masticators, fire engines, crew carriers, pickups, livestock haul trucks, all-terrain vehicles, and handheld power tools, which typically are petroleum-powered and would generate emissions. Activities on non-paved roads likely would generate fugitive PM_{10} and $PM_{2.5}$ dust. Prescribed fire primarily releases $PM_{2.5}$. The emissions from these activities would exceed air district-established mass emission thresholds, and they could result in or contribute to the nonattainment status of the NAAQs and CAAQs in the San Diego air basin. The overall intent of the project is

to reduce known impacts from destructive catastrophic wildfires, which are unfavorable and costly and could lead to adverse air quality and public health greater than prescribed fire or associated treatment activities.

The potential emission of criteria air pollutants from these sources to exceed the threshold standards was examined in the PEIR. The project proponent would apply **SPRs AD-4, AQ-1, AQ-2, AQ-3, AQ-4, and AQ-6** to assist in minimizing the criteria of air pollutants generated from treatment activities. **AD-4** directs the project proponent to post public notifications before prescribed burning. **AQ-1** requires the project to comply with air quality regulations. **AQ-2** requires, for prescribed pile burning, the submittal of a smoke management plan to SDAPCD and burning only on permissible burn days. The smoke management plan also includes public notification requirements before implementing prescribed burning activities. **AQ-3** requires a burn plan prepared by a qualified technician or certified State burn boss. **AQ-4** directs the project to implement dust management measures. **AQ-6** directs that all non-CAL FIRE prescribed burn projects follow all safety procedures required by CAL FIRE, including implementing an Incident Action Plan (IAP).

The project proponent considered **MM AQ-1** to reduce the mass emissions of criteria pollutants and precursors generated by the use of on-road and off-road equipment. However, as noted in PEIR, the infeasibility of implementing specific emission reduction techniques and the uncertainty associated with treatment activities (location, size, and timing), the emission reduction from the implementation of **MM AQ-1** cannot be meaningfully quantified. The cost to retrofit or replace vehicles and equipment with EPA's Tier 4 emission standards imposes financial hardships, particularly for local, small-scale vegetation treatment companies. Private vegetation treatment companies are cost conscious and would naturally minimize the number of vehicles or equipment or reduce operating time to reduce expenditure, indirectly contributing to less exhaust emissions. Further, public carpooling is generally unavailable or infeasible for workers traveling to remote worksites. Therefore, the project proponent has opted not to implement MM AQ-1. The project proponent would share the MM AQ-1 information with the landowner and contractors. As technology advances and costs become affordable, the landowner and contractors could incrementally prepare and replace equipment and vehicles to meet the air quality standards for future vegetation treatment projects. While the implementation of SPRs reduces the release of emissions, the potential impacts remain significant and unavoidable.

The emission of criteria air pollutants from the proposed project are within the scope of the PEIR analysis, as the air quality conditions are the same within and outside the CalVTP treatable landscape, and the treatment activities, including the usage of the equipment, are consistent with the treatment activities identified in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on air quality from criteria air pollutants is also significant. As described in the PEIR, the impact would remain potentially significant and unavoidable due to multiple variables quantifying emissions reduction. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact AQ-2 – Less than Significant

The proposed project includes manual and mechanical treatment activities, which would be applied for initial and maintenance treatments. The proposed project would likely use diesel fuel-powered equipment such as masticators, fire engines, crew carriers, pickups, livestock haul trucks, and other types of equipment. The use of diesel fuel-powered equipment and vehicles would expose people to diesel particulate emissions. However, the duration of exposure from diesel fuel-powered equipment and vehicles would be short-term and temporary, which would not lead to long-term exposure for workers, the public, or sensitive receptors.

The potential to expose people to diesel particulate matter was examined in the PEIR. The project proponent would apply **SPRs HAZ-1, NOI-4, and NOI-5** to reduce exposure to diesel particulate emissions to people. **HAZ-1** requires all diesel and gasoline-powered equipment and vehicles to be properly maintained according to state and federal regulations. **NOI-4** directs the placement of staging areas for equipment and tools away from noise-sensitive areas and other sensitive receptors. **NOI-5** restricts the idle time for equipment and vehicles. Consistent with the PEIR and the implementation of the SPRs to reduce the exposure of diesel particulate matter to people; therefore, the potential impacts remain less than significant.

The emission of diesel particulate matter emissions from the proposed project is within the scope of the PEIR analysis, as the potential exposure situation is the same within and outside the CalVTP treatable landscape. The

treatment activities, usage of the equipment and vehicles, and the duration of implementing the proposed project are consistent with the treatment activities identified in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on air quality from diesel particulate matter emissions is less than significant. The analysis of people exposed to diesel particulate matter emissions is consistent with the PEIR and would not constitute a substantially more serve significant impact than determined in the PEIR. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact AQ-3 – Less than Significant

The proposed project includes manual and mechanical treatment activities, which would be applied for initial and maintenance treatments. The treatment activities involve using various equipment and vehicles in off-road conditions and using prescribed burning across various soil types. The use of equipment and vehicles involves ground-disturbing activities. Ground-disturbing activities could expose people to naturally occurring asbestos (NOA) fugitive dust emissions.

The potential to expose people to NOA fugitive dust emissions was examined in the PEIR examined. California Geological Survey provides a list of known naturally occurring asbestos sites. The list review indicates that the proposed project is not within known areas with naturally occurring asbestos. Further, the Compliance Advisory issued by the SDAPCD states there are no known sources of naturally occurring asbestos in San Diego County. Therefore, this impact would not apply.

The potential of the proposed project to expose people to NOA is within the scope of the PEIR, as the potential exposure situation is the same within and outside the CalVTP treatable landscape. The proposed treatment activities, including equipment and vehicles, are consistent with the PEIR treatment activities. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of ground-disturbing activities generating NOA fugitive dust emissions is the same as described above. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact AQ-4 - Significant and Unavoidable

The proposed project includes prescribed burning, which would be applied for initial and maintenance treatments. Firefighters and people in the nearby community areas could be exposed to the toxic air contaminants from prescribed pile burning. Prescribed burning would create short-term exposure to concentrations of TACs, primarily $PM_{2.5}$ and other criteria air pollutants.

The potential to expose people to toxic air contaminants was examined in the PEIR. The project proponent would apply **SPRs AD-4, AQ-2, AQ-3, and AQ-6** to minimize exposure to toxic air contaminants to people. **AD-4** directs public notifications before prescribed burning. **AQ-2** requires submitting a smoke management plan to SCAQMD—an approved smoke management plan limits prescribed burning to permissible burn days. **AQ-3** requires a burn plan prepared by a qualified technician or certified State burn boss. **AQ-6** requires a prescribed burn project planned and managed by non-CAL FIRE crews must follow all safety procedures required by CAL FIRE. The analysis of people exposed to TACs from prescribed burning activities is consistent with the PEIR and would be significant but would not constitute a substantially more serve significant impact than determined in the PEIR.

The conditions and duration of prescribed pile burning are within the scope of the activities identified in the PEIR, and within the boundary of the proposed project area, air quality conditions are essentially the same within and outside the CalVTP treatable landscape. Therefore, the potential for exposure to toxic air contaminants is also within the scope of the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on air quality from toxic air contaminants from prescribed burning operations is significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact AQ-5- Less than Significant

The proposed project involves using various types of equipment and vehicles. Diesel-fuel equipment and vehicles include masticators, loaders, dump trucks, chippers, pickup trucks, haul trucks, crew carriers, and other similar types. The use and duration of diesel-powered equipment and vehicles would generate objectionable odors from diesel exhaust. People would be exposed to objectionable odors from diesel exhaust for a short and temporary time. Sensitive receptors within the vicinity of the project area could be impacted.

The potential to expose people to objectionable odors from diesel exhaust was examined in the PEIR. The project proponent would apply **SPRs HAZ-1, NOI-4, and NOI-5** to minimize exposure to objectional odors from diesel exhaust people. The analysis of people exposed to objectionable odor from diesel exhaust is minimized because the use and duration are short-term and temporary. The analysis of exposing people to diesel exhaust is consistent with the PEIR resulting in the determination that the impact would be less than significant.

The objectionable odor from diesel exhaust is within the scope of the PEIR analysis because, within the boundary of the project area, the potential exposure is the same within and outside the CalVTP treatable landscape. The associated equipment and equipment usage are consistent with those identified in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on people exposed to objectionable odors from diesel exhaust is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact AQ-6 - Significant and Unavoidable

The proposed project would apply prescribed burning to reduce biomass and restore wildfire resiliency. Prescribed burning could expose people to smoke and objectional odor during burning operations. Prescribed burning would occur only as short-term and temporary events that generate smoke and objectionable odor. The objectionable odor generated from prescribed burning could impact sensitive receptors.

The potential impacts of objectionable odor from prescribed burning operations were examined in the PEIR. The project proponents would apply **SPR AD-4, AQ-2, AQ-3, and AQ-6** to minimize the objectionable odor from prescribed burning. The SPRs are identified above. No other mitigation measures are feasible. Therefore, consistent with the PEIR, the impact of objectionable odor remains significant and unavoidable.

The conditions and the duration of prescribed burning are consistent with the activities identified in the PEIR, and within the boundary of the project area, the exposure potential is essentially the same within and outside the CalVTP treatable landscape. Therefore, exposure to objectionable odor from smoke is also within the scope of the PEIR analysis. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on people exposed to objectionable odors from smoke from prescribed burning is also significant and unavoidable. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Air Quality Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.4.1 "Environmental Setting" and Section 3.4.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the small inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts on air quality would occur that are not covered in the PEIR.

5.4 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources	LTS	Impact CUL-1, pp. 3.5-14 – 3.5-15	Yes	CUL-1, CUL-7 CUL-8	NA	LTS	No	Yes
Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources	SU	Impact CUL-2, pp. 3.5-15 – 3.5-16	Yes	CUL-1, through CUL-5 and CUL-8	CUL-2	LTSM	No	Yes
Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource	LTS	Impact CUL-3, p. 3.5-17	Yes	CUL-5,CUL-6 and CUL-8	NA	LTSM	No	Yes
Impact CUL-4: Disturb Human Remains	LTS	Impact CUL-4, p. 3.5-18	Yes	NA	NA	LTS	No	Yes

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Archaeological, Historical, and Tribal Cultural Resource Impacts: Would the treatment result in other impacts to archaeological, historical, and tribal cultural resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

Discussion

A Cultural Resources Inventory Report (CRIR) for Camp Winacka-Camp Whispering Oaks was prepared by Dudek for the proposed project. The CRIR was completed according to the *County of San Diego Guidelines for Determining Significance, Cultural Resources: Archaeological and Historical Resources.* The Principal Investigators for the CRIR are Registered Professional Archaeologists (RPAs) and are listed as approved archeological consultants with the County. The non-confidential CRIR is found in Attachment D.

Impact CUL-1- Less than Significant

The proposed project includes manual and mechanical treatment activities, herbivory, and prescribed burning, and these activities would be applied for initial and maintenance treatments. These activities have the potential to damage historical resources. The CRIR indicates no historic-era features, structures, or buildings within the proposed treatment area. Therefore, the proposed project would not impact historical resources.

The potential for the treatment activities to result in the disturbance or destruction of built-environmental structures that have not yet been evaluated for historical significance was examined in the PEIR. The project proponent would apply **SPRs CUL-1, CUL-7, and CUL-8** and generate a CRIR for this PSA**. CUL-1** requires an archaeological and historical record search per the applicable state or local agency procedures**.** The CRIR identifies record search was conducted utilizing local government guidelines. **CUL-7** requires establishing a 100-foot buffer around known historical resources, and no prescribed burning and mechanical treatments shall occur within the 100-foot buffer area. No historical resources were listed in the record search, and no historical resources were found during pedestrian surveys. **CUL-8** directs the project proponent to provide cultural resource training to the workforce

conducting the implementation activities, including the protection of sensitive archaeological, historical, or tribal cultural resources.

The potential for the proposed project to result in substantial adverse changes in the significance of built historical resources is within the scope of the PEIR analysis because the potential to discover built resources that have not been evaluated for historical significance is essentially the same within and outside the treatable landscape. Further, the proposed treatment type and activities are consistent with those analyzed in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of causing a substantial adverse change in the significance of built historical resources is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact CUL-2 – Less than Significant with Mitigation

The proposed project includes manual and mechanical treatment activities, herbivory, and prescribed burning, and these treatments would be implemented for initial and maintenance treatments. Implementing these activities would potentially impact significant archaeological or subsurface historical resources that are known and unknown. The CRIR indicates archaeological resources within the proposed treatment area.

The potential for the treatment activities to result in a substantial adverse change in the significance of unique archaeological resources or subsurface historical resources was examined in the PEIR. The project proponent would apply **SPRs CUL-1, CUL-2, CUL-3, CUL-4, CUL-5,** and **CUL-8** to avoid impacts on archaeological resources. **CUL-1** and **CUL-8** are identified above. **CUL-2** requires the project proponent to notify geographically affiliated Native American Tribes and the Native American Heritage Commission (NAHC). The CRIR reflects that this standard practice was satisfied, and comments were received from NAHC and tribes and documented in the report. **CUL-3** directs the project proponent to conduct pre-field research, and **CUL-4** requires archaeological surveys to be conducted within the treatment areas. The CRIR documents that the pre-field research and archaeological surveys were completed. **CUL-5** identifies that if cultural resources are within the treatment area and cannot be avoided, a qualified archaeologist would notify the culturally affiliated tribes and assess the archaeological find accordingly.

The protection measures indicated in the CRIR state, “To ensure that these archaeological resources are not affected during treatment activities, added Project-specific mitigation will include the opportunity for archaeological and Native American monitoring within 300-feet prehistoric archaeological sites and drainages. Further, no fuel treatment or other Project-related use of areas within resources will be permitted. No tracked equipment, driving, staging, dragging of brush, or other activities with potential to result in disturbance of native soils within 50-feet of these archaeological sites will be permitted. Only hand-work treatment will be permitted within 50-feet of these archaeological sites, as long as archaeological and tribal monitors are also provided the opportunity to be present during these activities. Monitors may provide recommendations for vegetation clearing in the vicinity of archaeological features to aid in hiding these areas, if applicable.” (CRIR, Section 5.2, page 56). The report does not reflect information regarding subsurface historical resources. Further, the CRIR outlines protection measures for known archaeological resources in written and enforceable language. Therefore, consistent with the SPRs, the CRIR concludes that the impact on archaeological resources will be less than significant with mitigation.

The potential for the proposed project to result in substantial adverse changes of unique archaeological resources or subsurface historical resources is within the scope of the PEIR analysis, as the potential to discover archaeological resources is essentially the same within and outside the treatable landscape. Further, the proposed treatment type and activities are consistent with those analyzed in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact that may result in substantial adverse changes of unique archaeological resources or subsurface historical resources is less than significant with mitigation. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact CUL-3 - Less Than Significant with Mitigation

The proposed project includes manual and mechanical treatment activities, herbivory, and prescribed pile burning, and these treatments would be implemented for initial and maintenance treatments. The implementation of these activities would potentially impact Tribal Cultural Resources (TCR). The CRIR indicates that NAHC and two NAHC-listed tribes responded to the notification letters.

The potential for the treatment activities to result in a substantial adverse change in significant Tribal Cultural Resources was examined in the PEIR. The project proponent would apply **SPRs CUL-5, CUL-6,** and **CUL-8** to avoid impacts to TCR. As noted above, **CUL-5** identifies that if cultural resources are within the treatment area and cannot be avoided, a qualified archaeologist would notify the culturally affiliated tribes and assess the archaeological find accordingly. **CUL-6** outlines that the project proponent will develop effective protection measures for important tribal cultural resources located within the treatment area**. CUL-8**, described above, directs the project proponent to provide cultural resource training to the workforce conducting the implementation activities, including the protection of sensitive archaeological, historical, or tribal cultural resources.

The CRIR indicates that NAHC reported that resources are listed in the Sacred Lands File, but no other information was provided on the nature or type of resources. San Pasqual Band of Mission Indians responded to the notification letter. They stated that the project is not within the boundaries of the San Pasqual Indian Reservation, but the area is considered part of their Traditional Use Area (TUA). They requested AB-52 consultation and access to cultural resource reports during the environmental review process. Fort Yuma Quechan Tribe responded and deferred to the local Tribes. The Fort Yuma Quechan Tribe supports the local Tribe's determination for this project.

The CRIR reflects that defining requirements for coordinating with Native American tribes regarding the identification of archeological sites has been conducted in a good-faith effort and remains ongoing. The present mitigation strategies have been developed with input from tribes. Consistent with added Project-specific mitigation identified in Impact CUL-2, the same mitigation applies to Impact CUL-3. No formal Tribal Cultural Resource has been to date through government-to-government consultation. Further, the CRIR outlines protection measures for known archaeological resources in written and enforceable language. Therefore, consistent with the SPRs, the CRIR concludes that the impact on Tribal Cultural Resources will be less than significant with mitigation.

The potential for the proposed project to cause a substantial adverse change in significant Tribal Cultural Resources is within the scope of the PEIR analysis, as the potential to discover archaeological resources is essentially the same within and outside the treatable landscape. Further, the proposed treatment type and activities are consistent with those analyzed in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact that may cause substantial adverse changes to a Tribal Cultural Resource is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact CUL-4 - Less Than Significant

The proposed project includes manual and mechanical treatment activities, herbivory, and prescribed pile burning, and these treatments would be implemented for initial and maintenance treatments. The implementation of these activities would potentially disturb human remains. The CRIR indicates that human remains were reported in 1976 in one site record.

The potential for the treatment activities to uncover human remains was examined in the PEIR. There are no SPRs for this impact. However, the CRIR indicates that treatment of the area within the site be avoided. Therefore, impacts to the site are not anticipated. Should the advertent discovery of human remains occur, compliance with California Health and Safety Code Sections 7050.5 and 7052.2 and Public Resource Code (PRC) Section 5097 is required. The CRIR concludes that with the implementation of avoidance measures, impacts to human remains will be less than significant.

The potential for the proposed project to disturb human remains is within the scope of the PEIR analysis, as the potential to discover archaeological resources is essentially the same within and outside the treatable landscape. Further, the proposed treatment type and activities are consistent with those analyzed in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR.

However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact that may disturb human remains is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Archaeological, Historical, and Tribal Cultural Resource Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.5.1 "Environmental Setting" and Section 3.5.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the small inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts on archaeological, historical, and tribal cultural resources would occur that are not covered in the PEIR.

5.5 BIOLOGICAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications	LTS	Impact BIO-1, pp 3.6-131–3.6.138	Yes	SPR BIO-1, 2, 3, 4, 5, 6, 7, 9 & 11 SPR GEO-1, 2, 3, 4, 7 & 8 SPR HYD-2, 4 & 5	MM BIO-1a MM BIO-1b	LTSM	No	Yes
Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	LTS (all wildlife species except bumble bees) S&U (bumble bees)	Impact BIO-2, pp 3.6-138–3.6-184	Yes	SPR BIO-1, 2, 3, 4, 5, 9, 10, 11 & 12 SPR HYD-2, 4 & 5	MM BIO-2a, 2b, 2f, 2g, 3b & 4	LTS	No	Yes
Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function	LTS	Impact BIO-3, pp 3.6-186–3.6-191	Yes	SPR BIO-1, 2, 3, 4, 5, 6, 7, 9,10,11 & 12 SPR GEO-3, 4, 5 & 7 SPR HAZ- 5 & 6 SPR HYD-1, 4 & 5	MM BIO-3a	LTSM	No	Yes
Impact BIO-4: Substantially Affect State or Federally Protected Wetlands	LTS	Impact BIO-4, pp 3.6-191–3.6-192	Yes	SPR BIO-1, 2, 3, 4 & 11 SPR GEO-1, 2, 3, 4, 5 & 7 SPR HYD-1, 3 & 4	MM BIO-4	LTSM	No	Yes
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	LTS	Impact BIO-5, pp 3.6-192–3.6-196	Yes	SPR BIO-1, 2, 4, 5, 9 & 11 SPR HYD: 4	MM BIO-5	LTSM	No	Yes
Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife	LTS	Impact BIO-6, pp 3.6-197–3.6-198	Yes	SPR BIO-1, 2, 4, 5, 6, 9, 11 & 12	NA	LTS	No	Yes
Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources	No Impact	Impact BIO-7, pp 3.6-198–3.6-199	Yes	SPR AD-3 SPR BIO-1, 3 & 7	N/A	LTS	No	Yes

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan	No Impact	Impact BIO-8, pp 3.6-199–3.6-200	None	None	None	N/A	No	Yes

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Biological Resources Impacts: Would the treatment result in other impacts to biological resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less than Significant
[identify new impact here, if applicable; add rows as needed]	☐	☐	☐

Discussion

Biological Resource Data Review

Special Status Plant Species Review:

The plant species list in Table 17a for the Southern California Mountain and Valley Ecological Section (M262B) in Vol. 2 of the Cal VTP PEIR, was the starting point for the sensitive plant species review for this project. This extensive list was reviewed with the Jepson CCH2 database[1] to determine if the species were found in San Diego County and also with the San Diego County Ecoregion Map[2] produced by the San Diego Natural History Museum. If plant locations were approximately within the "Central Mountains Humid Temperate Region", the species was included on the final list.

The next step was to check for other special status plants that may have been missed or had recently changed status with a CDFW CNDDB/BIOS review. The project is located in the Julian and (mostly) Santa Isabel topographic quadrangles. Since very little of the project area is in the Julian Quad, and that Quads east of Julian are in desert area with a very different habitat type than the project area, the standard 9-Quad run with Santa Ysabel in the center seemed to be the most appropriate. This review was done on 11 Jan 2023 it generated 691 records of sensitive plants & animals. Most of the new plant species found were 3s and 4. Since this area has not been surveyed extensively, these species are noted below. They will be recorded as collateral information if present.

[1] CCH2 Portal. 2022. Biodiversity data provided by the participants of the Consortium of California Herbaria (https://ucjeps.berkeley.edu/consortium/ Accessed on November 28, December 20).
[2] http://sdplantatlas.org/EcoRegionsMapPage.aspx

List of Rare Plant Rank: "3" and "4"	
California Androsace	Androsace elongata ssp. acuta (4.2)
Western Spleenwort	*Asplenium vespertinum (4.2)*
Payson's Jewelflower	Caulanthus simulans (4.2)
Peninsular Spineflower	*Chorizanthe leptotheca (4.2)*
Paniculate Tarplant	*Deinandra paniculate (4.2)*
Cleveland's Bush Monkeyflower	*Diplacus clevelandii (4.2)*
Banner Dudleya	*Dudleya saxosa* ssp. *aloides* (3.2)
Palomar Monkeyflower	*Erythranthe diffusa (4.3)*
Mission Canyon Bluecup	*Githopsis diffusa* ssp. *filicaulis (3.1)*
San Diego County Alumroot	*Heuchera rubescens* (3.3)
Graceful Tarplant	*Holocarpha virgata* ssp. *elongate (4.2)*
Beautiful Hulsea	*Hulsea vestita* ssp. *callicarpha (4.2)*
Wright's Hymenothrix	*Hymenothrix wrightii (4.3)*
Pride-of-California	*Lathyrus splendens (4.3)*
Robinson's Pepper-Grass	*Lepidium virginicum* ssp. menziesii (4.3)
Ocellated Humboldt Lily	*Lilium humboldtii* ssp. *ocellatum (4.2)*
Golden-Rayed Pentachaeta	*Pentachaeta aurea* ssp. *aurea (4.2)*
Narrow-Petaled Rein Orchid	Piperia leptopetala (4.3)
Hoffmann's Bitter Gooseberry	*Ribes amarum (3)*
Cuyamaca Waxleaf Raspberry	*Rubus glaucifolius (3.1)*
Parish's Rupertia	*Rupertia rigida (4.3)*
Caraway-Leaved Woodland-Gilia	*Saltugilia caruifolia (4.3)*
Laguna Mountains Jewelflower	*Streptanthus bernardinus (4.3)*
Rush-Like Bristleweed	*Xanthisma junceum (4.3)*

Audrey Kelley, environmental scientist with the California Department of Fish and Wildlife, responded to our project notification on January 12, 2023. She directed our attention to San Diego gumplant, (*Grindelia halli*), San Bernardino aster, (*Symphotrichum defoliatum*), southern mountain skullcap, and (*Scutellaria bolande*ri ssp. *austromontana*), among others.

The list of proposed covered plant species in the North County MSCP was obtained from Stephanie Neal of San Diego Co Planning on Dec 21 2022. Note that the North County Conservation Plan is in development and that the plant list may change as the Plan is completed. The current species list resulted in the addition of Engelmann oak (*Quercus engelmannii*) to the special status plant list for the project.

In addition, another county-wide HCP[3] is being proposed for four rare butterfly species. This suggests that the host plants of these butterfly species (Quino checkerspot, Hermes copper, Laguna Mountain skipper and Harbison dun skipper) should be included on the special status plant list for compliance *in the future*, particularly the perennial host plants. Thus, Cleveland's horkelia *(Horkelia clevelandii* var. *Clevelandii)*, San Diego sedge (*Carex spissa*) and redberry (*Rhamnus crocea*) were added to the list, even though they are not rare plant species.

Lauron Quonn, botanist for the Cleveland National Forest was contacted for a list of Forest Service Sensitive Species that have occurred nearby and that should be included on the project plant list as locally significant plant species. All 4 nearby species on her list were already included in the starting VTP master list. She highlighted velvety false-lupine (*Thermopsis california* var *semota*) as a species that was known to occur nearby.

The US Fish & Wildlife Service database for federally endangered, federally threatened and critical habitat was also reviewed for the project area. A project area shape-file was loaded into IPAC[4], (Information for Planning and Consultation, a USFWS tool for environmental review). No critical habitat or federally listed plant species were found in the project area.

There were 4 non-vascular plant species on the original VTP list (Table 17A) that were reviewed for the project area. None have ever been found at the elevation of the project area, so were not considered in this analysis.

All species were verified in the Jepson eFlora, the most up-to-date accepted taxonomic authority for California plants. Several taxonomic changes have occurred: 1) one species was combined with another and no longer

[3] https://www.sandiegocounty.gov/content/sdc/pds/mscp/bhcp.html
[4] https://ipac.ecosphere.fws.gov/

recognized (*Boechera hirshbergiae* has been combined with *B. johnstonii*), 2) *Lepidium virginicum* var. *robinsonii* is now under *L. virginicum* ssp. *menziesii,* 3) the species has been divided into a specific variety (*Horkelia clevelandii* is now *H. clevelandii* var. *clevelandii,* and 4) the variety or subspecies is no longer recognized: *Corethrogyne filaginifolia* var. *incana* is now *C. filaginifolia* and *Monardella nana* ssp. *leptosipha* is now *M. nana*. All changes have been noted in the plant list but the taxa under which protection status was recognized has been retained.

After checking all potential species for project site proximity and habitat type, the project special status plant list contains 50 species. Of these 50 species, 23 special status species have recorded locations within approximately 1 mile of the project site (that is collection records exist in the Consortium of California Herbaria). The other 27 species have been recorded that are over a mile away. Since the project area and the surrounding area aren't botanically well-known, these species were included as potentials as well. The likelihood of finding species is included in the plant list.

There are 2 federally-listed endangered species: San Diego button-celery (*Eryngium aristulatum* var. *parishii)* and San Bernardino bluegrass (*Poa atropurpurea)*. There are 3 state-listed endangered species: Cuyamaca Lake downingia (*Downingia concolor* var. *brevior)*, San Diego button-celery and Parish's meadowfoam (*Limnanthes alba* spp. *parishii)*. There are 3 state-listed rare species: Dunn's mariposa lily (*Calochortus dunnii)*, Mt. Laguna aster (*Dieteria asteroides* var. *lagunensis)* and Gander's ragwort (*Packera ganderi)*.

Table 1. Special Status Plant List for SD Girl Scout Camp VTP.

VASCULAR PLANTS			
Species	**Status**	**Habitat**	**Potential to Occur**
Yucaipa Onion *Allium marvinii*	1B.2	Chaparral, coastal scrub, cismontane woodland, pinyon and juniper woodland, valley and foothill grassland. Heavy clay soils; grows in grasslands and openings within shrublands or woodlands. 1230 to 3412 ft in elevation. Blooms March-May.	Locations recorded nearby. Potential if clay soils are in project area.
Otay Manzanita *Arctostaphylos otayensis*	1B.2	Chaparral, cismontane woodland. Metavolcanic soils with other chaparral associates. 394 to 5003 ft in elevation. Blooms January-April.	Possible, but not likely. Low potential; found south of project area
Dean's Milkvetch *Astragalus deanei*	FSS, 1B.1	Chaparral, cismontane woodland, coastal scrub, riparian forest. Open, brushy south-facing slopes in Diegan coastal sage, sometimes on recently burned-over hillsides. 230 to 2608 ft in elevation. Blooms February-May.	Potential; locations recorded downstream of project area.
Jacumba Milkvetch *Astragalus douglasii* var. *perstrictus*	1B.2	Chaparral, cismontane woodland, valley and foothill grassland, pinyon and juniper woodland, riparian scrub. Stony hillsides and gravelly or sandy flats in open oak woodland. 1640 to 4511 ft in elevation. Blooms April-June.	Potential; old (1894) location recorded nearby.
San Diego Milkvetch *Astragalus oocarpus*	1B.2	Chaparral, cismontane woodland. Openings in chaparral or on gravelly flats and slopes in thin oak woodland. 394 to 5889 ft in elevation. Blooms May-August.	Potential. Locations recorded nearby.
Johnston's Rockcress *Boechera johnstonii* (*B. hirshbergiae* now synonymous with this species)	1B.2	Chaparral, lower montane coniferous forest. Often on eroded clay soils. With Adenostoma, Quercus wislizenii. 4478 to 8497 ft in elevation. Blooms February-June.	Potential; locations found SE of project area near Pedro Fages Monument in Cuyamaca State Park.
Orcutt's Brodiaea *Brodiaea orcuttii*	1B.1	Vernal pools, valley and foothill grassland, closed-cone coniferous forest, cismontane woodland, chaparral, meadows and seeps. Mesic, clay habitats; sometimes serpentine; usually in vernal pools and small drainages. 98 to 5299 ft in elevation. Blooms May-July.	Potential if clay soils are in project area. Locations recorded nearby.
Dunn's Mariposa Lily *Calochortus dunnii*	SR, 1B.2	Closed-cone coniferous forest, chaparral, valley and foothill grassland. On gabbro or metavolcanic soils; also known from sandstone; often associated with chaparral. 837 to 5299 ft in elevation. Blooms (February), April-June.	Potential; locations recorded due west of the project area, near Desert View Park.
San Jacinto Mariposa Lily *Calochortus palmeri* var. *munzii*	1B.2	Lower montane coniferous forest, chaparral, meadows. Seen in open Jeffrey pine forest as well as in chaparral. 3084 to 5955 ft in elevation. Blooms April-July.	Potential; known location records are dispersed from the project area (1 mile or more).

Table 1: Continue

Species	Status	Habitat	Potential to Occur
San Diego Sedge *Carex spissa*	Host plant for rare Harbison Dun Skipper butterfly	Creekbanks, seeps, canyon bottoms, may be on serpentine substrate, under 4000 feet.	Low potential; not a lot of habitat in project area. Previous records are dispersed from the project area (1 mile or more).
Parish's Chaenactis *Chaenactis parishii*	1B.3	Chaparral. Rocky sites. 4265 to 8202 ft in elevation. Blooms May-July.	Potential; known location records are dispersed from the project area (1 mile or more).
Long-Spined Spineflower *Chorizanthe polygonoides* var. *longispina*	1B.2	Chaparral, coastal scrub, meadows and seeps, valley and foothill grassland, vernal pools. Gabbroic clay. 98 to 5052 ft in elevation. Blooms April-July.	Potential. Locations recorded nearby.
Delicate Clarkia *Clarkia delicata*	1B.2	Cismontane woodland, chaparral. Often on gabbro soils. 164 to 4462 ft in elevation. Blooms April-June.	Found on site.
California Sand-Aster *Corethrogyne filaginifolia* var. *incana* (no longer recognized by the Jepson Flora as a distinct taxa)	1B.1	Coastal scrub, coastal bluff scrub, chaparral. Most sites are disturbed, so hard to tell. Possibly in disturbed sites and ecotones. 10 to 377 ft in elevation. Blooms June-September.	Potential. Locations recorded nearby.
Cuyamaca Larkspur *Delphinium hesperium* ssp. *cuyamaceae*	FSS, 1B.2	Grassland and pine forest, central peninsular range, 5000 ft in elevation. Blooms June to July.	Potential. Locations recorded nearby.
Mount Laguna Aster *Dieteria asteroides* var. *lagunensis*	SR, 2B.1	Lower montane coniferous forest, meadows and seeps, vernal pools. Usually found in low, moist areas within meadows. 3986 to 6086 ft in elevation. Blooms May-July.	Low potential; locations known south of project area near Mt.Laguna.
Cuyamaca Lake Downingia *Downingia concolor* var. *brevior*	SE, 1B.1	Meadows and seeps, vernal pools. In vernal seeps, lakes and pools, and on mudflats, with Orthocarpus, Limnanthes, Collinsia. 4593 to 4921 ft in elevation. Blooms May-July.	Low potential; locations known from south of project area, near junction of Hwy 79 and S1.
Laguna Mtns Goldenbush *Ericameria cuneata* var. *macrocephala*	1B.3	Chaparral. Endemic to the Laguna Mountains. Among boulders; in crevices in granitic outcrops and in rocky soil. 3921 to 6070 ft in elevation. Blooms September-December.	Low potential; locations known from south of project area in Cuyamaca State Park.
San Diego Button-Celery *Eryngium aristulatum* var. *parishii*	SE, FE, 1B.1	Vernal pools, coastal scrub, valley and foothill grassland, wetland. San Diego mesa hardpan and claypan vernal pools and southern interior basalt flow vernal pools; usually surrounded by scrub. 49 to 2887 ft in elevation. Blooms April- June.	Potential if clay soils are in project area. Locations recorded nearby.
San Jacinto Mountains Bedstraw *Galium angustifolium* ssp. *jacinticum*	1B.3	Open, mixed forest; 4430 to 6890 ft in elevation. Blooms May to July.	Potential; know location records are dispersed from the project area (1 mile or more).
San Diego gumplant *Grindelia hallii*	1B.2	Meadows, valley and foothill grassland, chaparral, lower montane coniferous forest. Frequently occurs in low moist areas in meadows; associated species commonly include Wyethia, Ranunculus, Sidalcea. 607 to 5725 ft in elevation. Blooms May-October.	Potential. Locations recorded nearby.
Tecate Cypress *Hesperocyparis forbesii*	1B.1	Closed-cone coniferous forest, chaparral. Primarily on north-facing slopes; groves often associated with chaparral. On clay or gabbro. 197 to 5397 ft in elevation.	Low potential; locations recorded at Cuyamaca State Park south of project area.
Cuyamaca Cypress *Hesperocyparis stephensonii*	1B.1	Closed-cone coniferous forest, chaparral, chaparral, cismontane woodland, riparian forest. Restricted to the southwest slopes of Cuyamaca Peak, on gabbroic rock. 3396 to 4692 ft in elevation.	Low potential; old location record from nearby and also known from Cuyamaca State Park.
Laguna Mountains Alumroot *Heuchera brevistaminea*	1B.3	Broadleaved upland forest, chaparral, cismontane woodland, riparian forest. Steep, rocky slopes. 4462 to 6562 ft in elevation. Blooms April-July (September).	Low potential; locations known from south of project area, south of junction of Hwy 79 and S1.
Cleveland's Horkelia *Horkelia clevelandii* (Now known as *Horkelia clevelandii* var. *clevelandii*.)	CBR Host plant for rare Laguna Mt Skipper butterfly	Meadows, under pines, on granite; 3930 to 8200 ft in elevation. Blooms May to Aug.	Low potential; known locations recorded south of project area in Cuyamaca State Park.

Table 1: Continue

Species	Status	Habitat	Potential to Occur
San Diego Sunflower *Hulsea californica*	1B.3	Chaparral, lower montane coniferous forest, upper montane coniferous forest. Burns, clearings, or openings in chaparral and pine-oak woodland. 1198 to 6102 ft in elevation. Blooms April-June.	Potential. Locations recorded nearby.
Mexican Hulsea *Hulsea mexicana*	2B.3	Chaparral. Volcanic soils or burns and disturbed sites. 3593 to 4265 ft in elevation. Blooms April-June.	Low potential; known locations dispersed north and south of project area (greater than 1 mile).
Santa Lucia Dwarf Rush *Juncus luciensis*	1B.2	Vernal pools, meadows and seeps, lower montane coniferous forest, chaparral, Great Basin scrub. Vernal pools, ephemeral drainages, wet meadow habitats and streamsides. 984 to 6693 ft in elevation. Blooms April-July.	Low potential; found south of project area south of Hwy 79 and S1 junction near Lake Cuyamaca.
Short-Sepaled Lewisia *Lewisia brachycalyx*	2B.2	Lower montane coniferous forest, meadows and seeps. Dry to moist meadows in rich loam. 4495 to 8038 ft in elevation. Blooms February-June (July).	Low potential; known location in Cuyamaca State Park south of project area.
Parish's Meadowfoam *Limnanthes alba* spp. *parishii*	SE, 1B.2	Lower montane coniferous forest, meadows and seeps, vernal pools. Vernally moist areas and temporary seeps of highland meadows and plateaus; often bordering lakes and streams. 1985 to 5922 ft in elevation. Blooms April-June.	Potential. Locations recorded nearby.
Orcutt's Linanthus *Linanthus orcuttii*	1B.3	Chaparral, lower montane coniferous forest, pinyon and juniper woodland. Sometimes in disturbed areas; often in gravelly clearings. 3002 to 7037 ft in elevation. Blooms May-June.	Low potential; location recorded south of project area, south of Hwy 79/S1 junction.
Mountain Springs Lupine *Lupinus albifrons* var. *medius*	1B.3	Pinyon and juniper woodland, Sonoran desert scrub. Dry, sandy, gently sloping canyon washes, sandy soil pockets, and flats in steeper slopes and drainages. 1394 to 4494 ft in elevation. Blooms March-May.	Low potential; locations recorded near Mt. Laguna, south of project area.
Parish's Bush-Mallow *Malacothamnus parishii*	1A	Chaparral, coastal sage scrub. In a wash. 1001 to 1493 ft in elevation. Blooms June-July.	Low potential; dispersed locations south of project area along S1.
Felt-Leaved Monardella *Monardella hypoleuca* ssp. *lanata*	1B.2	Chaparral, cismontane woodland. Occurs in understory in mixed chaparral, chamise chaparral, and southern oak woodland; sandy soil. 984 to 5167 ft in elevation. Blooms June-August.	Low potential; locations recorded south of Lake Cuyamaca.
Hall's Monardella *Monardella macrantha* ssp. *hallii*	1B.3	Broadleaved upland forest, chaparral, lower montane coniferous forest, cismontane woodland, valley and foothill grassland. Dry slopes and ridges in openings within the above communities. 2395 to 7201 ft in elevation. Blooms June- October.	Potential. Locations recorded nearby.
Little Monardella *Monardella nana* ssp. *leptosipha* (Subspecies no longer recognized for this species.)	1B.2	Chaparral, lower montane coniferous forest. Sometimes in openings and fuelbreaks or in the understory of forest or chaparral. 2789 to 7956 ft in elevation. Blooms June-July.	Potential. Locations recorded nearby.
Appressed Muhly *Muhlenbergia appressa*	2B.2	Coastal scrub, Mojavean desert scrub, valley and foothill grassland. Rocky slopes, canyon bottoms. 66 to 5249 ft in elevation. Blooms April-May.	Low potential; locations recorded neary Hwy 79/S1 junction south of project area.
Baja Navarretia *Navarretia peninsularis*	1B.2	Lower montane coniferous forest, chaparral, meadows and seeps, pinyon and juniper woodland. Wet areas in open forest. 3773 to 7759 ft in elevation. Blooms (May), June-August.	Low potential; locations south of project area recorded along Hwy 79 in Cuyamaca State Park.
Gander's Ragwort *Packera ganderi*	SR, 1B.2	Chaparral. Recently burned sites and gabbro outcrops. 1591 to 3510 ft in elevation. Blooms April-June.	Low potential; 1 location south of project area recorded along Hwy 79 in Cuyamaca State Park.
San Bernardino Bluegrass *Poa atropurpurea*	FE, 1B.2	Meadows and seeps. Mesic meadows of open pine forests and grassy slopes, loamy alluvial to sandy loam soil. 4117 to 8711 ft in elevation. Blooms (April), May-July (August).	Low potential; locations south of project area recorded along Hwy 79.

Table 1: Continue

Species	Status	Habitat	Potential to Occur
Nutall's Scrub Oak *Quercus dumosa*	1B.1	Closed-cone coniferous forest, chaparral, coastal scrub. Generally on sandy soils near the coast; sometimes on clay loam. 49 to 1312 ft in elevation. Blooms February-April (May),(August).	Low potential; dispersed (more than 1 mile) locations recorded from project area.
Engelmann Oak *Quercus engelmannii*	MSCP	Slopes, foothills, woodlands below 4260 ft. Blooms April – May.	Present on site.
Redberry *Rhamnus crocea*	Host plant for rare Hermes Copper butterfly	Coastal-sage scrub, chaparral, woodland below 3800 ft. Blooms January – April.	Potential; dispersed (more than 1 mile) locations recorded from project area.
Single-Leaf Basketbrush *Rhus aromatica var. simplicifolia*	2B.3	Pinyon and juniper woodland. Usually granitic. 2395 to 4364 ft in elevation. Blooms March-April.	Potential. Locations recorded nearby.
Southern Mountains Skullcap *Scutellaria bolanderi* ssp. *austromontana*	1B.2	Chaparral, cismontane woodland, lower montane coniferous forest. In gravelly soils on streambanks or in mesic sites in oak or pine woodland. 1394 to 6562 ft in elevation. Blooms June-August.	Potential. Locations recorded nearby.
Salt Spring Checkerbloom *Sidalcea neomexicana*	2B.2	Chaparral, cismontane woodland, lower montane coniferous forest. In gravelly soils on streambanks or in mesic sites in oak or pine woodland. 1394 to 6562 ft in elevation. Blooms June-August.	Low potential; locations recorded neary Hwy 79/S1 junction south of project area.
Prairie Wedgegrass *Sphenopholis obtusata*	2B.2	Cismontane woodland, meadows and seeps. Open moist sites, along rivers and springs, alkaline desert seeps. 984 to 6562 ft in elevation. Blooms April-July.	Low potential; location recorded in Cuyamaca State Park.
S**outhern Jewelflower** *Streptanthus campestris*	1B.3	Chaparral, lower montane coniferous forest, pinyon-juniper woodland. Open, rocky areas. 2953 to 7546 ft in elevation. Blooms (April), May-July.	Potential; old records near project area; more recent locations recorded south of Hwy 79/S1 junction.
San Bernardino Aster *Symphyotrichum defoliatum*	1B.2	Meadows and seeps, cismontane woodland, coastal scrub, lower montane coniferous forest, marshes and swamps, valley and foothill grassland. Vernally mesic grassland or near ditches, streams and springs; disturbed areas. 7 to 6693 ft in elevation. Blooms July-November.	Potential. Locations recorded nearby.
Silvery False-Lupine *Thermopsis californica* var. *semota*	FSS, 1B.2	Lower montane coniferous forest, meadows and seeps, cismontane woodland, valley and foothill grassland. Pine forests and meadow edges, on rocky slopes and outcrops, and along roadsides. 3281 to 6135 ft in elevation. Blooms March-June.	Potential. Locations recorded nearby.

Status definitions:

California Rare Plant Rank[5]
1A: Plants presumed extirpated in CA and either rare or extinct elsewhere
1B.1: Plants rare, threatened, or endangered in CA and elsewhere and seriously threatened in CA
1B.2: Plants rare, threatened, or endangered in CA and elsewhere and moderately threatened in CA
1B.3: Plants rare, threatened, or endangered in CA and elsewhere and not very threatened in CA
2B.1: Plants rare, threatened, or endangered in CA but common elsewhere and seriously threatened in CA
2B.2: Plants rare, threatened, or endangered in A but common elsewhere and moderately threatened in CA
2B.3: Plants rare, threatened, or endangered in CA but common elsewhere and not very threatened in CA
CBR: Considered but rejected from consideration

FE: Federally Endangered Species
SE: State Endangered Species
SR: State Rare Species
MSCP: Species proposed for coverage in the North County Plan of the MSCP
FSS: Forest Service Sensitive Species

Additional Sources Consulted:

Bryophytes: https://bryophyteportal.org/portal/ accessed on March 6 2023

[5] California Native Plant Society, Rare Plant Program. 2023. Rare Plant Inventory (online edition, v9.5). Website https://www.rareplants.cnps.org [accessed 5 July 2023].

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Girl Scouts San Diego-Imperial Council, Inc. 1999. Biological Constraints Report for Camp Palomar, Escondido Program Center, Balboa Program Center, Camp Winacka and Whispering Oaks Program Center. Prepared by Robertson Environmental Consulting, El Cajon, CA.

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Jepson Flora Project (eds.) 2023, *Jepson eFlora*, https://ucjeps.berkeley.edu/eflora/, accessed on January 19 - 23, 2023.

Special Status Wildlife Species Review:

Table 17B. of Special Status Wildlife Species in Vol. 2 of the Cal VTP PEIR for the Southern California Mountain and Valley Ecological Section (M262B) was the starting point for reviewing special status wildlife species in the area. Literature reviews, available field data and the local knowledge of Kent Drake, camp manager, were all used to determine potential species presence in the project area with special attention given to range map and habitat preferences when field data was not available.

This list was further refined with 1) a 9 quad CNDDB search in 2022, 2) the proposed North County MSCP and 3) input from Cleveland Forest Biologist Kirsten Winters.

No habitat for fairy shrimp or Quino Checkerspot Butterfly (QCB) occurs within the project area and there is no federally designated Critical Habitat for any animal species in or near the project area.

Birds: Observations obtained from eBird were used to refine the Special Status Bird Species with Birds of the World (Cornell Lab of Ornithology: https://birdsoftheworld.org/) reviewed for ranges, migratory behavior, habitat and nesting information.

There are 45 special-status bird species in the Camp Winacka-Camp Whispering Oaks Vegetation Management Project area. See Table 2 for the list of special-status bird species analyzed for the project. There are 2 federally endangered species (Southwestern willow flycatcher and Least Bell's vireo), 1 federally threatened species (California gnatcatcher),3 California fully protected species (California): Golden eagle, white-tailed kite, American peregrine falcon, 4 state endangered (the Southwestern willow flycatcher, Least Bell's vireo, American peregrine falcon and white-tailed kite), and 1 state threatened species (Swainson's hawk) In addition there are 19 birds identified as CDFW species of special concern and 11 species proposed for coverage under the North County MSCP. There are 14 species listed as Birds of Conservation Concern by the USFWS, 6 species on the California Watch List and 1 state "focal species". There is no critical habitat for federally listed species in the project area.

Bird species can be grouped into habitat categories and ranked according to likelihood of impacting on site. Species in Table 2 have been arranged in these groups. Habitats affected are: oak forest associates > riparian birds > scrub bird species > open grassland birds > water birds/occasional foragers.

Table 2. Special Status Bird Species Known to Occur in the Vicinity of the Treatment Area and Potential for Occurrence in the Treatment Area

BIRDS			
Oak Forest Associate Species:			
Species	**Status**	**Habitat**	**Potential to Occur**
California Spotted Owl *Strix occidentalis occidentalis*	CSSC	Closed-canopy oak and pine woodlands. Preferred prey is big-eared or dusky-footed woodrat.	Potential to be present.
Oak Titmouse *Baeolophus inornatus*	BCC	Known oak forest associate. Feeds on seeds and insects. Not found on the ground often. Cavity nester.	High potential for occurrence in project area.
Lawrence's Goldfinch *Carduelis lawrencei*	BCC	Irruptive species found in arid woodlands. Seed eater, especially Amsinckia spp. Nests in oak species.	Potential for occurrence.
Cassin's Finch *Carpodacus cassinii*	BCC	Breeds in high elevation conifer forests and overwinters at lower elevations. Feeds on seeds and insects. Irregular visitor.	Project area best suited as overwintering habitat. May be observed.
Nuttall's Woodpecker *Picoides nuttallii*	BCC	Widespread woodpecker in SD Co. Prefers oak woodlands, riparian and coniferous forests. Eats insects and other arthropods.	Observed on site.
Band-tailed pigeon *Patagioenas fasciata*	CDFWFS	Feeds on elderberry fruit and acorns. Found in oak woodlands.	Observed on site.

Riparian Bird Species:			
Species	**Status**	**Habitat**	**Potential to Occur**
Least Bell's Vireo *Vireo bellii pusillus*	CE, FE, MSCP	Habitat is dense vegetation often along riparian corridors. Eats mainly insects and spiders. Breeds in SD Co.	Potential near small ponds and riparian areas in treatment area but those areas may not be large enough to support breeding birds. Low potential

Table 2: Continue

Riparian Bird Species:			
Species	**Status**	**Habitat**	**Potential to Occur**
Tricolored Blackbird *Agelaius tricolor*	CSSC, MSCP, BCC	Needs cattail stands (or blackberry thickets)for breeding; a colony nester and surrounding open areas for foraging.	Possible for a few birds to be in pond areas nesting or meadow area for foraging. Project area surrounds these habitats.
Clark's Marsh Wren *Cistothorus palustris clarkae*	CSSC	Restricted to marsh areas. Mostly found along coast. Eats invertebrates.	Low potential; marshy areas around the small lakes on site should be examined for this species.
Yellow-Breasted Chat *Icterus virens*	CSSC, MSCP	Found in dense riparian woodland. Insectivorous, eating fruits and berries when available.	Potential. May be in riparian areas around ponds in project area.
Summer Tanager *Piranga rubra*	CSSC	Mature riparian woodland, especially of Fremont cottonwood. Eats fruits and hymenoptera.	Low potential on site due to little preferred habitat in the project area.
Vermilion Flycatcher *Pyrocephalus rubinus*	CSSC	Usually found near water & riparian woodlands. Eats aerial arthropods.	Low potential to be found in project area.
Yellow Warbler *Setophaga petechia*	CSSC	Common breeding summer resident in SD Co. Prefers mature riparian vegetation. Insects, arthropods and small fruits.	Observed on site.
Yellow-Headed Blackbird *Xanthocephalus xanthocephalus*	CSSC	Rare bird in SD Co. At edge of breeding range but also migrates through Co. Granivorous during migration; insectivorous during breeding.	Potential near small ponds and riparian areas in treatment area as migratory stopovers. Low potential.
Common Yellowthroat *Geothlypis trichas sinuosa*	BCC	Prefers riparian woodland and freshwater marshes. Resident in SD County. Principal host of brown-headed cowbird. Primarily insectivorous.	Low potential but habitat around small lakes on site should be checked.
Bullock's Oriole *Icterus bullockii*	BCC	Prefers open woodland, woodland edges, scattered trees, especially in riparian areas. Insectivorous also eating fruit and nectar.	High potential.

Scrub Bird Species:			
Species	**Status**	**Habitat**	**Potential to Occur**
Coastal California Gnatcatcher *Polioptila californica californica*	MSCP, FT	Coastal sage scrub with CA sagebrush specialist. Insectivorous.	Low potential on site due to little preferred habitat in the project area.
Coastal Cactus Wren *Campylorhynchus brunneicapillus sandiegensis*	CSSC, MSCP	Low growing coastal scrub vegetation with cactus interspersed. Insectivorous along with fruit.	Low potential due to few extensive areas of cholla or prickly pear onsite.
Gray Vireo *Vireo vicinior*	CSSC	Dry dense south-facing slopes of chaparral. Not common in SD Co. Forages on arthropods. Cowbird host.	Potential to occur on NW side of project area of steep scrub vegetation.
Rufous-Crowned Sparrow *Aimophila ruficeps canescens*	MSCP	Small amount of habitat on steep hillside on NW side of project area. Forages for seed and insects on the ground.	Possible for birds to be on NW side in scrub vegetation. Low potential.
Bell's Sage Sparrow *Amphispiza belli belli*	MSCP	Shrubland species sensitive to habitat fragmentation. Low open chaparral. Ground foraging omnivore.	Low potential to occur on NW side of project area in low scrub vegetation.
Wrentit *Chamaea fasciata*	BCC	Resident species in scrub vegetation. High fidelity to home range. Insect gleaner also eating fruits and seeds.	Observed in project area.
Black-Chinned Sparrow *Spizella atrogularis*	BCC	Prefers steep chaparral-covered slopes. Summer visitor in SD Co. Insectivorous.	Potential to occur on NW side of project area of steep scrub vegetation. Low potential.
California Thrasher *Toxostoma redivivum*	BCC	Chaparral species also occurring in oak and riparian woodlands. Eats fruits and arthropods.	Observed on site.

Table 2: Continue

Open Grassland Species:			
Species	**Status**	**Habitat**	**Potential to Occur**
White-Tailed Kite *Elanus leucurus*	FP	Needs open habitat of CA vole, it's primary prey species. Nests, sometimes communally in the tops of tall trees.	Low potential but has been observed in area previously.
Grasshopper Sparrow *Ammodramus savannarum*	CSSC, MSCP	Preferred habitat is native bunchgrass areas. Forages on seeds and insects.	Low potential on site except in scattered small grassland areas.
Northern Harrier *Circus hudsonius*	CSSC, MSCP	Needs grasslands and marshes for foraging. Eats small mammals, reptiles, frogs and birds.	Potential for foraging in open grassland areas although birds may focus on adjacent areas.
Burrowing Owl *Athene cunicularia*	CSSC	Open treeless habitats, nests in burrows. Eats small vertebrates and invertebrates	Low potential but open areas should be checked.
Loggerhead Shrike *Lanius ludovicianus*	CSSC	Year-round resident of grassland, open sage scrub and chaparral. Carnivorous also feeding on carrion.	Low potential on site due to little preferred habitat in the project area.
Bryant's Savannah Sparrow *Passerculus sandwichensis alaudinus*	CSSC	Winter in SD Co. only. Need open grassland areas. Omnivorous eating seeds and small fruits with invertebrates.	Low potential on site due to little preferred habitat in the project area.
Oregon Vesper Sparrow *Pooecetes gramineus affinis*	CSSC	Habitat is open grassland and sparse scrub; may need large tracts of these. Eats seeds and insects.	Low potential on site due to only small patches of preferred habitat in the project area.
Ferruginous Hawk *Buteo regalis*	WL	Overwinters in area; breeds in intermountain west. Prefers grasslands & shrublands; preys on jackrabbits and ground squirrels.	Low potential for incidental occurrence; may forage in parts of project area. Trees should be checked for roosts.
California Horned Lark *Eremophila alpestris actia*	WL	Needs open, disturbed areas to find seeds & insects.	Low potential on site; project areas are not open for foraging.
Prairie Falcon *Falco mexicanus*	WL	Open habitats with perch sites. Feeds on small birds.	High potential for occurrence in project area.

Occasional foraging species:			
Species	**Status**	**Habitat**	**Potential to Occur**
American Peregrine Falcon *Falco peregrinus anatum*	FP, CE	Breeds along coast in SD County. Capture most prey in air.	Low potential for incidental observation on project site.
Bald Eagle *Haliaeetus leucocephalus*	CE,BCC	Non-breeding rare winter visitor to SD Co. Primary prey is fish. Known from Lake Henshaw.	Only potential incidental observations expected. No appropriate fish habitat in project area. Low potential.
Golden Eagle *Aquila chrysaetos*	FP, MSCP, BCC	Most nests built on cliffs, about 50 nests left in SD Co. Carnivorous; will scavenge on carrion.	Low potential but trees should be checked for nests. May forage in project area.
Swainson's Hawk *Buteo swainsoni*	CT	Migrant only in SD County. Needs low-growing vegetation for hunting to see preyl. Insectivorous in winter.	Low occurrence potential; may stop over in tall riparian trees during migration.
Osprey *Pandion haliaetus*	MSCP	Breeding re-established in SD Co. Primary prey is fish. Ponds in project area not large enough to support enough fish for osprey residency.	Only potential incidental observations expected. No appropriate fish habitat in project area. Low potential.
Olive-Sided Flycatcher *Contopus cooperi*	CSSC, BCC	Breeds in montane coniferous forests. Forages on flying insects, particularly bees.	Low potential as relatively few conifers occur onsite.
Vaux's Swift *Chaetura vauxi*	CSSC	Migrant in SD County. Needs hollow trees or chimneys for roosting. Insectivorous.	Potential for incidental occurrence in project area; prefer old growth forest areas. Low potential.
Purple Martin *Progne subis*	CSSC	Rare in SD Co. Secondary cavity nester. Eats flying insects.	Potential to be found in project area.
Cooper's Hawk *Accipiter cooperii*	WL	Prefers oak and riparian woodlands; feeds on small ground and shrub perching birds	Low potential for nesting as they prefer the lower coastal plain areas in SD Co.

Table 2: Continue

Species	Status	Habitat	Potential to Occur
Sharp-Shinned Hawk *Accipiter striatus*	WL	In forests and open areas. Specialized predator on passerines exclusively.	Not known to breed in SD Co. but may forage in project area. Low potential.
Merlin *Falco columbarius*	WL	Prefers open forests and grasslands for hunting small to medium sized birds.	Low potential due to lack of open areas in project area. Incidental observation possible.

FP = state fully protected
CE = California Endangered
CSSC = California Species of Special Concern
FT = Federally threatened
FE = Federally endangered
WL = California Watch List
BCC = USFWS Birds of Conservation Concern
CDFWFS – CDFW focus species; no regulatory protection
MSCP = currently on proposed list of covered species for the North Sand Diego Multi-Species Conservation Plan

Mammals: The San Diego Co Mammal Atlas (Tremor et al, eds., 2017) was used to obtain current life history information and potential for occurrence of special status mammal species in the project area, supplemented by species accounts from CDFW. iNaturalist was also searched for potential ringtail occurrences.

There are 18 special status mammal species to be considered in this fuel break project. There are no federal or state listed species. The species of most conservation concern are the MSCP species, the pallid bat, Townsend's big-eared bat and mountain lion and the sole state Fully Protected species, the ringtail. The ringtail, a raccoon relative, is the only state fully protected species. It is difficult to detect, however, thus little is known about its current distribution. There are 15 state species of concern, including 11 bat species. Two species are Forest Service sensitive species: Townsend's big-eared bat and fringed myotis (bat). Please refer to Table 3 for the list of special status mammal species analyzed for the project area.

Table 3. Special Status Mammal Species Known to Occur in the Vicinity of the Treatment Area and Potential for Occurrence in the Treatment Area

MAMMALS			
Species	**Status**	**Habitat**	**Potential to Occur**
Pallid Bat *Antrozous pallidus*	SC, MSCP	Desert mtn species, eats large bodied arthropods. Somewhat flexible habitat preference Recorded nearby (SDCMA).	Potential on site
Townsend's Big-Eared Bat *Corynorhinus townsendii*	FCC, SC, MSCP	Roost sites of caves or mines determine presence though species is in decline. Moth specialist.	Records within a few miles of project area; may forage in project area.
Spotted Bat *Euderma maculatum*	SC	Preferred roots in high rocky cliffs surrounded by open habitat. Moth specialist. Not a well known species.	Possible but not probable. Low potential.
Western Mastiff Bat *Eumops perotis californicus*	SC	Roost sites are high vertical cliffs, rock quarries, outcrops of fractured boulders. Needs spaces below roosts to fall before flight. Prefers large moths.	Recorded within a few miles of project site. Low potential.
Silver-Haired Bat *Lasionycteris noctivagans*	SC	Roost availability important. Roost in trees, including bird-excavated cavities and under bark in hardwood-conifer forests. Captures arthropod prey in flight.	Low potential; few records in San Diego Co. (SDVMA)
Western Red Bat *Lasiurus blossevillii/frantzii*	SC	Roosts in foliage of riparian trees. Eats moths and other arthropods.	Possible in riparian areas near project site. High potential.
Western Yellow Bat *Lasiurus xanthinus*	SC	Roosts in skirts of native & non-native palm trees. Insectivore.	Low potential; few palms in area.
California Leaf-Nosed Bat *Macrotus californicus*	SC	Primarily a desert species. Roosts in caves, mines and other manmade structures similar to caves. Eats arthropod prey off ground or vegetation and may eat small lizards.	Low potential unless mine roosts are present in area.
Fringed Myotis *Myotis thysanodes*	FSS, BLMS	Rare but occurs in oak woodlands and coniferous forests. Roosts in crevices & cavities and some manmade structures. Insectivorous; flying insects and small ground-dwelling arthropods.	Expect in project area due to preferred habitat available. High potential.
Pocketed Free-Tailed Bat *Nyctinomops femorosaccus*	SC	Roosts in crevices in steep rocky cliff faces and outcrops. Insectivorous: large moths and small flying beetles.	Possible; recorded near Julian. Medium potential.
Big Free-Tail Bat *Nyctinomps macrotis*	SC	Roosts in vertical cliffs, quarries and tall buildings. Eats moths and other insects.	Low potential; no observations near project site. Species appears to be a migrant in SD Co.

Table 3: Continue

Species	Status	Habitat	Potential to Occur
Ringtail *Bassariscus astutus*	FP	Needs vertical surfaces such as rock or tree trunks for quick escapes to safety. Omnivorous but eating mostly small rodents.	Potential but difficult to detect.
Mountain Lion *Puma concolor*	MSCP	Needs large prey such as deer and dense cover for hnting style. Carnivorous eating deer and other mammals.	Observed on site (Kent Drake, pers. comm.)
American Badger *Taxidea taxus*	SC	Prefers flat open areas, carnivorous feeding on rodents, reptiles, insects and amphibians.	Observed near site but may not be enough open habitat in project area to support burrows. Wide-ranging species may move across site. Low potential.
San Diego Black-Tailed Jackrabbit *Lepus californicus bennettii*	SC	Prefers open areas with cover. Herbivore eating grasses and herbs and some bushes.	Observed near site,but may not be enough open habitat in project area to support this species. Low potential.
Dulzura Pocket Mouse *Chaetodipus californicus femoralis*	SC	Chaparral species, eating mostly seeds and some leaves	High potential; observed nearby.
Northwestern San Diego Pocket Mouse *Chaetodipus fallax fallax*	SC	Prefers rocky habitat near shrubs.granivorous but may also eat leaves and stems.	High potential; observed nearby.
Southern Grasshopper Mouse *Onychomys torridus ramona*	SC	Open habitats with gentle terrain, including coastal sage scrub. CARNIVOROUS, eating arthropods	Low potential but difficult to trap in Sherman traps.

FP = state fully protected
CSSC = California Species of Special Concern
WL = California Watch List
FSS = Forest Service sensitive species
MSCP = currently on proposed list of covered species for the North Sand Diego Multi-Species Conservation Plan

Reptiles: The following sources were reviewed for reptiles: Jones and Lovich, editors (2009) and Lemm (2006). The online resources INaturalist.org and CaliforniaHerps.com were used to review recent occurrences.

There are 14 reptile special status species with potential to occur in the project area. There are no federal or state listed species. There are 2 species of federal concern (FSSC).. There are 6 Forest Service sensitive species (FSS), 8 species of California special concern (CSSC), 2 species on the California watch list (WL) and 2 species on the proposed list of species for the San Diego North County MSCP. Please see Table 4 for the list of special status reptile species analyzed for the project area.

Table 4. Special Status Reptile Species Known to Occur in the Vicinity of the Treatment Area and Potential for Occurrence in the Treatment Area

Reptiles			
Species	**Status**	**Habitat**	**Potential**
San Diego Banded Gecko *Coleonyx variegatus abbotti*	CSSC	Noctural; prefers rocky areas within in coastal sage and chaparral up to 3,000 feet in elevation. Insectivorous.	Low potential for project area: most recent observations are on the coastal plain area of the Cuyamacas at lower elevation.
San Diego Legless Lizard *Anniella stebbinsii**	FSSC, CSSC	Found in oak woodland, chaparral, coastal sage and pinyon juniper woodland up to 5,960 feet in elevation. Spends most of it's life underground. Active in the mornings and evenings remaining underground inbetween. Insectivorous. Leaf litter may be important.	Good potential for this species to occur in the project area, however as a burrowing species, it is difficult to detect.
Orange-Throated Whiptail *Aspidoscelis hyperythra*	WL, FSSC	Smallest whiptail species in California. Known in coastal sage and chaparral up to 3,430 feet. Very fast lizard with seemingly jerky movements. Often takes refuge under dense foliage.	May occur in project area in the chaparral and sage areas; should be included in species surveys. Medium potential.
Coastal Whiptail *Aspidoscelis tigris stejnegeri*	CSSC	Occurs in a variety of habitats up to 5,000 feet. Active from spring to fall. Stays away from open areas. Very skittish lizard.	Good potential for this species to occur in the project area, as recent nearby observations are logged in iNaturalist.
Coast Horned Lizard *Phrynosoma blainvillii*	CSSC, MSCP	Found in a variety of habitats up to 7,029 feet. Ant insectivore specialist. Active when surface temperatures are above 66 degrees; remainder of year is buried shallowly underground.	High potential; observations recorded recently nearby in iNaturalist
Coronado Skink *Plestiodon skiltonianus interparietalis*	WL	This is the smaller of the 2 skink species found in San Diego Co. Lives in all types of habitats but prefers undeveloped areas. Found in more open habitats under logs and debris and constructs a complicated sytem of burrows. Insectivorous.	High potential; observations near project area recorded in Inaturalist.
Red-Diamond Rattlesnake *Crotalus ruber*	FSS, CSSC	Common in coastal sage scrub and chaparral below 5,000 feet. Commonly found in rock piles and cactus patches and coiled under buckwheat and laurel sumac. Adults eat birds, rodents and fresh carrion.	High potential; known from site (K. Drake, pers. comm.)
San Diego Ringneck Snake *Diadophis punctatus similis*	FSS	Prefers moist areas in many habitats including oak and pine woodlands, coastal sage and chaparral and especially riparian areas. Found under moist rotting logs, leaf litter and bark. Most active just before or after dark. Eats invertebrates, amphibians and other small reptiles.	High potential; observations near project area recorded in Inaturalist.

Table 4: Continue

Species	Status	Habitat	Potential
San Diego Mountain Kingsnake *Lampropeltis zonata pulchra = L. multifasciata*	FSS	Found below 6,500 feet in montane conifer forests and mixed oak woodlands and in riparian areas and canyon bottoms in coastal sage and chaparral. Secretive species and may be difficult to detect despite coloration. Eats lizards, small snakes and possibly birds.	High potential found due east and south of project area; potential in project area.
Coastal Rosy Boa *Lichanura trivirgata roseofusca*	FSS	Found in coastal sage, chaparral, pine woodlands below 5,000 feet. Prefers either rock piles or rodent burrows. Eats mostly rodents though may take small lizards as well. Very docile snake to handle.	High potential for species occurrence in project area.
San Diego Mountain Kingsnake *Lampropeltis zonata pulchra = L. multifasciata*	FSS	Found below 6,500 feet in montane conifer forests and mixed oak woodlands and in riparian areas and canyon bottoms in coastal sage and chaparral. Secretive species and may be difficult to detect despite coloration. Eats lizards, small snakes and possibly birds.	High potential found due east and south of project area; potential in project area.
Coast Patch-Nosed Snake *Salvadora hexalepis virgultea*	CSSC	Fast, secretive snake not often observed. From 7,000 feet in low shrub habitats in coastal sage and chaparral. Eats whiptail lizards (Aspidoscelis sp.), smaller snakes, birds, eggs and small mammals.	High potential for species occurrence in project area.
Two-Striped Garter Snake *Thamnophis hammondii*	FSS, CSSC	Found in waterways below 8,000 feet. Basks on rocks near water and may climb trees. Eats fish, fish eggs and amphibians.	High potential for species occurrence in project area.
Southwestern Pond Turtle *Clemmys marmorata pallida* & *Emys marmorata* are now known as *Actinemys pallida*	FSS, MSCP, CSSC	Found near permanent year-round water. May hibernate on land in dense brush or near woodrat nests. Eats invertebrates, vegetation, carrion and fish and frogs.	Low potential for project area; few observations in San Diego county & the nearest to project site is further south in El Capitan resevoir. Should check ponds onsite.

FSSC = Federal Species of Special Concern
CSSC = California Species of Special Concern
WL = California Watch List
FSS = Forest Service sensitive species
MSCP = currently on proposed list of covered species for the North Sand Diego Multi-Species Conservation Plan

Amphibians: Lemm (2006) was used to review the amphibian species potentially in the project area with INaturalist.org and CaliforniaHerps.com were used to review recent occurrences.

There are 5 potential amphibian species in the project area: 2 Federally-endangered species, one, the Arroyo toad more likely than the other (red-legged frog). One species is from the Forest Service species of concern list, 4 of the 5 species are on the California species of special concern list and 3 are on the proposed species list for the North County MSCP that is currently in progress. Please refer to Table 5, below.

Table 5. Special Status Amphibian Species Known to Occur in the Vicinity of the Treatment Area with potential to occur in the Project Area.

Amphibians			
Amphibians	**Status**	**Habitat**	**Potential**
Arroyo Toad *Anaxyrus californicus*	FE, CSSC, MSCP	Riparian habitats with sandy streambeds with cottonwood, sycamore, live oak and willow trees but can occur in coniferous streambeds. Species requires shallow sandy ponds for breeding & egg laying. Eats invertebrates. Young eat ants. Active from first rains to early August. Estivates in upland habitat in slightly moist soils.	Found in San Diego River bed. Project area creeks drain into this area. Some potential depending on substrate of project area streambeds. Low to medium potential to occur in project area.
California Red-Legged Frog *Rana draytonii*	FE, CSSC, MSCP	Dense riparian habitat with slow or still water. Can be found in damp soils away from water. Adult eats other frogs and field mice and probably invertebrates. Young feed on algae.	Possible; found west of VMF in Aug 2020 (iNaturalist). Low potential due to elevation and scarcity.
Western Spadefoot *Spea hammondii*	CSSC, MSCP	Nocturnal in grasslands, scrub, oak woodlands up to 4650 ft in elevation where soil is favorable for burrowing. Eats invertebrates. Breeds in pools and burrows underground in the dry season.	Habitat available in project area, but area is at upper range of the spadefoots occupancy. High potential.
Coast Range Newt *Taricha torosa*	CSSC	Stout bodied newt found near water. Have neurotoxin to protect from predation. Breed in water and eat invertebrates. Non-breeding animals are found in moist leaf litter and downed logs.	Observed south of project area; within range according to Amphibiaweb and Inaturalist. High potential.
Large-Blotched Salamander *Ensatina eschscholtzii klauberi*	FSS, WL	Prefers oak & pine woodland up to 10,000 ft in elevation. Eggs laid in terrestrial nest in protected sites such as under moist logs. Remain underground in burrows during dry season. Known to have very localized small home ranges (6-41 meters).	Observed on site (K. Drake, pers. comm.)

FE = Federally endangered
FSS = Forest Service sensitive species
CSSC = California Species of Special Concern
MSCP = currently on proposed list of covered species for the North San Diego Multi-Species Conservation Plan

Invertebrates: Several sources were consulted for the invertebrate list. Hatfield et al. (2015) was used for Crotch's bumble bee and Reeder and Miller (1988) was used for the Warner Springs snail. In addition, iNaturalist.org was consulted for species occurrences.

The invertebrate list consists of the 2 species mentioned above. Crotch's bumble bee is a state candidate for listing and the Warner Springs snail is a Forest Service sensitive species. Please refer to Table 6, below.

Table 6. Invertebrate species potentially occurring in the project area.

Invertebrates			
Species	Status	Habitat	Potential
Crotch Bumble Bee *Bombus crotchii*	C	Open grassland and shrub habitat. Nests underground or in old rodent burrows or above ground in tufts of grass, cavities or dead trees. Annual colonies. Short-tongued species known to forage on Asclepias, Chaenactis, Lupinus, Medicago, Phacelia, and Salvia.	High potential; observations nearby recorded in iNaturalist
Warner Springs Snail *Rothelix warnerfontis*	FSS	Found in abandoned woodrat nests atWarner's Springs type locality.	Low potential; documented from 2900 feet in elevation north of project site.

C = candidate for California listing
FSS = Forest Service sensitive species

Additional Sources Consulted:

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Tremor, Scott, Drew Stokes, Wayne Spencer, Jay Diffendorfer, Howard Thomas, Susan Chivers and Philip Unitt, editors. 2017. San Diego County Mammal Atlas. No. 46. 1 August 2017. Proceedings of the San Diego Society of Natural History, San Diego Natural History Museum, San Diego, CA. 432 p.

Williams, Paul H., Robbin W. Thorp, Leif L. Richardson and Sheila R. Colla. 2014. An Identification Guide Bumble Bees of North America. Princeton University Press, Princeton. 208 p.

Review of Riparian and Sensitive Natural Communities

The CNDDB was consulted for sensitive plant communities, and none were mapped on the project site. There are 4 blue-line tributary streams that form the headwaters of Deer Creek and meet in a typical dendritic pattern before flowing out of the project area. Refer to the project description in the Biological Report.[6] Deer Creek meets Cedar Creek which joins the San Diego River that eventually flows into El Capitan Reservoir. The blue-line streams are in treatment units along with 2 small ponds. The larger pond is used in the boating recreation program at the camp. While the blue-line streams have had water this past year with the rainfall, they are intermittent and often dry. They are important for the wildlife onsite and active movement corridors across the area.

Sensitive Natural Communities were reviewed by using the CWHR vegetation classification for the project area (8 vegetation types) and cross-walking each to the Vegetation Alliances of the most current Manual of California Vegetation online.[7] These 8 vegetation types cross-walked to 178 vegetation alliances of the Manual of California Vegetation. There were 100 alliances outside of the potential project area, leaving 78 potential alliances in the project area. Of these, 24 were classified with a state or global ranking of 3 or less, indicating 100 or less known occurrences of the alliance across the state or world. Table 7 lists the CWHR Type, the alliances found in each and their Global (G) and State (S) rankings:

Table 7. Sensitive MCV Alliances potentially in each mapped CWHR Vegetation Type with global (G) and state (S) sensitivity ratings.

CWHR Vegetation Type	MCV Alliance	G	S
Annual Grassland	*Deinandra fasciculata* Herbaceous Alliance	2	2
Annual Grassland	*Lasthenia glaberrima - Eleocharis macrostachya* Herbaceous Alliance	2	2
Chamise-Redshank Chaparral	Adenostoma fasciculatum-Salvia sp Shrubland Alliance	3	3
Chamise-Redshank Chaparral	Xylococcus bicolor Shrubland Alliance	4	3
Chamise-Redshank Chaparral	Arctostaphylos glandulosa Shrubland Alliance	4	3
Chamise-Redshank Chaparral	Ceanothus greggii-Fremontodendron californicum Shrubland Alliance	4	3
Coastal Oak Woodland	Quercus engelmannii Woodland Alliance	3	3
Coastal Oak Woodland	Umbellularia californica Forest Alliance	4	3
Coastal Scrub	Eriogonum wrightii - E. heermannii - Buddleja utahensis Shrubland Alliance	3	3
Coastal Scrub	Isocoma menziesii Shrubland Alliance	3	3
Coastal Scrub	Keckiella antirrhinoides Shrubland Alliance	3	3
Coastal Scrub	Lepidospartum squamatum Shrubland Alliance	3	3
Coastal Scrub	Opuntia littoralis - Op. oricola - Cylindropuntia prolifera Shrubland Alliance	4	3
Coastal Scrub	Salvia apiana Shrubland Alliance	4	3
Coastal Scrub	Selaginella (bigelovii, wallacei) Herbaceous Alliance	4	3
Mixed Chaparral	Ceanothus verrucosus Provisional Shrubland Alliance	2	2
Mixed Chaparral	Ceanothus (oliganthus, tomentosus) Shrubland Alliance	3	3
Mixed Chaparral	Arctostaphylos glandulosa Shrubland Alliance	4	3
Mixed Chaparral	Arctostaphylos pungens - Arctostaphylos pringlei Shrubland Alliance	4	3
Mixed Chaparral	Ceanothus greggii - Fremontodendron californicum Shrubland Alliance	4	3
Montane Hardwood	Umbellularia californica Forest & Woodland Alliance	4	3
Montane Riparian	Vitis arizonica - Vitis girdiana Shrubland Alliance	3	3
Montane Riparian	Populus fremontii - Fraxinus velutina - Salix gooddingii Forest & Woodland Alliance	4	3.2
Sierran Mixed Conifer	Calocedrus decurrens Forest Alliance	4	3

[6] To be finalized by the end of July 2023
[7] https://vegetation.cnps.org/ accessed 7/3/2023

The total project area is 512.3 acres. The Treatable landscape shows 508.8 acres and 3.5 acres are outside the Treatable Landscape but within the project's treatment area. The CWHR vegetation types and alliances are not evenly distributed across the landscape. Table 8 below lists the acres of CWHR vegetation types with the number of potentially sensitive alliances in each.

Table 8. Acres of CWHR Vegetation Types along with the potential sensitive alliances in each.

CWHR Vegetation Types	Acres	#SVAs[8]
Annual Grassland	15.4	2
Chamise-Redshank Chaparral	0.2	4
Coastal Oak Woodland	90.7	2
Coastal Scrub	6.7	7
Mixed Chaparral	138.3	5
Montane Hardwood	130.5	1
Montane Riparian	111.5	2
Sierran Mixed Conifer	15.5	1
TOTAL	**508.8**	**24**

Note that there are 138.3 acres of Mixed Chaparral with a potential of 5 kinds of sensitive vegetation alliances present. This is the largest mapped CWHR Vegetation type with the highest potential number of sensitive alliances. Also, note the Chamise-Redshank Chaparral CWHR vegetation type total area of 0.2 acres and 4 possible sensitive alliances. Pre-Implementation sampling surveys will determine if the alliances are present.

State or Federally Protected Wetlands Review:

Within the project area of the two Girl Scout Camps, there are three ponds with the southernmost pond adjacent to a mapped wetland area, according to USGS NWI data. The project area does not include the large wet meadow area between Treatment Units 5 and 8 by design. Other small wetland areas may occur in the riparian areas and will be recorded and avoided as part of the pre-implementation survey.

Impact BIO-1 – Less than Significant with Mitgation

Special Status Plant Species
Treatment activities and maintenance treatments could result in direct or indirect adverse effects to the 50 special-status plant species with potential habitat within the treatment area. Fifteen of these species—Orcutt's brodiaea, San Diego sedge, Mt. Laguna aster, Cuyamaca Lake downingia, San Diego button-celery, Cleveland's horkelia, Santa Lucia dwarf rush, Parish's meadowfoam, Baja navarretia, San Bernardino bluegrass, southern mountains skullcap, Salt Spring checkerbloom, prairie wedgegrass, San Bernardino aster and silvery false-lupine—are typically associated with wet areas (e.g., creekbanks, streams, wetlands, meadows). Pursuant to **SPR HYD-4,** Watercourse and Lake Protection Zones (WLPZs) ranging from 50 to 150 feet adjacent to all aquatic habitat (i.e., wetland areas) within the treatment area will be implemented, which would avoid most adverse effects to these species. Also, **SPR HYD-2**, Avoid Construction of New Roads will maintain the integrity of both wetland and upland habitats.

Pursuant to **SPR BIO-7**, protocol-level surveys for special-status plants will be conducted prior to implementation of any treatment. If special-status plants are identified during surveys, Mitigation Measure **BIO-1b** will be implemented to avoid loss of identified special-status plants. Per Mitigation Measure **BIO-1b**, if special-status plants are identified during protocol-level surveys, a no-disturbance buffer of appropriate distance by a qualified biologist will be established around the area occupied by the species within which mechanical treatments, manual treatments, grazing treatments, herbicide applications nor prescribed fire or burn pile stacking will not occur.

[8] SVA is Number of Sensitive Vegetation Alliances

The potential for treatment activities to result in adverse effects on special-status plants was examined in the PEIR. This impact on special-status plants is within the scope of the PEIR because the treatment activities and intensity of disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR. SPRs that apply to project impacts under Impact BIO-1 are SPRs **BIO-1** review and survey project-specific biological resources, **BIO-2** require biological resource training for workers, **BIO-3** survey sensitive natural communities and other sensitive habitats, **BIO-4** design treatment to avoid loss or degradation of riparian habitat function, **BIO-5** avoid environmental effects of type conversion and maintain habitat function in chaparral and coastal sage scrub, **BIO-6** prevent spread of plant pathogens, **BIO-7** survey for special-status plants, **BIO-9** prevent spread of invasive plants, noxious weeds and invasive wildlife, **BIO-11** install wildlife-friendly fencing when using prescribed herbivory to avoid impacts to special status plants, **GEO-1** suspend disturbance during heavy precipitation, **GEO-2** limit high ground pressure vehicles, **GEO-3** stabilize any disturbed soil areas**GEO-4** monitor erosion, **GEO-7** minimize erosion, **GEO-8** identify steep slopes with unstable soils and include measures to avoid topsoil loss, **HYD-4** identify and protect watercourse and lake protection zones, and **HYD-5** protect non-target vegetation and special-status species from herbicides. As long as these SPRs are followed, this determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-2 – Less than Significant

Special Status Wildlife Species

Vegetation treatment types for the Girl Scout Camp Winacka and Camp Whispering Oaks include 1) **manual treatment** with handtools and chainsaws, 2) **mechanical treatment** using masticators, skidders, chippers and track chippers, 3) **prescribed burning** including broadcast burning and pile burning along with air curtain burners to dispose of accumulated biomass, 4) **herbivory** using grazing animals and 5) **herbicides** for managing the vegetation including invasive plant species such as Spanish broom. The CalVTP programmatic EIR has analyzed the state-wide effects of these treatments on the special status wildlife species in California and there is potential for significant impact to some of these species. There are project specific requirements and mitigation measures required in the VTP to reduce and avoid significant harm; this section will highlight the most appropriate project specific requirements and mitigation measures for the special status wildlife species potentially affected by this project.

It is also important to weigh the impacts to wildlife species from treatment activities with the inevitability of wildfire sweeping through the area, such as the Cedar Fire in 2003. Carefully timed treatments spaced between treatment units with customized treatment prescriptions and pre-implementation surveys to identify avoidance areas and buffers to reduce harm to species during low-activity seasons will have a much different outcome for both rare and common wildlife species than a wildfire rolling through the area with high intensity consuming the copious dead and down fuels. Maintaining a more open landscape on a rotating schedule may also keep the established Engelmann, Coast and Black oaks trees healthier with less competition and less susceptibility to the Golden Spotted Oak Borer. Proactively *managing* this landscape will do more to conserve the special status wildlife species, particularly if this is done in a heterogeneous pattern across the project area rather than leaving a continuous accumulation of a dead and dying tree and dense shrub fuel load for wildfire to convert to a near homogeneous moonscape.

Data review and reconnaissance surveys were conducted in accordance with **SPR BIO-1** (see Biological Attachment[9]). The project proponent/lead agency has consulted with regulatory agencies (California Department of Fish and Wildlife [CDFW] and U.S. Fish and Wildlife Service [USFWS] via IPAC) and has implemented agency recommendations into the project design. Worker training will be conducted prior to implementation (**SPR BIO-2)** for species awareness and avoidance.

The CalVTP analyzed wildlife species by “life history” groups and treatment activities in the PEIR in Chapter 3.6, pages 139 – 187. The following table list the 73 special status wildlife species potentially affected by this project[10] by life history group:

[9] To be finalized by the end of July 2023.
[10] Please refer to the Bio-1 discussion for the list by animal group, status and likelihood of occurrence of each species.

Life History Group	Species
Tree/Cavity Nesting	CA Spotted Owl, Oak Titmouse, Lawrence's Goldfinch, Cassin's Finch, Nuttall's Woodpecker, Band-Tailed Pigeon, Least Bell's Vireo, Vermilion Flycatcher, Bullock's Oriole, White-Tailed Kite, Ferruginous Hawk, Prairie Falcon, American Peregrine Falcon, Bald Eagle, Golden Eagle, Swainson's Hawk, Olive-Sided Flycatcher, Vaux's Swift, Purple Martin, Cooper's Hawk, Sharp-Shinned Hawk, Merlin, Ringtail
Shrub Nesting	Tricolored Blackbird, Clark's Marsh Wren, Yellow-Breasted Chat, Summer Tanager, Yellow Warbler, Yellow-Headed Blackbird, Common Yellowthroat, Coastal California Gnatcatcher, Coastal Cactus Wren, Gray Vireo, Bell's Sage Sparrow, Wrentit, Black-Chinned Sparrow, California Thrasher, Loggerhead Shrike
Ground Nesting	Rufous-Crowned Sparrow, Grasshopper Sparrow, Northern Harrier, Bryant's Savannah Sparrow, Oregon Vesper Sparrow, California Horned Lark, San Diego Black-Tailed Jackrabbit, Dulzura Pocket Mouse, Northwest San Diego Pocket Mouse, Southern Grasshopper Mouse
Burrowing/Denning	Burrowing Owl, American Badger, Mountain Lion
Insects/Terrestrial Invertebrates	Crotch's Bumblebee, Warner Springs Snail
Bats	Pallid Bat, Townsend's Big-Eared Bat, Spotted Bat, Western Mastiff Bat, Silver-Haired Bat, Western Red Bat, Western Yellow Bat, California Leaf-Nosed Bat, Fringed Myotis, Pocketed Free-Tailed Bat, Big Free-Tailed Bat
Amphibians/Reptiles	San Diego Banded Gecko, San Diego Legless Lizard, Orange-Throated Whiptail, Coastal Whiptail, Coast Horned Lizard, Coronado Skink, California Glossy Snake, Red-Diamond Rattlesnake, San Diego Ringneck Snake, San Diego Mountain Kingsnake, Coastal Rosy Boa, Coast Patch-Nosed Snake, Two-Striped Garter Snake, Southwest Pond Turtle, Arroyo Toad, California Red-Legged Frog, Western Spadefoot Toad, Coast Range Newt, Large-Blotched Salamander

Tree-nesting and cavity nesting species: Pre-Implementation surveys to identify sensitive habitats such as oak woodlands (**SPR BIO-3**) will determine treatment prescriptions. Pre-Implementation surveys – conducted as part of **MM BIO–2A & 2B** – will identify the special status species onsite for areas to avoid and buffer, the multi-cavity snags used as nursery sites or as acorn storage by the common species Acorn Woodpecker (**SPR BIO-12**). Courtship behavior and nest building for **Golden eagle** and **White-tailed kite** and other raptor species may occur outside of the nesting season (February 15 – August 15) established for Southern California required by the Federal Migratory Bird Treaty Act (MBTA) and State Fish and Game Code (FGC) 3503. A pre-implementation survey for these species 5 days prior to implementation work as part of **MM BIO-2B** will identify any potential breeding efforts by these species and if found, those areas will be buffered and avoided.

Treatments planned in select riparian areas in accordance with **SPR BIO-4** "design treatment to avoid loss or degradation of riparian habitat function", will not occur during nesting season. **Least Bell's vireo** (LBV) will not be impacted by fuel treatment activities. This species is a migrant and not expected on site outside of nesting season.

Shrub-nesting species: Bird reproduction is protected by the MBTA and California FGC 3503 incorporated in **SPR BIO-10** and **12**. If fuel reduction treatments are implemented during this limited operating period (LOP) of February 15 – August 15, nesting surveys will be conducted 5 days prior to planned implementation. If nests are found, they will either be buffered a sufficient distance to avoid disturbing birds or implementation will be delayed until nestlings fledge. Most shrub vegetation in the project area is mixed chaparral. Special status birds that may be affected are: **Gray Vireo**, **Bell's Sage Sparrow**, **Wrentit**, **Black-Chinned Sparrow**, **California Thrasher** and **Loggerhead Shrike**.

The potential habitat of **California gnactcatcher** (CAGN) may also be treated; pre-implementation surveys will be conducted and measures described above implemented to avoid impacts to nesting and fledging CAGN. Treatment prescriptions are designed so that Coastal sage scrub habitat function will not be reduced by the project **SPR BIO-5** nor type-converted by noxious weeds (**SPR BIO-9**)**.** Coastal Sage Scrub vegetation is 1.3% of the project area.

Riparian shrub nesting special status bird species include: **Tricolored Blackbirds**, **Clark's Marsh Wren**, Y**ellow-Breasted Chat**, **Summer Tanager**, **Yellow Warbler**, **Yellow-Headed Blackbird** and **Common Yellowthroat.** Although riparian vegetation treatment is not the focus of this project, **SPR BIO-4** and **SPR HYD-4** are designed to protect these areas by either careful treatment or avoidance of these areas. The pre-implementation surveys will determine the presence of these species.

Ground-nesting species: Standard Project Requirement **BIO-10** survey for special-status wildlife and nursery sites and **BIO-12** protect common nesting birds, including raptors protect ground-nesting species. Most of the ground-nesting bird species prefer grasslands and the majority of that habitat onsite is in the oak woodland portion of the treatment area. For special status mammal species, the **Dulzura Pocket Mouse Northwest San Diego Pocket Mouse** and **San Diego Black-tailed jackrabbit** and the **Southern Grasshopper Mouse**, these pre-implementation surveys will identify nesting sites under shrubs and avoid and buffer nesting areas if found as part of **MM BIO-2B**. The presence of **Ringtails**, which may nest at ground level, will also be checked during pre-implementation surveys.

Burrowing or Denning species: The pre-implementation survey will focus on **Burrowing Owls**, **American Badgers** and **Mountain Lions**. The chance of any of these species living in the treatment area is low; there is little open grassland for Burrowing Owls, Badgers may be moving through the area but have not been observed on site and a Mountain Lion den in the treatment area would be a source of concern to the Girl Scout camp managers, if known. Mountain Lions are known to move through the area. If any of these special status species is present, the occupied portion of the treatment area will be avoided and buffered as per **MM BIO-2B**. All workers will receive biological resource training to avoid any previously unidentified burrowing or denning sites (**SPR BIO-2**)

Insects and Invertebrate special status species: The range of special status insect **Crotch's bumblebee** overlaps with the project area and research grade observations have been reported in iNaturalist. Focused surveys as per **SPR BIO-10** will include surveys for bumblebee presence on spring flowers and flying individuals. Implementation of **MM BIO-2G** is designed to avoid loss of Crotch's bumblebee nests. Abandoned woodrat nests, the preferred habitat of the terrestrial **Warner Springs Snail**, in the treatment area will be examined for snail presence in the pre-implementation surveys as a part of **MM BIO-2F** and avoided if found.

Special Status Bat species: Treatment in areas near or in sensitive bat species roosting habitat will be avoided as per **SPR BIO-1** review and survey project-specific biological resources and **BIO-10** survey for special-status wildlife and nursery sites. Pre-implementation surveys will include checking rock outcrops for deep crevices and evidence of bat roosts and checking for roost sign near large trees. If evidence is found, roost sites will be buffered with a no-treatment zone and avoided as per **MM BIO-2B**. The **SPR BIO-10** pre-implementation surveys will also include canvasing the adjacent national forest lands for potential habitat and designating a no-treat buffer inside the project area if potential roosting areas are within 100 feet of the project area.

Special Status Amphibian and Reptile species: Potential habitat for **Arroyo Toad** will be identified prior to implementation (**SPR BIO-10**) and avoided as per **MM BIO-2A**. The WPLZ for potential toad habitat may be increased for potential upslope aestivation habitat of Arroyo toads as part of SPR **HYD-4** identify and protect watercourse and lake protection zones. Pre-implementation surveys, as per **SPR BIO-10** at various seasons prior to implementation will be conducted to identify and avoid any impacts to the additional special status amphibian and reptile species. Snake and lizards may be the most common special status reptile species in the treatment areas, however most treatment activities are expected to occur in the cooler months (outside of nesting season). Snakes and lizard species may be aestivating during actual implementation.

Special Status amphibian species, such as the **Southwestern Pond Turtle**, **California Red-Legged Frog**, **Western Spadefoot Toad**, **Coast Range Newt** and **Large-Blotched Salamander** are protected by **SPR BIO-4** and **SPR HYD-4** also. The pre-implementation surveys will determine the presence of these species within treatment areas.

Avoiding construction of new roads (**SPR HYD-2**) will help protect animals burrows and dens. Worker training (**SPR BIO-2**) will incorporate avoiding burrows, checking under shrubs for lizard eggs in hand-treatment areas and avoiding reptiles and reporting observations if seen.

Specific Project Requirements (**SPR**) and Mitigation Measures (**MM**) for biological resources that apply to project implementation for special status wildlife species include the following and will be used to guide the design of the pre and post implementation aspects of this project:

SPR or MM	SPR / MM - Description
SPR BIO-1	Review and survey project-specific biological resources,
SPR BIO-2	Require biological resource training for workers,
SPR BIO-3	Survey sensitive natural communities and other sensitive habitats,
SPR BIO-4	Design treatment to avoid loss or degradation of riparian habitat function,
SPR BIO-5	Avoid environmental effects of type conversion and maintain habitat function in chaparral and coastal sage scrub,
SPR BIO-9	Prevent the spread of invasive plants, noxious weeds and invasive wildlife,
SPR BIO-10	Survey for special status wildlife and nursery sites
SPR BIO-11	Install wildlife-friendly fencing when using prescribed herbivory to permit movement of native wildlife species,
SPR BIO-12	Protect common nesting birds, including raptors.
MM BIO-2A	Avoid Mortality, Injury or Disturbance and Maintain Habitat Function for Wildlife
MM BIO-2B	Avoid the above for all special status Wildlife Species
MM BIO-2F	Avoid Habitat for special status snails
MM BIO-2G	Design treatments to avoid mortality, injury or disturbance and maintain habitat function for special status Bumble Bees.
MM BIO 4	Avoid State and Federally Protected Wetlands
MM BIO-3A	Design Treatments to avoid loss of sensitive natural communities and oak woodlands
MM BIO 4	Avoid State and Federally Protected Wetlands
MM BIO-3A	Design Treatments to avoid loss of sensitive natural communities and oak woodlands

Impact BIO-3 – Less than Significant with Mitgation

Riparian/Sensitive Natural Communities

Initial treatment and maintenance treatments could result in direct or indirect adverse effects on sensitive habitats, including designated sensitive natural communities in the project area.

Data review and reconnaissance-level surveys of project-specific biological resources were conducted according to **SPR BIO-1** . There were no sensitive natural communities identified from the CNDDB in the project area. The preliminary review of Manual of California Vegetation indicates 24 alliances potentially present in the project area. See Table 7 in the SPR BIO 1 section for the list of potentially occurring alliances.
These alliances will be identified using the CDFW-CNPS Rapid Assessment Protocol[11] for sampling plots, and if present, mapped and flagged prior to implementation (**SPR BIO-3** survey sensitive natural communities and other sensitive habitats). The riparian and any identified chaparral/coastal sage alliances will be treated with prescriptions designed to maintain habitat function and avoid type conversion **(SPR BIO-4** design treatment to avoid loss or degradation of riparian habitat function and **SPR BIO-5** avoid environmental effects of type conversion and maintain habitat function in chaparral and coastal sage scrub**)** with worker training (**SPR BIO-2**) or remain untreated to comply with **MM BIO-3A**. Presence of special status plants and wildlife species will also be surveyed prior to implementation and avoidance measures will be taken as part of **SPR BIO-7** survey for special-status plants and **SPR BIO-10** survey for special-status wildlife and nursery sites. Any active nests found will be buffered and avoided along with raptor nests that may be found in large trees in the riparian areas (**SPR BIO-12**). Sensitive plant communities will also be protected from animals in selected grazing treatments by fencing in the grazing animals in the target areas **SPR BIO-11**).

[11] https://cnps.org/wp-content/uploads/2018/03/protocol-rapid_assess.pdf

The sensitive riparian communities will be protected from treatments of the surrounding vegetation with the Wildlife Protection Zones (WLPZ) of **SPR HYD-4** . No ground disturbance or pile burning will occur within the buffer zones. Any herbicides used, primarily to prevent the spread of the invasive Spanish broom (*Spartium junceum*) and others (**SPR BIO-9** prevent spread of invasive plants, noxious weeds and invasive wildlife) will adhere to **SPR HAZ-5** protect non-target vegetation and special-status species from herbicides, **HAZ-6** comply with herbicide application regulations, **HYD-1** comply with water quality regulations and **HYD-5** protect non-target vegetation and special-status species from herbicides. Precautions such as cleaning tools and equipment will be incorporated into all treatments in or near the riparian zones, working near any smooth-bark riparian trees, to avoid introducing shot-hole borers (**SPR BIO-6,** prevent spread of plant pathogens**)** into the project area. Disturbed soils will be stabilized (**SPR GEO-3,** stabilize disturbed soil areas**)**, soil erosion will be minimized (**SPR GEO-7**), monitored for erosion (**SPR GEO-4**) and future storm water draining off the steep slopes of the project area will be captured and carefully directed with water bars constructed as part of the project (**SPR GEO-5**). Workers implementing the fuel treatment will be trained to avoid and minimize impacts to sensitive resources and riparian areas (**SPR BIO-2**).

These SPRs would substantially reduce potential direct and indirect impacts to sensitive habitats and sensitive natural communities; however, there would still be potential for direct removal of sensitive vegetation or habitat modifications that degrade the quality of sensitive habitats or sensitive natural communities and that lead to a loss of acreage of these habitat types, eliminate sensitive natural communities or habitat from a treatment area, or reduce the habitat value or function of these habitats. Loss or substantial degradation of sensitive natural communities and sensitive habitats would be a **potentially significant** impact.

Impact BIO-4 - Less than Significant with Mitgation

State and federal wetlands

Initial treatment and maintenance treatments could result in direct or indirect adverse effects on state-protected or federally protected wetlands. The aquatic habitat within the treatment area has been excluded during the design of the treatments. However, based on review and survey of project-specific biological resources (**SPR BIO-1**), some portions of the treatment area contain portions of intermittent, and ephemeral streams, as well as portions of seasonal wetland features. With **SPR BIO-4** along with **SPR HYD-4**, WLPZs ranging from 50 to 150 feet will be established adjacent to all Class I and Class II streams within the treatment area, and Equipment Limitation Zones (ELZs) of at least 25 feet will be established around all Class III ephemeral streams within the treatment area. Under **Mitigation Measure BIO-4**, a qualified registered professional forester (RPF) or biologist will delineate the boundaries of the seasonal wetlands and associated riparian habitat and will establish a no-disturbance buffer of at least 25 feet with flagging or fencing. Ground disturbance will be prohibited within this buffer.

SPRs that apply to project impacts under Impact **BIO-4** are **SPRs BIO-1** review and survey project-specific biological resources, **BIO-2** require biological resource training for workers, **BIO-3** survey sensitive natural communities and other sensitive habitats, **BIO-4** and **BIO-11** install wildlife-friendly fencing when using prescribed herbivory to keep grazing animals out of wetland areas, **GEO-1 s**uspend disturbance during heavy precipitation, **GEO-3** , stabilize disturbed soil areas **GEO-4** monitor erosion, **GEO-5** drain stormwater via water breaks, **GEO-7** minimize erosion, **HYD-1** comply with water quality regulations, **HYD-3** water quality protections for prescribed herbivory including providing grazing animals water in containers, and **HYD-4** identify and protect watercourse and lake protection zones. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-5 – Less than Significant with Mitgation

Wildlife movement corridors and nurseries

Initial treatment and maintenance treatments could result in direct or indirect adverse effects on wildlife movement corridors and nurseries because suitable habitat is present in the treatment area. Based on review and survey of project-specific biological resources (**SPR BIO-1**), the project area in a habitat block that is part of a state-wide

effort to ensure movement of wildlife[12] and also included in a locally-focused effort of the South Coast region[13]. No defined corridors cross the project area, and it is considered moderately permeable habitat for animal movement. The creeks and drainages in the project area are important for local animal movement (K. Drake, pers. comm.)

Due to the nature of the proposed treatment activities, implementation would not result in a substantial change in the existing conditions that facilitate wildlife movement in the treatment area. No rookeries or obvious nurseries were observed during the reconnaissance surveys, however the units will be surveyed as the project is implemented (**SPR BIO-1** review and survey project-specific biological resources and **MM BIO-5**). Mule deer are known in the project area. No bat roosts were identified during the surveys. However, bats are plentiful in the area; large trees and other potential habitat features will be examined in the pre-implementation surveys. Arroyo toads may burrow above some of the dry stream beds. However riparian areas will be buffered (**SPR BIO-4** design treatment to avoid loss or degradation of riparian habitat function and **HYD-4** identify and protect watercourse and lake protection zones) and thus avoided. If any nursery areas are identified in the pre-implementation surveys, they will be flagged for avoidance (**MM BIO-5**) – for the animals as well as the workers who will receive training (**SPR BIO-2** require biological resource training for workers) on working around and avoiding these sites.

Insect movement is not expected to be impacted as project implementation will create new habitat for plant species that serve as nectar resources within the treatment areas and invasive plants will be controlled so that small mammals and reptiles can move through the project area (**SPR BIO-9** prevent spread of invasive plants, noxious weeds and invasive wildlife). The chaparral and coastal sage communities will not be type-converted due to project activities (**SPR BIO-5** avoid environmental effects of type conversion and maintain habitat function in chaparral and coastal sage scrub) and in areas where herbivory treatments are appropriate (**SPR BIO-11** install wildlife-friendly fencing when using prescribed herbivory) will apply. No long-term impacts to wildlife moving through the area are anticipated.

The potential for treatment activities to result in adverse effects on wildlife movement corridors and nurseries was examined in the PEIR. This impact is within the scope of the PEIR because the treatment activities and extent of expected disturbance as a result of implementing treatment activities are consistent with those analyzed in the PEIR.

Impact BIO-6 - Less than Significant

Common wildlife

Initial vegetation treatments and maintenance treatments could result in direct or indirect adverse effects resulting in reduction of habitat or abundance of common wildlife, including nesting birds and lizard species that lay eggs a few centimeters deep in soil under shrubs, because habitat suitable for these species is present throughout treatment areas. The potential for treatment activities, including maintenance treatments, to result in adverse effects on these resources was examined in the PEIR.

Adverse effects on nesting birds would be clearly avoided by conducting initial treatments between October 1 and January 31, outside of the nesting songbird season (February 1–August 31[14]). Maintenance treatments, including manual and mechanical treatment activities, may be conducted during portions of the nesting bird season (e.g.,

[12] Spencer, W.D., P. Beier, K. Penrod, K. Winters, C. Paulman, H. Rustigian-Romsos, J. Strittholt, M. Parisi, and A. Pettler. 2010. California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California. Prepared for California Department of Transportation, California Department of Fish and Game, and Federal Highways Administration.

Rustigan-Romsos, Heather. (2017 October 4). Natural Landscape Blocks – California Essential Habitat Connectivity (CEHC) [ds621]. California Department of Fish and Wildlife Biogeographic Information and Observation System (BIOS). Retrieved July 4, 2023 from http:/bios.dfg.ca.gov

[13] Penrod, K., C. Cabañero, P. Beier, C. Luke, W. Spencer, and E. Rubin. 2006. South Coast Missing Linkages Project: A Linkage Design for the Peninsular-Borrego Connection. Produced by South Coast Wildlands, Idyllwild, CA. www.scwildlands.org, in cooperation with California State Parks.

Penrod, Kristeen. (2008, December 2). South Coast Missing Linkages [ds419]. California Department of Fish and Wildlife Biogeographic Information and Observation System (BIOS). Retrieved July 4, 2023 from http:/bios.dfg.ca.gov

[14] Check what we decide to be nesting season and be consistent thru document

February–March, August). These activities could result in direct loss of active nests or disturbance to active nests from auditory and visual stimulus (e.g., heavy equipment, chain saws, vehicles, personnel) potentially resulting in abandonment and loss of eggs or chicks. If maintenance treatments would occur during the nesting season, then **SPR BIO-12** (protect common nesting birds, including raptors) would apply for common birds as well as raptor species (i.e. red-tail hawks that are known to nest in December and January in this area), and a survey for these species would be conducted within the treatment areas by a qualified biologist prior to treatment activities. If no active native bird nests are observed during focused surveys, then additional mitigation would not be required. If active nests of common birds or raptors are observed during focused surveys, disturbance to the nests would be avoided by establishing an appropriate buffer around the nests, modifying treatments to avoid disturbance to the nests, or deferring treatment until the nests are no longer active as determined by a qualified biologist. In addition, implementation of **SPR BIO-2** includes training for workers and would include what to do if active bird nests were observed and how to look under shrubs for lizard eggs. **SPR BIO-4** (design treatment to avoid loss or degradation of riparian habitat function) would protect common wildlife in riparian areas. **SPR BIO-6** (avoidance of chaparral and coastal sage scrub type conversion) will minimize long-term treatment effects on common species. **SPR BIO-6 (**prevent spread of plant pathogens) will target common tree species and their persistence in the treatment area. **SPR BIO-9** (preventing the spread of invasive and noxious plants and invasive wildlife) will also protect common species. **SPR-11** (install wildlife-friendly fencing when using prescribed herbivory) would reduce impacts of native wildlife moving through areas where animals are being grazed as part of the project.

The potential for adverse effects on common wildlife, including nesting birds, is within the scope of the PEIR because the treatment activities and extent of expected disturbance as a result of implementing vegetation treatments, including maintenance treatments, are consistent with those analyzed in the PEIR. SPRs applicable to this impact are **BIO-1, BIO-2**, **BIO-4**, **BIO-5**, **BIO-6**, **BIO-9**, **BIO-11** and **BIO-12**. This impact of the proposed project is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-7 - Less than Significant

Conflict with Local Policies

The Camp Winacka Camp Wispering Oaks Vegetation Management Project is within the boundaries of San Diego County in unincorporated county land. The Project is within the boundary of the North County MSCP that has not been finalized; see discussion under Impact 8.

The potential for treatment activities to result in conflict with local policies or ordinances was examined in the PEIR. The potential for the treatment project to conflict with local policies or ordinances is within the scope of the PEIR because vegetation treatment projects implemented under the CalVTP that are subject to local policies or ordinances would be required to comply with any applicable county, city, or other local policies, ordinances, and permitting procedures related to protection of biological resources, per **SPR AD-3** Consistency with Local Plans, Policies, and Ordinances.

SPRs that apply to this impact include **AD-3**, **BIO-1** review and survey project-specific biological resources, **BIO-3** survey sensitive natural communities and other sensitive habitats and **BIO-7** survey for special-status plants. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Impact BIO-8 – N/A

Local NCCP/HCPs

The Camp Winacka-Camp Whispering Oaks Vegetation Management Project is within the boundary of the proposed North County subarea plan of the San Diego MSCP and the potentially the Butterflies HCP in development. There are no currently approved NCCPs or HCP that include the project area. Impact BIO-8 is not applicable to this project.

However, to be in compliance with the *future* North County subarea plan, species proposed for coverage and that may be found in the project area have been included in the special status plant and animal lists[15]. The lifespan of this Vegetation Management Project is expected to overlap with the future North County Plan. Thus the following plants and animals have been included: Englemann Oak, Least Bell's Vireo, California Coastal Gnatcatcher, Tricolored Blackbird, Yellow Breasted Chat, Coastal Cactus Wren, Rufous Crowned Sparrow, Bell's Sage Sparrow, Grasshopper Sparrow, Northern Harrier, Burrowing Owl, Golden Eagle, Osprey, Pallid Bat, Townsend's Big Eared Bat, Mountain Lion, Coast Horned Lizard and Southwestern Pond Turtle.

There are four butterfly species proposed for the Butterflies HCP: Quino Checkspot, Laguna Mountains Skipper, Hermes Copper and Harbison Dun Skipper. None are known from the project area[16] however two host plants, San Diego Sedge and Cleveland's Horkelia were included on the special status plant list. Although these plant species are not rare, they are also not common. To err on the side of conservation, reporting and conserving these plant species in the project area will support the *future* Butterflies HCP and may allow for population expansion of these rare butterfly species in the future.

[15] Requested current list of species proposed for coverage under the proposed North County Subarea plan of the MSCP from Stephanie Neal of San Diego Co Planning on December 21, 2022. 19 species were included on that list.

[16] Sensitive Butterfly of San Diego Seminar on 28 January.2023.

5.6 GEOLOGY, SOILS, PALEONTOLOGY, AND MINERAL RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil	LTS	Impact GEO-1, pp. 3.7-26 – 3.7-29	Yes	GEO-1, 2, 3, 4, 5, 6, 7 & 8, AQ-3 & 4	NA	LTS	No	Yes
Impact GEO-2: Increase Risk of Landslide	LTS	Impact GEO-2, pp. 3.7-29 – 3.7-30	Yes	GEO-1, 2, 3, 4, 7, & 8 HYD-3 & 4	NA	LTS	No	Yes

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Geology, Soils, Paleontology, and Mineral Resource Impacts: Would the treatment result in other impacts to geology, soils, paleontology, and mineral resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

Discussion

Impact GEO-1 - Less Than Significant

Treatment activities include manual and mechanical treatments, herbivory, and prescribed pile burning would result in the removal of vegetation and cause soil disturbance. Prescribed burning would also result in the reduction of vegetation and forest litter and cause soil disturbance. These treatment activities have the potential to cause soil erosion or loss of top soils. The fuel reduction prescription limits the reduction of hazardous vegetation to 40-60% based on the existing vegetation, slope, and health of vegetation. Manual and mechanical treatments cut vegetation is chipped or masticated, and the chipped or shredded material is spread over bare soil areas to minimize soil erosion and the loss of top soils. Herbivory treatment would be guided by a grazing plan issued by a Certified Range Manager. Prescribed burning would be guided by a burn plan issued by the Burn Boss. These plans would include measures for soil protection to minimize soil erosion and the loss of topsoil.

The potential for these activities to cause substantial erosion or loss of topsoil was examined in the PEIR. The project proponent would apply **SPR AQ-3, SPR AQ-4, and SPR GEO-1 thru SPR GEO-8** to reduce soil erosion. **SPR AQ-3** requires a burn plan prepared by a qualified technician or certified State burn boss. **SPR AQ-4** directs the project to implement dust management measures. **SPR GEO-1** directs suspending treatment activities (mechanical, herbivory, and herbicide application) when the National Weather Service forecasts a chance (30% or more) of precipitation within 24 hours. **GEO-2** restricts high-ground pressure vehicles from operating in saturated soil conditions. **GEO-3** instructs for stabilizing disturbed soils by applying mulch over exposed soils. **GEO-4** requires an inspection of the treatment area to determine that erosion control SPRs and mitigations were installed correctly before the first rainy season. If not, then corrections shall be made prior to the rain event. **GEO-5** guides the installation of water breaks according to the waterbreak section in the California Forest Practice Rule (FPR) - Section 914.5.6(c). If waterbreaks are ineffective, then other erosion control measures would be instated as needed to maintain topsoils. **GEO-6** limits the size of burn piles not to exceed 20 feet in length, width, or diameter or on the contour to minimize damage to soils. **GEO-7** prohibits heavy equipment (mechanical operations) from operating on steep slopes greater than 50% for erosion hazard rating of high or extreme. Herbivory practices would not be used in areas with slopes steeper than 50% slope**. GEO-8** directs for evaluating treatment areas for slopes greater than 50% for unstable areas by an RPF or licensed geologist (PG or CEG). To the greatest extent feasible, steep slopes with unstable areas would be avoided. Therefore the impact to erosion or topsoils would be less than significant.

The potential of the proposed project to result in the substantial erosion or loss of topsoil is within the scope of the PEIR analysis as the soils conditions within the project area essentially are the same outside the treatable landscape and the treatment activities (type and use of equipment, extend of vegetation removal, and isolated application of prescribed pile burning) are consistent with the analysis in the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of causing substantial erosion or loss of topsoil is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact GEO-2 - Less Than Significant

Treatment activities include manual and mechanical treatments, herbivory, and prescribed pile burning would result in the removal of vegetation and cause soil disturbance, including on steep slopes. Root structures would not be removed, but the removal of tree and shrub canopy coverage could increase bare soils and the ability of soils to retain more water, or soil water content. Increased soil water content increases the potential for landslides. The interactive map review of the Reported Landslide by CSG reflects no history of landslides within the proposed project area. Further, less than 2% of the treatment area exceeds 50% slope.

The potential for these activities to increase the risk of landslides was examined in the PEIR. The project proponent would apply **SPR's GEO-1 thru GEO-4, GEO-7 and GEO-8, HYD-3, and HYD-4** to minimize the risk of landslides. The standard project requirements **GEO-1 thru GEO-4 and GEO-7 and GEO-8** are described above. **HYD-3** directs herbivory practices herded out of areas if accelerated soil erosion occurs. **HYD-4** directs to protect watercourses per the WLPZ section in the FPR – Section 916.5. Therefore the impact of increased risk of landslides is less than significant.

The potential of the proposed project to result in the increased risk of landslides is within the scope of the PEIR analysis as the soils conditions within the project area essentially are the same outside the treatable landscape, and the treatment activities (type and use of equipment, extend of vegetation removal, and isolated application of prescribed pile burning) are consistent with the analysis in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of increasing the risk of landslides is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Geology, Soils, Paleontology, and Mineral Resources Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.7.1 "Environmental Setting" and Section 3.7.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the small inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR analysis. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts to geology, soils, or minerals resources would occur that are not covered in the PEIR.

5.7 GREENHOUSE GAS EMISSIONS (GHG)

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs	LTS	Impact GHG-1, pp. 3.8-10 – 3.8-11	Yes	N/A	N/A	LTS	No	Yes
Impact GHG-2: Generate GHG Emissions through Treatment Activities	PS	Impact GHG-2, pp. 3.8-11 – 3.8-17	Yes	AQ-3	MM-GHG-2	SU	No	Yes

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New GHG Emissions Impacts: Would the treatment result in other impacts to GHG emissions that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

Discussion

Impact GHG-1- Less Than Significant

The proposed project would implement treatment activities that generate GHG emissions during the initial and maintenance treatment phases. The proposed project could potentially conflict with plans, policies, or regulations from an agency related to reducing GHG emissions. The individual treatment activities under the proposed project consist of manual and mechanical treatments, prescribed herbivory, herbicide application, and prescribed burning. All these treatment activities are described in the CalVTP, and they are consistent with the CalVTP's objectives to reduce long-term GHG emissions impacts from destructive wildfires and improve wildfire-resilient forest conditions to increase carbon sequestration. Further, the proposed project is consistent with the County of San Diego's 2018 Climate Action Plan (2018 CAP). The 2018 CPA indicates that in preparing for wildfires, "…. the County and other relevant agencies and organizations will need to adopt measures to reduce the potential for catastrophic wildfires to occur and the adverse health impacts associated with wildfire" (Chapter 4-11). In addition, the proposed project is consistent with the local plans that focus on hazardous fuel reduction to minimize catastrophic wildfire conditions, such as the Forest Management Plan for Camp Winacka-Camp Whispering Oaks, the CAL FIRE San Diego Unit Fire Plan, Julian CWPP, and the Julian Community Plan (2011).

The potential of the proposed project to conflict with an applicable plan, policy, or regulations related to reducing GHG emissions was examined in the PEIR. Since the proposed project is not subject to AB 1504 as a registered carbon offset project, SPR GHG-1 is not applicable practice. The proposed project would not conflict with plans, policies, or regulations related to GHG emissions; therefore, impact would be less than significant.

The potential of the proposed project to result in conflicts with applicable plans, policies, or regulations for reducing GHG emissions is within the scope of the PEIR analysis, as plans, policies, and regulations relevant to GHG reduction are essentially the same within and outside the treatable landscape, and proposed treatment activities in terms of GHG emissions from equipment and duration of use, are consistent with the associated activities analyzed in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact on consistency with applicable plans, policies, and regulations regarding GHG reduction is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact.

Impact GHG-2 - Significant and Unavoidable

Treatment activities include manual and mechanical treatments, prescribed herbivory, herbicide, and prescribed burning. These activities would generate GHG emissions during the initial and maintenance treatment phases. Manual and mechanical treatment activities would generate CO_2 emissions from fossil-fuel-powered vehicles, equipment, and hand tools. Prescribed pile or broadcast burning of forest/woody biomass would generate CO_2 emissions, particulate matter, and other air pollutants. Prescribed herbivory and herbicide applications require the use of petroleum fuel vehicles and equipment. In addition, the proposed project includes the use of ACB to burn 40,000 tons of oak wood, primarily GSOB-infested oaks logs. ACB requires fossil fuels to run the diesel engine, which generates GHG emissions.

In comparison, the GHG emission treatment activities are intended to reduce hazardous fuels that contribute to large and damaging wildfires, including reducing the significant and uncontrolled release of GHG emissions. Further, burning woody biomass through the use of an ACB burns more efficiently than open pile burning, generates less GHG emissions, minimizes the release of particulate matter, and sequesters carbon as biochar. As a reference to GHG impacts from wildfires, approximately one-quarter of all GHG emissions released in the 2007 fire season were from the Witch Fire that burned nearly 250,000 acres in San Diego County. The CalVTP PEIR reports that in the 2007 fire season, 22.8 million metric tons of CO_2 were released from slightly over one million acres burned by wildfires. Consistent with the CalVTP, a wildfire-resilient treated area would likely result in less GHG emission and yield a net carbon benefit by locally improving forest conditions and increasing carbon sequestering in soils, plants, and trees. However, because of the uncertainty in predicting when a wildfire occurs or to the extent of wildfire intensities or the carbon sequestration rate, consistent with PEIR and in good faith disclosure, the GHG impact is classified as potentially significant.

The potential for treatment activities to generate GHG emissions was examined in the PEIR. The project proponent would apply **SPR AQ-3 and MM GHG-2** to reduce GHG emissions related to prescribed burning. **AQ-3** requires a burn plan prepared by a qualified technician or certified State burn boss. **MM-GHG-2** directs the planning and implementation of prescribed burning operations to incorporate feasible methods for reducing GHG emissions. **MM-GHG-2** works with **AQ-3** and directs that the burn plan includes feasible GHG reduction techniques. Additionally, **MM GHG-2** identifies that other feasible methods or technologies to sequester carbon could be incorporated, such as conservation burning, a technique that reduces smoke particles and carbon released into the atmosphere and produces biochar. An ACB is considered an evolving technology that could sequester carbon, and for more information, see *Evaluation of Air Quality and Climate Change Impacts from Specialized Biomass Processing Technologies under the California Vegetation Treatment Program* (Ascent, December 2022.

The potential of the proposed project to result in generating GHG from implementing the treatment activities is within the scope of the PEIR analysis, as GHG emissions are essentially the same within and outside the treatable landscape, and proposed treatment activities in terms of GHG emissions from equipment and duration of use, are consistent with the associated activities analyzed in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to GHG emissions is significant and unavoidable. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Impacts Related to GHG Emissions

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.8.1 "Environmental Setting" and Section 3.8.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR analysis. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts from GHG emissions would occur that are not covered in the PEIR.

5.8 ENERGY RESOURCES

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
ould the project:								
Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy	LTS	Impact ENG-1, pp. 3.9-7 – 3.9-8	Yes	N/A	N/A	LTS	No	Yes

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Energy Resource Impacts: Would the treatment result in other impacts to energy resources that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

Discussion

Impact ENG-1 - Less Than Significant

The treatment activities require the use of various vehicles and mechanical equipment for the initial and maintenance treatment phases. Vehicles and equipment operate based on the use of fossil fuels, which results in the consumption of energy resources. The use of vehicles and equipment would be short-term and temporary. The initial treatment activities likely would require more fossil fuel energy than the maintenance phase of the proposed project.

The potential for treatment activities to result in the wasteful use of fossil fuels was examined in the PEIR. There are no SPRS or MM practices applicable to this impact. The potential of the proposed project to result in wasteful use of fossil fuel from implementing the treatment activities is within the scope of the PEIR analysis, as the consumption of energy resources is essentially the same within and outside the treatable landscape. The proposed treatment activities that require energy consumption, including the amount and duration, are consistent with the associated activities analyzed in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to GHG emissions is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Energy Resource Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.9.1 "Environmental Setting" and Section 3.9.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the small inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are less than significant and consistent with those covered in the PEIR. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts on energy resources would occur that are not covered in the PEIR.

5.9 HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials	LTS	Impact HAZ-1, pp. 3.10-14 – 3.10-15	Yes	HAZ-1	NA	LTS	No	Yes
Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides	LTS	Impact HAZ-2, pp. 3.10-15 – 3.10-18	Yes	HAZ-5 thru HAZ-9	NA	LTS	No	Yes
Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites	PS	Impact HAZ-3, pp. 3.10-18 – 3.10-19	Yes	NA	NA	LTS	No	Yes

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Hazardous Materials, Public Health and Safety Impacts: Would the treatment result in other impacts related to hazardous materials, public health and safety that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

Discussion

Impact HAZ-1 - Less Than Significant

The proposed project includes manual and mechanical treatment activities, and prescribed burning, which would be applied for initial and maintenance treatments. These activities would require transporting, using, and storing petroleum products (fuels, oils, and lubricants). These products are known hazardous materials and have the potential to create significant health hazards from the use of hazardous materials. The use of hazardous materials would be short-term and temporary.

The potential for these treatment activities, which involve hazardous materials that can cause significant health hazards, was examined in the PEIR. The project proponent would apply **SPR-HAZ 1** to minimize leaks and the risk of resultant contaminants entering the environment. **HAZ-1** requires maintenance of all diesel- and gasoline-powered equipment to the manufacturer's specification. Therefore, the impact is less than significant.

The potential impact is within the scope of the PEIR analysis, as the area within the project boundary, the potential exposure is essentially the same within and outside the treatable landscape. Further, the types of treatment, including equipment and the use of hazardous materials, are consistent with the analysis identified in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of creating a significant health hazard from the use of hazardous material is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact HAZ-2 - Less Than Significant

The proposed project includes the use of herbicides. The use of herbicides would target invasive or non-native vegetation. This activity would require the transportation, use, storage, and disposal of herbicides. The use of herbicides is limited to a small operational area within the proposed project boundary for the specific intention of controlling the invasive scotch broom. The herbicides that could be applied within the treatment area are only those listed in the CalVTP (*Section 2.5.2 Description of Treatment Activities, Herbicide Application*). This herbicide list has met strict standards set by the Environmental Protection Agency, California Environmental Protection Agency, and the Department of Pesticide Regulations. However, the potential adverse effect could occur if a large spill were to occur or if spraying occurs in close proximity to public areas.

The potential for this treatment activity to cause a significant health hazard was examined in the PEIR. The project proponent would apply **SPR-HAZ 5 through HAZ-9** to minimize significant health risks from the use of herbicides. **HAZ-5** requires a spill prevention and response plan to be prepared before beginning herbicide treatment activities. **HAZ-6** directs the project proponent to coordinate with the Agricultural Commissioner regarding required licenses and permits before implementing herbicide treatment activities. **HAZ-7** instructs that all herbicides and adjuvant containers would be triple rinsed with clean water at an approved site and disposed of rinsate in a batching tank (3 CCR Section 6684). **HAZ-8** indicates that herbicide treatment activities shall minimize drift by applying herbicide application parameters. **HAZ-9** requires notification within or adjacent to public and residential areas within 500 feet. Signs shall be posted at a specified location that shows the pertinent herbicide information prior to the start of the treatment, and notification shall remain posted at least 72 hours after ending the treatment application. Therefore the impact is less than significant.

The impact is within the scope of the PEIR analysis, as the area within the project boundary, the potential exposure is essentially the same within and outside the treatable landscape. Further, the types of treatment, including equipment and the use of hazardous materials, are consistent with the analysis identified in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of creating a significant health hazard from the use of herbicides is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact HAZ-3 - Less Than Significant

The proposed project includes manual and mechanical treatment activities, and prescribed pile burning, which would be applied as initial and maintenance treatments. These activities would generate soil disturbance, potentially exposing workers, the public, and the environment to the risk associated with existing hazardous materials within the treatment area. Generally, undeveloped lands would not contain hazardous materials; however, the project proponent should consider the potential of contamination sites within the treatment area.

The potential for treatment activities to expose workers, the public, and the environment to significant hazards from the disturbance of known hazardous materials within the project area was examined in the PEIR. There are no applicable SPRs for this impact**.** However, **MM HAZ-3** directs the project proponent to review the Hazardous Waste and Substance Site List (Cortese) (www.envirostor.dtsc.ca.gov/public/) for known sites within or near the treatment area. The review of the Cortese List reflects no known hazardous material sites within the proposed project area. The closest known record is approximately 5 miles from the treatment area. The closest recorded site is not a hazardous material site, and it would not impact the proposed project. **MM HAZ-3** also directs the project proponent to check with the landowner to determine if any sites are known to have previously used, stored, or disposed of hazardous material. The landowner reports the Department of Environmental Health has issued a permit for using and storing 80 gallons of 12% chlorine for pools and potable water disinfection. The permitted use and storage of chlorine are within the property boundary but outside the treatment area. Consistent with **MM HAZ-3**, the review of the Cortese List and the landowner report confirms no hazardous materials are within the treatment area. Therefore the impact would be reduced to less than significant.

The impact is within the scope of the PEIR analysis, as the area within the project boundary, the potential exposure is essentially the same within and outside the treatable landscape. Further, the types of treatment, including equipment and the use of hazardous materials, are consistent with the analysis identified in the PEIR. The small

inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of exposing the public or environment to significant hazards from disturbance to known hazardous material sites is less than significant. While the PEIR identifies the impact as potentially significant, the results of the site-specific analysis indicate that the impact is less than significant. Therefore, the proposed project is consistent with and within the scope of the PEIR. The impact is less than significant. Therefore, the determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Hazardous Materials, Public Health and Safety Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.10.1 "Environmental Setting" and Section 3.10.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the small inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR analysis. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts related to hazardous materials, public health, and safety would occur that are not covered in the PEIR.

5.10 HYDROLOGY AND WATER QUALITY

Impact in the PEIR			Project-Specific Checklist					
ronmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning	LTS	Impact HYD-1, pp. 3.11-25 – 3.11-27	Yes	AQ-3, GEO-4, GEO-6, HYD-1 and HYD-4	NA	LTS	No	Yes
Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities	LTS	Impact HYD-2, pp. 3.11-27 – 3.11-29	Yes	AQ-3, BIO-1, GEO-4, GEO-6, HAZ-1, HYD-2, HYD-4	NA	LTS	No	Yes
Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory	LTS	Impact HYD-3, p. 3.11-29	Yes	BIO-1, GEO-1, GEO-4, GEO-7, GEO-8, HAZ-1, HYD-3, HYD-4	NA	LTS	No	Yes
Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides	LTS	Impact HYD-4, pp. 3.11-30 – 3.11-31	Yes	BIO-4, GEO-1, HAZ-5, HAZ-6 HYD-2, HYD-4	NA	LTS	No	Yes
Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area	LTS	Impact HYD-5, p. 3.11-31	Yes	GEO-1, GEO-2, GEO-5, HYD-2, HYD-4, HYD-6	NA	LTS	No	Yes

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Hydrology and Water Quality Impacts: Would the treatment result in other impacts to hydrology and water quality that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

Discussion

Southern California is a Mediterranean climate, with warm to hot and dry summers and cool, wet winters, including snowfall in the higher mountains, including the proposed project area. Strong, hot, dry winds, known as Santa Ana Winds, are offshore winds blowing east to west, generally occur during the late summer/ fall seasons, and are

associated with Red Flag conditions for wildfires. Precipitation may occur from late October to late April, although rainfall events are variable, and precipitation occurs in relatively few events. Occasionally, subtropical moisture occurs during the summer months, may produce thunderstorms at higher elevations, and cause flash floods at lower elevations. The mean annual rainfall in the Julian area is around 24 inches. Drought conditions have prevailed over the last few years, except last year, rain and snowfall exceeded the annual averages.

The proposed project is in the Inaja watershed, within the Boulder Creek hydrological area, in the larger South Coast hydrological region. Four watercourses and three lakes/ponds are within the proposed project boundary. Dehr Creek is classified as WLPZ – Class II watercourse, and the three unnamed tributaries are classified as WLPZ – Class III watercourses. These water sources connect to the San Diego River. The proposed project is in the San Diego Regional Water Quality Control Board (SDWQCB) service area.

Impact HYD-1 - Less Than Significant

The proposed project includes prescribed pile and broadcast burning and ACB burning. Prescribed burning could be applied as an initial and maintenance treatment but primarily used as a maintenance treatment activity. Pile burning would be confined to woody debris piled in various locations with the treatment within the manual and mechanical treatment areas and burned during permissible burn days and favorable weather conditions. Pile burning would impact water quality in spot locations due to the surface movement of ash and burned debris from rainfalls or high wind events into lakes, ponds, or watercourses. Under prescribed fire weather conditions, broadcast burning allows a set fire to burn vegetation across a defined treatment area or burn unit for a specific and less intense outcome than uncontrolled wildfire conditions. Broadcast burning would impact water quality from a burned treatment unit due to the surface movement of ash and burned debris from rainfall or wind events into lakes, ponds, or watercourses. ACB burning is a specialized technology to burn heavy woody biomass in a controlled burn chamber and environment. ACB burning is conducted in a burn chamber, where ash and burned debris are contained in the burn chamber.

The potential for prescribed burning to cause runoff and violate water quality standards, regulations, or conflict with plans was examined in the PEIR. The project proponent would apply **SPR's AQ-3, GEO-4, GEO-6, HYD-1 and HYD-4. AQ-3** requires a burn plan prepared by a qualified technician or certified State burn boss. **GEO-4** requires inspecting the treatment area to determine that erosion control SPRs and mitigations were installed correctly before the first rainy season. **GEO-6** limits the size of burn piles not to exceed 20 feet in length, width, or diameter or on the contour to minimize damage to soils. **HYD-1** directs a project proponent to conform with the regional water quality board's permitting process, including waivers. San Diego Regional Water Quality Control Board (SDRWQCB) adopted Conditional Waiver No.5 for Discharge from Silvicultural Operations. Subsequent to the certification of the CalVTP PEIR, the SWQCB issued General Order that adopted the PSA as the assessment process that documents environmental impacts and SPRs and MMs for reducing or avoiding environmental impacts. Therefore the filing of an approved PSA meets the intent of the statewide General Order. **HYD-4** directs protecting water resources by flagging WLPZ according to the FPR. Therefore, the application of the SPRs results in the impact as less than significant.

The impact is within the scope of the PEIR analysis, as the area within the project boundary, the potential exposure is essentially the same within and outside the treatable landscape. Further, the type of treatment, including equipment to support prescribed pile burning, is consistent with the analysis identified in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of violating water quality standards, regulations, or conflict with plans from prescribed pile burning is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact HYD-2 - Less Than Significant

The proposed project would include manual and mechanical treatments, which would be applied as initial and maintenance treatments. The manual treatment involves using workers (handcrews) with hand tools, such as axes and chainsaws, to cut hazardous vegetation. The worker, particularly crews working on steep slopes, could create a localized ground disturbance that would cause adverse water quality. Mechanical treatment involves using heavy equipment such as small to medium-sized masticators and tract chippers. The use of mechanical equipment could cause soil disturbance and compaction and expose soils to erosion.

Manual and mechanical operations are guided by the fuel treatment prescription that limits the amount of vegetation treated (cut, chipped, or masticated). The fuel reduction prescription reduces the existing vegetation by 40-60%, thereby retaining native healthy vegetation to lessen the operational footprint and minimize soil disturbance. The mosaic retention of vegetation reduces exposed soils. Masticated and chipped material is used as mulch to cover exposed soils to minimize soil erosion. Watercourses are buffered according to the WPLZ regulations.

The potential for this treatment to violate water quality standards, regulations, or conflict with plans was examined in the PEIR. The project proponent would apply **SPR BIO-1, BIO-5, GEO-1, GEO-4, GEO-5, GEO-7, HAZ-1, HYD-2, and HYD-4**. Therefore, the proposed project is consistent with and within the scope of the PEIR. **BIO-1** requires a qualified RPF or biologist to conduct a data review and a reconnaissance-level survey prior to treatment, including sensitive wetlands, meadows, and riparian areas. **BIO-5** directs avoidance of type conversion of coastal sage and chaparral to herbaceous or annual grasslands. **GEO-1** directs suspending fuel treatment activities (mechanical, manual, herbivory, and herbicide application) when the National Weather Service forecasts a chance (30% or more) of precipitation within 24 hours. **GEO-4** requires inspecting the treatment area to determine that erosion control SPRs and mitigations were installed correctly before the first rainy season. If not, then corrections shall be made prior to the rain event. **GEO-5** requires installing storm runoff structures, or water breaks to divert surface runoff according to the erosion control guidelines in FPR. **GEO-7** prohibits heavy equipment from operating on steep slopes greater than 65% and steep slopes greater than 50%, with a high erosion hazard rating or higher. **HAZ-1** requires maintenance of all diesel- and gasoline-powered equipment to the manufacturer's specification, reducing the accidental leak or petroleum spills that may affect water resources. **HYD-2** avoids the construction or reconstruction of roads. **HYD-4** directs protecting water resources by flagging WLPZ according to the FPR. Therefore, the application of the SPRs results in the impact as less than significant.

The impact is within the scope of the PEIR analysis, as the area within the project boundary, the potential exposure is essentially the same within and outside the treatable landscape. Further, the types of treatment, including equipment, work locations, and the duration of activities, is consistent with the analysis identified in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of violating water quality standards and regulations or conflict with plans from manual or mechanical treatment activities is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact HYD-3 - Less Than Significant

The treatment activities include prescribed herbivory. While the treatment activity may be used as an initial treatment, the most likely use would be for maintenance. This treatment activity utilizes animals to graze on vegetation to treat vegetation. Grazing animals, allowed to move freely, tend to move toward water sources and nutrient-rich vegetation near water sources. Grazing could result in overconsumption, denuding vegetation, soil compaction, or erosion, leading to soil and water quality impacts. The accumulation of manure and urine in one area could lead to the runoff of nutrients and pathogens into water sources. Active herding, fencing, providing alternative water sources, and monitoring are common best management strategies to manage grazing animals.

The potential for this treatment to violate water quality standards, regulations, or conflict with plans was examined in the PEIR. The project proponent would apply **SPR BIO-1, GEO-1, GEO-4, GEO-7, HYD-3, and HYD-4**. Therefore, the proposed project is consistent with and within the scope of the PEIR. **BIO-1** requires a qualified RPF or biologist to conduct a data review and a reconnaissance-level survey prior to treatment, including sensitive wetlands, meadows, and riparian areas. **GEO-1** directs suspending fuel treatment activities (mechanical, manual, herbivory, and herbicide application) when the National Weather Service forecasts a chance (30% or more) of precipitation within 24 hours. **GEO-4** requires inspecting the treatment area to determine that erosion control SPRs and mitigations were installed correctly before the first rainy season. If not, then corrections shall be made prior to the rain event. **GEO-7** prohibits herbivory practices would not be used in areas with slopes steeper than 50% slope. **HYD-3** directs environmentally sensitive areas, such as waterbodies, wetlands, or riparian areas, to be identified and exclude herbivory using fencing or active herding. Water shall be provided for grazing animals through onsite stock ponds or portable water sources outside the sensitive areas. **HYD-4** directs protecting water resources by flagging WLPZ according to the FPR. Therefore, the application of the SPRs results in the impact as less than significant.

The impact is within the scope of the PEIR analysis, as the area within the boundary of the project area, the potential exposure is essentially the same within and outside the treatable landscape. Further, the herbivory treatment,

including types of grazing animals, grazing sites, and the duration of activities, is consistent with the analysis identified in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of violating water quality standards, regulations, or conflict with plans from herbivory activities is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact HYD-4 - Less Than Significant

The treatment activities include herbicides and would be used as initial and maintenance treatments. This treatment activity would be applied in limited locations to treat invasive or non-native species, such as scotch broom. The application of herbicides could impact water sources through direct contact, runoff, drift, leaching, misapplication, or spills.

The potential for this treatment to violate water quality standards, regulations, or conflict with plans was examined in the PEIR. The project proponent would apply **SPR BIO-4, GEO-1, HAZ-5, HAZ-6, HAZ-7, HAZ-8, HAZ-9 and HYD-4. BIO-4** directs that the treatment design avoids loss or degradation of riparian habitat function. It further indicates that only hand application of herbicides, approved for aquatic environments, would be allowed only during low flow periods or when seasonal streams are dry. **GEO-1** directs suspending fuel treatment activities (mechanical, manual, herbivory, and herbicide application) when the National Weather Service forecasts a chance (30% or more) of precipitation within 24 hours. **HAZ-5** requires a spill prevention and response plan to be prepared before beginning herbicide treatment activities. **HAZ-6** directs the project proponent to coordinate with the Agricultural Commissioner regarding required licenses and permits before implementing herbicide treatment activities. **HAZ-7** requires a triple rinse method for herbicide containers with clean water at an approved site and the rinsate disposed of in a batch tank. **HAZ-8** requires the application of herbicides to minimize drift into public areas. **HAZ-9** directs the project proponent (or implementing entity) to post visible signs at each end of the herbicide treatment area and any intersecting trails notifying the public about herbicide application. **HYD-4** directs protecting water resources by flagging WLPZ according to the FPR. Therefore, the application of the SPR results in the impact as less than significant.

The impact is within the scope of the PEIR analysis, as the area within the project, the potential exposure is essentially the same within and outside the treatable landscape. Further, the herbicide application, including types of grazing animals, grazing sites, and the duration of activities, is consistent with the analysis identified in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of violating water quality standards, regulations, or conflict with plans from the ground-based application of herbicides is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact HYD-5 - Less Than Significant

The proposed project involves manual, mechanical, and herbivory treatment activities and would be applied for initial and maintenance treatments. These treatment activities could alter the existing drainage pattern within the treatment area, particularly on erosive or exposed soils or steep slopes. The fuel reduction prescription retains mosaic patterns of healthy plants to minimize exposed soils. Best management practices include covering exposed soils with chips or masticated material over exposed soils, limiting operations on steep slopes, and installing waterbreaks to minimize the substantial altering of existing drainage patterns.

The potential to alter the existing drainage pattern of a treatment site or area was examined in the PEIR. The project proponent would apply **SPR GEO-1, GEO-2, GEO-5, HYD-2, HYD-4, and HYD-6** to minimize altering drainage patterns. **GEO-1, GEO-2, HYD-2, HYD-4, and GEO-5** are described above. **HYD-6** directs protecting existing stormwater drainage systems would be marked before initiating treatment operations to avoid disturbance. Therefore, the application of the SPR results in the impact as less than significant.

The impact is within the scope of the PEIR analysis, as the area within the boundary of the project area, the potential exposure is essentially the same within and outside the treatable landscape. Further, the treatment activities, including types of equipment and duration of activities, are consistent with the analysis identified in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within

the treatable landscape. Therefore, the impact of substantially altering the existing drainage pattern within the treatment area is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Hydrology and Water Quality Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.11.1 "Environmental Setting" and Section 3.11.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the small inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR analysis. No changed circumstances are present, and the small inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts related to hydrology and water quality would occur that are not covered in the PEIR.

5.11 LAND USE AND PLANNING, POPULATION AND HOUSING

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation	LTS	Impact LU-1, pp. 3.12-13 – 3.12-14	Yes	AD-3	N/A	LTS	No	Yes
Impact LU-2: Induce Substantial Unplanned Population Growth	LTS	Impact LU-2, pp. 3.12-14 – 3.12-15	Yes	NA	N/A	LTS	No	Yes

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Land Use and Planning, Population and Housing Impacts: Would the treatment result in other impacts to land use and planning, population and housing that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

Discussion

Impact LU-1 - Less Than Significant

The proposed project would occur on private property in an unincorporated area of San Diego County and involves manual and mechanical treatment, herbivory, herbicide, and prescribed burning. The proposed project could cause significant environmental impacts due to conflict with land use plans, policies, or regulations. A review of the applicable plans, policies, and regulations includes the *County of San Diego – Safety Element of the General Plan, County of San Diego Multispecies Conservation Program – North County Plan, County of San Diego Climate Action Plan, County of San Diego – Guidelines for Determining Significance – Cultural Resources: Archaeological and Historic Resources, County of San Diego Fire Codes, Julian Community Wildfire Protection Plan, CAL FIRE – San Diego Unit – Fire Plan, and the Forest Management Plan for Camp Winacka – Camp Whispering Oaks.* These plans, policies, and regulations guide and protect environmental resources, life, and property. Consistent with the *County of San Diego Safety Element*, the proposed project aligns *Policy S-4.1 Fuel Management Programs* under *Goal S-4 Manage Fuel Loads*. Further, the proposed project is identified in the *Regional Priority Plan* under the Regional Forest and Fire Capacity Program for San Diego County.

The potential for the proposed project to result in significant environmental impacts due to a conflict with a land use plan, policy, or regulations was examined in the PEIR. The project proponent would apply **SPR AD-3** to ensure the proposed project does not conflict with local land use plans, policies, and regulations. Therefore the application of the SPR results in the impact as less than significant.

The potential of the proposed project to result in land use conflicts that would cause significant environmental impact is within the scope of the PEIR analysis as the land use conditions within the project area essentially are the same outside the treatable landscape and the treatment type and the treatment activities are consistent with the analysis in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to causing a significant environmental impact due to conflicts with a land use plan, policy or regulation is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact LU-2 - Less Than Significant

The proposed project involves implementing treatment activities applied in the initial and maintenance treatment phases. The treatment activity requires a workforce. The initial and peak operational period, mechanical treatment would involve 2-5 workers per day, and manual treatment would involve 15-50 workers per day. The number of workers is slightly higher than those identified in the PEIR; however, manual treatment workers would be managed into smaller units (handcrews) and assigned to different sections of the project area. Typically, a handcrew is an organized group of 12-20 workers with a crew leader. For any given treatment unit, the operational work period would range from 1- 6 months for the initial treatment phase and 1-2 months for the maintenance phase. The proposed project would generate the highest demand for temporary workers during the initial treatment phase and lesser demand for temporary workers during the maintenance phase of the project. The workforce would be a mixture of temporary local and non-local workers. The projected number of workers would not induce significant population growth. Therefore the impact is less than significant.

The potential for the proposed project to cause substantial population growth and thereby increase the demand for housing was examined in the PEIR. There are no SPRs or MMs for this impact. The potential for the proposed project to result in a substantial population and increase the demand for housing is within the scope of the PEIR analysis. The population and housing demands conditions, essentially, are the same within and outside the CAL VTP treatable landscape. Further, the number of workers and handcrews is consistent with the PEIR. The inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of inducing substantial unplanned population growth is also less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Land Use and Planning, Population and Housing Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.12.1 "Environmental Setting" and Section 3.12.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the small inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR. No changed circumstances are present, and the small inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts to land use and planning, population, and housing would occur that are not covered in the PEIR.

5.12 NOISE

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation	LTS	Impact NOI-1, pp. 3.13-9 – 3.13-12; Appendix NOI-1	Yes	AD-3, NOI-1 thru NOI-6	N/A	LTS	No	Yes
Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities	LTS	Impact NOI-2, p. 3.13-12	Yes	NOI-1	N/A	LTS	No	Yes

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Noise Impacts: Would the treatment result in other noise-related impacts that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

Discussion

Impact NOI-1 - Less Than Significant

The proposed project includes manual and mechanical treatments, prescribed burning, and herbivory and would be applied as initial and maintenance treatment. These treatment activities could generate noise that would increase ambient noise levels within the operational area and potentially affect neighboring properties. Manual and mechanical treatment activities would generate noise similar to outdoor construction activities. Prescribed fire activities would be consistent with vehicle and equipment activities. Herbivory activities would generate noise comparable to farm animals. Except for herbivory activities, noise generated from the proposed project would be short-term and limited to daytime work hours. County of San Diego, Ordinance No. 9962, Noise Abatement and Control, Section 36.408 - Hours of Operations of Construction Equipment prohibits construction equipment from operating between 7 p.m. and 7 a.m. and prohibits construction equipment operating on Sundays and holidays. Treatment activities could occur Monday – Saturday between 7:00 a.m. – 7:00 p.m. The ordinance does not regulate noise from animals in legally operated facilities, such as farms.

The potential short-term increase in ambient noise was examined in the PEIR. The project proponent would apply **SPR AD-3, SPR NOI 1 through NOI 6** to reduce noise exposure generated by vegetation treatment activities. Consistent with **SPR AD-3 and SPR NOI-1**, the County of San Diego's Noise Ordinance (Ord. 9962) limits the work period from construction noise. Treatment activities could occur Monday – Saturday between 7:00 a.m. – 7:00 p.m. Duration of the noise may range from 1 to 90 days for any given area within the treatment area. Due to mandatory work breaks and lunch breaks, a break in the noise would occur throughout the workday. **NOI-2** specifically addresses that all equipment, vehicles, and power tools are expected to be used and maintained according to manufacturers' specifications. **NOI-3** requires engine shrouds to be closed during operations. **NOI-4** indicates that, where feasible, staging areas shall be located away from noise-sensitive areas. **NOI-5** limits the idle time for motorized equipment to 5 minutes or shut down when not in use. **NOI-6** requires notifying nearby noise-sensitive receptors before beginning operations. Therefore, the application of the SPRs would result in the impact as less than significant.

The impact generated from the short-term increase in ambient noise is within the scope of the PEIR analysis, as the noise exposure potential is essentially the same within and outside the treatable landscape, and the number and type of equipment proposed, and the duration of the equipment used, are consistent with those analyzed in the

PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to noise impacts is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact NOI-2 - Less Than Significant

Treatment activities involve mechanical treatment for both initial and maintenance treatments. Large trucks used to haul heavy equipment, crews, and livestock to and from treatment sites may pass through residential receptors, increasing the single event noise (SENL). Travel to and from the worksite would most likely occur early mornings and after the typical workday. Heavy equipment used to treat vegetation would operate throughout the day.

The potential short-term increase in large trucks generating SENL was examined in the PEIR. The project proponent would apply **SPR NOI-**1 to reduce SENL generated by large hauling trucks. **SPR NOI-1,** as noted above, limits treatment activities between Monday – Saturday between 7:00 a.m. – 7:00 p.m. Therefore the application of the SPR would result in the impact as less than significant.

The impact generated from the short-term increase in SENL is within the scope of the PEIR, as the noise exposure potential is essentially the same within and outside the treatable landscape, the number and type of equipment proposed, and the duration of the equipment used, are consistent with those analyzed in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to large trucks generating SENL impacts is also the same as described above. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Noise Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.13.1 "Environmental Setting" and Section 3.13.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the small inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR analysis. No changed circumstances are present, and the small inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts to noise would occur that are not covered in the PEIR.

5.13 RECREATION

Impact in the PEIR			Project-Specific Checklist					
vironmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas	LTS	Impact REC-1 pp. 3.14-6 – 3.14-7	Yes	REC-1	N/A	LTS	No	Yes

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Recreation Impacts: Would the treatment result in other impacts to recreation that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

Discussion

Impact REC-1 - Less Than Significant

The treatment area occurs on fenced, gated private property. The landowner, GSSD, provides various outdoor recreational experiences for Girl Scouts, including hiking, horseback riding, swimming, and camping. Public access is not permitted to protect and secure the Girls Scouts. The proposed treatment area and activities would impact recreational areas.

The potential for treatment activities to disrupt recreational activities was examined in the PEIR. The project proponent would apply **REC-1**. **REC-1** requires public notification at least two weeks before closing trails or recreational areas. Under this ownership, public notification would mean internal notification to the Girl Scout troops who recreate at the camps. Therefore, the application of the SPR results in the impact as less than significant.

The impact generated from disrupted recreational activities is within the scope of the PEIR analysis, as the recreational resources and activities are essentially the same within and outside the treatable landscape, and the treatment activities and intensity are consistent with those analyzed in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to recreation is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Recreation Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.14.1 "Environmental Setting" and Section 3.14.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the small inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR analysis. No changed circumstances are present, and the small inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts to recreation would occur that are not covered in the PEIR.

5.14 TRANSPORTATION

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures	LTS	Impact TRAN-1 pp. 3.15-9 – 3.15-10	Yes	AD-3, TRANS-1	None	LTS	No	Yes
Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses	LTS	Impact TRAN-2 pp. 3.15-10 – 3.15-11	Yes	AD-3, HYD-2, TRAN-1	None	LTS	No	Yes
Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP	PS	Impact TRAN-3 pp. 3.15-11 – 3.15-13	Yes	N/A	N/A	LTS	No	Yes

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Transportation Impacts: Would the treatment result in other impacts to transportation that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

Discussion

Impact TRAN-1 - Less Than Significant

The proposed project would temporarily increase vehicular traffic on public roads to access the treatment area and to conduct roadside treatment along a public road. State Highway 78 and San Diego County roads are the main public transportation roads. The county public roads are Pine Hill Road, Eagle Peak Road, and Boulder Creek Road. Boulder Creek Road bisects the treatment area, and the proposed treatment area along Boulder Creek would impact approximately 0.90 miles of Boulder Creek Road. All roads within the treatment area, except for Boulder Creek Road, are owned and controlled by the private property owner. The proposed project would expect 4-25 vehicles to transport people and equipment to the treatment area during the initial implementation phase and fewer trips for vehicles and equipment for maintenance. Vehicles and equipment would work or be parked within the treatment area or a designated staging area within the private property boundary. Overnight, vehicles and equipment would be parked at designated staging areas.

The potential for a temporary increase in vehicular traffic to conflict with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures was examined in the PEIR. The project proponent would apply **SPRs AD-3 and TRAN-1** to reduce potential traffic impacts. **AD-3** directs the project proponent to design and implement the project consistent with local plans and ordinances, including the San Diego County Transportation Division. **TRANS-1** guides the project proponent to coordinate with the transportation department to determine whether a Traffic Management Plan is needed. Therefore, the application of the SPRs would result in the impact as less than significant.

The potential for the proposed project to result in temporary traffic impacts by conflicting with a program, plan, ordinance, or policy regarding roadway facilities is within the scope of the PEIR analysis, as the treatment duration

and the limited number of vehicles associated with the proposed project are consistent with the analysis identified in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to temporary traffic operation is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact TRAN-2 - Less Than Significant

The proposed project does not construct new roads or modify existing roads. The proposed project includes prescribed burning and could be applied as an initial or maintenance treatment. This treatment activity would produce smoke that could affect visibility near roadways and generate a transportation hazard. The potential for smoke to affect visibility along roadways was examined in the PEIR.

The impact of this treatment activity is within the scope of the PEIR, as the analysis to implement prescribed burning is consistent with the PEIR. The project proponent would apply **SPRs AD-3**, **HYD-2**, and **TRAN-1** to reduce the potential of a smoke hazard**. AD-3** directs the project proponent to design and implement the project consistent with local plans and ordinances. **HYD-2** avoids the construction or reconstruction of roads. **TRANS-1** guides the project proponent to coordinate with the transportation department to determine whether a TMP is needed. Therefore the application of the SPRs would result in the impact as less than significant.

The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of increased hazards due to design features or incompatible uses is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact TRAN-3 - Less Than Significant

The proposed project would require vehicles and trucks daily to transport people and equipment to the treatment area during the initial and maintenance phases. The proposed project would require more vehicles and equipment for the initial treatment and fewer vehicles and equipment for maintenance. The impact on public roads would be a short-term, temporary impact. Manual treatment would require 2-4 crew carriers, 2-4 pickup trucks with trailers or chippers, and a water tender. Mechanical treatment activities would need 1-2 tractor-trailers hauling masticators and skidders and 2-3 pickup trucks with support equipment trailers. Herbicide treatment would require one pickup truck, hauling equipment, herbicides, and support supplies. Herbivory practices require 1-2 trucks hauling grazing animals and 1-2 pickup trucks with trailers. Prescribed or pile burning would require 3-5 fire engines, a fire crew, a water tender, and 1-2 support pickup trucks. Vehicles and trucks would travel from various starting points or home base facilities within the vicinity of the proposed project.

The potential for the proposed project to temporarily increase vehicle miles traveled (VMT) above the baseline was examined in the PEIR. According to the analysis in the PEIR and the Technical Advisory on Evaluating Transportation Impacts published by the Governor's Office of Planning and Research (OPR2018), transportation impacts are evaluated based on the number of trips per day. Since the PEIR covers the statewide program, the net VMT is assumed to be greater than 110 trips per day; therefore, the transportation impact was determined as significant and unavoidable for the statewide program. However, the CalVTP also indicates that individual vegetation treatment projects would likely generate fewer than 110 trips per day, resulting in a less-than-significant impact. Even if all the vehicles and trucks listed above for the proposed project were deployed on the same day, the VMT would be less than 110 trips per day.

The PEIR does not identify SPRs for this impact. The mitigation measure **MM AQ-1** was reviewed to consider the use of public transportation or carpooling. The rural nature of the project does not align with public transportation or public carpooling programs, as such, it would be infeasible to apply this mitigation for this impact. Because the proposed project likely would generate less than 100 trips per day, therefore the impact is less than significant.

The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of a net increase in VMT is less than significant. The

determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

New Transportation Impacts

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.15.1 "Environmental Setting" and Section 3.15.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR analysis. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts to transportation would occur that are not covered in the PEIR.

5.15 PUBLIC SERVICES, UTILITIES AND SERVICE SYSTEMS

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs	LTS	Impact UTIL-1 p. 3.16-9	Yes	NA	N/A	LTS	No	Yes
Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	PS	Impact UTIL-2 3.16-10 – 3.16-12	Yes	AD-3 , UTIL-1	NA	LTS	No	Yes
Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste	LTS	Impact UTIL-2 p 3.16-12	Yes	AD-3, UTIL-1	NA	LTS	No	Yes

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Public Services, Utilities and Service System Impacts: Would the treatment result in other impacts to public services, utilities and service systems that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

Discussion

Impact UTIL-1 - Less Than Significant

The proposed activities include manual and mechanical treatment, herbivory, and prescribed burning, which would be applied for initial and maintenance treatments. These activities would require an on-site water supply. These manual and mechanical treatments could generate dust and require on-site water to control fugitive dust. Herbivory treatment would require on-site water for grazing animals. Prescribed burning would require an on-site water supply to support prescribed fire activities. Generally, a minimal on-site water supply would be needed to address short-term and temporary demands for water. Further, the amount of water needed would be based on the treatment activity and the time of the year. For example, winter operations may not need water to control dust on the naturally surfaced road after a rain event, but late spring operations may require watering roads several times.

The potential to have an on-site water supply was examined in the PEIR. The PEIR does not identify SPRs or MMs for this impact. The proposed project could access the on-site water from the three lakes on the property, the on-site hydrant system, or be provided by water trucks or fire engines. Best management practices would be applied to reduce the amount of on-site water demand. Therefore, the impact is less than significant.

The impact is within the scope of the activities and impacts addressed in the PEIR, as the proposed project treatments, including the prescribed pile burning, are consistent with the analysis in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact associated with sufficient water supply to support the project is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact UTIL-2 - Less Than Significant

The manual and mechanical treatment activities would generate biomass during the initial and maintenance treatment phases. The initial treatment phase likely would generate more biomass than the maintenance phase. The proposed project expects to treat or process biomass on-site through chipping, masticating, lop-scatter, or burning activities. Most logs generated from felling dead and dying trees (heavy fuels) would be burned in the ACB or retained on-site as habitat features.

As an alternative, and only if grant funds were available to fund transportation and tipping costs, the proposed project could consider the off-site removal of logs to a log processing or co-generation facility. The amount of biomass that could be considered for off-site removal is nominal, likely less than 5% of the total estimated biomass volume. If grant funds were available to fund the transportation and tipping costs, potentially the biomass could be removed to a viable biomass processing facility such as a co-generation facility. The off-site biomass removal likely would be limited to the initial treatment phase. Biomass generated from the maintenance phase likely would be nominal and treated on-site. The Strategic Plan to Reduce Waste (2017) for the County of San Diego identifies several chipping and grinding facilities that process woody biomass. The closest co-generation facility is located in Mecca, California, which is over 80 miles away and is a 2-hour haul time, one-way. Tipping fees and haul costs discourage off-site removal to local chipping/grinding facilities or the co-generation facility. Therefore, the proposed project expects to treat and process biomass on-site. If grant funds were provided, due to the volume of GSOB-infested oak wood, most of the material would probably be treated on-site, and only a nominal portion of the biomass would be hauled to a biomass processing facility. The nominal amount of biomass that might be hauled is unlikely to exceed local wood processing/infrastructure capacity.

The potential to generate solid waste in excess of state standards was examined in the PEIR. The project proponent would apply **SPR AD-3 and UTIL-1**. **AD-3** directs the project proponent to design and implement the project consistent with local plans and ordinances. If the implementing entity opts to consider the removal of biomass, then **UTIL-1** requires a Solid Organic Waste Disposition Plan to guide biomass disposal. Therefore, the application of SPRs would result in the impact as less than significant.

The potential biomass impact is within the scope of activities and impacts identified in the PEIR, as the conditions for removing biomass are consistent with the analysis in the PEIR. Based on the variability of assessing biomass disposal across the state, the determination in the PEIR classified the impact as potentially significant and unavoidable to reflect CEQA's mandate of good faith disclosure of all potential effects. Locally, the County of San Diego Department of Public Works reflects the capacity to process greenwaste (biomass) and provides the public with a list of chipping and grinding facilities. Therefore, the impact on solid waste disposal is less than significant. Further, this determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact generated from solid waste in excess of state standards is less than significant. Although this proposed project, as a later activity, reflects a lesser impact than the statewide program, the determination is consistent with the PEIR, and it would not constitute a substantially more severe impact than identified in the PEIR.

Impact UTIL-3 – Less Than Significant

The manual and mechanical treatment activities would generate biomass during the initial and maintenance treatment phases. The biomass would be processed, burned, or otherwise retained biomass on-site. As a last option, a small portion of the biomass (5%) could be hauled to an off-site utilization facility, as noted above in Impact UTIL-2. Consistent with Strategic Plan to Reduce Waste in San Diego County, woody biomass must be disposed of or utilized at chipping/grinding facilities. The Strategic Plan provides a list of chipping/grinding facilities located throughout the county. Disposal of biomass at a solid waste facility (landfill) is prohibited. Therefore, the proposed project would not add solid waste or impact the solid waste system.

The proposed project was evaluated for compliance with the federal, state, and local goals and regulations related to solid waste, as examined in PEIR. The project proponent would apply **SPR's AD-3 and UTIL-1**. Both SPRs are discussed above in Impact UTIL-2. Therefore, the impact is less than significant.

The proposed project reflects compliance with federal, state, and local solid waste disposal and that the proposed project is within the scope of activities and impacts identified in the PEIR. Further, the conditions for removing biomass within and outside the treatable landscape and the operational components are consistent with the analysis in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact related to compliance with federal, state, and local goals and regulations regarding solid waste is less than significant. Although this proposed project, as a later activity, reflects a lesser impact than the statewide program, the determination is consistent with the PEIR, and it would not constitute a substantially more severe impact than identified in the PEIR.

New Impacts to Public Services, Utilities, and Service Systems

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.16.1 "Environmental Setting" and Section 3.16.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the small inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR analysis. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts to public services, utilities, and service systems would occur that are not covered in the PEIR.

5.16 WILDFIRE

Impact in the PEIR			Project-Specific Checklist					
Environmental Impact Covered In the PEIR	Identify Impact Significance in the PEIR	Identify Location of Impact Analysis in the PEIR	Does the Impact Apply to the Treatment Project?	List SPRs Applicable to the Treatment Project[1]	List MMs Applicable to the Treatment Project[1]	Identify Impact Significance for Treatment Project	Would this be a Substantially More Severe Significant Impact than Identified in the PEIR?	Is this Impact Within the Scope of the PEIR?
Would the project:								
Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire	LTS	Impact WIL-1 pp. 3.17-14 – 3.17-15	Yes	AD-3, AQ-3, HAZ-1, HAZ-2, HAZ-3, HAZ-4	NA	LTS	No	Yes
Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides	LTS	Impact WIL-2 pp. 3.17-15 – 3.17-16	Yes	AQ-3, GEO-3, GEO-4, GEO-5	NA	LTS	No	Yes

[1]N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact. None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

New Wildfire Impacts: Would the treatment result in other impacts related to wildfire that are not evaluated in the CalVTP PEIR?	☐ Yes	☒ No	If yes, complete row(s) below and discussion

Discussion

Impact WIL-1 - Less Than Significant

The proposed project includes manual and mechanical treatments and prescribed burning as initial and maintenance treatments. While treatment activities intend to reduce fire risk, the activities could exacerbate fire risk and expose people to uncontrolled wildfire. Excessive, untreated biomass, such as piles or windrows, from manual or mechanical treatment activities could potentially concentrate heavy fuel loading, creating a fire hazard. Equipment or hand-held power tools could generate an accidental spark and cause an uncontrolled wildfire. An escaped ember from a prescribed burn could cause an uncontrolled wildfire. The accidental discarding of smoking items in wildland areas, including the treatment areas, could also cause a wildfire.

The potential impact of these activities to substantially exacerbate fire risk and expose people to the uncontrolled spread of wildfire was examined in the PEIR. The project proponent would apply **SPRs AD-3, AQ-3, HAZ-2, HAZ-3, and HAZ-4** to minimize exacerbating fire risk. **AD-3** directs the project proponent to design and implement the project consistent with local plans and ordinances. **AQ-3** requires a burn plan prepared by a qualified technician or certified State burn boss. **HAZ-2** requires mechanized hand tools to be equipped with federal or state-approved spark arrestors. **HAZ-3** requires a crew using chainsaws to have a fire extinguisher per chainsaw, and each vehicle would be equipped with one long-handled shovel and one axe or Pulaski, consistent with PRC 4428. **HAZ-4** would also apply to restrict smoking to a designated area, a minimum of a 3-feet diameter area, barren and cleared to mineral soil. Smoking is prohibited in vegetated areas. Additionally, best management practices could include the timely removal or treatment of excessive biomass. Therefore, the application of SPRs would result in the impact as less than significant.

Increased wildfire risk from these treatment activities is within the scope of the PEIR analysis, as wildfire risk of the project area within and outside the treatable landscape is essentially the same, and the operational component (type of equipment and duration of treatment) of these activities are consistent with the analysis of the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of substantially exacerbated fire risk and exposing people to uncontrolled wildfire is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

Impact WIL-2 - Less Than Significant

The proposed project involves implementing treatment activities in the initial and maintenance treatment phases. The proposed project intends to reduce hazardous fuels through manual and mechanical treatment methods, prescribed herbivory, and prescribed burning. These activities would remove or burn vegetation, forest litter, slash, chipped, or masticated material, and expose soils. Removing vegetation on steep slopes or vulnerable hillsides could expose people or structures to substantial risks related to post-fire flooding or landslides. However, the fuel reduction prescription limits the amount of vegetation removal and retains more vegetation on steep slopes. Retaining more vegetation on steep slopes protects root structure and soil stability. Prescribed burns would be conducted in a manner to generate low-intensity fire effects to protect mature vegetation but also to protect soils. The proposed project would not involve activities to add housing or result in substantial unplanned population growth. Therefore, the people or structures would not be exposed to the risk of post-wildfire flooding or landslides.

The potential impact of these activities was examined in the PEIR. The project proponent would apply **SPRs AQ-3 and GEO-3, GEO-4 and GEO-5, GEO-7 and GEO-8** to minimize post-fire flooding. **SPR AQ-3,** as noted above**,** requires a burn plan prepared by a qualified technician or certified State burn boss. **GEO-3** instructs for stabilizing disturbed soils by applying mulch over exposed soils. **GEO-4** requires inspecting the treatment area to determine that erosion control SPRs and mitigations were installed correctly before the first rainy season. If not, then corrections shall be made prior to the rain event. **GEO-5** guides the installation of waterbreaks according to the California Forest Practice Rule (FPR) - Section 914.5.6(c). If waterbreaks are ineffective, other erosion control measures would be installed as needed to maintain topsoil. **GEO-7** prohibits heavy equipment (mechanical operations) from operating on steep slopes greater than 50% for erosion hazard rating of high or extreme. Herbivory practices would not be used in areas with slopes steeper than 50% slope. **GEO-8** directs for evaluating treatment areas for slopes greater than 50% for unstable areas by an RPF or licensed geologist (PG or CEG). To the greatest extent feasible, steep slopes with unstable areas would be avoided. Therefore the application of the SPRs would result in the impact as less than significant.

Potential exposure of people or structures to substantial risks related to post-fire flooding or landslides from these treatment activities is within the scope of the PEIR, as the risk for landslides is essentially the same within and outside the treatable landscape and severity and duration of the treatment activities are consistent with those analyzed in the PEIR. The small inclusion of land outside the treatable landscape constitutes a change to the geographic extent of the PEIR. However, the environmental conditions outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impact of exposing people and structures to substantial risk related to post-fire flooding and landslides is less than significant. The determination is consistent with the PEIR and would not constitute a substantially more severe impact than identified in the PEIR.

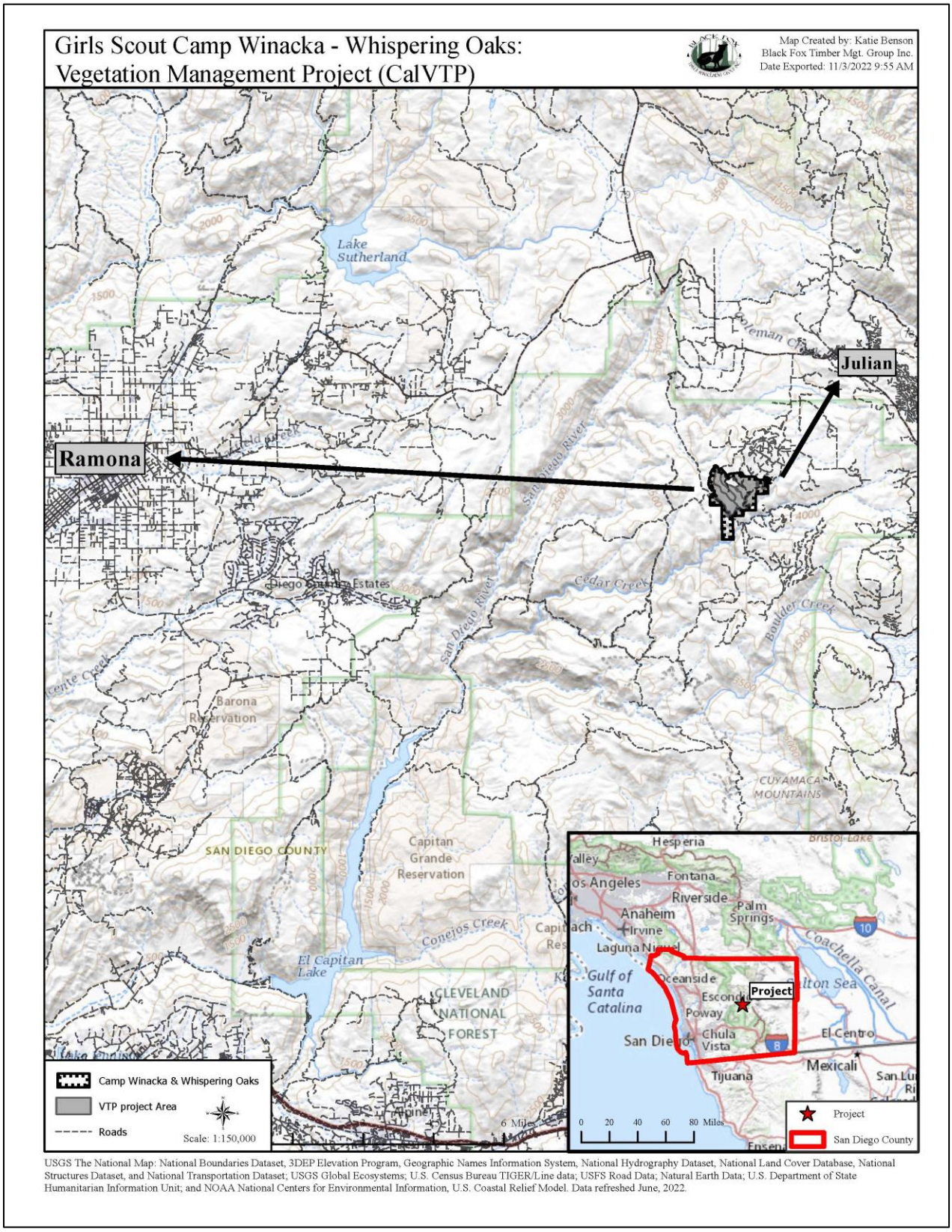
New Impacts to Wildfire

The proposed project is consistent with the treatment type and activities identified in the CalVTP PEIR. The evaluation process has considered the site-specific conditions of the proposed treatment and determined they are consistent with the applicable environmental and regulatory conditions presented in the CalVTP PEIR (see Section 3.17.1 "Environmental Setting" and Section 3.17.2 "Regulatory Setting," in Volume II of the Final PEIR). The project proponent has determined that the small inclusion of land in the proposed treatment area outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR. However, within the boundary of the project area, the existing environmental and regulatory conditions presented in the areas outside the treatable landscape are essentially the same as those within the treatable landscape. Therefore, the impacts of the proposed treatment project are also consistent with those covered in the PEIR analysis. No changed circumstances are present, and the inclusion of areas outside the CalVTP treatable landscape would not give rise to any new significant impact not addressed in the PEIR. Therefore, no new impacts related to wildfire would occur that are not covered in the PEIR.

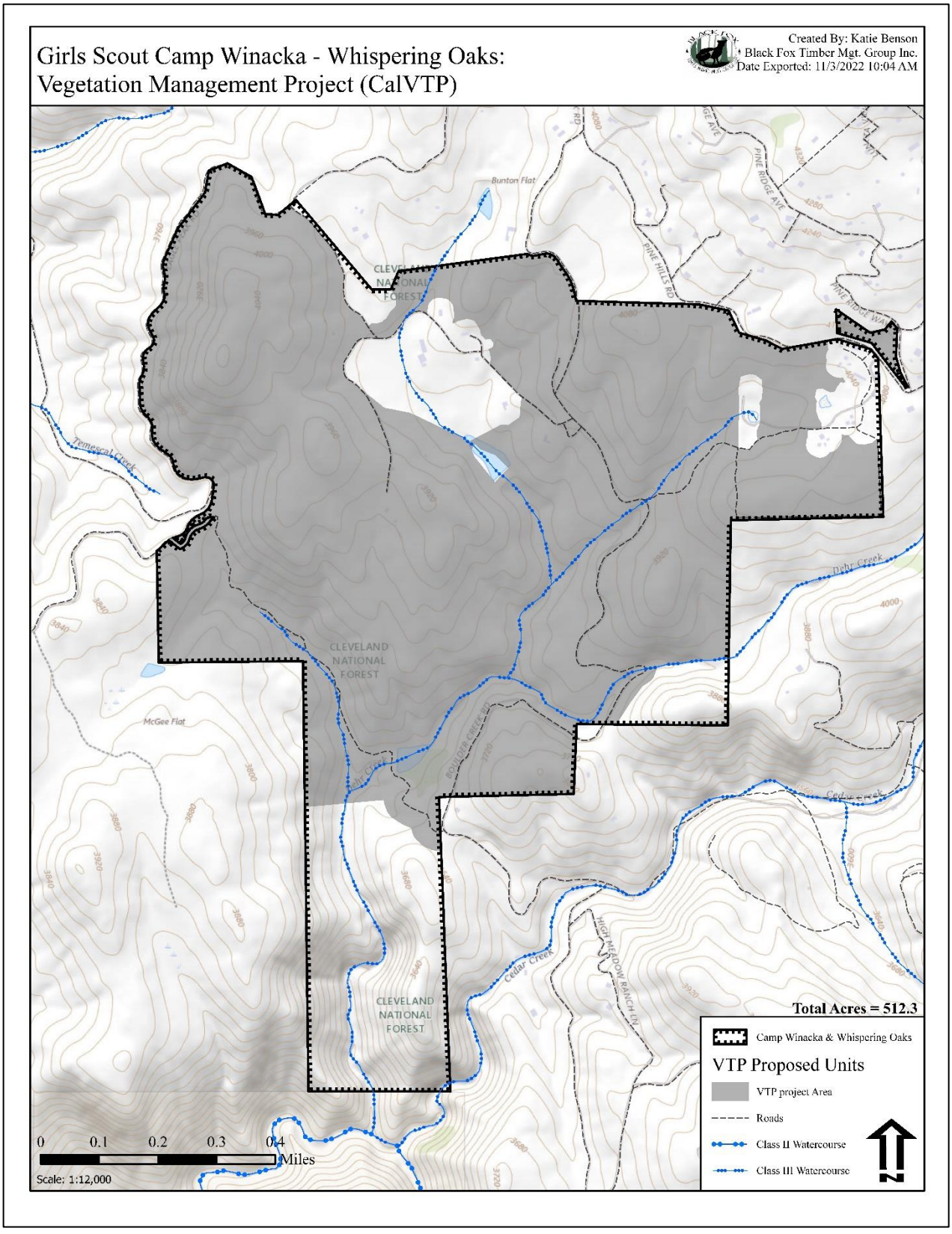
6. Map

1. Vicinity Map
2. Proposed Project Area
3. Property Boundary – Treatable Landscape
4. Treatable Landscape – Project
5. Treatable Landscape – Fuel Type
6. Manual Treatment
7. Mechanical Treatment
8. Prescribed Broadcast Burning
9. Prescribed Pile Burning
10. Prescribed Herbivory
11. Herbicide Treatment
12. Treatment Units - Topographic

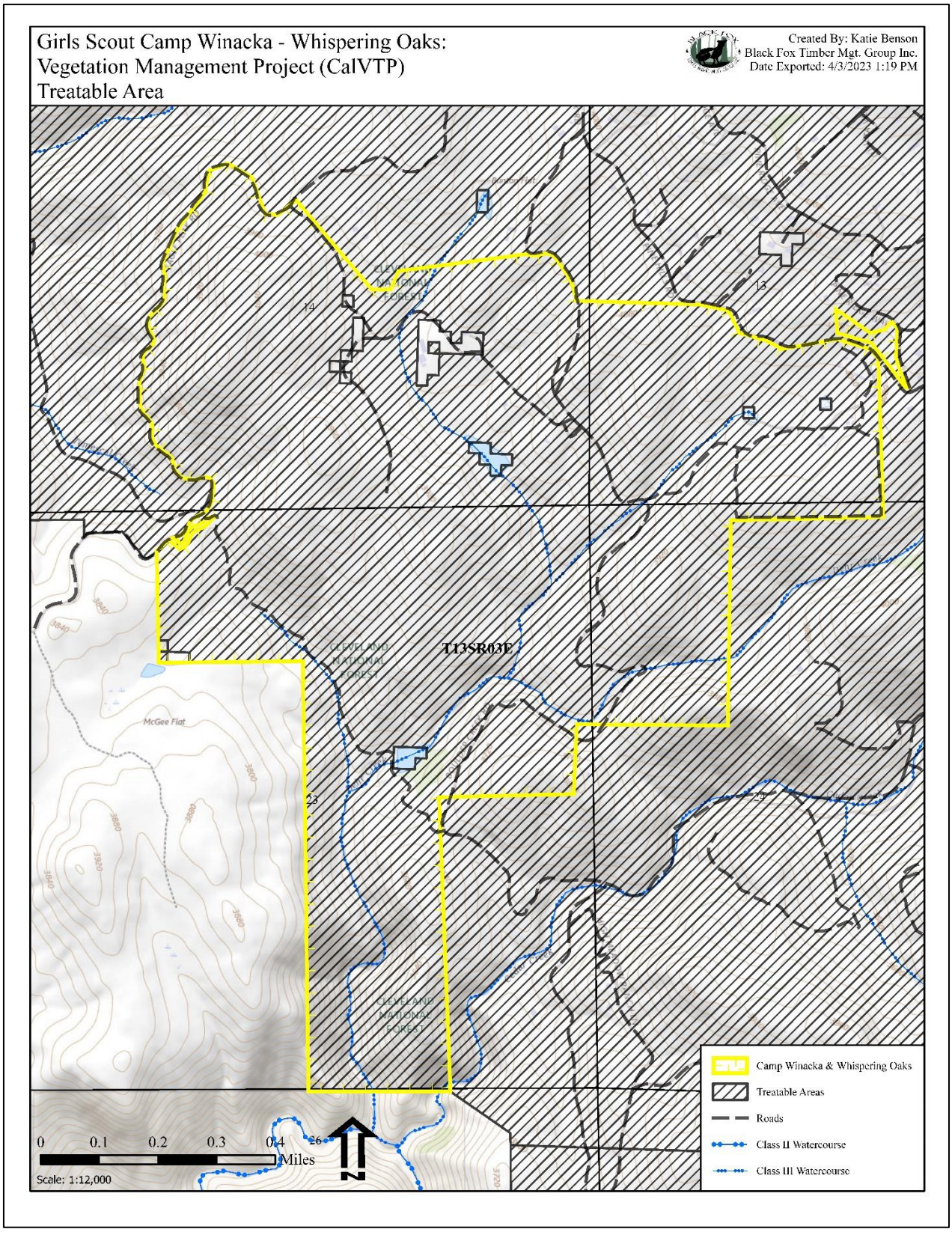
Map 1: Vicinity Map



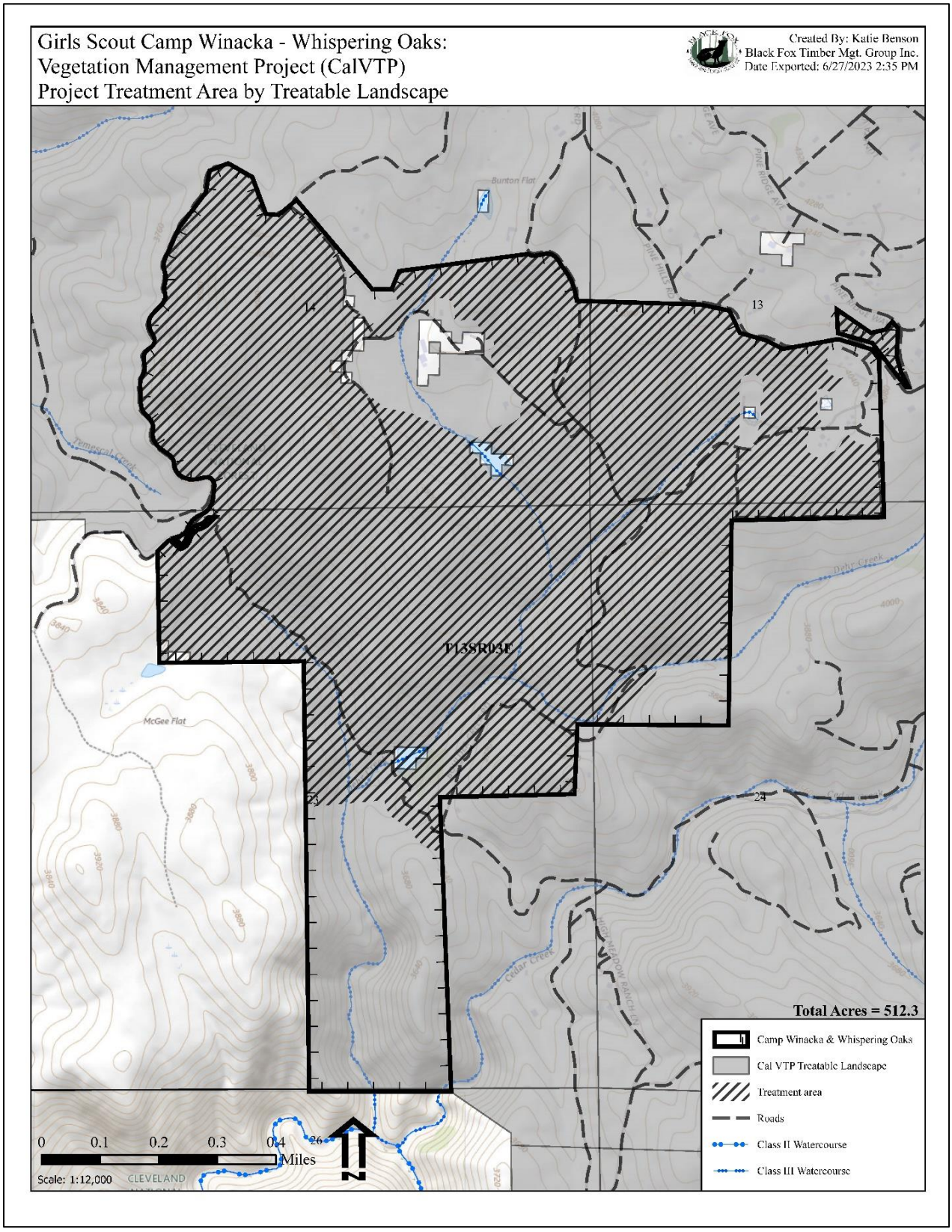
Map 2: Proposed Project Area



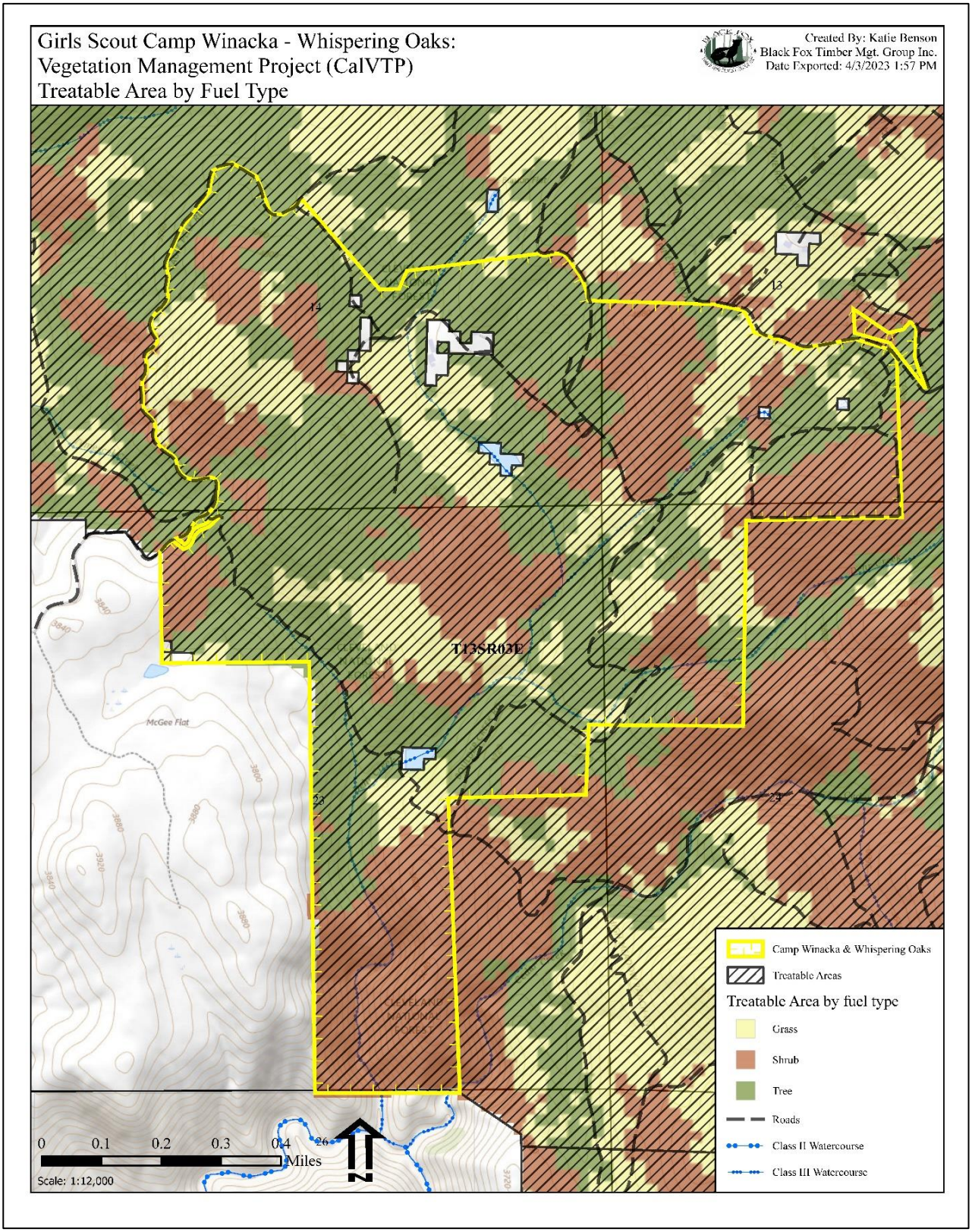
Map 3: Property Boundary – Treatable Landscape



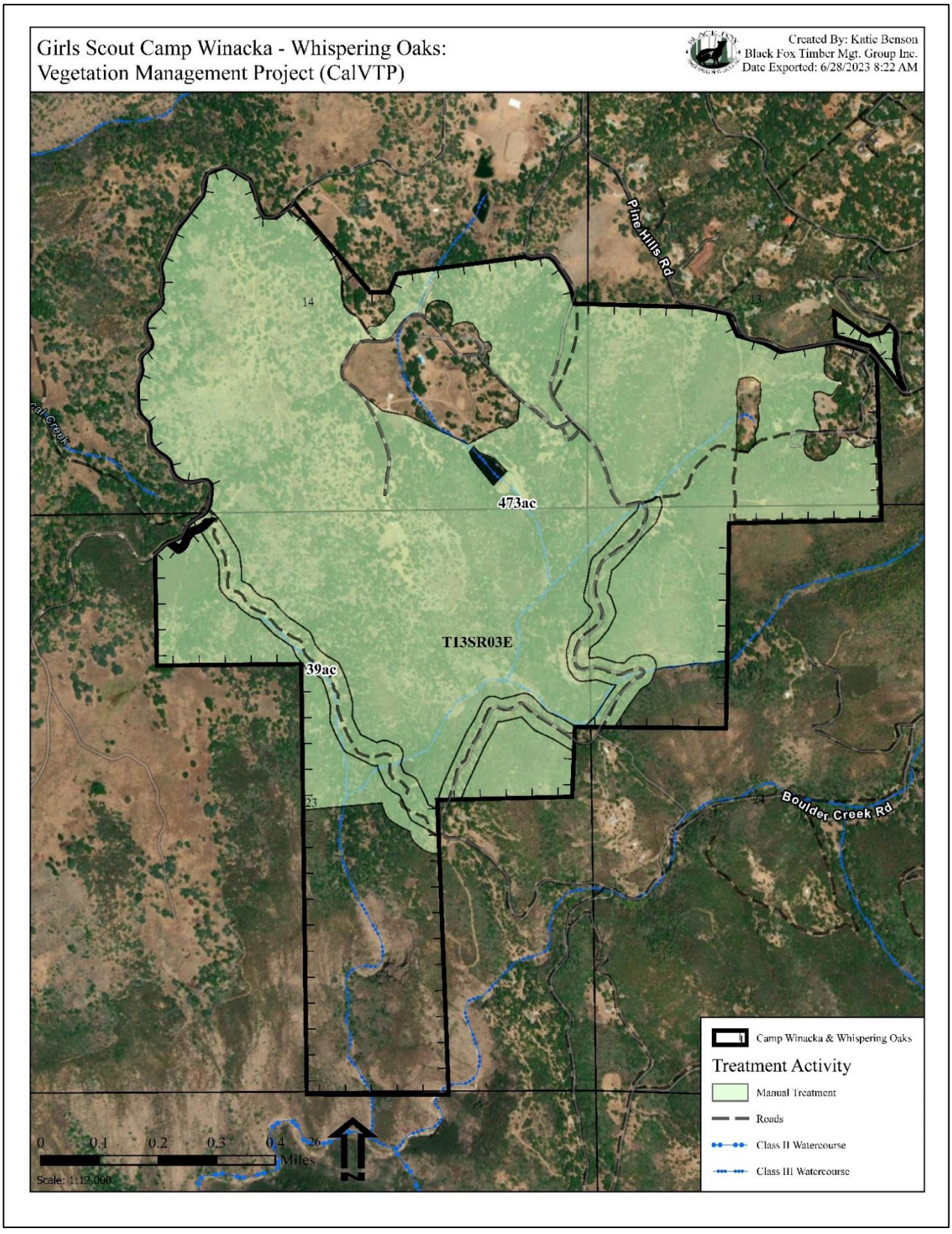
Map 4: Project Treatment Area by Treatable Landscape



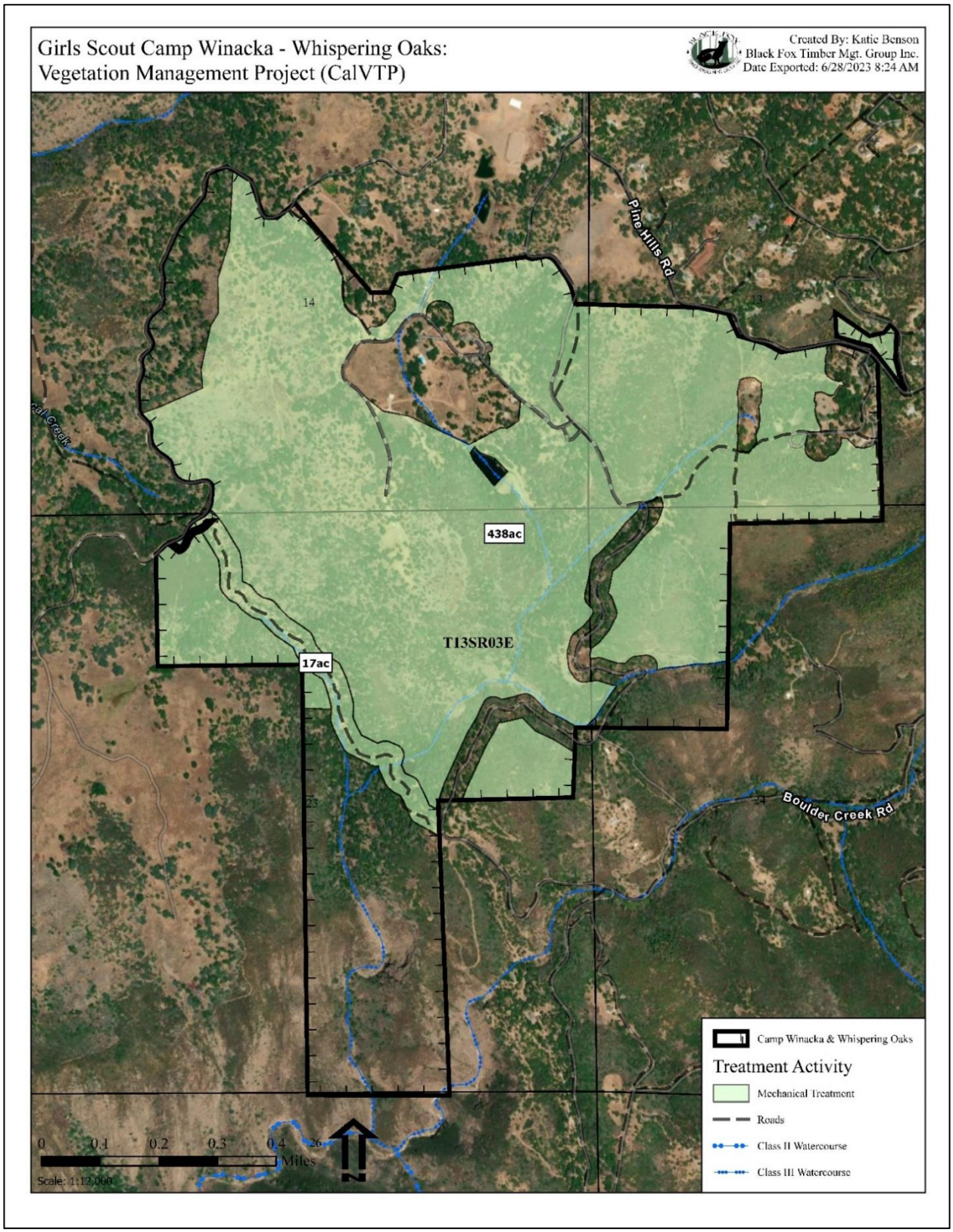
Map 5: Treatable Landscape – Fuel Type



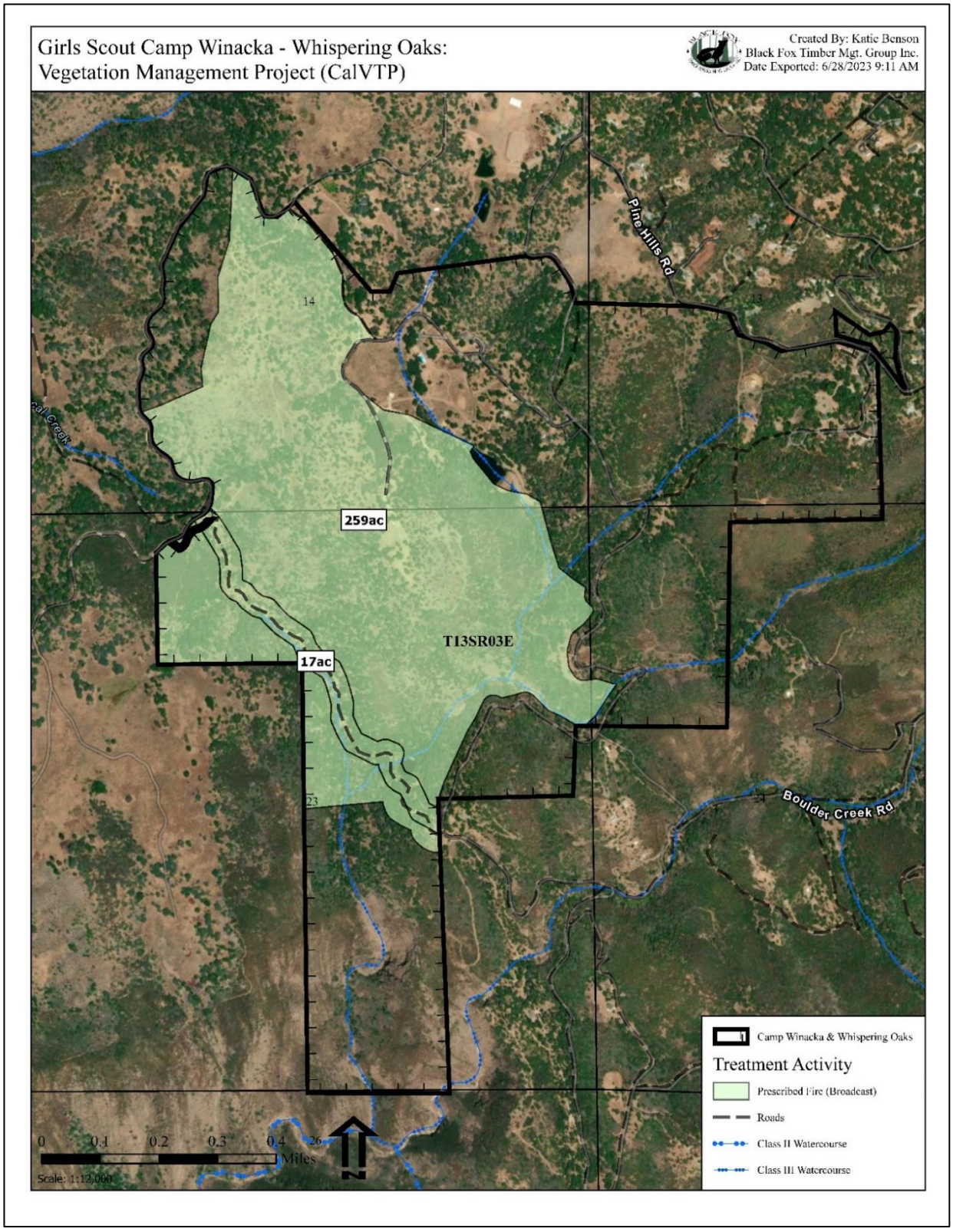
Map 6: Manual Treatment



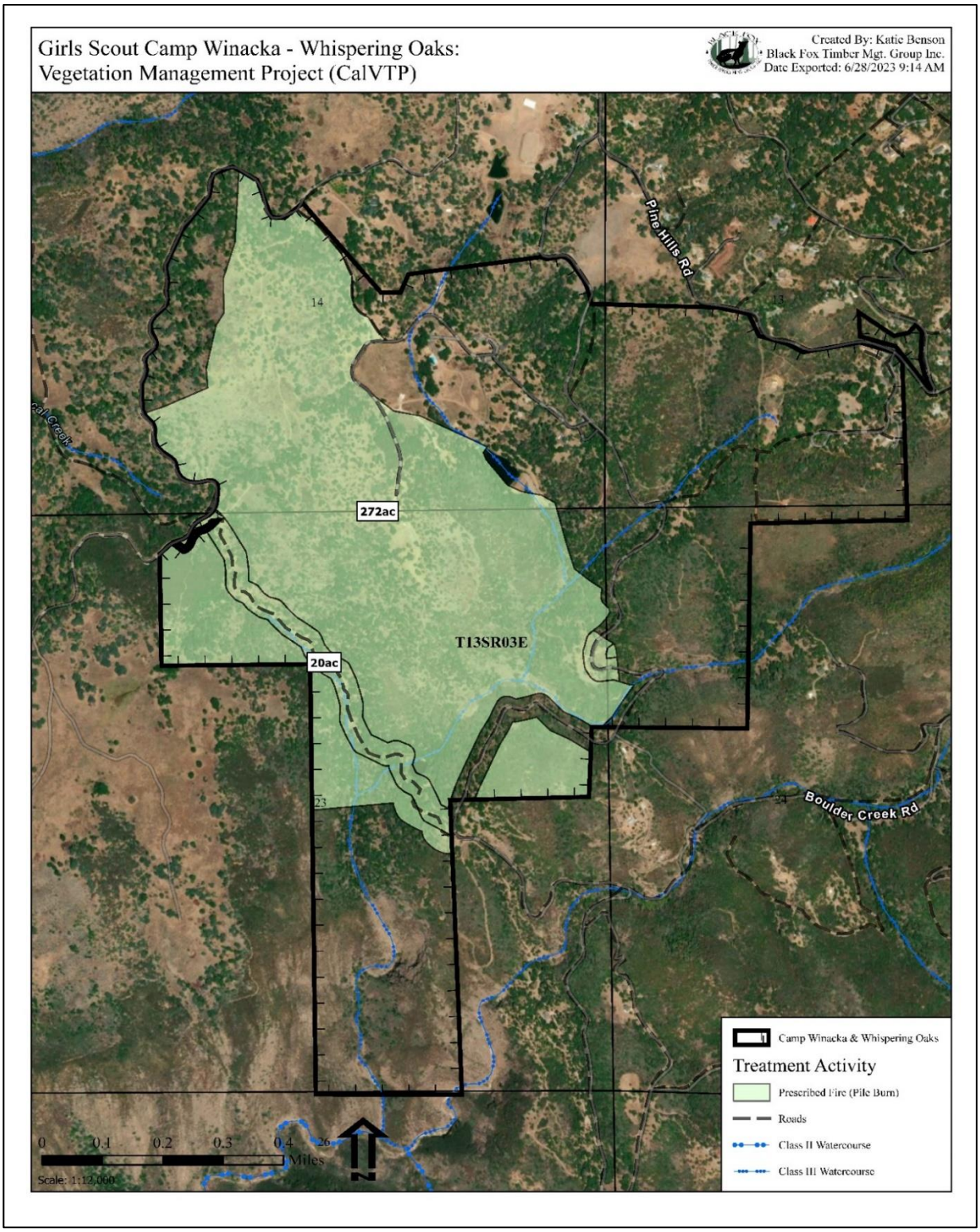
Map 7: Mechanical Treatment



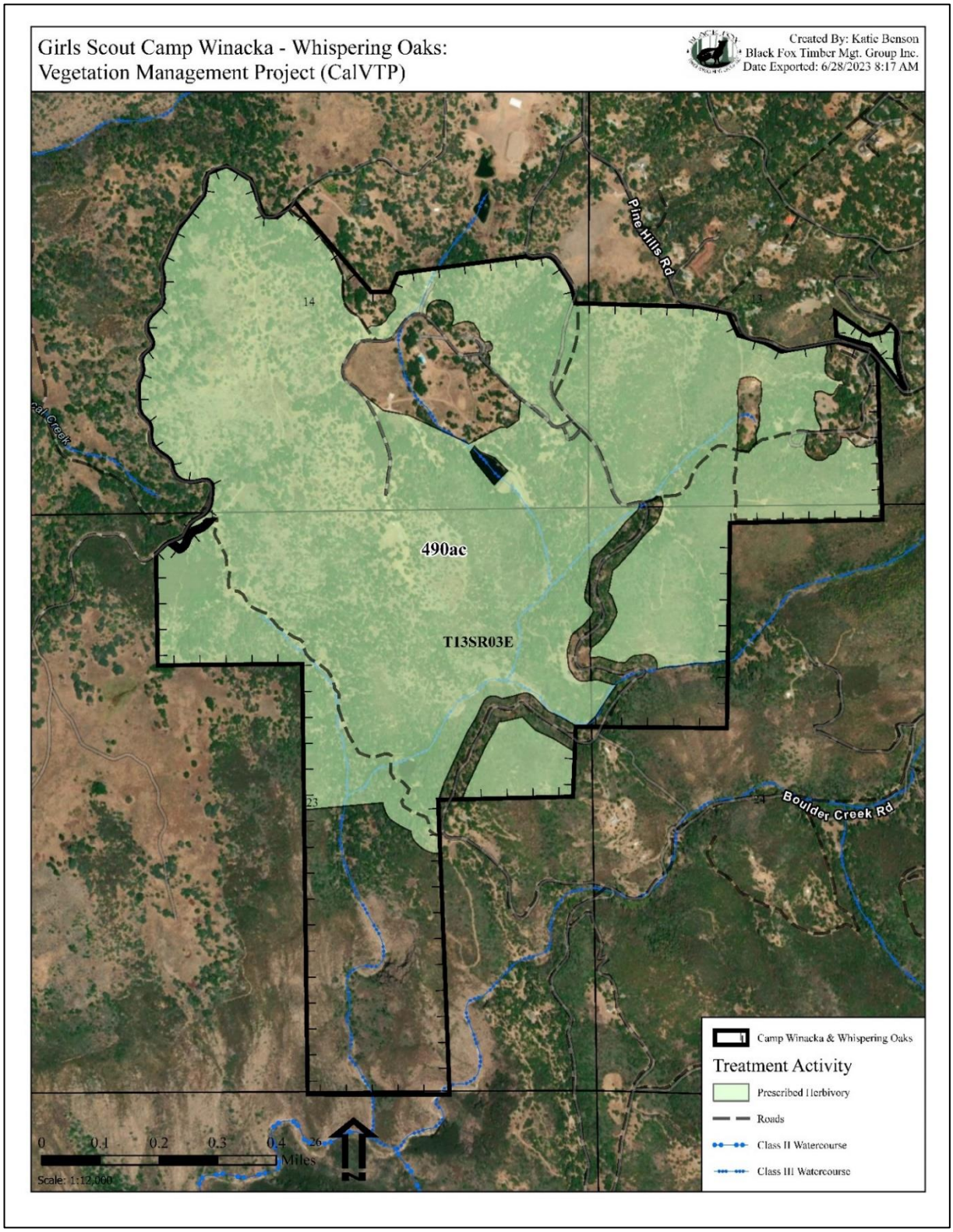
Map 8: Prescribed Broadcast Burning



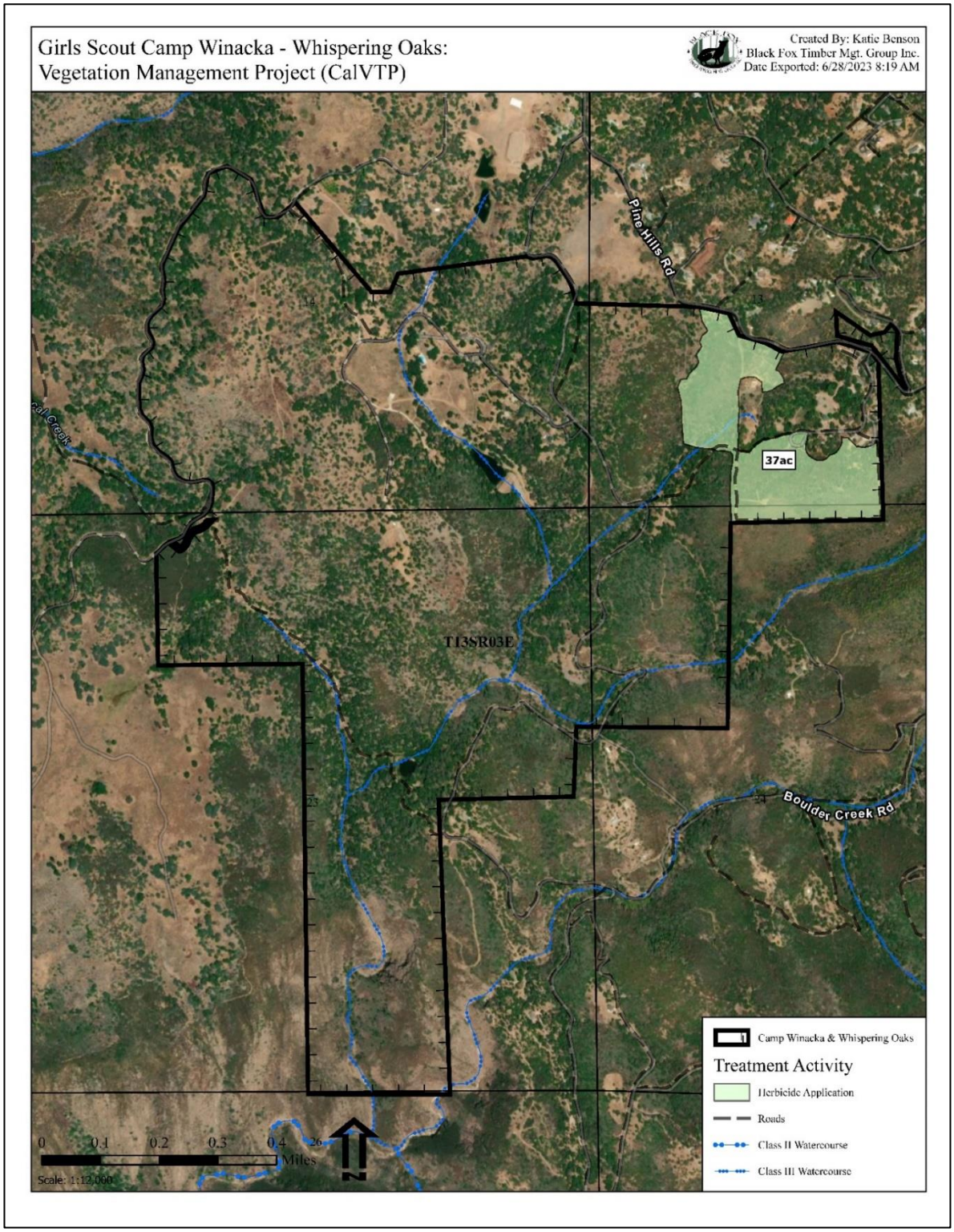
Map 9: Prescribed Pile Burning



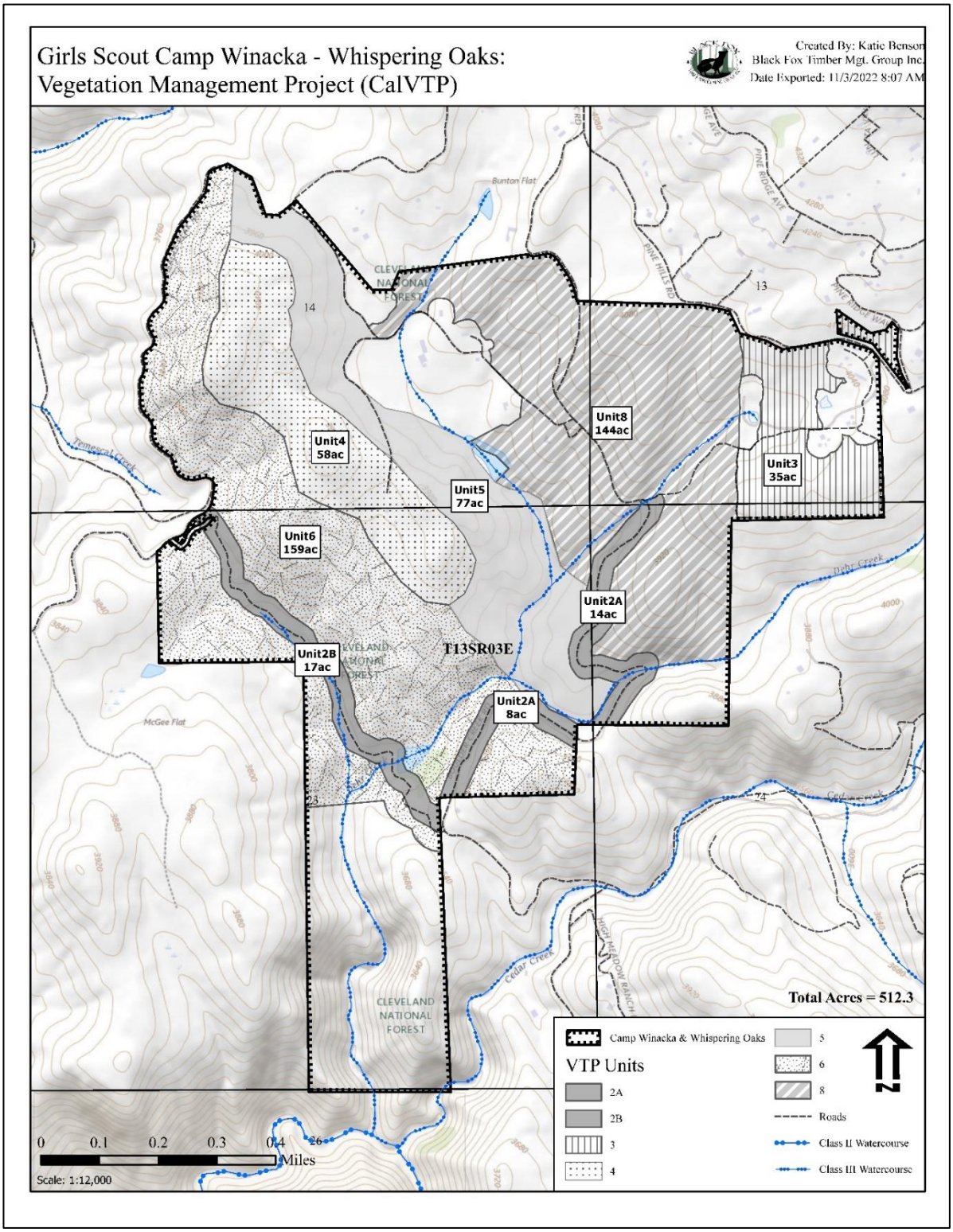
Map 10: Prescribed Herbivory



Map 11: Herbicide Treatment



Map 12: Treatment Units – Topographic



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SoCal Biology

Dr. Kate Kramer	Biologist
Tony McKinney	GIS Analyst

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9. ATTACHMENTS

A. Mitigation Monitoring and Reporting Program
B. Project Specific CEQA Findings and Statement of Overriding Consideration
C. Biological Resources Report
D. Cultural Resources Inventory Report (Non-Confidential)
E. Soils Report

ATTACHMENT A

Mitigation Monitoring and Reporting Program

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Mitigation Monitoring and Reporting Program

Introduction

The California Environmental Quality Act (CEQA) and the State CEQA Guidelines (PRC Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies "to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment." A Mitigation Monitoring and Reporting Program (MMRP) is required for approval of the proposed CalVTP, because the PEIR identifies potential significant adverse impacts, and all feasible mitigation measures have been adopted. Standard project requirements (SPRs), which are part of the program description, have been defined to avoid or minimize adverse effects. Where potentially significant impacts remain after the application of SPRs, Mitigation Measures (MMs) have been identified to further reduce and/or compensate for those impacts. While only MMs are required to be covered in an MMRP, both SPRs and MMs are included in the CalVTP MMRP to assist in the implementation of all environmental protection features of later activities consistent with the CalVTP PEIR.

Purpose of Mitigation Monitoring and Reporting Program

This MMRP has been prepared to monitor the implementation of mitigation measures identified in the PSA for the Camp Winacka-Camp Whispering Oaks: Vegetation Management Project. Consistent with the CalVTP, the PSA and the MMPR utilize an alpha-numeric coding system that identifies each SPR and MM. Table MM-1 is a list of the alpha-numeric codes for SPRs and MMs by environmental concern found in the PSA. The MMRP, presented in a table format, Table MM-2, provides the name and full description for each SPR and MM. The MMRP identifies the applicability of each SPR or MM for the project and for maintenance, and when (timing) each SPR or MM would be applied. Lastly, the MMRP identifies the implementing and verifying/monitoring entities for each SPR and MM.

Roles and Responsibilities

The RCDGSDC has prepared the MMRP in connection with a project-specific PSA, as noted above. Unless specified differently herein, GSSD, as the implementing entity, is responsible for taking all actions necessary to implement the MMs, including the SPRs, under its jurisdiction according to the specifications provided for each measure and for demonstrating that the action has been successfully completed. Unless otherwise specified herein, the RCDGSDC is responsible for reporting the implementation of mitigation measures pursuant to Section 15097 of the State CEQA Guidelines. Where it is appropriate, the roles and responsibilities vary between these entities, as identified in the MMRP.

Reporting

The RCDGSDC shall document and describe the compliance of the later treatment project with the required SPRs and MMs either by adapting the project-specific MMRP table or preparing a separate post-project implementation report (referred to by CAL FIRE as a Completion Report). The RCDGSDC should submit a MMRP regarding the status of the implementation of MM, including SPRs, to the California Board of Forestry and Fire Protection, based on the completion of treatment activities or other factors, such as at the end of a grant cycle. Therefore, RCDGSDC and GSSD shall maintain communications about the progress and activities related to implementing the treatment activities.

Table MM-1: List of SPRs and MMs identified in the PSA by Environmental Concern

Environmental Concern	Impact	Standard Practice Requirements (SPR)	Mitigation Measures (MM)
Aesthetics and Visual Resources	Impact AES-1	SPR AES-1, 2 & 3 SPR AQ-2	N/A
	Impact AES-2	SPR AD-3 & 4 SPR AES-1, 2, & 3 SPR AQ-2 & 3	N/A
	Impact AES-3	N/A	N/A
Agriculture and Forestry Resources	Impact AG-1	None	None
Air Quality	Impact AQ-1	SPR AD-4 SPR AQ-1, 2, 3, 4 & 6	NA
	Impact AQ-2	SPR HAZ-1 SPR NOI-4 & 5	N/A
	Impact AQ-3	N/A	N/A
	Impact AQ-4	SPR AD-4 SPR AQ-2, 3 & 6	N/A
	Impact AQ-5	SPR HAZ-1 SPR NOI-4 & 5	N/A
Archaeological, Historical, and Tribal Cultural Resources	Impact CUL-1	SPR CUL-1, 7 & & 8	NA
	Impact CUL-2	SPR CUL-1, 2, 3, 4, 5 & 8	MM CUL-2
	Impact CUL-3	SPR CUL-5, 6 & 8	NA
	Impact CUL-4	NA	NA
Biological Resources	Impact BIO-1	SPR BIO-1, 2, 3, 4, 5, 6, 7, 9 & 11 SPR GEO-1, 2, 3, 4, 7 & 8 SPR HYD-2, 4 & 5	MM BIO-1A & 1B
	Impact BIO-2	SPR BIO-1, 2, 3, 4, 5, 6, 9, 10, 11 & 12 SPR HYD-2, 4,& 5	MM BIO-2a, 2b, 2f, 2g 3b & 4
	Impact BIO-3	SPR BIO-1, 2, 3, 4, 5, 6, 9, 10, 11 & 12 SPR GEO-3, 4, 5 & 7 SPR HAZ-5 & 6 SPR HYD-1, 4 & 5	MM BIO-3A
	Impact BIO-4	SPR BIO-1, 2, 3, 4 & 11 SPR GEO-1, 3, 4, 5 & 7 SPR HYD-1, 3 & 4	MM BIO-4
	Impact BIO-5	SPR BIO-1, 2, 4, 5, 9, & 11 SPR HYD-4	MM BIO-5
	Impact BIO-6	SPR BIO-1, 2, 4, 5, 6, 9, 11 & 12	NA
	Impact BIO-7	SPR AD-3 SPR BIO-1, 3 & 7	N/A
	Impact BIO-8	None	None
Geology, Soils, Paleontology, and Mineral Resources	Impact GEO-1	SPR GEO-1, 2, 3, 4, 5, 6, 7 & 8 SPR AQ-3 & 4	NA
	Impact GEO-2	SPR GEO-1, 2, 3 &4 SPR GEO-7, & 8 SPR HYD-3 & 4	NA
Greenhouse Gas Emissions (GHG)	Impact GHG-1	N/A	N/A
	Impact GHG-2	SPR AQ-3	MM GHG-2
Energy Resources	Impact ENG-1	N/A	N/A
Hazardous Materials, Public Health and Safety	Impact HAZ-1	SPR HAZ-1	NA
	Impact HAZ-2	SPR HAZ-5, 6, 7, 8 & 9	NA
	Impact HAZ-3	NA	NA
Hydrology and Water Quality	Impact HYD-1	SPR AQ-3 SPR GEO-4 & 6 SPR HYD-1 & 4	NA
	Impact HYD-2	SPR AQ-3 SPR BIO-1 SPR GEO-4 & 6 SPR HAZ-1, 2 & 4	NA
	Impact HYD-3	SPR BIO-1 SPR GEO-1, 4, 7 & 8 SPR HAZ-1 SPR HYD-3 & 4	NA
	Impact HYD-4	SPR BIO-4 SPR GEO-1 SPR HAZ-5 & 6 SPR HYD-2 & 4	NA
	Impact HYD-5	SPR GEO-1, 2 & 5 SPR HYD-2, 4, & 6	NA

Environmental Concern	Impact	Standard Practice Requirements (SPR)	Mitigation Measures (MM)
Land Use and Planning, Population and Housing	Impact LU-1	SPR AD-3	N/A
	Impact LU-2	NA	N/A
Noise	Impact NOI-1	SPR AD-3 SPR NOI-1, 2, 3, 4, 5 & 6	N/A
	Impact NOI-2	SPR NOI-1	N/A
Recreation	Impact REC-1	SPR AD-3 SPR REC-1	NA
Transportation	Impact TRANS-1	SPR AD-3 SPR TRANS-1	N/A
	Impact TRANS-2	SPR AD-3 SPR HYD-2 SPR TRAN-1	N/A
	Impact TRANS-3	N/A	None
Public Services, Utilities, and Service Systems	Impact UTIL-1	NA	NA
	Impact UTIL-2	SPR AD-3 SPR UTIL-1	NA
	Impact UTIL-3	SPR AD-3 SPR UTIL-1	NA
Wildfire	Impact WUI-1	SPR AD-3 SPR AQ-3, SPR HAZ-1, 2, 3 & 4	NA
	Impact WUI-2	SPR AQ-3 SPR GEO-3, 4 & 5	NA

N/A: not applicable; there are no SPRs and/or MMs identified in the PEIR for this impact.

None: there are SPRs and/or MMs identified in the PEIR for this impact, but none are applicable to the treatment project.

Mitigation Monitoring and Reporting Program Table

The categories identified in the attached MMRP table are described below.

- **SPRs and Mitigation Measures** – This column provides the verbatim text of the applicable SPR or adopted mitigation measure.
- **Applicable to SPRs and MMs** – These columns identify if the SPR or MM applies to the initial treatment and to the maintenance phase of the project.
- **Timing** – This column identifies the time frame in which the SPR or mitigation measure will be implemented.
- **Implementing Entity** – This column identifies the party responsible for implementing the SPR or mitigation measure.
- **Verifying/Monitoring Entity** – This column identifies the party responsible for verifying and monitoring the implementation of the SPR or mitigation measure.

Table MM-2: Mitigation Monitoring and Reporting Program

SPR	Standard Project Requirements Administrative	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR AD-1	**Project Proponent Coordination** For treatments coordinated with CAL FIRE, CAL FIRE will meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable mitigation measures; identify any sensitive resources onsite; and discuss resource protection measures. For any prescribed burn treatments, CAL FIRE will also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Yes	Before During After	GSSD	RCDGSDC GSSD
SPR AD-2	**Delineate Protected Resources** The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly-visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. “Protected Resources” refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Yes	Before During After	GSSD	RCDGSDC GSSD
SPR AD-3	**Consistency with Local Plans, Policies, and Ordinances** The project proponent will design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Yes	Before	GSSD	RCDGSDC GSSD
SPR AD-4	**Public Notifications for Prescribed Burning** One to three days prior to the commencement of prescribed burning operations, the project proponent will: 1. Post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or smoke concerns; 2. Publish a public interest notification in a local newspapers or other widely distributed media source describing the activity, timing, and contact information; 3. Send the local county supervisor and county administrative officer (or equivalent official responsible for distribution of public information) a notification letter describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	Before During	GSSD	RCDGSDC GSSD

SPR	Standard Project Requirements Administrative	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR AD-5	**Maintain Site Cleanliness** If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	During After	GSSD	GSSD
SPR AD-6	**Public Notifications for Treatment Projects.** One to three days prior to the commencement of a treatment activity, the project proponent will post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or concerns. This SPR applies to all treatment activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.	Yes	Yes	Before During	GSSD	RCDGSDC GSSD
SPR AD-7	**Provide Information on Proposed, Approved, and Completed Treatment Projects** For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. ► Information on proposed projects (PSA in progress): ■ GIS data that include project location (as a point); ■ Project size (typically acres); ■ treatment types and activities; ■ and contact information for a representative of the project proponent. The project proponent will provide information on the proposed project to the Board or CAL FIRE as early as feasible in the planning phase. The project proponent will provide this information to the Board or CAL FIRE with sufficient lead time to allow those agencies to make the information available to the public at least two weeks prior to project approval. The project proponent may also make information available to the public via other mechanisms (e.g., the proponent's own website). ► Information on approved projects (PSA complete): ■ A completed PSA Environmental Checklist; ■ A completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist); ■ GIS data that include a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction).	Yes	Yes	Before After	GSSD RCDGSD	RCDGSDC GSSD

SPR	Standard Project Requirements Administrative	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR AD-7 (cont.)	► Information on completed projects: ■ GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction). ■ A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes: ○ Size of treated area (typically acres); ○ Treatment types and activities; ○ Dates of work; ○ A list of the SPRs and mitigation measures that were implemented ○ Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b). This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	See Above	See Above	See Above	See Above	See Above
SPR AD-8	**Request Access for Post-Treatment Assessment** For CAL FIRE projects, during contract development, CAL FIRE will include access to the treated area over a prescribed period (usually up to three years) to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance, as a contract term for consideration by the landowner. For public landowners, access to the treated area over a prescribed period will be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	After	GSSD Coordinate with CAL FIRE	RCDGSDC Coordinate with CAL FIRE
SPR AD-9	**Obtain a Coastal Development Permit for Proposed Treatment Within the Coastal Zone Where Required.** When planning a treatment project within the Coastal Zone, the project proponent will contact the local Coastal Commission district office, or applicable local government to determine if the project area is within the jurisdiction of the Coastal Commission, a local government with a certified Local Coastal Program (LCP), or both. All treatment projects in the Coastal Zone will be reviewed by the local Coastal Commission district office or local government with a certified LCP (in consultation with the local Coastal Commission district office regarding whether a Coastal Development Permit (CDP) is required). If a CDP is required, the treatment project will be designed to meet the following conditions: i. The treatment project will be designed in compliance with applicable provisions of the Coastal Act that provide substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the original jurisdiction of the Commission or an area of a local coastal government without a certified LCP; and ii. The treatment project will be designed in compliance with the applicable provisions of the certified LCP, specifically the substantive performance standards for the protection of potentially affected coastal resources, if the treatment activity will occur within the jurisdiction of a local coastal government with a certified LCP. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	No	No	NA	NA	NA

SPR	Standard Project Requirements Aesthetic and Visual Resource	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR AES-1	**Vegetation Thinning and Edge Feathering**	Yes	Yes	During	GSSD	GSSD
	The project proponent will thin and feather adjacent vegetation to break up or screen linear edges of the clearing and mimic forms of natural clearings as reasonable or appropriate for vegetation conditions. In general, thinning and feathering in irregular patches of varying densities, as well as a gradation of tall to short vegetation at the clearing edge, will achieve a natural transitional appearance. The contrast of a distinct clearing edge will be faded into this transitional band.					
	This SPR only applies to mechanical and manual treatment activities and all treatment types, including treatment maintenance.					
SPR AES-2	**Avoid Staging within Viewsheds**	Yes	Yes	Before During	GSSD	GSSD
	The project proponent will store all treatment-related materials, including vehicles, vegetation treatment debris, and equipment, outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible. The project proponent will also locate materials staging and storage areas outside of the viewshed of public trails, parks, recreation areas, and roadways to the extent feasible.					
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
SPR AES-3	**Provide Vegetation Screening**	Yes	Yes	During	GSSD	GSSD
	The project proponent will preserve sufficient vegetation within, at the edge of, or adjacent to treatment areas to screen views from public trails, parks, recreation areas, and roadways as reasonable or appropriate for vegetation conditions.					
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					

SPR	Standard Project Requirements Air Quality	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR AQ-1	**Comply with Air Quality Regulations** The project proponent will comply with the applicable air quality requirements of air districts within whose jurisdiction the project is located. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	Before During	GSSD	RCDGSDC
SPR AQ-2	**Submit Smoke Management Plan** The project proponent will submit a smoke management plan for all prescribed to the applicable air district, in accordance with 17 CCR Section 80160. Pursuant to this regulation a smoke management plan will not be required for burns less than 10 acres that also will not be conducted near smoke sensitive areas, unless otherwise directed by the air district. Burning will only be conducted in compliance with the burn authorization program of the applicable air district(s) having jurisdiction over the treatment area. Example of a smoke management plan is in the CalVTP Appendix PD-2. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	Before During	GSSD	RCDGSDC
SPR AQ-3	**Create Burn Plan** The project proponent will create a burn plan using the CAL FIRE burn plan template for all prescribed burns. The burn plan will include a fire behavior model output of First Order Fire Effects Model and BEHAVE or other fire behavior modeling simulation and that is performed by a qualified fire behavior technical specialist that predicts fire behavior, calculates consumption of fuels, tree mortality, predicted emissions, greenhouse gas emissions, and soil heating. The project proponent will minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. The burn plan will be created with input from a qualified technician or certified State burn boss. This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	Before During	GSSD	RCDGSDC
SPR AQ-4	**Minimize Dust** To minimize dust during treatment activities, the project proponent will implement the following measures: ► Limit the speed of vehicles and equipment traveling on unpaved areas to 15 miles per hour to reduce fugitive dust emissions, in accordance with the California Air Resources Board (CARB) Fugitive Dust protocol. ► If road use creates excessive dust, the project proponent will wet appurtenant, unpaved, dirt roads using water trucks or treat roads with a non-toxic chemical dust suppressant (e.g., emulsion polymers, organic material) during dry, dusty conditions. Any dust suppressant product used will be environmentally benign (i.e., non-toxic to plants and will not negatively impact water quality) and its use will not be prohibited by ARB, EPA, or the State Water Resources Control Board (SWRCB). The project proponent will not over-water exposed areas such that the water results in runoff. The type of dust suppression method will be selected by the project proponent based on soil, traffic, site-specific conditions, and air quality regulations.	Yes	Yes	During	GSSD	RCDGSDC

SPR	Standard Project Requirements Air Quality	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR AQ-4 (cont.)	► Remove visible dust, silt, or mud tracked-out on to public paved roadways where sufficient water supplies and access to water is available. The project proponent will remove dust, silt, and mud from vehicles at the conclusion of each workday, or at a minimum of every 24 hours for continuous treatment activities, in accordance with Vehicle Code Section 23113.	See Above	See Above	See Above	See Above	See Above
	► Suspend ground-disturbing treatment activities, including land clearing and bulldozer lines, when there is visible dust transport (particulate pollution) outside the treatment boundary, if the particulate emissions may "cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property," per Health and Safety Code Section 41700.					
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
SPR AQ-5	**Avoid Naturally Occurring Asbestos**	No	No	NA	NA	NA
	The project proponent will avoid ground-disturbing treatment activities in areas identified as likely to contain naturally occurring asbestos (NOA) per maps and guidance published by the California Geological Survey, unless an Asbestos Dust Control Plan (17 CCR Section 93105) is prepared and approved by the air district(s) with jurisdiction over the treatment area. Any NOA-related guidance provided by the applicable air district will be followed.					
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
SPR AQ-6	**Prescribed Burn Safety Procedures**	Yes	Yes	Before, During After	GSSD Consult with CAL FIRE	GSSD Consult with CAL FIRE
	Prescribed burns planned and managed by non-CAL FIRE crews will follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP). The IAP will include the burn dates; burn hours; weather limitations; the specific burn prescription; a communications plan; a medical plan; a traffic plan; and special instructions such as minimizing smoke impacts to specific local roadways. The IAP will also assign responsibilities for coordination with the appropriate air district, such as conducting onsite briefings, posting notifications, weather monitoring during burning, and other burn related preparations.					
	This SPR applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.					

SPR	Standard Project Requirements Archaeological, Historical, and Tribal Cultural Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR CUL-1	**Conduct Record Search** An archaeological and historical resource record search will be conducted per the applicable state or local agency procedures. Instead of conducting a new search, the project proponent may use recent record searches containing the treatment area requested by a landowner or other public agency in accordance applicable agency guidance. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Yes	Before	RCDGSDC	RCDGSDC
SPR CUL-2	**Contact Geographically Affiliated Native American Tribes** The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List. Using the appropriate Native Americans Contact List, the project proponent will notify the California Native American Tribes in the counties where the treatment activity is located. The notification will contain the following: ► A written description of the treatment location and boundaries. ► Brief narrative of the treatment objectives. ► A description of the activities used (e.g., prescribed burning, mastication) and associated acreages. ► A map of the treatment area at a sufficient scale to indicate the spatial extent of activities. ► A request for information regarding potential impacts to cultural resources from the proposed treatment. ► A detailed description of the depth of excavation, if ground disturbance is expected. In addition, the project proponent will contact the NAHC for a review of their Sacred Lands File. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Yes	Before	RCDGSDC	RCDGSDC
SPR CUL-3	**Pre-field Research** The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. The purpose of this research is to properly inform survey design, based on the types of resources likely to be encountered within the treatment area, and to be prepared to interpret, record, and evaluate these findings within the context of local history and prehistory. The qualified archaeologist and/or archaeologically-trained resource professional will review records, study maps, read pertinent ethnographic, archaeological, and historical literature specific to the area being studied, and conduct other tasks to maximize the effectiveness of the survey. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Yes	Before	RCDGSDC	RCDGSDC
SPR CUL-4	**Archaeological Surveys** The project proponent will coordinate with an archaeologically-trained resource professional and/or qualified archaeologist to conduct a site-specific survey of the treatment area. The survey methodology (e.g., pedestrian survey, subsurface investigation) depends on whether the area has a low, moderate, or high sensitivity for resources, which is based on whether the records search, pre-field research, and/or Native American consultation identifies archaeological or historical resources near or within the treatment area. A survey report will be completed for every cultural resource survey completed. The specific requirements will comply with the applicable state or local agency. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Yes	Before During	RCDGSDC	RCDGSDC

SPR	Standard Project Requirements Archaeological, Historical, and Tribal Cultural Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR CUL-5	**Treatment of Archaeological Resources** If cultural resources are identified within a treatment area, cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. The project proponent, in consultation with culturally affiliated tribe(s), will develop effective protection measures for important cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. These protection measures will be written in clear, enforceable language, and will be included in the survey report in accordance with applicable state or local agency procedures. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Yes	Before During	RCDGSDC	RCDGSDC
SPR CUL-6	**Treatment of Tribal Cultural Resources** The project proponent, in consultation with the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. These measures may include adjusting the treatment location or design to entirely avoid cultural resource locations or changing treatment activities so that damaging effects to cultural resources will not occur. The project proponent will provide the tribe(s) the opportunity to submit comments and participate in consultation to resolve issues of concern. The project proponent will defer implementing the treatment until the tribe approves protection measures, or if agreement cannot be reached after a good-faith effort, the proponent determines that any or all feasible measures have been implemented, where feasible, and the resource is either avoided or protected. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Yes	Before	RCDGSDC	RCDGSDC
SPR CUL-7	**Avoid Built Historical Resources** If the records search identifies built historical resources, as defined in Section 15064.5 of the State CEQA Guidelines, the project proponent will avoid these resources. Within a buffer of 100 feet of the built historical resource, there will be no prescribed burning or mechanical treatment activities Buffers less than 100 feet for built historical resources will only be used after consultation with and receipt of written approval from a qualified archaeologist. If the records search does not identify known historical resources in the treatment area, but structures (i.e., buildings, bridges, roadways) over 50 years old that have not been evaluated for historic significance are present in the treatment area, they will similarly be avoided. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Yes	Before	RCDGSDC	RCDGSDC
SPR CUL-8	**Cultural Resource Training** The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. Workers will be trained to halt work if archaeological resources are encountered on a treatment site and the treatment method consists of physical disturbance of land surfaces (e.g., soil disturbance). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Yes	During	GSSD	RCDGSDC

SPR	Standard Project Requirements Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR BIO-1	**Review and Survey Project-Specific Biological Resources** The project proponent will require a qualified RPF or biologist to conduct a data review and reconnaissance-level survey prior to treatment, no more than one year prior to the submittal of the PSA for each treatment project, and no more than one year between completion of the PSA and implementation of the treatment project. The data reviewed will include the biological resources setting, species and sensitive natural communities tables, and habitat information in this PEIR for the ecoregion(s) where the treatment will occur. It will also include review of the best available, current data for the area, including vegetation mapping data, species distribution/range information, CNDDB, California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants of California, relevant BIOS queries, and relevant general and regional plans. Reconnaissance-level biological surveys will be general surveys that include visual and auditory inspection for biological resources to help determine the environmental setting of a project site. The qualified surveyor will: 1. identify and document sensitive resources, such as riparian or other sensitive habitats, sensitive natural community, wetlands, or wildlife nursery site or habitat (including bird nests), and 2. assess the suitability of habitat for special-status plant and animal species. The surveyor will also record any incidental wildlife observations. For each treatment project, habitat assessments will be completed at a time of year that is appropriate for identifying habitat and no more than one year prior to the submittal of the PSA, unless it can be demonstrated in the PSA that habitat assessments older than one year remain valid (e.g., site conditions are unchanged and no treatment activity has occurred since the assessment). If more than one year passes between completion of the PSA and initiation of the treatment project, the project proponent will verify the continued accuracy of the PSA prior to beginning the treatment project by reviewing for any data updates and/or visiting the site to verify conditions. Based on the results of the data review and reconnaissance-level survey, the project proponent, in consultation with a qualified RPF or biologist, will determine which one of the following best characterizes the treatment: 1. **Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided**. If, based on the data review and reconnaissance-level survey, the qualified RPF or biologist determines that suitable habitat for sensitive biological resources is present but adverse effects on the suitable habitat can clearly be avoided through one of the following methods, the avoidance mechanism will be implemented prior to initiating treatment and will remain in effect throughout the treatment: a. by physically avoiding the suitable habitat, or b. by conducting treatment outside of the season when a sensitive resource could be present within the suitable habitat or outside the season of sensitivity (e.g., outside of special-status bird nesting season, during dormant season of sensitive annual or geophytic plant species, or outside of maternity and rearing season at wildlife nursery sites). Physical avoidance will include flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway) to delineate the boundary of the avoidance area around the suitable habitat. For physical avoidance, a buffer may be implemented as determined necessary by the qualified RPF or biologist.	Yes	Yes	Before	RCDGSDC	RCDGSDC

SPR	Standard Project Requirements Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR BIO-1 (cont.)	2. **Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided**. Further review and surveys will be conducted to determine presence/absence of sensitive biological resources that may be affected, as described in the SPRs below. Further review may include contacting USFWS, NOAA Fisheries, CDFW, CNPS, or local resource agencies as necessary to determine the potential for special-status species or other sensitive biological resources to be affected by the treatment activity. Focused or protocol-level surveys will be conducted as necessary to determine presence/absence. If protocol surveys are conducted, survey procedures will adhere to methodologies approved by resource agencies and the scientific community, such as those that are available on the CDFW webpage at: https://www.wildlife.ca.gov/Conservation/Survey-Protocols. Specific survey requirements are addressed for each resource type in relevant SPRs (e.g., additional survey requirements are presented for special-status plants in SPR BIO-7).	See Above	See Above	See Above	See Above	See Above
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
SPR BIO-2	**Require Biological Resource Training for Workers**	Yes	Yes	Before During	RCDGSDC GSSD	RCDGSDC
	The project proponent will require crew members and contractors to receive training from a qualified RPF or biologist prior to beginning a treatment project. The training will describe the appropriate work practices necessary to effectively implement the biological SPRs and mitigation measures and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of pertinent special-status species; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; impact minimization procedures; and reporting requirements. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF, biologist, or biological technician. The qualified RPF, biologist, or biological technician will immediately contact CDFW or USFWS, as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled).					
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
	Sensitive Natural Communities and Other Sensitive Habitats					
SPR BIO-3	**Survey Sensitive Natural Communities and Other Sensitive Habitats.**	Yes	Yes	Before During	GSSD	RCDGSDC
	If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided, the project proponent will:					
	► Require a qualified RPF or biologist to perform a protocol-level survey following the CDFW "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities" (current version dated March 20, 2018) of the treatment area prior to the start of treatment activities for sensitive natural communities and sensitive habitats. Sensitive natural communities will be identified using the best means possible, including keying them out using the most current edition of A Manual of California Vegetation (including updated natural communities data at http://vegetation.cnps.org/), or referring to relevant reports (e.g., reports found on the VegCAMP website).					
	► Map and digitally record, using a Global Positioning System (GPS), the limits of any potential sensitive habitat and sensitive natural community identified in the treatment area.					
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					

SPR	Standard Project Requirements Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR BIO-4	**Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function**	Yes	Yes	Before During	RCDGSDC	RCDGSDC
	Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions by implementing the following within riparian habitats:					
	▶ Retain at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within the limits of riparian habitat identified and mapped during surveys conducted pursuant to SPR BIO-3. Native riparian vegetation will be retained in a well distributed multi-storied stand composed of a diversity of species similar to that found before the start of treatment activities.					
	▶ Treatments will be limited to removal of uncharacteristic fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the riparian vegetation types characteristic of the region. This includes hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species.					
	▶ Removal of large, native riparian hardwood trees (e.g., willow, ash, maple, oak, alder, sycamore, cottonwood) will be minimized to the extent feasible and 75 percent of the pretreatment native riparian hardwood tree canopy will be retained. Because tree size varies depending on vegetation type present and site conditions, the tree size retention parameter will be determined on a site-specific basis depending on vegetation type present and setting; however, live, healthy, native trees that are considered large for that type of tree and large relative to other trees in that location will be retained. A scientifically-based, project-specific explanation substantiating the retention size parameter for native riparian hardwood tree removal will be provided in the Biological Resources Discussion of the PSA.					
	Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, presence of sufficient seed trees, light availability, and changes in stream shading may inform the tree size retention requirements.					
	▶ Removed trees will be felled away from adjacent streams or waterbodies and piled outside of the riparian vegetation zone (unless there is an ecological reason to do otherwise that is approved by applicable regulatory agencies, such as adding large woody material to a stream to enhance fish habitat, e.g., see *Accelerated Wood Recruitment and Timber Operations: Process Guidance from the California Timber Harvest Review Team Agencies and National Marine Fisheries Service*).					
	▶ Vegetation removal that could reduce stream shading and increase stream temperatures will be avoided.					
	▶ Ground disturbance within riparian habitats will be limited to the minimum necessary to implement effective treatments. This will consist of the minimum disturbance area necessary to reduce hazardous fuels and return the riparian community to a natural fire regime (i.e., Condition Class 1) considering historic fire return intervals, climate change, and land use constraints.					

SPR	Standard Project Requirements -- Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR BIO-4 (cont.)	► The project proponent will notify CDFW pursuant to California Fish and Game Code Section 1602 prior to implementing any treatment activities in riparian habitats. Notification will identify the treatment activities, map the vegetation to be removed, identify the impact avoidance identification methods to be used (e.g., flagging), and appropriate protections for the retention of shaded riverine habitat, including buffers and other applicable measures to prevent erosion into the waterway.	See Above	See Above	See Above	See Above	See Above
	► In consideration of spatial variability of riparian vegetation types and condition and consistent with California Forest Practice Rules Section 916.9(v) (February 2019 version), a different set of vegetation retention standards and protection measures from those specified in the above bullets may be implemented on a site-specific basis if the qualified RPF and the project proponent demonstrate through substantial evidence that alternative design measures provide a more effective means of achieving the treatment objectives and would result in effects to the Beneficial Functions of Riparian Zones equal or more favorable than those expected to result from application of the above measures. Deviation from the above design specifications, different protection measures and design standards will only be approved when the treatment plan incorporates an evaluation of beneficial functions of the riparian habitat and with written concurrence from CDFW.					
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
SPR BIO-5	**Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub**	Yes	Yes	Before During	GSSD	RCDGSDC
	The project proponent will design treatment activities to avoid type conversion where native coastal sage scrub and chaparral are present. An ecological definition of type conversion is used in the CalVTP PEIR for assessment of environmental effects: a change from a vegetation type dominated by native shrub species that are characteristic of chaparral and coastal sage scrub vegetation alliances to a vegetation type characterized predominantly by weedy herbaceous cover or annual grasslands. For the PEIR, type conversion is considered in terms of habitat function, which is defined here as the arrangement and capability of habitat features to provide refuge, food source, and reproduction habitat to plants and animals, and thereby contribute to the conservation of biological and genetic diversity and evolutionary processes (de Groot et al. 2002). Some modification of habitat characteristics may occur provided habitat function is maintained (i.e., the location, essential habitat features, and species supported are not substantially changed).					
	During the reconnaissance-level survey required in SPR BIO-1, a qualified RPF or biologist will identify chaparral and coastal sage scrub vegetation to the alliance level and determine the condition class and fire return interval departure of the chaparral and/or coastal sage scrub present in each treatment area.					
	For all treatment types in chaparral and coastal sage scrub, the project proponent, in consultation with a qualified RPF or qualified biologist will:					
	► Develop a treatment design that avoids environmental effects of type conversion in chaparral and coastal sage scrub vegetation alliances, which will include evaluating and determining the appropriate spatial scale at which the proponent would consider type conversion, and substantiating its appropriateness. The project proponent will demonstrate with substantial evidence that the habitat function of chaparral and coastal sage scrub would be at least maintained within the identified spatial scale at which type conversion is evaluated for the specific treatment project. Consideration of factors such as site hydrology, erosion potential, suitability of wildlife habitat, spatial needs of sensitive species, presence of sufficient seed					

SPR	Standard Project Requirements Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR BIO-5 (Cont.)	(cont.) plants and nurse plants, light availability, and edge effects may inform the determination of an appropriate spatial scale. ► The treatment design will maintain a minimum percent cover of mature native shrubs within the treatment area to maintain habitat function; the appropriate percent cover will be identified by the project proponent in the development of treatment design and be specific to the vegetation alliances that are present in the identified spatial scale used to evaluate type conversion. Mature native shrubs that are retained will be distributed contiguously or in patches within the stand. If the stand consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity, to the extent needed to avoid type conversion. These SPR requirements apply to all treatment activities and all treatment types, including treatment maintenance.	See Above	See Above	See Above	See Above	See Above
	Additional measures will be applied to ecological restoration treatment types:					
SPR BIO-5 E Resto-ration	► For ecological restoration treatment types, complete removal of the mature shrub layer will not occur in native chaparral and coastal sage scrub vegetation types. ► Ecological restoration treatments will not be implemented in vegetation types that are within their natural fire return interval (i.e., time since last burn is less than the average time listed as the fire return interval range in Table 3.6-1) unless the project proponent demonstrates with substantial evidence that the habitat function of chaparral and coastal sage scrub would be improved. ► A minimum of 35 percent relative cover of existing shrubs and associated native vegetation will be retained at existing densities in patches distributed in a mosaic pattern within the treated area or the shrub canopy will be thinned by no more than 20 percent from baseline density (i.e., if baseline shrub canopy density is 60 percent, post treatment shrub canopy density will be no less than 40 percent). A different percent relative cover can be retained if the project proponent demonstrates with substantial evidence that alternative treatment design measures would result in effects on the habitat function of chaparral and coastal sage scrub that are equal or more favorable than those expected to result from application of the above measures. Biological considerations that may inform a deviation from the minimum 35 percent relative cover retention include but are not limited to soil moisture requirements, increased soil temperatures, changes in light/shading, presence of sufficient seed plants and nurse plants, erosion potential, and site hydrology. ► If the stand within the treatment area consists of multiple age classes, patches representing a range of middle to old age classes will be retained to maintain and improve heterogeneity.	No	No	NA	NA	NA
SPR BIO-6	**Prevent Spread of Plant Pathogens** When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., Ione chaparral, blue oak woodland), the project proponent will implement the following best management practices to prevent the spread of Phytopthora and other plant pathogens (e.g., pitch canker (Fusarium), goldspotted oak borer, shot hole borer, bark beetle): ► Clean and sanitize vehicles, equipment, tools, footwear, and clothes before arriving at a treatment site and when leaving a contaminated site, or a site in a county where contamination is a risk;	Yes	Yes	Before During	GSSD	RCDGSDC

SPR	Standard Project Requirements Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR BIO-6 (cont.)	► Include training on Phytopthora diseases and other plant pathogens in the worker awareness training; ► Minimize soil disturbance as much as possible by limiting the number of vehicles, avoiding off-road travel as much as possible, and limiting use of mechanized equipment; ► Clean soil and debris from equipment and sanitize hand tools, buckets, gloves, and footwear when moving from high risk to low risk areas or between widely separated portions of a treatment area; and ► Follow the procedures listed in Guidance for plant pathogen prevention when working at contaminated restoration sites or with rare plants and sensitive habitat (Working Group for Phytoptheras in Native Habitats 2016). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	See Above	See Above	See Above	See Above	See Above
	SPECIAL-STATUS PLANTS					
SPR BIO-7	**Survey for Special-Status Plants** If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW's "Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities." Surveys to determine the presence or absence of special-status plant species will be conducted in suitable habitat that could be affected by the treatment and timed to coincide with the blooming or other appropriate phenological period of the target species (as determined by a qualified RPF or botanist), or all species in the same genus as the target species will be assumed to be special-status. If potentially occurring special-status plants are listed under CESA or ESA, protocol-level surveys to determine presence/absence of the listed species will be conducted in all circumstances, unless determined otherwise by CDFW or USFWS. For other special-status plants not listed under CESA or ESA, as defined in Section 3.6.1 of this PEIR, surveys will not be required under the following circumstances: ► If protocol-level surveys, consisting of at least two survey visits (e.g., early blooming season and later blooming season) during a normal weather year, have been completed in the 5 years before implementation of the treatment project and no special-status plants were found, and no treatment activity has occurred following the protocol-level survey, treatment may proceed without additional plant surveys. ► If the target special-status plant species is an herbaceous annual, stump-sprouting, or geophyte species, the treatment may be carried out during the dormant season for that species or when the species has completed its annual lifecycle without conducting presence/absence surveys provided the treatment will not alter habitat or destroy seeds, stumps, or roots, rhizomes, bulbs and other underground parts in a way that would make it unsuitable for the target species to reestablish following treatment. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Yes	Before During	GSSD	RCDGSDC

SPR	Standard Project Requirements Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
	ENVIRONMENTALLY SENSITIVE HABITAT AREAS					
SPR BIO-8	**Identify and Avoid or Minimize Impacts in Coastal Zone ESHAs**	No	No	NA	NA	NA
	When planning a treatment project within the Coastal Zone, the project proponent will, in consultation with the Coastal Commission or a local government with a certified Local Coastal Program (LCP) (as applicable), identify the habitat types and species present to determine if the area qualifies as an Environmentally Sensitive Habitat Area (ESHA). If the area is an ESHA, the treatment project may be allowed pursuant to this PEIR, if it meets the following conditions. If a project requires a CDP by the Coastal Commission or a local government with a certified LCP (as applicable), the CDP approval may require modification these conditions to further avoid and minimize impacts:					
	▶ The treatment will be designed, in compliance with the Coastal Act or LCP if a site is within a certified plan LCP area, to protect the habitat function of the affected ESHA protect habitat values, and prevent loss or type conversion of habitat and vegetation types that define the ESHA, or loss of special-status species that inhabit the ESHA.					
	▶ Treatment actions will be limited to eradication or control of invasive plants, removal of uncharacteristic fuel loads (e.g., removing dead, diseased, or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are characteristic of healthy stands of the vegetation types present in the ESHA.					
	▶ A qualified biologist or RPF familiar with the ecology of the treatment area will monitor all treatment activities in ESHAs.					
	▶ Appropriate no-disturbance buffers will be developed in compliance with the Coastal Act or relevant LCP policies for treatment activities in the vicinity of ESHAs to avoid adverse direct and indirect effects to ESHAs.					
	This SPR applies to all treatment activities and all treatment types, including treatment maintenance.					
	INVASIVE PLANTS AND WILDLIFE					
SPR BIO-9	**Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife**	Yes	Yes	Before During	GSSD	RCDGSDC
	The project proponent will take the following actions to prevent the spread of invasive plants, noxious weeds, and invasive wildlife (e.g., New Zealand mudsnail):					
	▶ Clean clothing, footwear, and equipment used during treatments of soil, seeds, vegetative matter, or other debris or seed-bearing material, or water (e.g., rivers, streams, creeks, lakes) before entering the treatment area or when leaving an area with infestations of invasive plants, and noxious weeds, or invasive wildlife;					
	▶ For all heavy equipment and vehicles traveling off road, pressure wash, if feasible, or otherwise appropriately decontaminate equipment at a designated weed-cleaning station prior to entering the treatment area from an area with infestations of invasive plants, noxious weeds, or invasive wildlife. Anti-fungal wash agents will be specified if the equipment has been exposed to any pathogen that could affect native species;					
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					

SPR	Standard Project Requirements Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR BIO-9 (Cont.)	► Inspect all heavy equipment, vehicles, tools, or other treatment-related materials for sand, mud, or other signs that weed seeds or propagules could be present prior to use in the treatment area. If the equipment is not clean, the qualified RPF or biological technician will deny entry to the work areas; ► Stage equipment in areas free of invasive plant infestations unless there are no uninfested areas present within a reasonable proximity to the treatment area; ► Identify significant infestations of invasive plant species (i.e., those rated as invasive by Cal-IPC or designated as noxious weeds by California Department of Food and Agriculture) during reconnaissance-level surveys and target them for removal during treatment activities. Treatment methods will be selected based on the invasive species present and may include herbicide application, manual or mechanical treatments, prescribed burning, and/or herbivory, and will be designed to maximize success in killing or removing the invasive plants and preventing reestablishment based on the life history characteristics of the invasive plant species present. Treatments will be focused on removing invasive plant species that cause ecological harm to native vegetation types, especially those that can alter fire cycles; ► Treat invasive plant biomass onsite to eliminate seeds and propagules and prevent reestablishment or dispose of invasive plant biomass offsite at an appropriate waste collection facility (if not kept on site); transport invasive plant materials in a closed container or bag to prevent the spread of propagules during transport; and ► Implement Fire and Fuel Management BMPs outlined in the "Preventing the Spread of Invasive Plants: Best Management Practices for Land Managers" (Cal-IPC 2012, or current version). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	See Above	See Above	See Above	See Above	See Above
	WILDLIFE					
SPR BIO-10	**Survey for Special-Status Wildlife and Nursery Sites** If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries, monarch overwintering sites) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. The qualified RPF or biologist will determine if following an established protocol is required, and the project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate survey protocols. Unless otherwise specified in a protocol, the survey will be conducted no more than 14 days prior to the beginning of treatment activities. Focused or protocol surveys for a special-status species with potential to occur in the treatment area may not be required if presence of the species is assumed. This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.	Yes	Yes	Before During	GSSD	RCDGSDC

SPR	Standard Project Requirements Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR BIO-11	**Install Wildlife-Friendly Fencing (Prescribed Herbivory)** If temporary fencing is required for prescribed herbivory treatment, a wildlife-friendly fencing design will be used. The project proponent will require a qualified RPF or biologist to review and approve the design before installation to minimize the risk of wildlife entanglement. The fencing design will meet the following standards: ► Minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale or snag a leaping animal; and, if feasible, keeping electric netting type fencing electrified at all times or laid down while not in use. ► Charge temporary electric fencing with intermittent pulse energizers; continuous output fence chargers will not be permitted. ► Allow wildlife to jump over easily without injury by installing fencing that can flex as animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it. The determination of appropriate fence height will consider slope, as steep slopes are more difficult for wildlife to pass. ► Be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers This SPR applies only to prescribed herbivory and all treatment types, including treatment maintenance.	Yes	Yes	Before During	GSSD	RCDGSDC
SPR BIO-12	**Protect Common Nesting Birds, Including Raptors** The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP PEIR. The active nesting season will be defined by the qualified RPF or biologist. If active nesting season avoidance is not feasible, a qualified RPF or biologist will conduct a survey for common nesting birds, including raptors. Existing records (e.g., CNDDB, eBird database, State Wildlife Action Plan) should be reviewed in advance of the survey to identity the common nesting birds, including raptors, that are known to occur in the vicinity of the treatment site. The survey area will encompass reasonably accessible areas of the treatment site and the immediately surrounding vicinity viewable from the treatment site. The survey area will be determined by a qualified RPF or biologist, based on the potential species in the area, location of suitable nesting habitat, and type of treatment. For vegetation removal or project activities that would occur during the nesting season, the survey will be conducted at a time that balances the effectiveness of detecting nests and the reasonable consideration of potential avoidance strategies. Typically, this timeframe would be up to 3 weeks before treatment. The survey will occur in a single survey period of sufficient duration to reasonably detect nesting birds, including raptors, typically one day for most treatment projects (depending on the size, configuration, and vegetation density in the treatment site), and conducted during the active time of day for target species, typically close to dawn and/or dusk. The survey may be conducted concurrently with other biological surveys, if they are required by other SPRs. Survey methods will be tailored by the qualified RPF or biologist to site and habitat conditions, typically involving walking throughout the survey area, visually searching for nests and birds exhibiting behavior that is typical of breeding (e.g., delivering food). If an active nest is observed (i.e., presence of eggs and/or chicks) or determined to likely be present based on nesting bird behavior, the project proponent will implement a feasible strategy to avoid disturbance of active nests, which may include, but is not limited to, one or more of the following measures:	Yes	Yes	Before During	GSSD	RCDGSDC

SPR	Standard Project Requirements Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR BIO-12 (cont.)	► **Establish Buffer.** The project proponent will establish a temporary, species-appropriate buffer around the nest sufficient to reasonably expect that breeding would not be disrupted. Treatment activities will be implemented outside of the buffer. The buffer location will be determined by a qualified RPF or biologist. Factors to be considered for determining buffer location will include: presence of natural buffers provided by vegetation or topography, nest height above ground, baseline levels of noise and human activity, species sensitivity, and expected treatment activities. Nests of common birds within the buffer need not be monitored during treatment. However, buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician.	See Above	See Above	See Above	See Above	See Above
	► **Modify Treatment.** The project proponent will modify the treatment in the vicinity of an active nest to avoid disturbance of active nests (e.g., by implementing manual treatment methods, rather than mechanical treatment methods). Treatment modifications will be determined by the project proponent in coordination with the qualified RPF or biologist.					
	► **Defer Treatment.** The project proponent will defer the timing of treatment in the portion(s) of the treatment site that could disturb the active nest. If this avoidance strategy is implemented, treatment activity will not commence until young fledge or the nest becomes inactive, as determined by the qualified RPF, biologist, or biological technician.					
	Feasible actions will be taken by the project proponent to avoid loss of common native bird nests. The feasibility of implementing the avoidance strategies will be determined by the project proponent based on whether implementation of this SPR will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. Considerations may include limitations on the presence of environmental and atmospheric conditions necessary to execute treatment prescriptions (e.g., the limited seasonal windows during which prescribed burning can occur when vegetation moisture, weather, wind, and other physical conditions are suitable). If it is infeasible to avoid loss of common bird nests (not including raptor nests), the project proponent will document the reasons implementation of the avoidance strategies is infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report).					
	The following avoidance strategies may also be considered together with or in lieu of other actions for implementation by a project proponent to avoid disturbance to raptor nests:					
	► Monitor Active Raptor Nest During Treatment. A qualified RPF, biologist, or biological technician will monitor an active raptor nest during treatment activities to identify signs of agitation, nest defense, or other behaviors that signal disturbance of the active nest is likely (e.g., standing up from a brooding position, flying off the nest). If breeding raptors are showing signs of nest disturbance, one of the other avoidance strategies (establish buffer, modify treatment or defer treatment) will be implemented or a pause in the treatment activity will occur until the disturbance behavior ceases.					
	► Retention of Raptor Nest Trees. Trees with visible raptor nests, whether occupied or not, will be retained.					
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					

SPR	Standard Project Requirements Geological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR GEO-1	**Suspend Disturbance during Heavy Precipitation**	Yes	Yes	During	GSSD	RCDGSD
	The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to:					
	1) Areas of ponded water,					
	2) Pumping of fines from the soil or road surfacing					
	3) Loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts,					
	4) Spinning or churning of wheels or tracks that produces a wet slurry, or					
	5) Inadequate traction without blading wet soil or surfacing materials.					
	This SPR applies only to mechanical, prescribed herbivory, and herbicide treatment activities and all treatment types, including treatment maintenance.					
SPR GEO-2	**Limit High Ground Pressure Vehicles**	Yes	Yes	During	GSSD	RCDGSDC
	The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use.					
	This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.					
SPR GEO-3	**Stabilize Disturbed Soil Areas**	Yes	Yes	During	GSSD	RCDGSDC
	The project proponent will stabilize soil disturbed during mechanical, prescribed herbivory treatments, and prescribed burns that result in exposure of bare soil over 50 percent or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, prescribed herbivory, or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery, or animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion.					
	Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface.					
	This SPR only applies to mechanical prescribed herbivory, and prescribed burns that result in exposure of bare soil over 50 percent of the project area treatment activities and all treatment types, including treatment maintenance.					

SPR	Standard Project Requirements Geological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR GEO-4	**Erosion Monitoring** The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., ≥ 1.5 inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	Before During After	GSSD	RCDGSDC
SPR GEO-5	**Drain Stormwater via Water Breaks** The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (February 2019 version). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies only to mechanical, prescribed herbivory, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	During After	GSSD	RCDGSDC
SPR GEO-6	**Minimize Burn Pile Size** The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15 percent of the total treatment area (Busse et al. 2014). The project proponent will not locate burn piles in a Watercourse and Lake Protection Zone as defined in SPR HYD-4. This SPR applies to mechanical, manual, and prescribed burning treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	During	GSSD	RCDGSDC
SPR GEO-7	**Minimize Erosion** To minimize erosion, the project proponent will: 1. Prohibit use of heavy equipment where any of the following conditions are present: i. Slopes steeper than 65 percent. ii. Slopes steeper than 50 percent where the erosion hazard rating is high or extreme. iii. Slopes steeper than 50 percent that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake. 2. On slopes between 50 percent and 65 percent where the erosion hazard rating is moderate, and all slope percentages are for average slope steepness based on sample areas that are 20 acres, or less, heavy equipment will be limited to: i. Existing tractor roads that do not require reconstruction, or ii. New tractor roads flagged by the project proponent prior to the treatment activity. 3. Prescribed herbivory treatments will not be used in areas with over 50 percent slope. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	During	GSSD	RCDGSDC

SPR	Standard Project Requirements Geological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR GEO-8	**Steep Slopes**	Yes	Yes	During	GSSD	RCDGSDC
	The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50 percent for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). If unstable areas or soils are identified within the treatment area, are unavoidable, and will be potentially directly or indirectly affected by the treatment, a licensed geologist (P.G. or C.E.G.) will determine the potential for landslide, erosion, of other issue related to unstable soils and identity measures (e.g., those in SPR GEO-7) that will be implemented by the project proponent such that substantial erosion or loss of topsoil would not occur.					
	This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types, including treatment maintenance.					

SPR	Standard Project Requirements Greenhouse Gas Emissions	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR GHG-1	**Contribute to the AB 1504 Carbon Inventory Process**	No	No	NA	NA	NA
	The project proponent of treatment projects subject to the AB 1504 process will provide all necessary data about the treatment that is needed by the U.S. Forest Service and FRAP to fulfill requirements of the AB 1504 carbon inventory, and to aid in the ongoing research about the long-term net change in carbon sequestration resulting from treatment activity.					
	This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.					

SPR	Standard Project Requirements Hazardous Materials, Public Health and Safety	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR HAZ-1	**Maintain All Equipment** The project proponent will maintain all diesel- and gasoline-powered equipment per manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. Prior to the start of treatment activities, the project proponent will inspect all equipment for leaks and inspect everyday thereafter until equipment is removed from the site. Any equipment found leaking will be promptly removed. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	During	GSSD	RCDGSDC
SPR HAZ-2	**Require Spark Arrestors** The project proponent will require mechanized hand tools to have federal- or state-approved spark arrestors. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	During	GSSD	RCDGSDC
SPR HAZ-3	**Require Fire Extinguishers** The project proponent will require tree cutting crews to carry one fire extinguisher per chainsaw. Each vehicle would be equipped with one long-handled shovel and one axe or Pulaski consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	During	GSSD	RCDGSDC
SPR HAZ-4	**Prohibit Smoking in Vegetated Areas** The project proponent will require that smoking is only permitted in designated smoking areas barren or cleared to mineral soil at least 3 feet in diameter (PRC Section 4423.4). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Yes	During	GSSD	RCDGSDC
SPR HAZ-5	**Spill Prevention and Response Plan** The project proponent or licensed Pest Control Advisor (PCA) will prepare a Spill Prevention and Response Plan (SPRP) prior to beginning any herbicide treatment activities to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants. The SPRP will include (but not be limited to): ► A map that delineates staging areas, and storage, loading, and mixing areas for herbicides; ► A list of items required in an onsite spill kit that will be maintained throughout the life of the activity; ► Procedures for the proper storage, use, and disposal of any herbicides, adjuvants, or other chemicals used in vegetation treatment. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	During	GSSD	RCDGSDC
SPR HAZ-6	**Comply with Herbicide Application Regulations** The project proponent will coordinate pesticide use with the applicable County Agricultural Commissioner(s), and all required licenses and permits will be obtained prior to herbicide application. The project proponent will prepare all herbicide applications to do the following: ► Be implemented consistent with recommendations prepared annually by a licensed PCA.	Yes	Yes	During	GSSD	RCDGSDC

SPR	Standard Project Requirements Hazardous Materials, Public Health and Safety	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR HAZ-6 (cont.)	► Comply with all appropriate laws and regulations pertaining to the use of pesticides and safety standards for employees and the public, as governed by the EPA, DPR, and applicable local jurisdictions. ► Adhere to label directions for application rates and methods, storage, transportation, mixing, container disposal, and weather limitations to application such as wind speed, humidity, temperature, and precipitation. ► Be applied by an applicator appropriately licensed by the State. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	See Above	See Above	See Above	See Above	See Above
SPR HAZ-7	**Triple Rinse Herbicide Containers** The project proponent will triple rinse all herbicide and adjuvant containers with clean water at an approved site, and dispose of rinsate by placing it in the batch tank for application per 3 CCR Section 6684. The project proponent will puncture used containers on the top and bottom to render them unusable, unless said containers are part of a manufacturer's container recycling program, in which case the manufacturer's instructions will be followed. Disposal of non-recyclable containers will be at legal dumpsites. Equipment will not be cleaned, and personnel will not be washed in a manner that would allow contaminated water to directly enter any body of water within the treatment area or adjacent watersheds. Disposal of all herbicides will follow label requirements and waste disposal regulations. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	During	GSSD	RCDGSDC
SPR HAZ-8	**Minimize Herbicide Drift to Public Areas** The project proponent will employ the following herbicide application parameters during herbicide application to minimize drift into public areas: ► Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative); ► Spray nozzles will be configured to produce the largest appropriate droplet size to minimize drift; ► Low nozzle pressures (30-70 pounds per square inch) will be utilized to minimize drift; and ► Spray nozzles will be kept within 24 inches of vegetation during spraying. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	During	GSSD	RCDGSDC
SPR HAZ-9	**Notification of Herbicide Use in the Vicinity of Public Areas** For herbicide applications occurring within or adjacent to public recreation areas, residential areas, schools, or any other public areas within 500 feet, the project proponent will post signs at each end of herbicide treatment areas and any intersecting trails notifying the public of the use of herbicides. The signs will include the signal word (i.e., Danger, Warning or Caution), product name, and manufacturer; active ingredient; EPA registration number; target pest; treatment location; date and time of application; restricted entry interval, if applicable per the label requirements; date which notification sign may be removed; and a contact person with a telephone number. Signs will be posted prior to the start of treatment and notification will remain in place for at least 72 hours after treatment ceases. This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	During	GSSD	RCDGSDC

SPR	Standard Project Requirements Hydrology and Water Quality	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR HYD-1	**Comply with Water Quality Regulations** Project proponents must also conduct proposed vegetation treatments in conformance with appropriate RWQCB timber, vegetation and land disturbance related Waste Discharge Requirements (WDRs) and/or related Conditional Waivers of Waste Discharge Requirements (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. If applicable, this includes compliance with the conditions of general waste discharge requirements (GWDR) and waste discharge requirement waivers for timber or silviculture activities where these waivers are designed to apply to non-commercial fuel reduction and forest health projects. In general, GWDR and Waivers of waste discharge requirements for fuel reduction and forest health activities require that wastes, including but not limited to petroleum products, soil, silt, sand, clay, rock, felled trees, slash, sawdust, bark, ash, and pesticides must not be discharged to surface waters or placed where it may be carried into surface waters; and that Water Board staff must be allowed reasonable access to the property in order to determine compliance with the waiver conditions. The specifications for each GWDR and Waiver vary by region. Regions 2 (San Francisco Bay), 4 (Los Angeles), 8 (Santa Ana), and 7 (Colorado River) are highly urban or minimally forested and do not offer GWDRs or Waivers for fuel reduction or vegetation management activities. The current applicable GWDRs and Waivers for timber and vegetation management activities are included in Appendix HYD-1. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	Before During	GSSD	RCDGSDC
SPR HYD-2	**Avoid Construction of New Roads** The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Yes	During	GSSD	RCDGSDC
SPR HYD-3	**Water Quality Protections for Prescribed Herbivory** The project proponent will include the following water quality protections for all prescribed herbivory treatments: ► Environmentally sensitive areas such as waterbodies, wetlands, or riparian areas will be identified in the treatment prescription and excluded from prescribed herbivory project areas using temporary fencing or active herding. A buffer of approximately 50 feet will be maintained between sensitive and actively grazed areas. ► Water will be provided for grazing animals in the form of an on-site stock pond or a portable water source located outside of environmentally sensitive areas. ► Treatment prescriptions will be designed to protect soil stability. Grazing animals will be herded out of an area if accelerated soil erosion is observed. This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.	Yes	Yes	During	GSSD	RCDGSDC

<table>
<tr><th>SPR</th><th>Standard Project Requirements
Hydrology and Water Quality</th><th>Applicable to Project?</th><th>Applicable to Maintenance?</th><th>Timing</th><th>Implementing Entity</th><th>Verify/Monitoring Entity</th></tr>
<tr><td>HYD-4</td><td>
Identify and Protect Watercourse and Lake Protection Zones
The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) on either side of watercourses as defined in the table below, which is based on 14 CCR Section 916 .5 of the California Forest Practice Rules (February 2019 version). WLPZ’s are classified based on the uses of the stream and the presence of aquatic life. Wider WLPZs are required for steep slopes.
<table>
<tr><td colspan="5">Procedures for Determining Watercourse and Lake Protection Zone (WLPZ) widths:</td></tr>
<tr><td>Water Class</td><td>Class I</td><td>Class II</td><td>Class III</td><td>Class IV</td></tr>
<tr><td>Water Class Characteristics or Key Indicator Beneficial Use</td><td>1) Domestic supplies, including springs, on site and/or within 100 feet downstream of the operations area and/or 2) Fish always or seasonally present onsite, includes habitat to sustain fish</td><td>1) Fish always or seasonally present offsite within 1000 feet downstream and/or 2) Aquatic habitat for nonfish aquatic species. 3) Excludes Class III waters that are tributary to Class I waters.</td><td>No aquatic life present, watercourse showing evidence of being capable of sediment transport to Class I and II waters under normal high-water flow conditions after completion of timber operations.</td><td>Man-made watercourses, usually downstream, established domestic, agricultural, hydroelectric supply or other beneficial use.</td></tr>
<tr><td colspan="5">WLPZ Width (ft) – Distance from top of bank to the edge of the protection zone</td></tr>
<tr><td>< 30 % Slope</td><td>75</td><td>50</td><td colspan="2" rowspan="3">Sufficient to prevent the degradation of downstream beneficial uses of water. Determined on a site-specific basis.</td></tr>
<tr><td>30-50 % Slope</td><td>100</td><td>75</td></tr>
<tr><td>>50 % Slope</td><td>150</td><td>100</td></tr>
</table>
The following WLPZ protections will be applied for all treatments:

Treatment activities with WLPZs will retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat. If this percentage is reduced, a qualified RPF will provide the project proponent with a site- and/or treatment activity-specific explanation for the percent surface cover reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced percent as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). This requirement is based on 14 CCR Section 916.4 [936.4, 956.4] Subsection (b)(6) (February 2019 version) and 14 CCR Section 916.5 (February 2019 version).
Equipment, including tractors and vehicles, must not be driven in wet areas or WLPZs, except over existing roads or watercourse crossings where vehicle tires or tracks remain dry.
Equipment used in vegetation removal operations will not be serviced in WLPZs, within wet meadows or other wet areas, or in locations that would allow grease, oil, or fuel to pass into lakes, watercourses, or wet areas.

</td><td>Yes</td><td>Yes</td><td>During</td><td>GSSD</td><td>RCDGSDC</td></tr>
</table>

SPR	Standard Project Requirements Hydrology and Water Quality	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
HYD-4 (cont.)	▶ WLPZs will be kept free of slash, debris, and other material that harm the beneficial uses of water. Accidental deposits will be removed immediately.	See Above	See Above	See Above	See Above	See Above
	▶ Burn piles will be located outside of WLPZs.					
	▶ No fire ignition (nor use of associated accelerants) will occur within WLPZs however low intensity backing fires may be allowed to enter or spread into WLPZs.					
	▶ Within Class I and Class II WLPZs, locations where project operations expose a continuous area of mineral soil 800 square feet or larger shall be treated for reduction of soil loss. Treatment shall occur prior to October 15th and disturbances that are created after October 15th shall be treated within 10 days. Stabilization measures shall be selected that will prevent significant movement of soil into water bodies and may include but are not limited to mulching, rip-rap, grass seeding, or chemical soil stabilizers.					
	▶ Where mineral soil has been exposed by project operations on approaches to watercourse crossings of Class I, II, or III within a WLPZ, the disturbed area shall be stabilized to the extent necessary to prevent the discharge of soil into watercourses or lakes in amounts that would adversely affect the quality and beneficial uses of the watercourse.					
	▶ Where necessary to protect beneficial uses of water from project operations, protection measures such as seeding, mulching, or replanting shall be used to retain and improve the natural ability of the ground cover within the WLPZ to filter sediment, minimize soil erosion, and stabilize banks of watercourses and lakes.					
	▶ Equipment limitation zones (ELZs) will be designated adjacent to Class III and Class IV watercourses with minimum widths of 25 feet where side-slope is less than 30 percent and 50 feet where side-slope is 30 percent or greater. An RPF will describe the limitations of heavy equipment within the ELZ and, where appropriate, will include additional measures to protect the beneficial uses of water.					
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
SPR HYD-5	**Protect Non-Target Vegetation and Special-status Species from Herbicides**	Yes	Yes	Before During After	GSSD	RCDGSDC
	▶ Locate herbicide mixing sites in areas devoid of vegetation and where there is no potential of a spill reaching non-target vegetation or a waterway.					
	▶ Use only herbicides labeled for use in aquatic environments when working in riparian habitats or other areas where there is a possibility the herbicide could come into direct contact with water. Only hand application of herbicides will be allowed in riparian habitats and only during low-flow periods or when seasonal streams are dry.					
	▶ No terrestrial or aquatic herbicides will be applied within WLPZs of Class I and II watercourses, if feasible. If this is not feasible, hand application of herbicides labeled for use in aquatic environments may be used within the WLPZ provided that the project proponent notifies the applicable regional water quality control board no fewer than 15 days prior to herbicide application. The feasibility of avoiding herbicide application within WLPZ of Class I and II watercourses will be determined by the project proponent and may be based on whether doing so will preclude achieving CalVTP program objectives, including, but not limited to, protection of vulnerable communities. The reasons for infeasibility will be documented in the PSA.					
	▶ No herbicides will be applied within a 50-foot buffer of ESA or CESA listed plant species or within 50 feet of dry vernal pools.					

SPR	Standard Project Requirements Hydrology and Water Quality	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR HYD-5 (cont.)	► For spray applications in and adjacent to habitats suitable for special-status species, use herbicides containing dye (registered for aquatic use by DPR, if warranted) to prevent overspray. ► Application will cease when weather parameters exceed label specifications or when sustained winds at the site of application exceeds 7 miles per hour (whichever is more conservative). ► No herbicide will be applied during precipitation events or if precipitation is forecast 24 hours before or after project activities. This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.	See Above	See Above	See Above	See Above	See Above
SPR HYD-6	**Protect Existing Drainage Systems** If a treatment activity is adjacent to a roadway with stormwater drainage infrastructure, the existing stormwater drainage infrastructure will be marked prior to ground disturbing activities. If a drainage structure or infiltration system is inadvertently disturbed or modified during project activities, the project proponent will coordinate with owner of the system or feature to repair any damage and ensure that restore pre-project drainage conditions. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Yes	Before During	GSSD	RCDGSDC

SPR	Standard Project Requirements Noise	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR NOI-1	**Limit Heavy Equipment Use to Daytime Hours**	Yes	Yes	During	GSSD	GSSD
	The project proponent will require that operation of heavy equipment associated with treatment activities (heavy off-road equipment, tools, and delivery of equipment and materials) will occur during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship). Cities and counties in the treatable landscape typically restrict construction-noise (which would apply to vegetation treatment noise) to particular daytime hours. If the project proponent is subject to local noise ordinance, it will adhere to those to the extent the project is subject to them. If the applicable jurisdiction does not have a noise ordinance or policy restricting the time-of-day when noise-generating activity can occur noise-generating vegetation treatment activity will be limited to the hours of 7:00 a.m. to 6:00 p.m., Monday through Saturday, and between 9:00 a.m. and 6:00 p.m. on Sunday and federal holidays. If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area.					
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
SPR NOI-2	**Equipment Maintenance**	Yes	Yes	During	GSSD	GSSD
	The project proponent will require that all powered treatment equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations.					
	This SPR applies to all activities and all treatment types, including treatment maintenance.					
SPR NOI-3	**Engine Shroud Closure**	Yes	Yes	During	GSSD	GSSD
	The project proponent will require that engine shrouds be closed during equipment operation. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.					
SPR NOI-4	**Locate Staging Areas Away from Noise-Sensitive Land Uses**	Yes	Yes	During	GSSD	GSSD
	The project proponent will locate treatment activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible, to minimize noise exposure.					
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
SPR NOI-5	**Restrict Equipment Idle Time**	Yes	Yes	During	GSSD	GSSD
	The project proponent will locate treatment activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible, to minimize noise exposure.					
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
SPR NOI-6	**Notify Nearby Off-Site Noise-Sensitive Receptors**	Yes	Yes	During	GSSD	GSSD
	For treatment activities utilizing heavy equipment, the project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. Notification will include anticipated dates and hours during which treatment activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification.					
	This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.					

SPR	Standard Project Requirements Recreation	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR REC-1	If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent will coordinate with the owner/manager of that recreation area or facility. If temporary closure of a recreation area or facility is required, the project proponent will work with the owner/manager to post notifications of the closure at least 2 weeks prior to the commencement of the treatment activities. Additionally, notification of the treatment activity will be provided to the Administrative Officer (or equivalent official responsible for distribution of public information) of the county(ies) in which the affected recreation area or facility is located.	Yes	Yes	Before During	GSSD	GSSD
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					

SPR	Standard Project Requirements Transportation	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR TRANS-1	**Implement Traffic Control during Treatments**	Yes	Yes	Before During	GSSD	GSSD
	Prior to initiating vegetation treatment activities the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. A TMP will be needed if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments. If needed, a TMP will be prepared to provide measures to reduce potential traffic obstructions, hazards, and service level degradation along affected roadway facilities. The scope of the TMP will depend on the type, intensity, and duration of the specific treatment activities under the CalVTP. Measures included in the TMP could include (but are not be limited to) construction signage to provide motorists with notification and information when approaching or traveling along the affected roadway facilities, flaggers for lane closures to provide temporary traffic control along affected roadway facilities, treatment schedule restrictions to avoid seasons or time periods of peak vehicle traffic, haul-trip, delivery, and/or commute time restrictions that would be implemented to avoid peak traffic days and times along affected roadway facilities. If the TMP identifies impacts on transportation facilities outside of the jurisdiction of the project proponent, the TMP will be submitted to the agency with jurisdiction over the affected roadways prior to commencement of vegetation treatment projects.					
	This SPR applies to all treatment activities and treatment types, including treatment maintenance.					
	Smoke generated during prescribed burn operations could potentially affect driver visibility and traffic operations along nearby roadways. Direct smoke impacts to roadway visibility and indirect impacts related to driver distraction will be considered during the planning phase of burning operations. Smoke impacts and smoke management practices specific to traffic operations during prescribed fire operations will be identified and addressed within the TMP. The TMP will include measures to monitor smoke dispersion onto public roadways, and traffic control operations will be initiated in the event burning operations could affect traffic safety along any roadways.					
	This SPR applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.					

SPR	Standard Project Requirements Public Utilities	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
SPR UTIL- 1	**Solid Organic Waste Disposition Plan**	Yes	Yes	Before During After	GSSD	GSSD
	For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. The Solid Organic Waste Disposition Plan will include the amount (e.g., tons) of solid organic waste to be managed onsite (i.e., scattering of wood materials, generating unburned piles, and pile burning) and transported offsite for processing (i.e., biomass power plant, wood product processing facility, composting). If the project proponent intends to transport solid organic waste offsite, the Solid Organic Waste Disposition Plan will clearly identify the location and capacity of the intended processing facility, consistent with local and state regulations to demonstrate that adequate capacity exists to accept the treated materials.					
	This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.					

MM	Mitigation Measures Aesthetics	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM AES-3	**Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks**	No	No	NA	NA	NA
	The project proponent will conduct a visual reconnaissance of the treatment area prior to implementing non-shaded fuel breaks to observe the surrounding landscape and determine if public viewing locations, including scenic vistas, public trails, and state scenic highways, have views of the proposed treatment area. If none are identified, the non-shaded fuel break may be implemented without additional visual mitigation.					
	If the project proponent identifies public viewing points, including heavily used scenic vistas, public trails, recreation areas, and state scenic highways with lengthy views (i.e., longer than a few seconds) of a proposed non-shaded fuel break treatment area, the project proponent will, prior to implementation, attempt to identify any feasible change in location of the fuel break to reduce its visibility from public viewpoints. If no feasible location changes exist that would reduce impacts to public viewers and achieve the intended wildfire risk reduction objectives of the proposed non-shaded fuel break, the project proponent will implement, where feasible, a shaded fuel break rather than a non-shaded fuel break, if the shaded fuel break would achieve the intended wildfire risk reduction objectives. With the shaded fuel break, the project proponent will thin and feather adjacent vegetation to break up the linear edges of the fuel break and strategically preserve vegetation at the edge of the fuel break, as feasible, to help screen public views and minimize the contrast between the fuel break and surrounding vegetation.					

MM	Mitigation Measures Air Quality	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM AQ-1	**Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques** Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment. It is acknowledged that due to cost, availability, and the limits of current technology, there may be circumstances where implementation of certain emission reduction techniques will not feasible. The project proponent will document the emission reduction techniques that will be applied and will explain the reasons other techniques that could reduce emissions are infeasible. Techniques for reducing emissions may include, but are not limited to, the following ► Use renewable diesel fuel in diesel-powered construction equipment. Renewable diesel fuel must meet the following criteria: ■ meet California's Low Carbon Fuel Standards and be certified by CARB Executive Officer; ■ be hydrogenation-derived (reaction with hydrogen at high temperatures) from 100 percent biomass material (i.e., non-petroleum sources), such as animal fats and vegetables; ■ contain no fatty acids or functionalized fatty acid esters; and ■ have a chemical structure that is identical to petroleum-based diesel and complies with American Society for Testing and Materials D975 requirements for diesel fuels to ensure compatibility with all existing diesel engines. ► Electric- and gasoline-powered equipment will be substituted for diesel-powered equipment. ► Workers will be encouraged to carpool to work sites, and/or use public transportation for their commutes. ► Off-road equipment, diesel trucks, and generators will be equipped with Best Available Control Technology for emission reductions of NO_X and PM.	No This information is expected to be shared with the workforce to allow for time & effort and prepare to for funding the cost to retrofit their vehicles & equipment for future fuel reduction work.	No	NA	NA	NA

MM	Mitigation Measures Archaeological, Historical, and Tribal Cultural Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM CUL- 2	**Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources** If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil ("midden"), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified archaeologist will assess the significance of the find. The qualified archaeologist will work with the project proponent to develop a primary records report that will comply with applicable state or local agency procedures. If the archaeologist determines that further information is needed to evaluate significance, a data recovery plan will be prepared. If the find is determined to be significant by the qualified archaeologist (i.e., because the find constitutes a unique archaeological resource, subsurface historical resource, or tribal cultural resource), the archaeologist will work with the project proponent to develop appropriate procedures to protect the integrity of the resource. Procedures could include preservation in place (which is the preferred manner of mitigating impacts to archaeological sites), archival research, subsurface testing, or recovery of scientifically consequential information from and about the resource. Any find will be recorded standard DPR Primary Record forms (Form DPR 523) will be submitted to the appropriate regional information center.	Yes	Yes	Before During	GSSD	RCDGSDC

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-1a	**Avoid Loss of Special-Status Plants Listed under ESA or CESA** If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway), exceptions to this requirement are listed later in this measure. The no-disturbance buffers will generally be a minimum of 50 feet from listed plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid killing or damaging listed plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate buffer size will be determined based on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. For example, paint-on or wicking application of herbicides to invasive plants may be implemented within 50 feet of listed plant species without posing a risk, especially if the listed plants are dormant at the time of application. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform the determination of buffer width. If a no-disturbance buffer is reduced below 50 feet from a listed plant, a qualified RPF or botanist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report) with a science-based justification for the deviation. No fire ignition (and associated use of accelerants) will occur within 50 feet of listed plants. For species listed under ESA or CESA, if the project proponent cannot avoid loss by implementing no- disturbance buffers, the project proponent will implement Mitigation Measure BIO-1c. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist, in consultation with CDFW and USFWS, as appropriate depending on species status and location, that the listed plants would benefit from treatment in the occupied habitat area even though some of the listed plants may be lost during treatment activities. For a treatment to be considered beneficial to listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to listed plants, no compensatory mitigation for loss of individuals will be required.	Yes	Yes	Before During	GSSD	RCDGSDC

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-1b	**Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA** If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement the following measures to avoid loss of individuals and maintain habitat function of occupied habitat: ► Physically avoid the area occupied by the special-status plants by establishing a no-disturbance buffer around the area occupied by species and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The no- disturbance buffers will generally be a minimum of 50 feet from special-status plants, but the size and shape of the buffer zone may be adjusted if a qualified RPF or botanist determines that a smaller buffer will be sufficient to avoid loss of or damaging to special-status plants or that a larger buffer is necessary to sufficiently protect plants from the treatment activity. The appropriate size and shape of the buffer zone will be determined by a qualified RPF or botanist and will depend on plant phenology at the time of treatment (e.g., whether the plants are in a dormant, vegetative, or flowering state), the individual species' vulnerability to the treatment method being used, and environmental conditions and terrain. Consideration of factors such as site hydrology, changes in light, edge effects, and potential introduction of invasive plants and noxious weeds may inform an appropriate buffer size and shape. ► Treatments may be conducted within this buffer if the potentially affected special-status plant species is a geophytic, stump-sprouting, or annual species, and the treatment can be conducted outside of the growing season (e.g., after it has completed its annual life cycle) or during the dormant season using only treatment activities that would not damage the stump, root system or other underground parts of special-status plants or destroy the seedbank. ► Treatments will be designed to maintain the function of special-status plant habitat. For example, for a fuel break proposed in treatment areas occupied by special-status plants, if the removal of shade cover would degrade the special-status plant habitat despite the requirement to physically or seasonally avoid the special-status plant itself, habitat function would be diminished and the treatment would need to be modified or precluded from implementation. ► No fire ignition (and associated use of accelerants) will occur within the special-status plant buffer. A qualified RPF or botanist with knowledge of the special-status plant species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment would not maintain habitat function of the special-status plant habitat (i.e., the habitat would be rendered unsuitable) or because the loss of special-status plants would substantially reduce the number or restrict the range of a special-status plant species. If the project proponent determines the impact on special-status plants would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status plants or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-1c will be implemented.	Yes	Yes	Before During	GSSD	RCDGSDC

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-1b (cont.)	The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the special-status plants would benefit from treatment in the occupied habitat area even though some of the non- listed special-status plants may be killed during treatment activities. For a treatment to be considered beneficial to non-listed special-status plants, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status plants, no compensatory mitigation will be required.	See above	See above	See above	See above	See above
MM BIO-1c	**Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants** If significant impacts on listed or non-listed special-status plants cannot feasibly be avoided as specified under the circumstances described under Mitigation Measures BIO-1a and 1b, the project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant impacts that require compensatory mitigation and describes the compensatory mitigation strategy being implemented and how unavoidable losses of special-status plants will be compensated. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. If the special- status plant taxa are listed under ESA or CESA, the plan will be submitted to CDFW and/or USFWS (as appropriate) for review and comment. The first priority for compensatory mitigation will be preserving and enhancing existing populations outside of the treatment area in perpetuity, or if that is not an option because existing populations that can be preserved in perpetuity are not available, one of the following mitigation options will be implemented by the project proponent instead: ► creating populations on mitigation sites outside of the treatment area through seed collection and dispersal (annual species) or transplantation (perennial species); ► purchasing mitigation credits from a CDFW- or USFWS-approved conservation or mitigation bank in sufficient quantities to offset the loss of occupied habitat; and ► if the affected special-status plants are not listed under ESA or CESA, compensatory mitigation may include restoring or enhancing degraded habitats so that they are made suitable to support special- status plant species in the future. If relocation efforts are part of the Compensatory Mitigation Plan, the plan will include details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, success criteria, and remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements. The following performance standards will be applied for relocation: ► the extent of occupied area will be substantially similar to the affected occupied habitat and will be suitable for self-producing populations. Re-located/re-established populations will be considered suitable for self-producing when: ► habitat conditions allow for plants to reestablish annually for a minimum of 5 years with no human intervention, such as supplemental seeding; and	No	No	N/A	N/A	N/A

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-1c (cont.)	► reestablished habitats contain an occupied area comparable to existing occupied habitat areas in similar habitat types in the region.	See above	See above	See above	See above	See above
	If preservation of existing populations or creation of new populations is part of the mitigation plan, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands and actions (e.g., the number and type of credits, location of mitigation bank or easement, restoration or enhancement actions), parties responsible for the long-term management of the land, and the legal and funding mechanisms (e.g., holder of conservation easement or fee title).					
	The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity.					
	If mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, funding assurances, and success criteria such as those listed above and other details, as appropriate to target the preservation of long term viable populations.					
	If mitigation includes restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat.					
	If the loss of occupied habitat cannot be offset (e.g., if preservation of existing populations or creation of new populations through relocation efforts are not available for a certain species), and as a result treatment activities would substantially reduce the number or restrict the range of listed plant species, then the treatment will not qualify as within the scope of this PEIR.					
	Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit for state-listed plants), if these requirements are equally or more effective than the mitigation identified above.					
MM BIO 2a	**Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)**	Yes	Yes	Before During	GSSD	RCDGSDC
	If California Fully Protected Species or species listed under ESA or CESA are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid adverse effects to the species by implementing the following.					
	<u>Avoid Mortality, Injury, or Disturbance of Individuals</u>					
	The project proponent will implement one of the following 2 measures to avoid mortality, injury, or disturbance of individuals:					
	1. Treatment will not be implemented within the occupied habitat. Any treatment activities outside occupied habitat will be a sufficient distance from the occupied habitat such that mortality, injury, or disturbance of the species will not occur, as determined by a qualified RPF or biologist using the most current and commonly-accepted science and considering published agency guidance; OR					

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO 2a (cont.)	2. Treatment will be implemented outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, CDFW and/or USFWS/NOAA Fisheries will be consulted to determine if there is a period of time within which treatment could occur that would avoid mortality, injury, or disturbance of the species.	See above	See above	See above	See above	See above
	▶ For species listed under ESA or CESA, if the project proponent cannot avoid mortality, injury or disturbance by implementing one of the two options listed above, the project proponent will implement Mitigation Measure BIO-2c.					
	▶ Injury or mortality of California Fully Protected Species is prohibited pursuant to Sections 3511, 4700, 5050, and 5515 of the California Fish and Game Code and will be avoided.					
	Maintain Habitat Function					
	▶ The project proponent will design treatment activities to maintain the habitat function, by implementing the following:					
	■ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; dens; tree snags; large raptor nests [including inactive nests]; downed woody debris; food sources). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science.					
	■ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that listed or fully protected wildlife with specific requirements for high canopy cover (e.g., Humboldt marten, fisher, spotted owl, coastal California gnatcatcher, riparian woodrat) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted [e.g., 50 percent for coastal California gnatcatcher]) such that habitat function is maintained.					
	▶ A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. Because this measure pertains to species listed under CESA or ESA or are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS/NOAA Fisheries regarding the determination that habitat function is maintained. If consultation determines that the treatment will not maintain habitat function for the special-status species, the project proponent will implement Mitigation Measure BIO-2c.					

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-2b	**Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)** If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species by implementing the following. **Avoid Mortality, Injury, or Disturbance of Individuals** ► The project proponent will implement the following to avoid mortality, injury, or disturbance of individuals: For all treatment activities except prescribed burning, the project proponent will establish a no-disturbance buffer around occupied sites (e.g., nests, dens, roosts, middens, burrows, nurseries). Buffer size will be determined by a qualified RPF or biologist using the most current, commonly accepted science and will consider published agency guidance; however, buffers will generally be a minimum of 100 feet, unless site conditions indicate a smaller buffer would be sufficient for protection or a larger buffer would be needed. Factors to be considered in determining buffer size will include, but not be limited to, the species' tolerance to disturbance; the presence of natural buffers provided by vegetation or topography; nest height; locations of foraging territory; baseline levels of noise and human activity; and treatment activity. Buffer size may be adjusted if the qualified RPF or biologist determines that such an adjustment would not be likely to adversely affect (i.e., cause mortality, injury, or disturbance to) the species within the nest, den, burrow, or other occupied site. If a no-disturbance buffer is reduced below 100 feet from an occupied site, a qualified RPF or biologist will provide the project proponent with a site- and/or treatment activity-specific explanation for the buffer reduction, which will be included in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any deviation (e.g., further reduction) from the reduced buffer as explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report). ■ No-disturbance buffers will be marked with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). No activity will occur within the buffer areas until the qualified RPF or biologist has determined that the young have fledged or dispersed; the nest, den, or other occurrence is no longer active; or reducing the buffer would not likely result in disturbance, mortality, or injury. A qualified RPF, biologist, or biological technician will be required to monitor the effectiveness of the no-disturbance buffer around the nest, den, burrow, or other occurrence during treatment. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in mortality, injury or disturbance to special-status species.	Yes	Yes	Before During	GSSD	RCDGSDC

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-2b (cont.)	■ For prescribed burning, the project proponent will implement the treatment outside the sensitive period of the species' life history (e.g., outside the breeding or nesting season) during which the species may be more susceptible to disturbance, or disturbance could result in loss of eggs or young. For species present year-round, the qualified RPF or biologist will determine the period of time within which prescribed burning could occur that will avoid or minimize mortality, injury, or disturbance of the species. The project proponent may consult with CDFW and/or USFWS for technical information regarding appropriate limited operating periods.	See above	See above	See above	See above	See above
	<u>Maintain Habitat Function</u>					
	► For all treatment activities, the project proponent will design treatment activities to maintain the habitat function by implementing the following:					
	■ While performing review and surveys for SPR BIO-1 and SPR BIO-10, a qualified RPF or biologist will identify any habitat features that are necessary for survival (e.g., habitat necessary for breeding, foraging, shelter, movement) of the affected wildlife species (e.g., trees with complex structure, trees with large cavities, trees with nesting platforms; tree snags; large raptor nests [including inactive nests]; downed woody debris). These habitat features will be marked and treatments applied to the features will be designed to minimize or avoid the loss or degradation of suitable habitat for listed species during treatments. Identification and treatment of these features will be based on the life history and habitat requirements of the affected species and the most current, commonly accepted science.					
	■ If it is determined during implementation of SPR BIO-1 and SPR BIO-10 that special-status wildlife with specific requirements for high canopy cover (e.g., northern goshawk, Sierra Nevada snowshoe hare) are present within a treatment area, then tree or shrub canopy cover within existing suitable areas will be retained at the percentage preferred by the species (as determined by expert opinion, published habitat association information, or other documented standards that are commonly accepted) such that the habitat function is maintained.					
	► A qualified RPF or biologist will determine if, after implementation of the impact avoidance measures listed above, the habitat function will remain for the affected species after implementation of the treatment. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding habitat function.					
	A qualified RPF or biologist with knowledge of the special-status wildlife species habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status wildlife species' habitat or because the loss of special-status wildlife would substantially reduce the number or restrict the range of a special-status wildlife species.					
	If the project proponent determines the impact on special-status wildlife would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status wildlife or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented.					

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-2b (cont.)	The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the non-listed special-status wildlife would benefit from treatment in the occupied habitat area even though some of the non-listed special-status wildlife may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to non-listed special-status wildlife, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required. The qualified RPF or biologist may consult with CDFW and/or USFWS for technical information regarding the determination that a non- listed special-status species would benefit from the treatment.	See above	See above	See above	See above	See above

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-2c	**Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)**	No	No	N/A	N/A	N/A
	If the provisions of Mitigation Measure BIO-2a, BIO-2b, BIO-2d, BIO-2e, BIO-2f, or BIO-2g cannot be implemented and the project proponent determines that additional mitigation is necessary to reduce significant impacts, the project proponent will compensate for such impacts to species or habitat by acquiring and/or protecting land that provides (or will provide in the case of restoration) habitat function for affected species that is at least equivalent to the habitat function removed or degraded as a result of the treatment.					
	Compensation may include:					
	1. Preserving existing habitat outside of the treatment area in perpetuity; this may entail purchasing mitigation credits and/or lands from a CDFW- or USFWS-approved entity in sufficient quantity to offset the residual significant impacts, generally at a ratio of 1:1 for habitat; and					
	2. Restoring or enhancing existing habitat within the treatment area or outside of the treatment area (including decommissioning roads, adding perching structures, removing existing perching structures, or removing existing movement barriers or other existing features that are adversely affecting the species).					
	The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and:					
	1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanisms for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity.					

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
	2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored habitat.	See Above	See Above	See Above	See Above	See Above
	Review requirements are as follows:					
	▶ The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan.					
	▶ For species listed under ESA or CESA or a California Fully Protected Species, the project proponent will submit the mitigation plan to CDFW and/or USFWS/NOAA Fisheries for review and comment.					
	▶ For other special-status wildlife species the project proponent may consult with CDFW and/or USFWS regarding the availability and applicability of compensatory mitigation and other related technical information.					
	Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., incidental take permit), if these requirements are equally or more effective than the mitigation identified above.					
MM BIO-2d	**Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities**	No	No	N/A	N/A	N/A
	If elderberry shrubs within the documented range of valley elderberry longhorn beetle are identified during review and surveys for SPR BIO-1, and valley elderberry longhorn beetle or likely occupied suitable elderberry habitat (e.g., within riparian, within historic riparian, containing exit holes) is confirmed to be present during protocol-level surveys following the protocol outlined in USFWS *Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle* (USFWS 2017) per SPR BIO-10, the following protective measures will be implemented to avoid and minimize impacts to valley elderberry longhorn beetle:					
	▶ If elderberry shrubs are 165 feet or more from the treatment area, and treatment activities would not encroach within this distance, direct or indirect impacts are not expected and further mitigation is not required.					
	▶ If elderberry shrubs are located within 165 feet of the treatment area, the following measures will be implemented:					
	■ A minimum avoidance area of at least 20 feet from the dripline of each elderberry plant will be fenced or flagged and maintained to avoid direct impacts (e.g., damage to root system) that could damage or kill the plant, with the exception of the following activities:					
	○ Manual trimming of elderberry shrubs will only occur between November and February and will avoid removal of any branches or stems that are greater than or equal to 1 inch in diameter to avoid and minimize adverse effects on valley elderberry longhorn beetle.					
	○ Manual trimming of elderberry shrubs will only occur between November and February and will avoid removal of any branches or stems that are greater than or equal to 1 inch in diameter to avoid and minimize adverse effects on valley elderberry longhorn beetle.					

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-2d (Cont.)	■ A qualified RPF, biologist, or biological technician familiar with valley elderberry longhorn beetle and its life history will monitor the work area to verify the avoidance and minimization measures are implemented. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to valley elderberry longhorn beetle. If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of VELB or degradation of occupied habitat such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c.	See Above	See Above	See Above	See Above	See Above
MM BIO-2e	**Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities)** If federally listed butterflies are identified as occurring or having potential to occur during review and surveys for SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, then the following measures will be implemented: ► Treatment areas within the range of these species will be surveyed for the host plant for each species (Table 3.6-34). ► Host plants for federally listed butterflies within the occupied habitat will be marked with high-visibility flagging, fencing, or stakes, and no treatment activities will occur within 10 feet of these plants. ► Because prescribed herbivory could result in the indiscriminate removal of the host plants for federally listed butterflies, this treatment type will not be used within occupied habitat of any federally listed butterfly species, unless it is known that the host plant is unpalatable to the herbivore. ► Treatment areas that are not occupied but are within the range of the federally listed butterfly will be divided into as many treatment units as feasible such that the entirety of the habitat is not treated within the same year. ► Treatments will be conducted in a patchy pattern to the extent feasible in areas that are not occupied but are within the range of the federally listed butterfly, such that the entirety of the habitat is not burned or removed and untreated portions of suitable habitat are retained. If the project proponent cannot implement the measures above to avoid mortality, injury, or disturbance of federally listed butterflies or degradation of occupied habitat (host plants) such that its function would not be maintained, the project proponent will implement Mitigation Measure BIO-2c. **CESA and ESA Listed Species.** A qualified RPF or biologist will determine if, after implementation of any feasible impact avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed butterflies or degradation of occupied habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-2c.	No	No	N/A	N/A	N/A

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-2e (cont.)	Table 3.6-34: Special-status Butterflies and Associated Host Plants	See Above	See Above	See Above	See Above	See Above

Butterfly Species	Host Plants
bay checkerspot butterfly	dwarf plantain (*Plantago virginica*), purple owl's clover (*Castilleja exserta*)
Behren's silverspot butterfly	blue violet (*Viola adunca*)
callippe silverspot butterfly	California golden violet (*Viola pedunculata*)
Carson wandering skipper	salt grass (*Distichlis spicata*)
El Segundo blue butterfly	seacliff buckwheat (*Eriogonum parvifolium*)
Hermes copper butterfly	spiny redberry (*Rhamnus crocea*)
Kern primrose sphinx moth	plains evening-primrose (*Camissonia contorta*), field primrose (*Camissonia campestris*)
Laguna Mountains skipper	Cleveland's horkelia (*Horkelia clevelandii*), sticky cinquefoil (*Drymocallis glandulosa*)
Lange's metalmark butterfly	naked-stemmed buckwheat (*Eriogonum nudum*)
lotis blue butterfly	seaside bird's foot trefoil (*Hosackia gracilis*)
Mission blue butterfly	lupine (*Lupinus* spp.)
Myrtle's silverspot butterfly	blue violet
Oregon silverspot butterfly	blue violet
Palos Verdes blue butterfly	Santa Barbara milkvetch (*Astragalus trichopodus*), common deerweed (*Acmispon glaber*)
San Bruno elfin butterfly	broadleaf stonecrop (*Sedum spathulifolium*), manzanita (*Arctostaphylos* spp.), huckleberry (*Vaccinuum* spp.)
Smith's blue butterfly	seacliff buckwheat, seaside buckwheat (*Eriogonum latifolium*)
Quino checkerspot butterfly	dwarf plantain, purple owl's clover

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-2e (cont.)	**Other Special-status Species.** A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA, because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status butterflies would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status butterflies or degradation of occupied habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented. The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status butterfly species would benefit from treatment in the occupied habitat area even though some may be killed, injured or disturbed during treatment activities. For a treatment to be considered beneficial to special-status butterfly species, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources). If it is determined that treatment activities would be beneficial to special-status butterflies, no compensatory mitigation will be required.	See Above	See Above	See Above	See Above	See Above
MM BIO-2f	**Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities)** If treatment activities would occur within the limited range of any state or federally listed beetle, fly, grasshopper, or snail, and these species are identified as occurring or having potential to occur due to the presence of potentially suitable habitat during review and surveys for SPR BIO-1 and surveys for SPR BIO- 10, then the following measures will be implemented: ► To avoid and minimize impacts to Mount Hermon June beetle and Zayante band-winged grasshopper, treatment activities will not occur within "Sandhills" habitat in Santa Cruz County, the only suitable habitat for these species. ► To avoid and minimize impacts to Casey's June beetle, Delhi Sands flower-loving fly (*Rhaphiomidas terminates abdominalis*), Delta green ground beetle (*Elaphrus virisis*), Morro shoulderband snail, Ohlone tiger beetle (*Cicindela ohlone*), and Trinity bristle snail, treatment activities will not occur within habitat in the range of these species that is deemed suitable by a qualified RPF or biologist with familiarity of the species.	Yes	Yes	Before During	GSSD	RCDGSDC
MM BIO-2g	**Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special- Status Bumble Bees (All Treatment Activities)** If special-status bumble bees are identified as occurring during review and surveys under SPR BIO-1 and confirmed during protocol-level surveys per SPR BIO-10, or if suitable habitat for special-status bumble bees is identified during review and surveys under SPR BIO-1 (e.g., wet meadow, forest meadow, riparian, grassland, or coastal scrub habitat containing sufficient floral resources within the range of the species), then the project proponent will implement the following measures, as feasible:	Yes	Yes	Before During	GSSD	RCDGSDC

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-2g (Cont)	▶ Prescribed burning within occupied or suitable habitat for special-status bumble bees will occur from October through February to avoid the bumble bee flight season.	See Above	See Above	See Above	See Above	See Above
	▶ Treatment areas in occupied or suitable habitat will be divided into a sufficient number of treatment units such that the entirety of the habitat is not treated within the same year; the objective of this measure is to provide refuge for special-status bumble bees during treatment activities and temporary retention of suitable floral resources proximate to the treatment area.					
	▶ Treatments will be conducted in a patchy pattern to the extent feasible in occupied or suitable habitat, such that the entirety of the habitat is not burned or removed and untreated portions of occupied or suitable habitat are retained (e.g., fire breaks will be aligned to allow for areas of unburned floral resources for special-status bumble bees within the treatment area).					
	▶ Herbicides will not be applied to flowering native plants within occupied or suitable habitat to the extent feasible during the flight season (March through September).					
	CESA and ESA Listed Species. A qualified RPF or biologist will determine if, after implementation of feasible avoidance measures (potentially including others not listed above), the treatment will result in mortality, injury, or disturbance to the species, or if after implementation of the treatment, habitat function will remain for the affected species. For species listed under CESA or ESA or that are fully protected, the qualified RPF or biologist will consult with CDFW and/or USFWS regarding this determination. If consultation determines that mortality, injury, or disturbance of listed bumble bees (in the event the Candidate listing is confirmed) or degradation of occupied (or assumed to be occupied) habitat such that its function would not be maintained would occur, the project proponent will implement Mitigation Measure BIO-					
	Other Special-status Species. A qualified RPF or biologist with knowledge of the special-status species' habitat and life history will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat function of the special-status species' habitat or because the loss of special-status individuals would substantially reduce the number or restrict the range of a special-status species. If the project proponent determines the impact on special-status bumble bees would be less than significant, no further mitigation will be required. If the project proponent determines that the loss of special-status bumble bees or degradation of occupied (or assumed to be occupied) habitat would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-2c will be implemented.					
	The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status bumble bee species would benefit from treatment in the occupied (or assumed to be occupied) habitat area even though some of the non-listed special-status bumble bees may be killed, injured, or disturbed during treatment activities. For a treatment to be considered beneficial to special-status bumble bee species, the qualified RPF or biologist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the species (or similar species) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to special-status bumble bees, no compensatory mitigation will be required.					

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-2h	**Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory)** The project proponent will implement the following measure if treatment activities are planned within the range of desert bighorn sheep, peninsular bighorn sheep, Sierra Nevada bighorn sheep, or pronghorn: ► Prescribed herbivory activities will be prohibited within a 14-mile buffer around suitable habitat for any species of bighorn sheep within the range of these species consistent with the more stringent recommendations in the Recovery Plan for Sierra Nevada bighorn sheep (USFWS 2007). ► Prescribed herbivory activities will be avoided within the range of pronghorn where feasible (where this range does not overlap with the range of any species of bighorn sheep).	No	No	N/A	N/A	N/A
MM BIO-3a	**Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands** The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to SPR BIO-3: ► Reference the Manual of California Vegetation, Appendix 2, Table A2, Fire Characteristics (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/) or other best available information to determine the natural fire regime of the specific sensitive natural community type (i.e., alliance) present. The condition class and fire return interval departure of the vegetation alliances present will also be determined. ► Design treatments in sensitive natural communities and oak woodlands to restore the natural fire regime and return vegetation composition and structure to their natural condition to maintain or improve habitat function of the affected sensitive natural community. Treatments will be designed to replicate the fire regime attributes for the affected sensitive natural community or oak woodland type including seasonality, fire return interval, fire size, spatial complexity, fireline intensity, severity, and fire type as described in Fire in California's Ecosystems (Van Wagtendonk et al. 2018) and the Manual of California Vegetation (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/). Treatments will not be implemented in sensitive natural communities that are within their natural fire return interval (i.e., time since last burn is less than the average time required for that vegetation type to recover from fire) or within Condition Class 1. ► To the extent feasible, no fuel breaks will be created in sensitive natural communities with rarity ranks of S1 (critically imperiled) and S2 (imperiled). ► To the extent feasible, fuel breaks will not remove more than 20 percent of the native vegetation relative cover from a stand of sensitive natural community vegetation in sensitive natural communities with a rarity rank of S3 (vulnerable) or in oak woodlands. In forest and woodland sensitive natural communities with a rarity rank of S3, and in oak woodlands, only shaded fuel breaks will be installed, and they will not be installed in more than 20 percent of the stand of sensitive natural community or oak woodland vegetation (i.e., if the sensitive natural community covers 100 acres, no more than 20 acres will be converted to create the fuel break).	Yes	Yes	Before During	GSSD	RCDGSDC

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-3a (Cont)	► Use prescribed burning as the primary treatment activity in sensitive natural communities that are fire dependent (e.g., closed-cone forest and woodland alliances, chaparral alliances characterized by fire- stimulated, obligate seeders), to the extent feasible and appropriate based on the fire regime attributes as described in Fire in California's Ecosystems (Van Wagtendonk et al. 2018) and the Manual of California Vegetation (Sawyer et al. 2009 or current version, including updated natural communities data at http://vegetation.cnps.org/).	See Above	See Above	See Above	See Above	See Above
	► Time prescribed herbivory to occur when non-target vegetation is not susceptible to damage (e.g. non- target vegetation is dormant or has completed its reproductive cycle for the year). For example, use herbivores to control invasive plants growing in sensitive habitats or sensitive natural communities when sensitive vegetation is dormant but invasive plants are growing. Timing of herbivory to avoid non- target vegetation will be determined by a qualified botanist, RPF, or biologist based on the specific vegetation alliance being treated, the life forms and life conditions of its characteristic plant species, and the sensitivity of the non-target vegetation to the effects of herbivory.					
	The feasibility of implementing the avoidance measures will be determined by the project proponent based on whether implementation of this mitigation measure will preclude completing the treatment project within the reasonable period of time necessary to meet CalVTP program objectives, including, but not limited to, protection of vulnerable communities. If the avoidance measures are determined by the project proponent to be infeasible, the project proponent will document the reasons implementation of the avoidance strategies are infeasible in the PSA. After completion of the PSA and prior to or during treatment implementation, if there is any change in the feasibility of avoidance strategies from those explained in the PSA, this will be documented in the post-project implementation report (referred to by CAL FIRE as a Completion Report).					
	A qualified RPF or botanist with knowledge of the affected sensitive natural community will review the treatment design and applicable impact minimization measures (potentially including others not listed above) to determine if the anticipated residual effects of the treatment would be significant under CEQA because implementation of the treatment will not maintain habitat functions of the sensitive natural community or oak woodland. If the project proponent determines the impact on sensitive natural communities or oak woodlands would be less than significant, no further mitigation will be required. If the project proponent determines that the loss or degradation of sensitive natural communities or oak woodlands would be significant under CEQA after implementing feasible treatment design alternatives and impact minimization measures, then Mitigation Measure BIO-3b will be implemented.					
	The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the occupied habitat area even though some loss may occur during treatment activities. For a treatment to be considered beneficial to a sensitive natural community or oak woodland, the qualified RPF or botanist will demonstrate with substantial evidence that habitat function is reasonably expected to improve with implementation of the treatment (e.g., by citing scientific studies demonstrating that the community (or similar community) has benefitted from increased sunlight due to canopy opening, eradication of invasive species, or otherwise reduced competition for resources), and the substantial evidence will be included in the PSA. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.					

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-3b	**Compensate for Loss of Sensitive Natural Communities and Oak Woodlands** If significant impacts on sensitive natural communities or oak woodlands cannot feasibly be avoided or reduced as specified under Mitigation Measure BIO-3a, the project proponent will implement the following actions: ► Compensate for unavoidable losses of sensitive natural community and oak woodland acreage and function by: ■ restoring sensitive natural community or oak woodland functions and acreage within the treatment area; ■ restoring degraded sensitive natural communities or oak woodlands outside of the treatment area at a sufficient ratio to offset the loss of acreage and habitat function; or ■ preserving existing sensitive natural communities or oak woodlands of equal or better value to the sensitive natural community lost through a conservation easement at a sufficient ratio to offset the loss of acreage and habitat function. The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on sensitive natural communities or oak woodlands that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and: 1. For preserving existing habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long- term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory habitat will be preserved in perpetuity. 2. For restoring or enhancing habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat. The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan in order to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan.	No	No	N/A	N/A	N/A
MM BIO-3c	**Compensate for Unavoidable Loss of Riparian Habitat** If, after implementation of SPR BIO-4, impacts to riparian habitat remain significant under CEQA, the project proponent will implement the following: ► Compensate for unavoidable losses of riparian habitat acreage and function by: ■ restoring riparian habitat functions and acreage within the treatment area; ■ purchasing riparian habitat credits at a CDFW-approved mitigation bank; or	No	No	N/A	N/A	N/A

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-3c (cont.)	■ preserving existing riparian habitat of equal or better value to the riparian habitat lost through a conservation easement at a sufficient ratio to offset the loss of riparian habitat function and value.	See Above	See Above	See Above	See Above	See Above
	► The project proponent will prepare a Compensatory Mitigation Plan that identifies the residual significant effects on riparian habitat that require compensatory mitigation and describes the compensatory mitigation strategy being implemented to reduce residual effects, and:					
	1. For preserving existing riparian habitat outside of the treatment area in perpetuity, the Compensatory Mitigation Plan will include a summary of the proposed compensation lands (e.g., the number and type of credits, location of mitigation bank or easement), parties responsible for the long-term management of the land, and the legal and funding mechanism for long-term conservation (e.g., holder of conservation easement or fee title). The project proponent will submit evidence that the necessary mitigation has been implemented or that the project proponent has entered into a legal agreement to implement it and that compensatory plant populations will be preserved in perpetuity.					
	2. For restoring or enhancing riparian habitat within the treatment area or outside of the treatment area, the Compensatory Mitigation Plan will include a description of the proposed habitat improvements, success criteria that demonstrate the performance standard of maintained habitat function has been met, legal and funding mechanisms, and parties responsible for long-term management and monitoring of the restored or enhanced habitat.					
	The project proponent will consult with CDFW and/or any other applicable responsible agency prior to finalizing the Compensatory Mitigation Plan to satisfy that responsible agency's requirements (e.g., permits, approvals) within the plan. Compensatory mitigation may be satisfied through compliance with permit conditions, or other authorizations obtained by the project proponent (e.g., Lake and Streambed Alteration Agreement), if these requirements are equally or more effective than the mitigation identified above.					
MM BIO-4	**Avoid State and Federally Protected Wetlands**	Yes	Yes	Before During	GSSD	RCDGSDC
	Impacts to wetlands will be avoided using the following measures:					
	► The qualified RPF or biologist will delineate the boundaries of federally protected wetlands according to methods established in the USACE wetlands delineation manual (Environmental Laboratory 1987) and the appropriate regional supplement for the ecoregion in which the treatment is being implemented.					
	► The qualified RPF or biologist will delineate the boundaries of wetlands that may not meet the definition of waters of the United States, but would qualify as waters of the state, according to the state wetland procedures (California Water Boards 2019 or current procedures).					

MM	Mitigation Measures Biological Resources	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitoring Entity
MM BIO-4 (cont.)	► A qualified RPF or biologist will establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone will be determined in coordination with the qualified RPF or biologist and will depend on the type of wetland present (e.g., seasonal wetland, wet meadow, freshwater marsh, vernal pool), the timing of treatment (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the species' vulnerability to the treatment activities, environmental conditions and terrain, and the treatment activity being implemented.	See Above	See Above	See Above	See Above	See Above
	► A qualified RPF or biological technician will periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided.					
	► Within this buffer, herbicide application is prohibited.					
	► Within this buffer, soil disturbance is prohibited. Accordingly, the following activities are not allowed within the buffer zone: mechanical treatments, prescribed herbivory, equipment and vehicle access or staging.					
	► Only prescribed (broadcast) burning may be implemented in wetland habitats if it is determined by a qualified RPF or biologist that:					
	■ No special-status species are present in the wetland habitat.					
	■ The wetland habitat function would be maintained.					
	■ The prescribed burn is within the normal fire return interval for the wetland vegetation types present.					
	■ Fire containment lines and pile burning are prohibited within the buffer.					
	■ No fire ignition (and associated use of accelerants) will occur within the wetland buffer.					
MM BIO-5	**Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites**	Yes	Yes	Before During	GSSD	RCDGSDC
	The project proponent will implement the following measures while working in treatment areas that contain nursery sites identified in surveys conducted pursuant to SPR BIO-10:					
	► **Retain Known Nursery Sites.** A qualified RPF or biologist will identify the important habitat features of the wildlife nursery and, prior to treatment activities, will mark these features for avoidance and retention during treatment.					
	► **Establish Avoidance Buffers.** The project proponent will establish a non-disturbance buffer around the nursery site if activities are required while the nursery site is active/ occupied. The appropriate size and shape of the buffer will be determined by a qualified RPF or biologist, based on potential effects of project-related habitat disturbance, noise, visual disturbance, and other factors. No treatment activity will commence within the buffer area until a qualified RPF or biologist confirms that the nursery site is no longer active/occupied. Monitoring of the effectiveness of the non-disturbance buffer around the nursery site by a qualified RPF, biologist, or biological technician during and after treatment activities will be required. If treatment activities cause agitated behavior of the individual(s), the buffer distance will be increased, or treatment activities modified until the agitated behavior stops. The qualified RPF, biologist, or biological technician will have the authority to stop any treatment activities that could result in potential adverse effects to special-status species.					

MM	Mitigation Measures Greenhouse Gas Emissions	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitor Entity
MM GHG- 2	**Implement GHG Emission Reduction Techniques During Prescribed Burns** When planning for and conducting a prescribed burn, project proponents implementing a prescribed burn will incorporate feasible methods for reducing GHG emissions, including the following, which are identified in the National Wildfire Coordinating Group *Smoke Management Guide for Prescribed Fire* (NWCG 2018): ► reduce the total area burned by isolating and leaving large fuels (e.g., large logs, snags) unburned; ► reduce the total area burned through mosaic burning; ► burn when fuels have a higher fuel moisture content; ► reduce fuel loading by removing fuels before ignition. Methods to remove fuels include mechanical treatments, manual treatments, prescribed herbivory, and biomass utilization; and ► schedule burns before new fuels appear. As the science evolves, other feasible methods or technologies to sequester carbon could be incorporated, such as conservation burning, a technique for burning woody material that reduces the production of smoke particulates and carbon released into the atmosphere and generates more biochar. Biochar is produced from the material left over after the burn and spread with compost to increase soil organic matter and soil carbon sequestration. Technologies to reduce greenhouse gas emissions may also include portable units that perform gasification to produce electricity or pyrolysis that produces biooil that can be used as liquid fuel and/or syngas that can be used to generate electricity. The project proponent will document in the Burn Plan required pursuant to SPR AQ-3 which methods for reducing GHG emissions can feasibly be integrated into the treatment design.	Yes	Yes	Before During After	GSSD	RCDGSDC

MM	Mitigation Measures Hazardous Materials, Public Health and Safety	Applicable to Project?	Applicable to Maintenance?	Timing	Implementing Entity	Verify/Monitor Entity
MM HAZ-3	**Identify and Avoid Known Hazardous Waste Sites** Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments) or prescribed burning, CAL FIRE and other project proponents will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials. If it is determined that hazardous materials sites could be located within the boundary of a treatment site, the project proponent will conduct a DTSC EnviroStor web search (https://www.envirostor.dtsc.ca.gov/public/) and consult DTSC's Cortese List to identify any known contamination sites within the project site. If a proposed mechanical treatment or prescribed burn is located on a site included on the DTSC Cortese List as containing potential soil contamination that has not been cleaned up and deemed closed by DTSC, the area will be marked and no prescribed burning or soil disturbing treatment activities will occur within 100 feet of the site boundaries. If it is determined through coordination with landowners or after review of the Cortese List that no potential or known contamination is located on a project site, the project may proceed as planned.	Yes No recorded sites within 5 miles of the project area.	No	No	RCDGSDC	RCDGSDC

ATTACHMENT B

CEQA Findings and Statement of Overriding Considerations

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INTRODUCTION

The **Resource Conservation District of Greater San Diego County**[1], referred to herein as "Project Proponent," in the exercise of its independent judgment, makes and adopts the following findings regarding its decision to approve the **Camp Winacka-Camp Whispering Oaks: Vegetation Management Project** referred to herein as "vegetation treatment project," within the scope of the California Vegetation Treatment Program (CalVTP). This document has been prepared in accordance with the California Environmental Quality Act (Pub. Resources Code, Sections 21000 et seq.) (CEQA) and the CEQA Guidelines (Cal. Code Regs., Tit. 14, Sections 15000 et seq.).

STATUTORY REQUIREMENTS FOR FINDINGS

Public Resources Code section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The same section provides that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." (Pub. Resources Code, Section 21002.) Section 21002 goes on to provide that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate and principles announced in Public Resources Code section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See Pub. Resources Code, Section 21081, subd. (a); CEQA Guidelines, Section 15091, subd. (a).) For each significant environmental effect identified in an EIR for a project, the approving agency must issue a written finding reaching one or more of three permissible conclusions:

(1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

(3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

(CEQA Guidelines, Section 15091, subd. (a); Pub. Resources Code, Section 21081, subd. (a).) Public Resources Code section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors." (See also *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 565.)

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a Statement of Overriding Considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects." (CEQA Guidelines, Sections 15093, 15043, subd. (b); see also Pub. Resources Code, Section 21081, subd. (b).) The California Board of Forestry and Fire Protection (the Board), adopted Findings and a Statement of Overriding Considerations on December 30, 2019.

Here, as explained in the Board's Findings and the Draft Program Environmental Impact Report (Draft PEIR) and the Final PEIR (collectively, the "PEIR"), the CalVTP would result in significant and unavoidable environmental

[1] For the purposes of implementing the CalVTP, a project proponent is a public agency that provides funding for vegetation treatment or has land ownership, land management, or other regulatory responsibility in the treatable landscape and is seeking to fund, authorize, or implement vegetation treatments consistent with the CalVTP. If through the Project Specific Analysis (PSA) a project proponent determines that a proposed project is within the scope of the CalVTP PEIR, then the project proponent would act as a responsible agency pursuant to CEQA. A regulatory agency seeking to use the CalVTP PEIR to issue any secondary approval or permit for vegetation treatments would also be a responsible agency. If the PSA determines that one or more impacts of a proposed later vegetation treatment project is not within the scope of the CalVTP PEIR, then the project proponent may serve as a lead agency in the preparation of additional environmental documentation that accompanies the PEIR for CEQA compliance.

effects to the following: Aesthetics; Air Quality; Archaeological, Historical, and Tribal Cultural Resources; Biological Resources; Greenhouse Gas Emissions; Transportation; and Public Services, Utilities, and Service Systems. For reasons set forth in the Board's Statement of Overriding Considerations, however, the Board determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the CalVTP.

When a responsible agency approves a vegetation treatment project using a within the scope finding for all environmental impacts, it must adopt its own CEQA findings pursuant to Section 15091 of the State CEQA Guidelines, and if needed, a statement of overriding considerations, pursuant to Section 15093 of the State CEQA Guidelines. (See CEQA Guidelines section 15096(h).) According to case law, a responsible agency's findings need only address environmental impacts "within the scope of the responsible agency's jurisdiction." (*Riverwatch v. Olivenhain Municipal Water District* (2009) 170 Cal.App.4th 1186, 1202.) Although each responsible agency must adopt its own findings, such agencies have the option of reusing, incorporating, or adapting all or part of the findings adopted by the Board for the CalVTP PEIR to meet the agency's own requirements to the extent the findings are applicable to the proposed vegetation treatment project. The following document sets forth the required findings for an agency's project-specific approval that relies on and implements the CalVTP PEIR.

The Project Proponent adopts these findings to document its exercise of its independent judgment regarding the potential environmental effects analyzed in the PEIR and to document its reasoning for approving the vegetation treatment project under the CalVTP in spite of these effects.

BACKGROUND AND PROJECT DESCRIPTION

The following are excerpts from the PSA for the proposed project.

Camp Winacka and Camp Whispering Oaks are adjoining Girl Scouts camps in eastern San Diego County that provide Girl Scouts with day-use and overnight outdoor recreational experiences. Scouts have owned the camps for nearly sixty years. In 1959, GSSD acquired a 38-acre parcel known as Camp Davidson from the Armed Forces YMCA. The Armed Forces used the facility as a rest and recovery location for military troops during World War II and the Korean Conflict. After GSSD purchased the property, the Camp was renamed Camp Whispering Oaks. Nearly ten years later, in 1968, Girl Scouts acquired a portion of the Rutherford Ranch and was named Camp Winacka. Then in 1995, additional acres were purchased to bring Camp Winacka to 594 acres. The combined acreage totals 632 acres.

Before the GSSD owned the property, cattle grazing was commonly practiced, and it is thought that grazing may have minimized the destructive wildfire impacts before the late 1960s. After GSSD acquired the property, cattle grazing stopped, and native vegetation was permitted to grow unchecked. Incrementally, over thirty years, the growth of vegetation increased fuel loading. The bark beetle epidemic also killed thousands of pines within the camp and surrounding area during the 2001-2005 drought. High fuel loading and standing dead trees aided the Cedar Fire in rapidly spreading through the camp and the surrounding community.

Twenty years post Cedar Fire, vegetation has regrown and increased fuel loading. In recent years, GSOB, a relatively new invasive oak pest detected in eastern San Diego County, spread throughout the county, including the camps. The oak pest has caused extensive oak mortality throughout the camp, and fuel loading exceeds thousands of tons of dead oak biomass. Infested oak wood requires special handling. Onsite management, including burning infested oak wood, is the most efficient and effective way to reduce heavy fuel loading and minimize the GSOB population.

Because the proposed project is aligned with the Cooperative Forest Management Plan for the San Diego/Imperial County Girl Scout Council (FMP-2017), the proposed project has been organized into similar units. Treatment Unit 1 in the FMP-2017 was identified as a Defensible Space treatment area around structures. This unit is not included in the proposed project because the CalVTP does not include Defensible Space around structures. Treatment Unit 7 in the FMP-2017 was a stand-alone unit. This area is incorporated into the proposed project as Treatment Unit 6. Treatment Unit 3, in the FMP-2017, was a stream improvement project funded by NRCS. Treatment Unit 3 has been assigned as the treatment area in Camp Whispering Oaks. The remaining treatment units identified in the FMP-2017 are approximately similar in the layout and treatment activities in the proposed project.

All fuel types, grass, shrubs, and trees are present throughout the project area. The general distribution of vegetation type across the treatment units is reflected in Table 1: Fuel Type and Vegetation Classification by Treatment Unit. Trees and shrubs are the dominant fuel types; grass fuel type represents about one-fifth of the

area. Table 1 also shows that most grass fuel types are classified as Coastal Oak Woodland, indicating that the fuel type classification focused on the understory vegetation rather than the tree component.

The tree component, comprised of Coastal Oak Woodland, Sierra Mixed Conifer, Montane Riparian, and Montane Hardwood, is distributed approximately across 68% of the proposed treatment area. Most of the tree species in these vegetation classifications are conifers and oaks. Oak species, particularly red oak species (California black oak, coast live oak, canyon live oak, and Engelmann oak), is a concern. GSOB has caused severe oak mortality, contributing to heavy fuel loading throughout the treatment areas. The GSSD has estimated that the total volume of dead or dying oaks due to GSOB exceeds 40,000 tons of biomass.

Table 1: Fuel Type and Vegetation Classification by Treatment Unit

Fuel Type Classification			Vegetation Classifications	Treatment Units							Acres*	
Fuel Type	Acres	Percent	CWHR	2A	2B	3	4	5	6	8	Grand Total	Percent
Grass	106.1	21.9%	Annual Grassland				11.2	1.3	1.8	1.1	15.4	3.0%
Grass			Coastal Oak Woodland	3.5	2.4	4.8	0.8	13.0	34.9	31.3	90.7	17.8%
Shrubs	145.2	28.5%	Chamise-Redshank Chaparral						0.2		0.2	.03%
Shrubs			Coastal Scrub				0.2		6.5		6.7	1.3%
Shrubs			Mixed Chaparral	0.8	1.0	19.6	18.1	19.7	31.8	47.3	138.3	27.2%
Trees	257.5	50.6%	Sierran Mixed Conifer		4.0	2.2		0.3	5.7	3.3	15.5	3.1%
Trees			Montane Riparian	17.6	6.3	8.6		16.8	40.3	21.9	111.5	21.9%
Trees			Montane Hardwood		3.3		27.4	25.2	36.1	38.5	130.5	25.6%
Grand Total	508.8	100%	Grand Total	21.9	17.0	35.2	57.7	76.2	157.4	143.4	508.8	100%

The proposed project intends to reduce wildfire impacts and restore and maintain wildfire resiliency within the boundaries of the GSSD camps by treating hazardous fuels on 512 acres, or 81% of the GSSD property. The proposed project establishes two treatment types: fuel breaks and WUI fuel reduction to reduce hazardous fuels. Operationally, the fuel breaks and WUI-fuel reduction treatment types are strategically divided into treatment units to manage the workload and operational timeframes. Table 2, shown below, reflects the treatment unit by treatment activities and acres.

Table 2: Treatment Units and Treatment Activities

	Treatment Type	Fuel Breaks		WUI- Fuel Reduction					
	Treatment Units	2a	2b	3	4	5	6	8	Total Acres
	Acres	22	17	35	58	77	159	144	**512**
Treatment Activities	Manual	22	17	35	58	77	159	144	512
	Mechanical		17	35	58	77	124	144	455
	Pile Burn		17		58	77	139		291
	Broadcast Burn		17		58	77	124		276
	Herbicide			24				13	37
	Herbivory			35	58	77	159	144	473

Fuel breaks are next to roadways, and WUI fuel reduction areas are strategically located throughout the property boundary and organized as treatment units. The fuel break prescription reduces, removes, and modifies hazardous fuels to improve fire-safe ingress/egress next to roadways and provide an operational area to fight fires. The WUI fuel reduction prescription reduces, removes, and modifies hazardous fuels to reduce fuel loading to change fire behavior, lessen fire impacts and restore wildfire resiliency. Not every acre expects to be treated with the same treatment activity or intensity. Further, the WUI fuel reduction prescription includes retention areas to conserve habitat that creates mosaic patterns with the treatment areas. The long-term goal is maintaining wildfire resiliency with heterogeneous habitat, structure, and diversity.

The treatment activities to treat hazardous vegetation include manual treatment, mechanical treatment, prescribed and pile burning, herbivory, and herbicides. The range of treatment activities allows flexibility to apply treatment based on site-specific conditions, fire and treatment history, insect and disease, plants, habitat, soil characteristics, weather, cultural resources, sensitive areas, costs, funding, and other factors. Given the volume of GSOB-infested oak wood, ACBs are the primary method to dispose of woody biomass. See Figures 5 – 10 for the specific treatment activity maps.

The treatment activity or activities for each treatment unit are selected and applied based on several factors, including contracting, funding, workforce availability, and equipment. Treatment activities may be used at different times throughout the year or over several years. For example, manual treatment may occur during summer, followed by late autumn or early winter pile burning. Mechanical treatment might occur in late spring/early summer, followed by herbivory two years later to minimize the regrowth of brush species. Alternatively, after the initial treatment, prescribed broadcast burning could be applied to maintain the effectiveness of the treatment.

Fuel Break Prescription

Treatment Units 2a and 2b are fuel breaks strategically located near roadways. Treatment Unit 2a centers along Boulder Creek Road and applies manual treatment methods. Treatment Unit 2b centers along a service road between Boulder Creek and Eagle Peak Road. Besides manual treatment, mechanical, pile, and broadcast burning may be applied within this unit. The fuel breaks are intended to reduce, remove, and modify hazardous fuels to create a safe travel route for ingress-egress for civilians and firefighters and to provide a strategic area for firefighters to conduct safe firefighting operations. The fuel break assists with minimizing roadside ignitions.

The fuel breaks centered along the roadway or service road are 200 feet wide. Unit 2A is approximately 0.90 miles, and Unit 2B is approximately 0.75 miles long. The prescription intends to reduce hazardous fuels by removing ladder fuels under tree canopies, removing dead and dying trees, including GSOB-infested oaks and bark beetle-killed conifers, and removing live trees less than 10-inches in diameter (only in overstocked, densely forested areas). The work includes pruning trees, spatially separating shrubs or groups away from trees, and weed-whacking grasses and light shrub species. The spatial separation of vegetation ranges from four to six (4-6) times the height of vegetation or a reduction of 40% to 60% of the current hazardous fuel cover. Visually, the fuel break would appear as an open montane forested area of oaks and conifers in the overstory, scatterings of single and groups of shrubs spatially separated in open areas in the understory, and light grasses and forbs at ground level. The outer perimeter or edge of the fuel break would appear as a feathered and scalloped edge to naturally blend into the adjoining unit or untreated areas. Chipped and masticated material may cover bare or exposed soils or minimize the grasses beside roadways.

WUI Fuel Reduction Prescription

WUI fuel reduction intends to create a wildfire-resilient environment that balances fire safety and habitat values with reducing catastrophic wildfire conditions. In the event of a wildfire, the wildfire-resilient environment, a wildfire would burn through the area without causing significant impacts on life, property, and the natural environment.

Treatment Units 3, 4, 5, 6, and 8 are WUI fuel reduction areas. The WUI fuel reduction prescription reduces, removes, and modifies hazardous fuels to reduce fuel loading to change fire behavior, lessen fire impacts and build wildfire resiliency. Not every acre expects to be treated with the same treatment activity or intensity. Further, the WUI fuel reduction prescription includes retention areas to conserve habitat, creating mosaic patterns within the treatment areas. The long-term goal is maintaining a wildfire-resilient area with heterogeneous habitat, structure, and diversity.

Treatment Unit 3 may utilize manual, mechanical, and herbivory treatment methods to reduce hazardous fuels and fuel loading. In addition, herbicides may be used to treat the invasive scotch broom found in this area. Due to the proximity of neighboring developed parcels, prescribed pile and broadcast burning were not included in this treatment unit.

Treatment Units 4, 5, and 6 may apply manual, mechanical, prescribed broadcast burn, pile burn, and herbivory treatment methods. These treatment units are located furthest from developed areas, where prescribed pile and broadcast burning are potential treatment activities.

Treatment Unit 8 may use manual, mechanical, and herbivory treatment methods. Like Treatment Unit 3, due to the proximity of neighboring developed parcels, prescribed pile and broadcast burning were not included in the treatment unit. Herbicides may be applied to treat this unit's small patches of the invasive scotch broom.

The WUI fuel reduction prescription is similar to the fuel break prescription, which intends to reduce hazardous fuels but includes the higher retention of healthy brush and trees. The spatial separation of vegetation ranges from two to six (2-6) times the height of vegetation depending on slope, aspect, and health of vegetation. Given the extensive oak and pine mortality throughout the property, removing dead and dying trees takes priority. Snag and down woody log retention

are acceptable in suitable locations. Snags with habitat characteristics may be retained at a proportion of 4-6 snags per acre located outside the fall or strike zone of roadways, trails or structures. Large-diameter down woody logs may be retained at a proportion of 5-10 logs per acre in scattered patterns. Size, height, or length of snags and down woody logs may vary over the treatment area, and retention proportions may also vary.

Understory fuel reduction retains healthy brush species and younger, vigorous-growing trees to become the future forest. The prescription allows for closer spacing of trees and shrub species and additional retention areas (untreated or lightly treated areas) to create heterogeneous habitat, structure, and diversity while achieving the fuel reduction objective. Visually, the WUI fuel reduction would appear as a mixture of open and partially closed montane forested areas of oaks and conifers in the overstory, scatterings of a single isolated specimen or a clustering of brush and small trees in the understory, and grasses and forbs at ground level. Chipped and masticated material may cover bare or exposed soils. Preferable for chip depth not to exceed 3 inches in depth and are broadcasted and spread over soils in discontinuous random patterns that create gaps in chip coverage to expose soils. Chip coverage should not exceed 70%; where 30% of the soil is not covered with chips breaks up the compacted surface fuels and provides potential habitat for ground-nesting species, such as bees.

Buffer zones or retention areas, which are untreated areas, may occur within the fuel break and the WUI fuel reduction areas. Typically, buffer zones or retention areas within fuel breaks are associated with protection measures for other resource values, such as biological or cultural resources. Buffer zones or retention areas within the WUI fuel reduction area include protection measures for other resource values and untreated areas to retain habitat, structure, and diversity that balances aesthetics with the fuel reduction objective. The size or distance of the buffer zone or retention area may vary depending on the resources. A qualified archaeologist sets protection measures for cultural resources according to the SPRs for cultural resources. Recommendations from culturally affiliated tribes are also considered and usually incorporated into the protection measures. A qualified biologist sets protection measures for biological resources according to the SPRs for these resources. Recommendations from wildlife agencies are considered and incorporated into the protection measures.

Treatment Activity - Implementation

Implementation primarily would occur through manual treatment methods, meaning handcrews using chainsaws and chippers. Tow-behind or track chippers may be used to chip branches and limb wood. In favorable terrain situations, mechanical treatment, such as masticators, or skid steers with masticating heads, may be used to cut and process hazardous fuels into chips or shreds. Chipped or shredded material remains on site and is spread or dispersed over soils. Alternatively, cut biomass may be piled and burned, relocated to a designated location within the property, utilized as firewood, milled into non-structural lumber or burned in the ACB. Herbivory and herbicides may be applied to maintain the effectiveness of the initial treatment.

All prescribed, piled, or air curtain burning requires a burn and a smoke management permit from the California Department of Forestry and Fire Protection (CAL FIRE) and the San Diego Air Pollution Control District (APCD). A certified range manager would be consulted regarding the application of herbivory in terms of types of animals, numbers of animals, and the timing and duration of grazing. A pest control advisor would be consulted regarding the application of herbicides.

Treatment Activity Description

The treatment methods are primarily manual and mechanical operations. Access, slope, soil conditions, and other site factors determine the treatment method. Most treatment areas (70-80%) would occur through manual or hand treatment. Approximately 20-30% of the area is suitable for mechanical treatment. Steep slopes and soil conditions limit the size of mastication equipment to small or medium-sized masticators. Hand tools, such as chainsaws, axes, shovels, and weedeaters, are likely tools for manual or hand-treatment operations. Other support vehicles, such as dump trucks, loaders, and trailers, may be necessary to complete the job. Access limits the use of these vehicles to paved or natural surfaced roads.

The proposed project includes using herbicides, herbivory, and prescribed burning to provide additional activities to support the project. Herbicide application would be used for targeted invasive/non-native species contributing to hazardous fuel loading. Herbivory practices would be an option for initial treatment and maintenance in suitable locations. Prescribed burning is limited to pile burning in isolated locations that are not accessible for equipment to dispose of cut vegetation.

Herbicides would be an option for treating invasive/non-native vegetation in isolated locations. This treatment intends to reduce the competition of invasive/non-native species, retaining native, healthy vegetation (shrubs and

trees) spatially separated to lessen fuel loading. The project manager would consult a Pest Control Advisor (PCA) for a written herbicide recommendation. The written herbicide recommendation would identify the target species, the appropriate herbicide, and the application methods and equipment. Application of herbicides must follow the label instructions. Herbicides that could be used are those listed in the CalVTP. Herbicides would only be applied through all-terrain vehicles or backpack-style sprayers. Aerial herbicide application is not permitted. To ensure herbicides are applied appropriately on the target species under the prescribed site conditions, including weather conditions, all personnel applying herbicides would receive herbicide use and safety training. Additionally, herbicide applicators would be required to wear the appropriate level of personal protective equipment as guided by the label and written instructions by the PCA.

Herbivory practices would be an option for initial treatment for some locations within the treatment area. Further, herbivory practices would help maintain the fuel break. The project manager would consult with a Certified Rangeland Manager (CRM) to develop an herbivory treatment plan. The herbivory treatment plan would consider the project site conditions, the type and number of grazing animals, target vegetation for grazing (shrubs and invasive grass/forbs), and the ability to manage the grazing herd to stay within the fuel reduction prescription. Factors such as fencing, access, capacity and facilities for loading/offloading animals, proximity to developed areas, and water availability would need to be considered. The grazing stock would need to be weed-free before arriving at the project site and then moved off-site to release any weed seeds from their digestive tract. Herders would be required to implement this treatment activity.

Burning could be prescribed as pile burning, broadcast burning, or ACB burning operations. The project manager would consult with CAL FIRE to determine the most appropriate burn treatment activity (method) to treat the biomass within the treatment area. In consultation with CAL FIRE, the burn boss would be identified; a written Burn Plan and Incident Action Plan (IAP) would be completed before burning. A burn permit, also called a Smoke Management Plan (SMP), would be completed, and approved by San Diego Air Pollution Control Board (SDAPCD). Burning in San Diego County is restricted to permissible burn days. GSSD staff would conduct ACB operations and, potentially, pile burning. Broadcast burning would be conducted in partnership with CAL FIRE.

Maintenance

The implementing entity expects to maintain long-term property ownership and expects to maintain the initial treatment. The treatment activities for the initial treatment are expected to be the same for maintenance treatment. Maintenance activities are expected to treat less volume and involve less time and cost.

To maintain the effectiveness of the initial treatment, the implementing entity would conduct maintenance on a 5-7 year cycle based on site conditions, regrowth, wildfires, pest outbreaks, or other factors. In coordination with the project proponent, the implementing entity would consult a Registered Professional Forester (RPF) or environmental professional knowledgeable in the CalVTP and conduct an onsite evaluation to determine maintenance treatment needs. In addition, the project proponent, in coordination with the implementing entity, is expected to review the PSA at least ten years after the approval of the proposed project. The review of the PSA would include, among other PSA items, a review of the CNNDB database for the current listing of protected species and a review of the archaeological record search for new cultural records. Adjusting biological and/or cultural resource protection measures may be necessary to adapt to the new information. Absence of conditions that would render the PSA deficient with CEQA or environmental regulations, then a 10-year review cycle and reassessment of the PSA would permit long-term environmental review document to serve long-term.

ENVIRONMENTAL REVIEW PROCESS

The Project Proponent followed the evaluation and reporting process outlined in the PSA and required under the CalVTP.

On **March 21, 2023**, Project Proponent submitted to CAL FIRE the required information regarding this project when it began preparing the PSA. The submittal included:

- GIS data that included project location (as a point);
- project size;
- planned treatment types and activities; and
- contact information for a representative of the project proponent.

Upon adoption of these findings and approval of the project, Project Proponent will submit this completed PSA and associated geospatial data to CAL FIRE at the time a Notice of Determination is filed. The submittal will include the following:

- The completed PSA Environmental Checklist;
- The completed Mitigation Monitoring and Reporting Program (using Attachment A to the Environmental Checklist);
- GIS data that include:
  - a polygon(s) of the project area, showing the extent of each treatment type included in the project (ecological restoration, fuel break, WUI fuel reduction)

As required under the CalVTP, Project Proponent will submit the following information to CAL FIRE after implementation of the treatment:

- GIS data that include a polygon(s) of the treated area, showing the extent of each treatment type implemented (ecological restoration, fuel break, WUI fuel reduction)
- A post-project implementation report (referred to by CAL FIRE as a Completion Report) that includes
  - Size of treated area (typically acres);
  - Treatment types and activities;
  - Dates of work;
  - A list of the SPRs and mitigation measures that were implemented; and
  - Any explanations regarding implementation if required by SPRs and mitigation measures (e.g., explanation for feasibility determination required by SPR BIO-12; explanation for reduction of a no-disturbance buffer below the general minimum size described in Mitigation Measures BIO-1a and BIO-2b.

RECORD OF PROCEEDINGS

In accordance with Public Resources Code Section 21167, subdivision (e), the record of proceedings for the Project Proponent's decision to approve the vegetation treatment project under the CalVTP includes the following documents at a minimum:

- The certified Final PEIR for the CalVTP, including the Draft PEIR, responses to comments on the Draft PEIR, and appendices;
- All recommendations and findings adopted by the Board in connection with the CalVTP and all documents cited or referred to therein;
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the treatment project prepared by the Project Proponent, consultants to the Project Proponent, or responsible or trustee agencies with respect to the Project Proponent's compliance with the requirements of CEQA and with respect to the Project Proponent's action on the CalVTP;
- Matters of common knowledge to the Project Proponent, including but not limited to federal, state, and local laws and regulations;
- Any documents expressly cited in these findings, in addition to those cited above; and
- Any other materials required for the record of proceedings by Public Resources Code section 21167.6, subdivision (e).

Pursuant to CEQA Guidelines section 15091, subdivision (e), the documents constituting the record of proceedings are available for review during normal business hours at:

Resource Conservation District of Greater San Diego County
11769 Waterhill Road
Lakeside, CA 92040

The custodian of these documents is **Heather Marlow, Director of Forestry & Fire Prevention Programs.**

MITIGATION MONITORING AND REPORTING PROGRAM

A Mitigation Monitoring and Reporting Program (MMRP) was adopted by the Board for the CalVTP, and the applicable mitigation measures for this treatment project have been identified in the PSA. The Project Proponent will use the MMRP to track compliance with the CalVTP mitigation measures. The MMRP will remain available for public review during the compliance period. The Final MMRP is attached to and is approved in conjunction with the approval of the treatment project and adoption of these Findings.

FINDINGS FOR DETERMINATIONS OF LESS THAN SIGNIFICANT

The Project Proponent has reviewed and considered the information in the Final PEIR for the CalVTP addressing potential environmental effects, proposed mitigation measures, and alternatives. The Project Proponent, relying on the facts and analysis in the Final PEIR and the treatment project PSA, which were presented to the **Board of Directors for the Resource Conservation District of Greater San Diego County** and reviewed and considered prior to any approvals, concurs with the conclusions of the Final PEIR and the treatment project PSA regarding the potential environmental effects of the CalVTP and the treatment project.

The Project Proponent concurs with the conclusions in the Final PEIR and treatment project PSA that all of the following impacts will be less than significant:

Aesthetics and Visual Resources

- Impact AES-1: Result in Short-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from Treatment Activities
- Impact AES-2: Result in Long-Term, Substantial Degradation of a Scenic Vista or Visual Character or Quality of Public Views, or Damage to Scenic Resources in a State Scenic Highway from WUI Fuel Reduction, Ecological Restoration, or Shaded Fuel Break Treatment Types

Agricultural and Forestry Resources

- Impact AG-1: Directly Result in the Loss of Forest Land or Conversion of Forest Land to a 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

Air Quality

- Impact AQ-2: Expose People to Diesel Particulate Matter Emissions and Related Health Risk
- Impact AQ-3: Expose People to Fugitive Dust Emissions Containing Naturally Occurring Asbestos and Related Health Risk
- Impact AQ-5: Expose People to Objectionable Odors from Diesel Exhaust

Archaeological, Historical, and Tribal Cultural Resources

- Impact CUL-1: Cause a Substantial Adverse Change in the Significance of Built Historical Resources
- Impact CUL-4: Disturb Human Remains

Biological Resources

- Impact BIO-6: Substantially Reduce Habitat or Abundance of Common Wildlife
- Impact BIO-7: Conflict with Local Policies or Ordinances Protecting Biological Resources
- Impact BIO-8: Conflict with the Provisions of an Adopted Natural Community Conservation Plan, Habitat Conservation Plan, or Other Approved Habitat Plan

Geology, Soils, and Mineral Resources

- Impact GEO-1: Result in Substantial Erosion or Loss of Topsoil
- Impact GEO-2: Increase Risk of Landslide

Greenhouse Gas Emissions

- Impact GHG-1: Conflict with Applicable Plan, Policy, or Regulation of an Agency Adopted for the Purpose of Reducing the Emissions of GHGs

Energy Resources

- Impact ENG-1: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy

Hazardous Materials, Public Health and Safety

- Impact HAZ-1: Create a Significant Health Hazard from the Use of Hazardous Materials
- Impact HAZ-2: Create a Significant Health Hazard from the Use of Herbicides
- Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites

Hydrology and Water Quality

- Impact HYD-1: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Prescribed Burning
- Impact HYD-2: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Implementation of Manual or Mechanical Treatment Activities
- Impact HYD-3: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through Prescribed Herbivory
- Impact HYD-4: Violate Water Quality Standards or Waste Discharge Requirements, Substantially Degrade Surface or Ground Water Quality, or Conflict with or Obstruct the Implementation of a Water Quality Control Plan Through the Ground Application of Herbicides
- Impact HYD-5: Substantially Alter the Existing Drainage Pattern of a Treatment Site or Area

Land Use and Planning, Population and Housing

- Impact LU-1: Cause a Significant Environmental Impact Due to a Conflict with a Land Use Plan, Policy, or Regulation
- Impact LU-2: Induce Substantial Unplanned Population Growth

Noise

- Impact NOI-1: Result in a Substantial Short-Term Increase in Exterior Ambient Noise Levels During Treatment Implementation
- Impact NOI-2: Result in a Substantial Short-Term Increase in Truck-Generated SENL's During Treatment Activities

Recreation

- Impact REC-1: Directly or Indirectly Disrupt Recreational Activities within Designated Recreation Areas

Transportation

- Impact TRAN-1: Result in Temporary Traffic Operations Impacts by Conflicting with a Program, Plan, Ordinance, or Policy Addressing Roadway Facilities or Prolonged Road Closures
- Impact TRAN-2: Substantially Increase Hazards due to a Design Feature or Incompatible Uses
- Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP

Public Services, Utilities, ad Service Systems

- Impact UTIL-1: Result in Physical Impacts Associated with Provision of Sufficient Water Supplies, Including Related Infrastructure Needs
- Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity
- Impact UTIL-3: Comply with Federal, State, and Local Management and Reduction Goals, Statutes, and Regulations Related to Solid Waste

Wildfire

- Impact WIL-1: Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire

- Impact WIL-2: Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides.

SIGNIFICANT EFFECTS AND MITIGATION MEASURES

The PEIR identified a number of significant and potentially significant environmental effects (or impacts) that the CalVTP will contribute to or cause. The Board determined that some of these significant effects can be fully avoided through the application of feasible mitigation measures. Other effects, however, cannot be avoided by the adoption of feasible mitigation measures or alternatives and thus will be significant and unavoidable. For reasons set forth in Section 10.2 of the Board's Findings and Statement of Overriding Considerations, however, the Board determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the CalVTP.

The Board adopted the findings required by CEQA for all direct and indirect significant impacts. The findings provided a summary description of each impact, described the applicable mitigation measures identified in the PEIR and adopted by the Board, and stated the Board's findings on the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the Final PEIR; and the Board incorporated by reference into its findings the discussion in those documents supporting the Final PEIR's determinations. In making those findings, the Board ratified, adopted, and incorporated into the findings the analyses and explanations in the Draft PEIR and Final PEIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions were specifically and expressly modified by the findings.

Not every individual treatment project will have all of the significant environmental impacts that the CalVTP was determined to contribute to or cause. Additionally, some of the environmental impacts predicted by the CalVTP PEIR to be significant and unavoidable or less than significant after mitigation may be determined in a PSA to be less severe for an individual treatment project than determined in the statewide PEIR. The impacts and mitigation measures identified in Sections 8.1 and 8.2 below reflect the conclusions of the PSA by indicating which of the CalVTP's impacts that this treatment project will contribute to or cause. By indicating the project-specific effects of this treatment project as follows, the Project Proponent's decisionmaker or decision making body is hereby making the required findings under CEQA regarding the application or feasibility of mitigation measures to reduce those impacts.

FINDINGS FOR IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

The Project Proponent finds that changes or alterations have been required in, or incorporated into, the treatment project which avoid or substantially lessen the significant environmental effects indicated below, as identified in the Final PEIR and the PSA. Implementation of the mitigation measures indicated below to be applicable to the treatment project, which have been required or incorporated into the project, will reduce these impacts to a less than significant level. The Project Proponent hereby directs that these mitigation measures be adopted.

Archaeological, Historical, and Tribal Cultural Resources

☒ **Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources**

☒ Mitigation Measure CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources

☒ **Impact CUL-3: Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource**

☒ Mitigation Measure: CRIR - Protect Inadvertent Discoveries of Tribal Cultural Resources

A comprehensive Cultural Resources Inventory Report (CRIR) was completed for this proposed project. The report recommends, "To ensure that these archaeological resources are not affected during treatment activities, added Project-specific mitigation

will include the opportunity for archaeological and Native American monitoring within 300-feet prehistoric archaeological sites and drainages." (CRIR, Section 5.2, page 56.)

Biological Resources

☒ **Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications**

- ☒ Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA
- ☒ Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA
- ☐ Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants

☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Tree-Nesting and Cavity-Nesting Wildlife)**

- ☒ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
- ☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☒ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Shrub-Nesting Wildlife)**

- ☒ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
- ☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)
- ☐ Mitigation Measure BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)
- ☒ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
- ☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Ground-Nesting Wildlife)**

- ☒ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
- ☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
- ☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)

☒ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Burrowing and Denning Wildlife)**

☒ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)

☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)

☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)

☒ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Insects and Other Terrestrial Invertebrates)**

☒ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)

☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)

☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)

☐ Mitigation Measure BIO-2d: Implement Protective Measures for Valley Elderberry Longhorn Beetle (All Treatment Activities)

☐ Mitigation Measure BIO-2e: Design Treatment to Retain Special-Status Butterfly Host Plants (All Treatment Activities)

☒ Mitigation Measure BIO-2f: Avoid Habitat for Special-Status Beetles, Flies, Grasshoppers, and Snails (All Treatment Activities)

☒ Mitigation Measure BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities)

☒ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Bats)**

☒ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)

☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)

☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)

☒ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Ungulates)**

☒ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)

☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)

☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)

☐ Mitigation Measure BIO-2h: Avoid Potential Disease Transmission Between Domestic Livestock and Special-Status Ungulates (Prescribed Herbivory)

☒ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Fish and Aquatic Invertebrates (in wetlands, vernal pools))**

☒ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)

☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)

☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)

☒ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☒ Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands

☒ **Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (Amphibians and Reptiles (in wetlands, vernal pools, associated riparian))**

☒ Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)

☒ Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)

☐ Mitigation Measure BIO-2c: Compensate for Mortality, Injury, or Disturbance and Loss of Habitat Function for Special-Status Wildlife if Applicable (All Treatment Activities)

☒ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☒ Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands

☒ **Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function**

☒ Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands

☐ Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat

☒ **Impact BIO-4: Substantially Affect State or Federally Protected Wetlands**

☒ Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands

☒ **Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries**

☒ Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites

FINDINGS FOR SIGNIFICANT AND UNAVOIDABLE IMPACTS

The CalVTP PEIR determined that some impacts of the program would be significant and unavoidable, even after implementation of all feasible mitigation. The Project Proponent finds that the treatment project would contribute to or cause the following significant and unavoidable impacts as indicated. Incorporating and implementing the following mitigation measures indicated to be applicable to the treatment project will reduce the severity of this impact, but not to a less-than-significant level. The Project Proponent hereby directs that these mitigation measures be adopted. The Project Proponent, therefore, finds that changes or alterations have been required in, or incorporated into, the treatment project that will substantially lessen, but not avoid, the significant environmental effect as identified in the PEIR and PSA.

The Project Proponent finds that fully mitigating these impacts is not feasible; there are no feasible mitigation measures beyond the mitigation measures indicated below to reduce these impacts. The Project Proponent concludes, however, that the benefits of the CalVTP and the vegetation treatment project outweigh the significant unavoidable impacts of the Program and treatment project, as set forth in the Board's Statement of Overriding Considerations.

Air Quality

☒ **Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that Would Exceed CAAQS Or NAAQS and Conflict with Regional Air Quality Plans**

☐ Mitigation Measure AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques

☒ No feasible mitigation is available.

Additional information to support CalVTP Findings for the Proposed Project:

Mitigation Measure AQ-1 was included in the CalVTP and adopted by the Board of Forestry to reduce the severity of this impact from vehicle and equipment exhaust emission to a less-than-

significant level. However, implementing MM AQ-1 would be infeasible to apply and achieve a meaningful reduction of exhaust emissions. Because MM AQ-1 cannot account for meaningful quantified emissions from vehicles, equipment, or treatment area, the implementation of Mitigation Measure AQ-1 could not validate the reduction of emissions or achieve a less-than-significant level. Further, the cost to retrofit or replace vehicles and equipment is prohibitive, particularly for local, small-scale vegetation treatment companies. Private vegetation treatment companies are cost conscious and would naturally minimize the number of vehicles or equipment or reduce operating time to reduce expenditure, indirectly contributing to less exhaust emissions. Further, public carpooling is generally unavailable or infeasible for workers traveling to remote worksites. Nonetheless, the project proponent should share the MM AQ-1 information with the landowner and contractors to allow them to prepare and replace equipment and vehicles to meet the new air quality standards for future vegetation treatment projects.

The project proponent has applied all feasible SPRs (AD-4, AQ-1, AQ-2, AQ-3, AQ-4, and AQ-6) to reduce impacts to air quality. The project proponent finds that mitigating Impact AQ-1 to less than significant is infeasible. Further, the project proponent recognizes the public benefit of the CalVTP and has concluded that the proposed project, as a later activity to the CalVTP PEIR, reduces the threat of destructive wildfires, increases firefighter safety, enhances community wildfire protection, protects oaks, and improves forest health. The project proponent has determined that the proposed project's benefits outweigh and provide a greater public benefit than the significant unavoidable impacts identified in Impact AQ-1 as set forth in the Statement of Overriding Considerations. The project proponent therefore finds that the SPRs that are required and incorporated into the proposed project expect to lessen, but not avoid, the significant environmental impacts as identified in the PEIR.

☒ **Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk**

☒ No feasible mitigation is available.

Additional information to support CalVTP Findings for the Proposed Project:

All feasible activities and notification have been included into the CalVTP to reduce the severity of this impact, but not to a less-than-significant level. Consistent with the substantial evidence provided in the CalVTP, there are no feasible methods or measures available to implement to reduce the impact; therefore, this impact remains significant and unavoidable. The proposed project incorporates all the feasible SPRs, (AD-4, AQ-2, AQ-3, AQ-4, and AQ-6). While the SPRs reduce or minimize smoke emissions, or exposure to smoke, the impact would remain significant and unavoidable. The project proponent finds that to reduce Impact AQ-6 to less than significant is infeasible. Further, the project proponent recognizes the public benefit of the CalVTP and has concluded that the proposed project, as a later activity to the CalVTP PEIR, reduces the threat of destructive wildfires, increases firefighter safety, enhances community wildfire protection, protects oaks, and improves forest health. The project proponent has determined that the proposed project's benefits outweigh and provide a greater public benefit than the significant unavoidable impacts identified in Impact AQ-4 as set forth in the Statement of Overriding Considerations. The project proponent therefore finds that the SPRs that are required and incorporated into the proposed project expect to lessen, but not avoid, the significant environmental impacts as identified in the PEIR.

☒ **Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning**

☒ No feasible mitigation is available.

Additional information to support CalVTP Findings for the Proposed Project:

All feasible activities and notification have been included into the CalVTP to reduce the severity of this impact, but not to a less-than-significant level. Consistent with the substantial evidence

provided in the CalVTP, there are no feasible methods or measures available to implement to reduce the impact; therefore, this impact remains significant and unavoidable. The proposed project incorporates all the feasible SPRs, (AD-4, AQ-2, AQ-3, and AQ-6). While the SPRs reduce or minimize objectional orders from smoke from prescribed burning operations, exposure to objectional odors from prescribed burning would remain significant and unavoidable. The project proponent finds that to reduce Impact AQ-6 to less than significant is infeasible. Further, the project proponent recognizes the public benefit of the CalVTP and has concluded that the proposed project, as a later activity to the CalVTP PEIR, reduces the threat of destructive wildfires, increases firefighter safety, enhances community wildfire protection, protects oaks, and improves forest health. The project proponent has determined that the proposed project's benefits outweigh and provide a greater public benefit than the significant unavoidable impacts identified in Impact AQ-6 as set forth in the Statement of Overriding Considerations. The project proponent therefore finds that the SPRs that are required and incorporated into the proposed project expect to lessen, but not avoid, the significant environmental impacts as identified in the PEIR.

Greenhouse Gas Emissions

☒ **Impact GHG-2: Generate GHG Emissions through Treatment Activities**

☒ Mitigation Measure GHG-2: Implement GHG Emission Reduction Techniques During Prescribed Burns

☐ No feasible mitigation is available.

Additional information to support CalVTP Findings for the Proposed Project:

All feasible practices and notifications have been included into the CalVTP to reduce the severity of this impact, but not to a less-than-significant level. Consistent with the substantial evidence provided in the CalVTP, there are no feasible methods or measures available to implement to reduce the impact; therefore, this impact remains significant and unavoidable. However, the proposed project incorporates SPR AQ-3 (burn plan) for prescribed burning and MM GHG-2 outlines various burning techniques to control the release of emissions, including the use of other feasible methods or technologies to sequester carbon, such as the use air curtain burners (ACBs). Because of uncertainty in predicting wildfires or the carbon sequestration rate, in food faith disclosure, the impact would remain significant and unavoidable. The project proponent finds that to reduce Impact GHG-2 to less than significant is infeasible. Further, the project proponent recognizes the public benefit of the CalVTP and has concluded that the proposed project, as a later activity to the CalVTP PEIR, reduces the threat of destructive wildfires, increases firefighter safety, enhances community wildfire protection, protects oaks, and improves forest health. The project proponent has determined that the proposed project's benefits outweigh and provide a greater public benefit than the significant unavoidable impacts identified in Impact GHG-2 as set forth in the Statement of Overriding Considerations. The project proponent therefore finds that the SPRs that are required and incorporated into the proposed project expect to lessen, but not avoid, the significant environmental impacts as identified in the PEIR.

STATEMENT OF OVERRIDING CONSIDERATIONS[2]

As set forth in the Board's adopted Findings, the Board determined that the CalVTP will result in significant adverse environmental effects that cannot be avoided even with the adoption of all feasible mitigation measures, and there are no feasible project alternatives that would mitigate or substantially lessen the impacts. Despite these effects, however, the Board, in accordance with CEQA Guidelines Section 15093, chose to approve the CalVTP because,

[2] If the PSA indicates that the project proponent's treatment project will not contribute to or cause any of the significant and unavoidable impacts determined in the PEIR, the proponent need not adopt a statement of overriding considerations.

in its view, the benefits to life, property, and other resources, and the other benefits of the CalVTP, will render the significant effects acceptable.

In the Board's judgment, the CalVTP and its benefits outweigh its unavoidable significant effects. The Board's Findings were based on substantial evidence in the record. The Board's Statement of Overriding Considerations identified the specific reasons why, in the Board's judgment, the benefits of the CalVTP as approved outweigh its unavoidable significant effects.

Exercising its independent judgment and review, the Project Proponent concurs that the benefits of the CalVTP and the treatment project outweigh the significant environmental effects and hereby incorporates by reference and adopts the Board's Statement of Overriding Considerations for the CalVTP.

Any one of the reasons listed in the Statement of Overriding Considerations is sufficient to justify approval of the treatment project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the Project Proponent would stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section, and the documents found in the Record of Proceedings, which are described and defined in Section 5, above.

- The CalVTP will reduce dire risks to life, property, and natural resources in California.
- The CalVTP reflects the most current and commonly accepted science and conditions in California and allows for adaptation in response to potential evolution and changes in science and conditions.
- The CalVTP reflects the Board's and CAL FIRE's goals. The CalVTP will help the Board and CAL FIRE achieve their central goals for reducing and preventing the impacts of fire in the state, as outlined in the *2018 Strategic Fire Plan for California*. The CalVTP will help to establish a natural environment that is more resilient and built assets that are more resistant to the occurrence and effects of wildland fire.
- The CalVTP will help implement Executive Orders, including:
  - EO B-42-17: Governor Brown's order issued to bolster the state's response to unprecedented tree die-off through further expediting removal of millions of dead and dying trees across the state;
  - EO B-52-18: Governor Brown's order to improve forest management and restoration, provide regulatory relief, and reduce barriers for prescribed fire; and
  - EO N-05-19: Governor Newsom's order directing CAL FIRE to recommend immediate-, medium-, and long-term actions to help prevent destructive wildfires.
- The Board is required by law to comply with SB 1260, signed into law by Governor Brown in February 2018, which improves California forest management practices to reduce the risk of wildfire in light of the changing climate and includes provisions for the CalVTP PEIR to serve as the programmatic CEQA coverage for prescribed burns within the SRA. The CalVTP will bring the Board into compliance with these requirements.
- The Board is required by law to comply with SB 632, signed into law by Governor Newsom in October 2019, which requires the Board to certify a Final PEIR, pursuant to CEQA, for the vegetation treatment program filed with the State Clearinghouse under Number 2019012052 in January 2019. The CalVTP will bring the Board into compliance with this requirement.
- The CalVTP will help to meet California's GHG emission goals consistent with the California Forest Carbon Plan, California's 2017 Climate Change Scoping Plan, Fire on the Mountain: Rethinking Forest Management in the Sierra Nevada, and California 2030 Natural and Working Lands Climate Change Implementation Plan.
- The Resource Conservation District of Greater San Diego, a local community leader in building forest and fire capacity, supports programs and sets priorities to restore and protect San Diego County watersheds, prevent wildfire damage through education and fuel reduction, promote nutrition and stewardship through sustainable agriculture and soil health, and revitalize pollinator habitats. The Board of Directors for the RCDGSDC finds that the statewide CalVTP program to increase the pace and scale for fuel reduction is a benefit to the citizens and natural resources in San Diego County. Further, the proposed project, Camp Winacka-Camp Whispering Oaks: Vegetation Management Project, is consistent with the mission of RCDGSDC, the goals of the Regional Forest and Fire Capacity Program, and the objectives of the local Julian Community Wildfire Protection Plan.

RESOURCE CONSERVATION DISTRICT
Greater San Diego County

Resource Conservation District of Greater San Diego County
11769 Waterhill Rd., Lakeside, CA 92040
Phone: (619) 562-0096 Fax: (619) 562-4799
Website: www.rcdsandiego.org

Date: August 16, 2023

Agenda Item 4-2: Resolution 2023-14 Grant Agreement: CDFA CA Underserved and Small Producer Program (CUSP)

Discussion / History: The RCDGSDC has recently applied for and been awarded a grant from CDFA's CUSP program. These funds will support RCD staff in providing technical assistance for drought relief grants to small and underseved producers within our district. This will be our second grant through the CUSP program and will allow us to continue providing dedicated staff time to conducting outreach and providing services to historically underserved farmers and ranchers.

The grant agreement and Resolution 2023-14 to seek authorization to sign the grant agreement are attached.

Financial Impact: Grant award of $86,951.77

Staff Recommendation to Board: Staff requests that the Board approves Resolution 2023-14 and authorizes the Executive Director to sign the grant agreement.

Resource Conservation District of Greater San Diego County
11769 Waterhill Road * Lakeside, CA 92040
Phone: 619-562-0096 * Fax: 619-562-4799 * Website: www/rcdsandiego.org

RESOLUTION 2023-14

RESOLUTION OF THE BOARD OF DIRECTORS OF THE RESOURCE CONSERVATION DISTRICT OF GREATER SAN DIEGO COUNTY TO SIGN A GRANT AGREEMENT WITH THE CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE FOR FUNDING THROUGH THE CALIFORNIA UNDERSERVED AND SMALL PRODUCER PROGRAM

WHEREAS, the Resource Conservation District of Greater San Diego County has been awarded a grant from the California Department of Food and Agriculture (CDFA) CA Underserved and Small Producer Program to provide technical assistance on drought relief grants to small and socially disadvantaged farmers,

AND WHEREAS, the Resource Conservation District of Greater San Diego County has the capacity to implement the program under this Contract which has been approved by the CDFA for the sum of $86,951.77,

NOW, THEREFORE, BE IT RESOLVED that the RCD Board of Directors authorizes the Executive Director to sign the Agreement with CDFA on behalf of the RCDGSDC.

PASSED AND ADOPTED at the RCD special meeting held on August 16, 2023 by the following vote:

Ayes:
Nays:
Abstain:
Absent:

Attest:

_____ _____

Donald H. Butz, President Joanne Sauerman, Board Clerk

State of California, Department of Food and Agriculture
AGREEMENT
GAU-03 (Rev.7/2023)

GRANT AGREEMENT SIGNATURE PAGE

AGREEMENT NUMBER
23-0408-000-SO

1. This Agreement is entered into between the State Agency and the Recipient named below:

STATE AGENCY'S NAME
CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE (CDFA)

RECIPIENT'S NAME
RESOURCE CONSERVATION DISTRICT OF GREATER SAN DIEGO COUNTY

2. The Agreement Term is: July 1, 2023 through April 30, 2025

3. The maximum amount of this Agreement is: $86,951.77

4. The parties agree to comply with the terms and conditions of the following exhibits and attachments which are by this reference made a part of the Agreement:

Exhibit A: Recipient and Project Information	2 Page(s)
Exhibit B: General Terms and Conditions	5 Page(s)
Exhibit C: Payment and Budget Provisions	2 Page(s)
Attachments: Scope of Work and Budget	

IN WITNESS WHEREOF, this Agreement has been executed by the parties hereto.

RECIPIENT

RECIPIENT'S NAME *(Organization's Legal Name)*
RESOURCE CONSERVATION DISTRICT OF GREATER SAN DIEGO COUNTY

BY *(Authorized Signature)*	DATE SIGNED
✍	

PRINTED NAME AND TITLE OF PERSON SIGNING

ADDRESS
11769 Waterhill Road, Lakeside, CA 92040

STATE OF CALIFORNIA

AGENCY NAME
CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE (CDFA)

BY *(Authorized Signature)*	DATE SIGNED
✍	

PRINTED NAME AND TITLE OF PERSON SIGNING
LAURA RODRIGUEZ, STAFF SERVICES MANAGER I, OFFICE OF GRANTS ADMINISTRATION

ADDRESS
1220 N STREET, ROOM 120
SACRAMENTO, CA 95814

LB

EXHIBIT A

RECIPIENT AND PROJECT INFORMATION

1. CDFA hereby awards an Agreement to the Recipient for the project described herein:
Recipient will provide 1x1 technical assistance for drought relief grants to small and Socially Disadvantaged Farmers and Ranchers (SDFRs) producers and workshops for marketing support in San Diego County.

Project Title: Drought Relief and Business Support for San Diego Underserved Producers

2.The Managers for this Agreement are:

FOR CDFA:		**FOR RECIPIENT:**	
Name:	Kristi Duprey	Name:	Ann Baldridge
Division/Branch:	Administrative Services / Office of Grants Administration	Organization:	Resource Conservation District of Greater San Diego County
Address:	1220 N Street, Suite 120	Address:	11769 Waterhill Road
City/State/Zip:	Sacramento, CA 95814	City/State/Zip:	Lakeside, CA 92040
Phone:	916-296-8612	Phone:	619-562-0096
Email Address:	kristi.duprey@cdfa.ca.gov	Email Address:	ann.baldridge@rcdsandiego.org

3. The Grant Administrative Contacts for this Agreement are:

FOR CDFA:		**FOR RECIPIENT:**	
Name:	Briana Perez	Name:	Joel Kramer
Division/Branch:	Administrative Services / Office of Grants Administration	Organization:	Resource Conservation District of Greater San Diego County
Address:	1220 N Street, Suite 120	Address:	11769 Waterhill Road
City/State/Zip:	Sacramento, CA 95814	City/State/Zip:	Lakeside, CA 92040
Phone:	916-214-2332	Phone:	619-562-0096
Email Address:	briana.perez@cdfa.ca.gov	Email Address:	joel.kramer@rcdsandiego.org

FISCAL CONTACT FOR RECIPIENT (if different from above):	
Name:	Chris Kelley
Organization:	Resource Conservation District of Greater San Diego County
Address:	11769 Waterhill Road
City/State/Zip:	Lakeside, CA 92040
Phone:	619-562-0096
Email Address:	chris.kelley@rcdsandiego.org

4. **RECIPIENT: Please check appropriate box below:**
   Research and Development (R&D) means all research activities, both basic and applied, and all development activities that are performed by non-Federal entities. The term research also includes activities involving the training of individuals in research techniques where such activities utilize the same facilities as other R&D activities and where such activities are not included in the instruction function.

   This award ☐ does ☑ does not support R&D.

5. For a detailed description of activities to be performed and duties, see Scope of Work and Budget.

EXHIBIT B

GENERAL TERMS AND CONDITIONS

1. **Approval**
   This Agreement is of no force or effect until signed by both parties. The Recipient may not invoice for activities performed prior to the commencement date or completed after the termination date of this Agreement.

2. **Agreement Execution**
   Unless otherwise prohibited by state law, regulation, or Department or Recipient policy, the parties agree that an electronic copy of a signed Agreement, or an electronically signed Agreement, has the same force and legal effect as an Agreement executed with an original ink signature. The term "electronic copy of a signed Agreement" refers to a transmission by facsimile, electronic mail, or other electronic means of a copy of an original signed Agreement in a portable document format. The term "electronically signed Agreement" means an Agreement that is executed by applying an electronic signature using technology approved by all parties.

3. **Assignment**
   This Agreement is not assignable by the Recipient, either in whole or in part, without the prior consent of the CDFA Agreement Manager or designee in the form of a formal written amendment.

4. **Governing Law**
   This Agreement is governed by and will be interpreted in accordance with all applicable State and Federal laws.

5. **State and Federal Law**
   It is the responsibility of the Recipient to know and understand which State, Federal, and local laws, regulations, and ordinances are applicable to this Agreement and the Project, as described in Exhibit A. The Recipient shall be responsible for observing and complying with all applicable State and Federal laws and regulations. Failure to comply may constitute a material breach.

6. **Recipient Commitments**
   The Recipient accepts and agrees to comply with all terms, provisions, conditions and commitments of the Agreement, including all incorporated documents, and to fulfill all assurances, declarations, representations, and statements made by the Recipient in the application, documents, amendments, and communications in support of its request for funding.

7. **Performance and Assurances**
   The Recipient agrees to faithfully and expeditiously perform or cause to be performed all Project work as described in the Scope of Work, and to apply grant funds awarded in this Agreement only to allowable Project costs.

8. **Mutual Liability**
   Parties shall, to the extent allowed by law, each be individually liable for any and all claims, losses, causes of action, judgments, damages, and expenses to the extent directly caused by their officers, agents, or employees.

9. **Unenforceable Provision**
   In the event that any provision of this Agreement is unenforceable or held to be unenforceable, the parties agree that all other provisions of this Agreement shall remain operative and binding.

10. Contractors/Consultants

The Recipient, and the agents and employees of Recipient, in the performance of this Agreement, are not officers, employees, or agents of the CDFA. The Recipient's obligation to pay its Contractors/Consultants is an independent obligation from the CDFA's obligation to make payments to the Recipient. Recipient agrees to comply with all applicable State and local laws and regulations during the term of this Agreement. The Recipient is responsible to ensure that any/all contractors/consultants it engages to carry out activities under this Agreement shall have the proper licenses/certificates required in their respective disciplines. The Contractors/Consultants shall not affect the Recipient's overall responsibility for the management of the project, and the Recipient shall reserve sufficient rights and control to enable it to fulfill its responsibilities under this Agreement.

11. Non-Discrimination Clause

The Recipient agrees that during the performance of this Agreement, it will not discriminate, harass, or allow harassment or discrimination against any employee or applicant for employment based on race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, or military and veteran status. The Recipient agrees to require the same of all contractors and consultants retained to carry out the activities under this Agreement.

The Recipient agrees that during the performance of this Agreement, the evaluation and treatment of its employees and applicants for employment are free from discrimination and harassment. The Recipient will comply with the provision*s* of the Fair Employment and Housing Act (Government Code section 12990 *et seq*.) and the applicable regulations promulgated there under (California Code of Regulations, Title 2, section 7285 *et seq*.). The applicable regulations of the Fair Employment and Housing Commission implementing Government Code section 12990 (a-f), set forth in Chapter 5 of Division 4 of Title 2 of the California Code of Regulations, are incorporated into this Agreement by reference and made a part hereof as if set forth in full. The Recipient will give written notice of their obligations under this clause to labor organizations with which they have a collective bargaining unit or other Agreement. The Recipient must include the nondiscrimination and compliance provisions of this clause in all subcontracts to perform work under this Agreement.

The Recipient agrees to require the same of all contractors and consultants retained to carry out activities under this Agreement.

12. Excise Tax

The State of California is exempt from federal excise taxes and no payment will be made for any taxes levied on employees' wages. The CDFA will pay for any applicable State of California or local sales or use taxes on the services rendered or equipment or parts supplied pursuant to this Agreement. California may pay any applicable sales and use tax imposed by another State.

13. Disputes

The Recipient must continue with the responsibilities under this Agreement during any dispute. In the event of a dispute, the Recipient must file a "Notice of Dispute" with the CDFA Agreement Manager, identified in Exhibit A, or designee within ten (10) calendar days of discovery of the problem. The Notice of Dispute must contain the Agreement number. Within ten (10) calendar days of receipt of the Notice of Dispute, the CDFA Agreement Manager or designee must meet with the Recipient for the purpose of resolving the dispute. In the event of a dispute, the language contained within this Agreement prevails.

14. Termination for Convenience

This Agreement may be terminated by either party upon written notice. Notice of termination must be delivered to the other party at least thirty (30) calendar days prior to the intended date of termination. Notice of termination does not nullify obligations already incurred prior to the date of termination. In the event of Termination for Convenience of this Agreement by CDFA, CDFA must pay all responsible costs and non-cancellable obligations incurred by the Recipient as of the date of termination.

15. Termination for Cause

Either party may terminate this Agreement for cause in the event of a material breach of this Agreement, provided that the non-breaching party provides written notice of the material breach and ten (10) calendar days to cure the breach. If the breach is not cured to the satisfaction of the non-breaching party within ten (10) calendar days of receipt of notice, this Agreement shall automatically terminate and the CDFA shall reimburse the Recipient for all documented costs incurred up to the date of the notice of termination, including all non-cancellable obligations.

16. Acceptable Failure to Perform

The Recipient shall not be liable for any failure to perform as required by this Agreement, to the extent such failure to perform is caused by any of the following: labor disturbances or disputes of any kind, accidents, the inability to obtain any required government approval to proceed, civil disorders, acts of aggression, acts of God, energy or other conservation measures, failure of utilities, mechanical breakdowns, materials shortages, disease, pandemics, or similar occurrences.

17. Breach

The parties may be in material breach under this Agreement if they fail to comply with any term of this Agreement, or a party determines that the other party is not implementing the Project in accordance with the provisions of this Agreement, or that a party has failed in any other respect to comply with the provisions of this Agreement. In the event of a material breach, the party identifying the breach shall provide a Notice of Material Breach to the breaching party within fifteen (15) calendar days upon discovery of breach. The breaching party shall have fifteen (15) calendar days from receipt of the notice to notify how it intends to cure the breach. Upon receipt of the proposed cure, the non-breaching party has fifteen (15) days to accept or reject the proposed cure. Upon the non-breaching party's approval of the cure, the breaching party has thirty (30) days to implement the cure. If the breaching party fails to cure the breach within thirty (30) days of the non-breaching party's approval of the cure, the non-breaching party may take the following respective actions:

A. CDFA may suspend payments;
B. CDFA may demand repayment of all funding;
C. Either party may terminate the Agreement
D. CDFA may debar Recipient; or
E. Either party may take any other action deemed necessary to recover costs.

The non-breaching party shall send a Notice of Failure to Cure Material Breach upon its decision to carry out any of these actions. These actions are effective upon issuance of the Notice of Failure to Cure Material Breach, unless the Recipient appeals a Notice of Failure to Cure Material Breach, in which case the effective date falls on the issuance of a final decision on the appeal.

Where CDFA notifies the Recipient of its decision to demand repayment pursuant to this paragraph, the funds that are subject to the demand shall be repaid immediately. CDFA may consider the Recipient's refusal to repay the requested disbursed amount a material breach.

A Notification of Failure to Cure Material Breach may be appealed to CDFA. The appeal must be post marked within ten (10) calendar days of the date the Recipient received the Notice of Failure to Cure and addressed to the CDFA Legal Office of Hearing and Appeals or emailed to CDFA.LegalOffice@cdfa.ca.gov.

California Department of Food and Agriculture
Legal Office of Hearing and Appeals
1220 N Street
Sacramento, CA 95814

All notices, communications, and appeals described in this paragraph must be received in writing to be considered timely.

If CDFA notifies the Recipient of its decision to withhold the entire funding amount from the Recipient pursuant to this paragraph, this Agreement shall terminate upon receipt of such notice by the Recipient and CDFA shall no longer be required to provide funds under this Agreement and the Agreement shall no longer be binding on either party.

18. Publicity and Acknowledgement

The Recipient agrees that it will acknowledge CDFA's support whenever projects funded, in whole or in part, by this Agreement are publicized in any news media, brochures, publications, audiovisuals, presentations or other types of promotional material and in accordance with the Grant Procedures Manual if incorporated by reference and attachment to the Agreement. The Recipients may not use the CDFA logo.

19. News Releases/Public Conferences

The Recipient agrees to notify the CDFA in writing at least two (2) business days before any news releases or public conferences are initiated by the Recipient or its Contractors/Consultants regarding the project described in the Attachments, Scope of Work and Budget and any project results.

20. Scope of Work and Budget Changes

Changes to the Scope of Work, Budget, or the Project term, must be requested in writing to CDFA Grant Administrative Contact no less than thirty (30) days prior to the requested implementation date. Any changes to the Scope of Work and Budget are subject to CDFA approval and, at its discretion, CDFA may choose to accept or deny any changes. If accepted and after negotiations are concluded, the agreed upon changes will be made and become part of this Agreement. CDFA will respond in writing within ten (10) business days as to whether the proposed changes are accepted.

21. Reporting Requirements

The Recipient agrees to comply with all reporting requirements specified in Scope of Work and/or Grant Procedures Manual if incorporated by reference to this Agreement as an attachment.

22. California State Auditor

This Agreement is subject to examination and audit by the California State Auditor for a period of three (3) years after final payment under the Agreement.

23. Equipment

Purchase of equipment not included in the approved Budget requires prior approval. The Recipient must comply with state requirements regarding the use, maintenance, disposition, and reporting of equipment as contained in CCR, Title 3, Division 1, Chapter 5, sections 303, 311, 324.1 and 324.2.

24. Closeout

The Agreement will be closed out after the completion of the Project or project term, receipt and approval of the final invoice and final report, and resolution of any performance or compliance issues.

25. Confidential and Public Records

The Recipient and CDFA understand that each party may come into possession of information and/or data which may be deemed confidential or proprietary by the person or organization furnishing the information or data. Such information or data may be subject to disclosure under the California Public Records Act or the Public Contract Code. CDFA has the sole authority to determine whether the

information is releasable. Each party agrees to maintain such information as confidential and notify the other party of any requests for release of the information.

26. Amendments

Changes to funding amount or Agreement term require an amendment and must be requested in writing to the CDFA Agreement Manager or designee no later than sixty (60) calendar days prior to the requested implementation date. Amendments are subject to CDFA approval, and, at its discretion, may choose to accept or deny these changes. No amendments are possible if the Agreement is expired.

27. Executive Order N-6-22 Russia Sanctions

On March 4, 2022, Governor Gavin Newsom issued Executive Order N-6-22 (the EO) regarding Economic Sanctions against Russia and Russian entities and individuals. “Economic Sanctions” refers to sanctions imposed by the U.S. government in response to Russia’s actions in Ukraine, as well as any sanctions imposed under state law. The EO directs state agencies to terminate agreements with, and to refrain from entering any new agreements with, individuals or entities that are determined to be a target of Economic Sanctions. Accordingly, should the State determine Recipient is a target of Economic Sanctions or is conducting prohibited transactions with sanctioned individuals or entities, that shall be grounds for termination of this agreement. The State shall provide Recipient advance written notice of such termination, allowing Recipient at least 30 calendar days to provide a written response. Termination shall be at the sole discretion of the State.

EXHIBIT C
PAYMENT AND BUDGET PROVISIONS

1. Invoicing and Payment

A. For activities satisfactorily rendered and performed according to the attached Scope of Work and Budget, and upon receipt and approval of the invoices, CDFA agrees to reimburse the Recipient for actual allowable expenditures incurred in accordance with the rates specified herein, which is attached hereto and made a part of this Agreement.

B. Invoices must include the Agreement Number, performance period, type of activities performed in accordance with this Agreement, and when applicable, a breakdown of the costs of parts and materials, labor charges, and any other relevant information required to ensure proper invoices are submitted for payment.

C. Unless stated in the Scope of Work, quarterly invoices must be submitted to the CDFA Administrative Contact, within thirty (30) calendar days after the end of each quarter in which activities under this Agreement were performed.

D. Unless stated in the Scope of Work, a final invoice will be submitted for payment no more than thirty (30) calendar days following the expiration date of this Agreement, or after project is complete, whichever comes first. The final invoice must be clearly marked “Final Invoice” thus indicating that all payment obligations of the CDFA under this Agreement have ceased and that no further payments are due or outstanding.

2. Allowable Expenses and Fiscal Documentation

A. The Recipient must maintain adequate documentation for expenditures of this Agreement to permit the determination of the allowability of expenditures reimbursed by CDFA under this Agreement. If CDFA cannot determine if expenditures are allowable under the terms of this Agreement because records are nonexistent or inadequate according to Generally Accepted Accounting Principles, CDFA may disallow the expenditures.

B. If mileage is a reimbursable expense, using a privately-owned vehicle will be at the standard mileage rate established by the United States (U.S.) Internal Revenue Service (IRS) and in effect at the time of travel. The standard mileage rate in effect at the time of travel can be found on IRS’s website regardless of funding source/type.

C. If domestic travel is a reimbursable expense, receipts must be maintained to support the claimed expenditures. The maximum rates allowable for travel within California are those established by the California Department of Human Resources (CalHR). The maximum rates allowable for domestic travel outside of California are those established by the United States General Services Administration (GSA).

D. If foreign travel is a reimbursable expense, receipts must be maintained to support the claimed expenditures. The maximum rates allowable are those established in a per diem supplement to Section 925, Department of State Standardized Regulations.

E. The Recipient will maintain and have available, upon request by CDFA, all financial records and documentation pertaining to this Agreement. These records and documentation will be kept for three (3) years after completion of the Agreement period or until final resolution of any performance/compliance review concerns or litigation claims.

3. Prompt Payment Clause

Payment will be made in accordance with, and within the time specified in, California Government Code Title 1, Division 3.6, Part 3, Chapter 4.5, commencing with Section 927 - The California Prompt Payment Act.

4. Budget Contingency Clause

If funding for any fiscal year is reduced or deleted for purposes of this program, the CDFA has the option to either cancel this Agreement with no liability occurring to the CDFA or offer to amend the Agreement to reflect the reduced amount.

2023 CALIFORNIA UNDERSERVED AND SMALL PRODUCER (CUSP) GRANT PROGRAM
Scope of Work

Recipient Organization Name: Resource Conservation District of Greater San Diego County

Grant Award: $ 86,951.77

☒ PART 1: Drought Relief Technical Assistance
☐ PART 2: Block Grant Program to Administer Direct Drought Relief Grants

Project Title: Drought Relief and Business Support for San Diego Underserved Producers

Executive Summary:

Underserved producers are extremely resilient under pressure. The Resource Conservation District of Greater San Diego (RCDGSDC) will conduct outreach to 200 producers, visit 25 farms and ranches to assess drought impacts and provide one-on-one application assistance for 25 eligible farmers to the CUSP Drought Relief Direct Producer Grant Program managed by other CUSP regional administrators. RCDGSDC will hold one educational webinar and one in-person workshop on-farm economics and marketing for 60 producers in total. With the support of the California Department of Food and Agriculture, RCDGSDC will empower underserved producers to weather difficult times ahead.

Program Description:

RCDGSDC field and outreach staff provide a variety of technical services to support small-scale and underserved producers. To enhance production, RCDGSDC educates producers about conservation practice implementation, test soil for nutrients and organic matter, evaluate irrigation systems for water efficiency, and subsidize producers to test well pumps. To improve business operations, RCDGSDC conducts planning of carbon farm plans and related conservation plans and assist producers with grant applications for infrastructure improvements and economic relief. These relationships allow the organization to connect producers with partners for land access or sales and to advocate for producer needs to local representatives. To support producers with marketing and business operations, the RCDGSDC relies on local partners who specialize in this skillset.

The primary concern for all producers in San Diego is water availability. Water costs in the region are higher than anywhere in the country. San Diego farms rely primarily on surface water from imported supplies, with insufficient rainfall to support complete dry farming and generally poor groundwater quality and supply. San Diego agricultural producers are leaders in water efficiency, implementing efficient irrigation technologies on a broad scale. To keep their farms viable, while adapting to ever more frequent heatwaves and drought, San Diego producers very much need technical assistance for water efficiency. Water scarcity impacts appear through crop stress, lost yields, disease impacts or increased energy requirements for pumping. Fortunately, most of these symptoms can be tracked through direct observation and confirmation with producers.

2023 CALIFORNIA UNDERSERVED AND SMALL PRODUCER (CUSP) GRANT PROGRAM
Scope of Work

This project will build upon previous outreach by capitalizing on existing relationships and reputation with the new goal of having underserved producers initiate contact with RCDGSDC staff in addition to RCDGSDC staff conducting initial outreach. The RCDGSDC technical assistant is now experienced at grant application technical assistance and will take the lead on organizing site visits and completing drought relief applications. The current drought funding opportunity should be more successful because technical assistance providers can provide necessary documentation through site assessments and the funding is available on a rolling basis.

For its outreach strategy, RCDGSDC will prioritize underserved producers who are small-scale (fewer than 50 acres) or identify as an ethnic minority because these groups have historically not had equal access to government assistance. To reach the 200 producers, RCDGSDC will use its monthly bilingual newsletter, direct phone calls, actively update its website with relief opportunities, and share news with partner organizations. The RCDGSDC provides technical assistance and grant application support to farmers and ranchers in three principal regions classified as AB 1550 Low-Income Communities: South San Diego Bay, the Campo border mountain region, and the Ramona plateau. In addition, the South Bay includes AB 1550 Low-income Communities within a half-mile of a SB 535 Disadvantaged Community. RCDGSDC will focus outreach efforts and application on these underserved communities but will announce opportunities to its entire network. RCDGSDC will make the educational events accessible to Spanish-speaking producers by hiring a translator for live events and written materials. RCDGSDC will also design workshop content to be relevant to farmworkers and farm managers in addition to the typical audience of farm owners.

Priority Groups and Impact/Geographic Region Served:

Through this CUSP funding, RCDGSDC plans to conduct outreach to 200 producers, farm visits and application assistance for 25 producers, and business and marketing education for 60 producers. At least fifty percent of the producers who receive application assistance will be self-identified ethnic minorities and small-scale producers. According to California Department of Food and Agriculture (CDFA), San Diego is in the top five counties in California for the number of Socially Disadvantaged Farmers and Ranchers. San Diego County has over 5,000 farms, more than any other county in the United States. Of those, 68 percent are small farms less than 10 acres in size. Two-thousand five hundred women are principal operators on San Diego farms, as well as 1,120 veteran principal operators, and about 880 Hispanic or Latino principal operators, indicating a large population of underserved and small farmers and ranchers in the region. Eighteen federally recognized California Native American Tribes are co-located with the County, several of which manage active commercial agricultural operations. RCDGSDC provides technical assistance and grant application support to farmers and ranchers in three principal regions classified as AB 1550 Low-Income Communities: South San Diego Bay, the Campo border mountain region, and the Ramona plateau. RCDGSDC offers Spanish language technical assistance and workshops and

collaborate with local tribes on land management projects. RCDGSDC manages the Tijuana River Valley Community Garden in San Diego's South Bay, whose members represent the diversity of the many socially disadvantaged communities in the South Bay. In the community garden, the RCDGSDC also hosts 10 quarter-acre farm plots for beginning farmers where at least one in four plot holders belong to a minority ethnic group and reside in the South Bay. The RCDGSDC holds a memorandum of understanding to provide technical assistance to agricultural producers in the jurisdiction of Upper San Luis Rey Resource Conservation District, which is co-located with several federally recognized tribal reservations with active commercial agriculture programs.

Project Goals and Intended Outcomes

Through this grant opportunity, RCDGSDC staff intends to further develop relationships with underserved producers in the jurisdiction by offering tangible support in response to chronic drought. Additionally, RCDGSDC staff intends to identify impacted farms and connect them to funding opportunities, improve farm business resilience and improve on-farm water resource management. As a result of this grant, participating underserved farm owners and managers will be more financially literate and aware of the adaptation strategies for drought conditions. In addition, farmers which receive funding will maintain infrastructure which is less vulnerable to drought conditions. Lastly, RCDGSDC and partner organizations will develop deeper relationships with underserved farm businesses, allowing for clearer communication following natural hazards and service organizations will have a better understanding of the non-production concerns which affect the viability of underserved farm businesses.

RCDGSDC will advertise relief opportunities throughout the jurisdiction, contacting 200 recipients and participants via bilingual newsletter, updated website, and partner organizations. RCDGSDC plans to assist 25 producers to submit applications for drought relief, visiting their operations to document impacts as needed.

This program also builds up previous work by providing financial literacy and marketing as a new educational topic and by collaborating with partner organizations. The San Diego Food System Alliance is developing a free, online bilingual database of opportunities for small-scale producers through the Local Food Economy Lab (LFEL). In addition, they offer business planning for select farm and fishery businesses. RCDGSDC will use this grant to share LFEL opportunities with underserved producers, many of whom have not received assistance from a government agency and will greatly benefit from this additional support. Through this process, the RCDGSDC will build on collaborative relationships with Spanish-speaking partner organizations that serve local underserved producers. RCDGSDC will educate 60 producers in farm business and marketing by holding one educational workshop and one webinar in collaboration with partner organizations, as well as participating in partner events.

2023 CALIFORNIA UNDERSERVED AND SMALL PRODUCER (CUSP) GRANT PROGRAM
Scope of Work

Project Activities and Timeline:

Project Activity	Performed by	Timeline
Outreach to 200 producers via bilingual newsletter, phone calls, live website, and partner organizations	Technical Assistant, Office Coordinator, Outreach Coordinator	Jul 2023 – Mar 2025
Visit 25 farms and ranches to assess farm needs, drought impacts, and eligibility for relief opportunities	Technical Assistant, Agricultural Specialist, Office Coordinator	Aug 2023 – Mar 2025
Provide technical assistance and one-on-one application assistance for 25 eligible farmers to apply for economic relief via phone and in person	Technical Assistant	Jul 2023 – Mar 2025
Hold educational webinar and workshop, and table at partner organizations to educate 60 producers about farm finances and marketing	Technical Assistant, Agricultural Specialist, Office Coordinator, Outreach Coordinator	Oct 2023 – Dec 2024
Report progress towards grant outcomes, metrics, and objectives. Account for all grant operations, reporting requirements, budget, and financial transactions for grant expenditure reporting and auditing purposes	Technical Assistant, Agricultural Specialist, Accountant	Jul 2023 – Apr 2025

Evaluation (Project Success Measures)

RCDGSDC will keep track of all metrics using Microsoft Excel and Google Sheets. Major metrics will include, site visits conducted, field assessments completed, applications submitted, underserved producers reached, educational materials generated and participants in training events. To track the number of underserved producers engaged, RCDGSDC will ask that participants to self-identify, or indicate a criterion of a disadvantaged group. Key metrics will include outreach about relief programs to 200 producers, visits to 25 farms and ranches to assess drought impacts, application assistance for 25 relief applicants, and farm economics education for 60 producers. Qualitative measures will include:

1. Strengthened trust between the RCDGSDC and underserved producers.
2. Increased direct communication between underserved producers and farm business support organizations like Community Alliance with Family Farmers and Community Health Improvement Partners.

3. Improved financial literacy for underserved producers who participate in educational events.
4. Increased stable farm production in the face of future drought conditions.
5. A clearer understanding by RCDGSDC staff of barriers to farm viability which are not related to conservation or production. Financial management of the grant will include tracking expenditures against the grant balance.

Data Collection and Tracking

RCDGSDC will keep track of all metrics using Microsoft Excel and Google Sheets. Registration forms and post-workshop surveys will be created using a data management and polling system. To track the number of underserved producers engaged, RCDGSDC will ask that participants to self-identify, or indicate criteria of a disadvantaged group. All applications submitted will be stored on the RCDGSDC server including the grant application, producer narrative, financial records, field assessment form, photos, and other relevant documentation. We will prepare quarterly financial and progress reports with Microsoft Word or online as requested by CDFA Farm Equity Office. Reports will include at a minimum, the number of producers assisted, the number of underserved producers assisted, the size of the operation and the activities completed toward the grant objectives. Financial management of the grant will include tracking expenditures against the grant balance.

Project Oversight

Grant Manager- Elizabeth Garcia
Email: Elizabeth.garcia@rcdsandiego.org Phone: (619) 562-0096 x 202

Executive Director- Ann Baldridge
Email: ann.baldridge@rcdsandiego.org Phone (619) 562-0096

2023 California Underserved and Small Producer Grant Program (CUSP) Budget

Recipient Organization Name: Resource Conservation District of Greater San Diego

Budget Categories	Amount of Funds Requested	Description of Costs or Activities
A. Salary and Wages Cost of salary and wages for time spent working on the project by employees of the applicant organization.	$37,108.11	Financial Coordinator @ 2% FTE per year at $51.88/hour Total funding for years 1&2 = $5,156.40 Outreach Coordinator @ 3% FTE per year at $30.67/hour Total funding for years 1&2 = $3,435.39 Technical Assistant @ 18% FTE per year at $25.83/hour Total funding for years 1&2 = $20,540.02 Office Coordinator @ 3% FTE per year at $28.09/hour Total funding for years 1&2 = $3,146.09 Agricultural Specialist @ 3% FTE per year at $36.59/hour Total funding for years 1&2 = $4,830.21
B. Fringe Benefits Cost of fringe benefits for time spent working on the project in accordance with the applicant organization's established fringe benefits policy.	$18,554.05	Financial Coordinator @ 50% of hourly rate, Total funding for years 1&2 = $2,578.20 Outreach Coordinator @ @ 50% of hourly rate, Total funding for years 1&2 = $1,717.70 Technical Assistant @ 50% of hourly rate, Total funding for years 1&2 = $10,270.00 Office Coordinator @ 50% of hourly rate, Total funding for years 1&2 = $1,573.05 Agricultural Specialist @ 50% of hourly rate, Total funding for years 1&2 = $2,415.10
C. Travel Cost of project related travel for all individuals except contractual personnel.	$1,160.01	Mileage for one off-site workshop and one partner event and 25 farm visits (1,771 mi/$.655 per mile)
D. Supplies Cost to purchase supplies (for items less than $5,000 per unit) necessary to achieve project objectives.	$863	Durable outreach canopy for tabling and workshop ($440). Durable tablecloths for tabling and workshops ($298) Presentation materials for outreach events at $20 each for five items ($100) Organizing materials for outreach events at $5 each for five items ($25)
E. Equipment	$0	NA

Budget Categories	Amount of Funds Requested	Description of Costs or Activities
Capital expenditures of up to $5,000 to help implement the project.		
F. Contractual Cost of work by individuals/organizations other than the applicant (e.g., cooperators, consultants, contractors, partners, etc.). This can include cooperating entities	$11,500	Workshop Consultant (TBD)- To design and lead in-person half-day farm economics workshop including financial literacy, business planning and government assistance with a focus on Spanish-speaking producers. 50 hours at $100 hourly rate including time for team to prepare travel and facilitate workshop ($5,000). Speaker Fee (TBD)- For educational webinar about farm economics including business planning and marketing; flat fee includes time to plan, prepare and deliver presentation ($500) Spanish Translator (TBD)- Live Spanish-language translator for webinar and in-person workshop, including $250 flat rate for webinar and two translators at $350 per person per half-day for in-person workshop. ($1,000) Farm Business Planning Consultant (TBD)- Partner organization focused on supporting underserved producers to design and team to staff in-person workshop including financial literacy, business planning and government assistance with a focus on Spanish-speaking producers at an average of $60 per hour for 50 person hours ($3,000) Translation (TBD)- Spanish language translator for outreach flyers, educational materials, and online newsletters to translate up to 80 pages at $50 per hour or two pages per hour. ($2,000)

Budget Categories	Amount of Funds Requested	Description of Costs or Activities
G. Other Cost of all other expenses (i.e., program participant stipends, publications, data collection, facility rental fees, subscriptions, etc.).	$1,067.95	Facility rental fee for one time in-person workshop venue ($400) Printing and postage for outreach events and workshops ($217.95) Catering fee for in-person workshop, approximated at $18 per person for 25 participants ($450) including breakfast and lunch (CalHR limit of $7 per person breakfast, $11 per person lunch).
H. Indirect Costs Facilities and administrative costs.	$16,698.65	30% indirect cost rate for grant administration, applied to grant expenses.
I. Total Funds Requested Sum of categories A through H.	**$86,951.77**	

RESOURCE CONSERVATION DISTRICT
Greater San Diego County

Resource Conservation District of Greater San Diego County
11769 Waterhill Rd., Lakeside, CA 92040
Phone: (619) 562-0096 Fax: (619) 562-4799
Website: www.rcdsandiego.org

Date: August 16, 2023

Agenda Item 4-3: Resolution 2023-15 Grant Services Agreement: Inland Empire RCD/NRCS Distaster Recovery program

Discussion / History: In April 2021, the RCDGSD accepted a subaward agreement from Inland Empire RCD through a grant they hold from the NRCS to provide post-disaster recovery assistance to landowners by conducting a property assessment and linking them to NRCS cost-share programs. This service was targeted at agricultural lands that had recently been impacted by wildfire.

We have been offered an extension of this grant funding to continue this program and have included an agreement in this Board packet that has already been approved by the IERCD Board. The objectives of this program are to (1) coordinate disaster recovery activities with NRCS staff on behalf of IERCD, (2) reach agricultural producers that have been affected by recent natural hazards, and (3) aid NRCS, IERCD and agricultural producers by initiating the process for post natural-hazard assistance. Technical Assistant Elizabeth Garcia will be the project lead for all four activities.

RCDGSDC staff will conduct four activities as a part of this grant: producer outreach, impact and eligibility assessment, assistance with applying to the NRCS Environmental Quality Improvement Program (EQIP), and reporting and financial tracking. These will be carried out over a six-month period this fall and winter.

Financial Impact: Grant award of $29,628.00

Staff Recommendation to Board: Staff requests that the Board approves Resolution 2023-15 and authorizes the Executive Director to sign the grant services agreement.

Resource Conservation District of Greater San Diego County
11769 Waterhill Road * Lakeside, CA 92040
Phone: 619-562-0096 * Fax: 619-562-4799 * Website: www/rcdsandiego.org

RESOLUTION 2023-15

RESOLUTION OF THE BOARD OF DIRECTORS OF THE RESOURCE CONSERVATION DISTRICT OF GREATER SAN DIEGO COUNTY TO SIGN A GRANT SERVICES AGREEMENT WITH THE INLAND EMPIRE RESOURCE CONSERVATION DISTRICT FOR FUNDING THROUGH THE NATIONAL RESOURCE CONSERVATION SERVICE

WHEREAS, the Resource Conservation District of Greater San Diego County has been offered a subaward agreement from the Inland Empire Resource Conservation District through a grant they hold from the NRCS to provide disaster recovery assistance to agricultural landowners,

AND WHEREAS, the Resource Conservation District of Greater San Diego County has the experience and capacity to implement the program under this agreement which has been approved by IERCD for the sum of $29,628,

NOW, THEREFORE, BE IT RESOLVED that the RCD Board of Directors authorizes the Executive Director to sign the Agreement with IERCD on behalf of the RCDGSDC.

PASSED AND ADOPTED at the RCD special meeting held on August 16, 2023 by the following vote:

Ayes:
Nays:
Abstain:
Absent:

Attest:

_____ _____

Donald H. Butz, President Joanne Sauerman, Board Clerk

INLAND EMPIRE RESOURCE CONSERVATION DISTRICT
NRCS GRANT SERVICES AGREEMENT
with
RESOURCE CONSERVATION DISTRICT OF GREATER SAN DIEGO COUNTY

This Agreement is made and entered into as of August _____, 2023 by and between the Inland Empire Resource Conservation District ("District"), and Resource Conservation District of Greater San Diego County (hereinafter referred to as "Consultant"). District and Consultant are sometimes individually referred to as "Party" and collectively as "Parties" in this Agreement.

RECITALS

A. District is a public agency of the State of California and is in need of services for the following project:

NATURAL RESOURCES CONSERVATION SERVICE DISASTER RECOVERY GRANT COOPERATIVE AGREEMENT WITH INLAND EMPIRE RCD (AWARD NO. NR219104XXXXC004) (hereinafter referred to as "the Project").

B. Consultant has the necessary qualifications to provide such services.

C. The Parties desire by this Agreement to establish the terms for District to retain Consultant to provide the services described herein.

AGREEMENT

NOW, THEREFORE, IT IS AGREED AS FOLLOWS:

1. Services.

Consultant shall provide the District with the services described in the Scope of Services attached hereto as Exhibit "A."

2. Compensation.

a. Subject to paragraph 2(b) below, the District shall pay for such services in accordance with the Schedule of Charges set forth in Exhibit "B."

b. In no event shall the total amount paid for services rendered by Consultant under this Agreement exceed the sum of **$29,628.00**. This amount is to cover all printing and related costs, and the District will not pay any additional fees for printing expenses. Periodic payments shall be made within 30 days of receipt of an invoice which includes a description of the work performed. Payments to Consultant for work performed will be made on a monthly billing basis.

3. Additional Work.

If changes in the work seem merited by Consultant or the District, and informal consultations with the other party indicate that a change is warranted, it shall be processed in the following manner: a letter outlining the changes shall be forwarded to the District by Consultant with a statement of estimated changes in fee or time schedule. An amendment to this Agreement shall be prepared by the District and executed by both Parties before performance of such services, or the District will not be required to pay for the changes in the scope of work. Such amendment shall not render ineffective or invalidate unaffected portions of this Agreement.

4. Maintenance of Records.

Books, documents, papers, accounting records, and other evidence pertaining to costs incurred shall be maintained by Consultant and made available at all reasonable times during the contract period and for four (4) years from the date of final payment under the contract for inspection by District.

5. Time of Performance.

Consultant shall perform its services in a prompt and timely manner and shall commence performance upon receipt of written notice from the District to proceed ("Notice to Proceed"). Consultant shall complete the services required hereunder as described in the USDA Natural Resources Conservation Service Grant Agreement attached as Exhibit "A" herein. The Notice to Proceed shall set forth the date of commencement of work.

6. Delays in Performance.

a. Neither District nor Consultant shall be considered in default of this Agreement for delays in performance caused by circumstances beyond the reasonable control of the non-performing party. For purposes of this Agreement, such circumstances include but are not limited to, abnormal weather conditions; floods; earthquakes; fire; epidemics; war; riots and other civil disturbances; strikes, lockouts, work slowdowns, and other labor disturbances; sabotage or judicial restraint.

b. Should such circumstances occur, the non-performing party shall, within a reasonable time of being prevented from performing, give written notice to the other party describing the circumstances preventing continued performance and the efforts being made to resume performance of this Agreement.

7. Compliance with Law.

a. Consultant shall comply with all applicable laws, ordinances, codes and regulations of the federal, state and local government, including Cal/OSHA requirements.

b. If required, Consultant shall assist the District, as requested, in obtaining and maintaining all permits required of Consultant by federal, state and local regulatory agencies.

c. If applicable, Consultant is responsible for all costs of clean up and/ or removal of hazardous and toxic substances spilled as a result of his or her services or operations performed under this Agreement.

8. Standard of Care.

Consultant's services will be performed in accordance with generally accepted professional practices and principles and in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing under similar conditions.

9. Assignment and Subconsultant.

Consultant shall not assign, sublet, or transfer this Agreement or any rights under or interest in this Agreement without the written consent of the District, which may be withheld for any reason. Any attempt to so assign or so transfer without such consent shall be void and without legal effect and shall constitute grounds for termination. Subcontracts, if any, shall contain a provision making them subject to all provisions stipulated in this Agreement. Nothing contained herein shall prevent Consultant from employing independent associates, and subconsultants as Consultant may deem appropriate to assist in the performance of services hereunder.

10. Independent Consultant.

Consultant is retained as an independent contractor and is not an employee of District. No employee or agent of Consultant shall become an employee of District. The work to be performed shall be in accordance with the work described in this Agreement, subject to such directions and amendments from District as herein provided.

11. Insurance.

Consultant shall not commence work for the District until it has provided evidence satisfactory to the District it has secured all insurance required under this section. In addition, Consultant shall not allow any subcontractor to commence work on any subcontract until it has secured all insurance required under this section.

a. Commercial General Liability

(i) The Consultant shall take out and maintain, during the performance of all work under this Agreement, in amounts not less than specified herein, Commercial General Liability Insurance, in a form and with insurance companies acceptable to the District.

(ii) Coverage for Commercial General Liability insurance shall be at least as broad as the following:

(1) Insurance Services Office Commercial General Liability coverage (Occurrence Form CG 00 01) or exact equivalent.

(iii) Commercial General Liability Insurance must include coverage for the following:

(1) Bodily Injury and Property Damage
(2) Personal Injury/Advertising Injury
(3) Premises/Operations Liability
(4) Products/Completed Operations Liability
(5) Aggregate Limits that Apply per Year
(6) Explosion, Collapse and Underground (UCX) exclusion deleted
(7) Contractual Liability with respect to this Contract
(8) Broad Form Property Damage
(9) Independent Consultants Coverage

(iv) The policy shall contain no endorsements or provisions limiting coverage for (1) contractual liability; (2) cross liability exclusion for claims or suits by one insured against another; (3) products/completed operations liability; or (4) contain any other exclusion contrary to the Agreement.

(v) The policy shall give District, its officials, officers, employees, agents and District designated volunteers additional insured status using ISO endorsement forms CG 20 10 10 01 and 20 37 10 01, or endorsements providing the exact same coverage.

(vi) The general liability program may utilize either deductibles or provide coverage excess of a self-insured retention, subject to written approval by the District, and provided that such deductibles shall not apply to the District as an additional insured.

b. Automobile Liability

(i) At all times during the performance of the work under this Agreement, the Consultant shall maintain Automobile Liability Insurance for bodily injury and property damage including coverage for owned, non-owned and hired vehicles, in a form and with insurance companies acceptable to the District.

(ii) Coverage for automobile liability insurance shall be at least as broad as Insurance Services Office Form Number CA 00 01 covering automobile liability (Coverage Symbol 1, any auto).

(iii) The policy shall give District, its officials, officers, employees, agents and District designated volunteers additional insured status.

(iv) Subject to written approval by the District, the automobile liability program may utilize deductibles, provided that such deductibles shall not apply to the District as an additional insured, but not a self-insured retention.

c. Workers' Compensation/Employer's Liability

(i) Consultant certifies that he/she is aware of the provisions of Section 3700 of the California Labor Code which requires every employer to be insured against liability for workers' compensation or to undertake self-insurance in accordance with the provisions of that code, and he/she will comply with such provisions before commencing work under this Agreement.

(ii) To the extent Consultant has employees at any time during the term of this Agreement, at all times during the performance of the work under this Agreement, the Consultant shall maintain full compensation insurance for all persons employed directly by him/her to carry out the work contemplated under this Agreement, all in accordance with the "Workers' Compensation and Insurance Act," Division IV of the Labor Code of the State of California and any acts amendatory thereof, and Employer's Liability Coverage in amounts indicated herein. Consultant shall require all subconsultants to obtain and maintain, for the period required by this Agreement, workers' compensation coverage of the same type and limits as specified in this section.

d. Minimum Policy Limits Required

(i) The following insurance limits are required for the Agreement:

	Combined Single Limit
Commercial General Liability	$1,000,000 per occurrence/ $2,000,000 aggregate for bodily injury, personal injury, and property damage
Automobile Liability	$1,000,000 per occurrence for bodily injury and property damage
Employer's Liability	$1,000,000 per occurrence

(ii) Defense costs shall be payable in addition to the limits.

(iii) Requirements of specific coverage or limits contained in this section are not intended as a limitation on coverage, limits, or other requirement, or a waiver of any coverage normally provided by any insurance. Any available coverage shall be provided to the parties required to be named as Additional Insured pursuant to this Agreement.

e. Evidence Required

Prior to execution of the Agreement, the Consultant shall file with the District evidence of insurance from an insurer or insurers certifying to the coverage of all insurance required herein. Such evidence shall include original copies of the ISO CG 00 01 (or insurer's equivalent) signed by the insurer's representative and Certificate of Insurance (Acord Form 25-S or equivalent), together with required endorsements. All evidence of insurance shall be signed by a properly authorized officer, agent, or qualified representative of the insurer and shall certify the names of the insured, any additional insureds, where appropriate, the type and amount of the insurance, the location and operations to which the insurance applies, and the expiration date of such insurance.

f. Policy Provisions Required

(i) Consultant shall provide the District at least thirty (30) days prior written notice of cancellation of any policy required by this Agreement, except that the Consultant shall provide at least ten (10) days prior written notice of cancellation of any such policy due to non-payment of premium. If any of the required coverage is cancelled or expires during the term of this Agreement, the Consultant shall deliver renewal certificate(s) including the General Liability Additional Insured Endorsement to the District at least ten (10) days prior to the effective date of cancellation or expiration.

(ii) The Commercial General Liability Policy and Automobile Policy shall each contain a provision stating that Consultant's policy is primary insurance and that any insurance, self-insurance or other coverage maintained by the District or any named insureds shall not be called upon to contribute to any loss.

(iii) The retroactive date (if any) of each policy is to be no later than the effective date of this Agreement. Consultant shall maintain such coverage continuously for a period of at least three years after the completion of the work under this Agreement. Consultant shall purchase a one (1) year extended reporting period A) if the retroactive date is advanced past the effective date of this Agreement; B) if the policy is cancelled or not renewed; or C) if the policy is replaced by another claims-made policy with a retroactive date subsequent to the effective date of this Agreement.

(iv) All required insurance coverages, except for the professional liability coverage, shall contain or be endorsed to waiver of subrogation in favor of the District, its officials, officers, employees, agents, and volunteers or shall specifically allow Consultant or others providing insurance evidence in compliance with these specifications to waive their right of recovery prior to a loss. Consultant hereby waives its own right of recovery against District, and shall require similar written express waivers and insurance clauses from each of its subconsultants.

(v) The limits set forth herein shall apply separately to each insured against whom claims are made or suits are brought, except with respect to the limits of liability. Further the limits set forth herein shall not be construed to relieve the Consultant from liability in excess of such coverage, nor shall it limit the Consultant's indemnification obligations to the District and shall not preclude the District from taking such other actions available to the District under other provisions of the Agreement or law.

g. Qualifying Insurers

(i) All policies required shall be issued by acceptable insurance companies, as determined by the District, which satisfy the following minimum requirements:

(1) Each such policy shall be from a company or companies with a current A.M. Best's rating of no less than A:VII and admitted to transact in the business of insurance in the State of California, or otherwise allowed to place insurance through surplus line brokers under applicable provisions of the California Insurance Code or any federal law.

h. Additional Insurance Provisions

(i) The foregoing requirements as to the types and limits of insurance coverage to be maintained by Consultant, and any approval of said insurance by the District, is not intended to and shall not in any manner limit or qualify the liabilities and obligations otherwise assumed by the Consultant pursuant to this Agreement, including but not limited to, the provisions concerning indemnification.

(ii) If at any time during the life of the Agreement, any policy of insurance required under this Agreement does not comply with these specifications or is canceled and not replaced, District has the right but not the duty to obtain the insurance it deems necessary and any premium paid by District will be promptly reimbursed by Consultant or District will withhold amounts sufficient to pay premium from Consultant payments. In the alternative, District may cancel this Agreement.

(iii) The District may require the Consultant to provide complete copies of all insurance policies in effect for the duration of the Project.

(iv) Neither the District nor any of its officials, officers, employees, agents or volunteers shall be personally responsible for any liability arising under or by virtue of this Agreement.

i. Subconsultant Insurance Requirements. Consultant shall not allow any subcontractors or subconsultants to commence work on any subcontract until they have provided evidence satisfactory to the District that they have secured all insurance required under this section. Policies of commercial general liability insurance provided by such subcontractors or subconsultants shall be endorsed to name the District as an additional insured using ISO form CG 20 38 04 13 or an endorsement providing the exact same coverage. If requested by Consultant, District may approve different scopes or minimum limits of insurance for particular subcontractors or subconsultants.

12. Indemnification.

a. To the fullest extent permitted by law, Consultant shall defend (with counsel reasonably approved by the District), indemnify and hold the District, its officials, officers, employees, agents and volunteers free and harmless from any and all claims, demands, causes of action, suits, actions, proceedings, costs, expenses, liability, judgments, awards, decrees, settlements, loss, damage or injury of any kind, in law or equity, to property or persons, including wrongful death, (collectively, "Claims") in any manner arising out of, pertaining to, or incident to any alleged acts, errors or omissions, or willful misconduct of Consultant, its officials, officers, employees, subcontractors, consultants or agents in connection with the performance of the Consultant's services, the Project or this Agreement, the USDA Natural Resources Conservation Service Grant Agreement found in Exhibit "A" herein, including without limitation the payment of all consequential damages, expert witness fees and attorneys' fees and other related costs and expenses. Notwithstanding the foregoing, to the extent Consultant's services are subject to Civil Code Section 2782.8, the above indemnity shall be limited, to the extent required by Civil Code Section 2782.8, to Claims that arise out of, pertain to, or relate to the negligence, recklessness, or willful misconduct of the Consultant. Consultant's obligation to indemnify shall not be restricted to insurance proceeds, if any, received by the District, its officials, officers, employees, agents or volunteers.

b. Additional Indemnity Obligations. Consultant shall defend, with counsel of District's choosing and at Consultant's own cost, expense and risk, any and all Claims covered by this section that may be brought or instituted against the District, its officials, officers, employees, agents or volunteers. Consultant shall pay and satisfy any judgment, award or decree that may be rendered against the District, its officials, officers, employees, agents or volunteers as part of any such claim, suit, action or other proceeding. Consultant shall also reimburse District for the cost of any settlement paid by the District, its officials, officers, employees, agents or volunteers as part of any such claim, suit, action or other proceeding. Such reimbursement shall include payment for the District's attorney's fees and costs, including expert witness fees. Consultant shall reimburse the District, its officials, officers, employees, agents and volunteers, for any and all legal expenses and costs incurred by each of them in connection therewith or in enforcing the indemnity herein provided. Consultant's obligation to indemnify shall not be restricted to insurance proceeds, if any, received by the District, its officials, officers, employees, agents and volunteers.

c. To the fullest extent permitted by law, District shall defend (with counsel reasonably approved by the Consultant), indemnify and hold the Consultant, its officials, officers, employees, agents and volunteers free and harmless from any and all Claims (as defined in Section 12a. above) in any manner arising out of, pertaining to, or incident to any alleged acts, errors or omissions, or willful misconduct of District, its officials, officers, employees, subcontractors, consultants or agents in connection with the performance of the District's services, the Project or this Agreement, the USDA Natural Resources Conservation Service Grant Agreement found in Exhibit "A" herein, including without limitation the payment of all consequential damages, expert witness fees and attorneys' fees and other related costs and expenses. Notwithstanding the foregoing, to the extent Districts services are subject to Civil Code Section 2782.8, the above indemnity shall be limited, to the extent required by Civil Code Section 2782.8, to Claims that arise out of, pertain to, or relate to the negligence, recklessness, or willful misconduct of the District. District's obligation to indemnify shall not be restricted to insurance proceeds, if any, received by the Consultant, its officials, officers, employees, agents or volunteers.

d. Additional Indemnity Obligations. District shall defend, with counsel of Consultant's choosing and at District's own cost, expense and risk, any and all Claims covered by this section that may be brought or instituted against the Consultant, its officials, officers, employees, agents or volunteers. District shall pay and satisfy any judgment, award or decree that may be rendered against the Consultant, its officials, officers, employees, agents or volunteers as part of any such claim, suit, action or other proceeding. District shall also reimburse Consultant for the cost of any settlement paid by the Consultant, its officials, officers, employees, agents or volunteers as part of any such claim, suit, action or other proceeding. Such reimbursement shall include payment for the Consultant's attorney's fees and costs, including expert witness fees. District shall reimburse the Consultant, its officials, officers, employees, agents and volunteers, for any and all legal expenses and costs incurred by each of them in connection therewith or in enforcing the indemnity herein provided. District's obligation to indemnify shall not be restricted to insurance proceeds, if any, received by the Consultant, its officials, officers, employees, agents and volunteers.

13. California Labor Code Requirements.

a. Consultant is aware of the requirements of California Labor Code Sections 1720 et seq. and 1770 et seq., which require the payment of prevailing wage rates and the performance of other requirements on certain "public works" and "maintenance" projects. If the services are being performed as part of an applicable "public works" or "maintenance" project, as defined by the Prevailing Wage Laws, and if the total compensation is $1,000 or more, Consultant agrees to fully comply with such Prevailing Wage Laws, if applicable. Consultant shall defend, indemnify and hold the District, its officials, officers, employees and agents free and harmless from any claims, liabilities, costs, penalties or interest arising out of any failure or alleged failure to comply with the Prevailing Wage Laws. It shall be mandatory upon the Consultant and all subconsultants to comply with all California Labor Code provisions, which include but are not limited to prevailing wages, employment of apprentices, hours of labor and debarment of contractors and subcontractors. It shall be mandatory upon the Consultant and all subconsultants to comply with all California Labor Code provisions, which include but are not limited to prevailing wages (Labor Code Sections 1771, 1774 and 1775), employment of apprentices (Labor Code Section 1777.5), certified payroll records (Labor Code Section 1776), hours of labor (Labor Code

Sections 1813 and 1815) and debarment of contractors and subcontractors (Labor Code Sections 1777.1).

b. If the services are being performed as part of an applicable "public works" or "maintenance" project, then pursuant to Labor Code Sections 1725.5 and 1771.1, the Consultant and all subconsultants performing such Services must be registered with the Department of Industrial Relations. Consultant shall maintain registration for the duration of the Project and require the same of any subconsultants, as applicable. This Project may also be subject to compliance monitoring and enforcement by the Department of Industrial Relations. It shall be Consultant's sole responsibility to comply with all applicable registration and labor compliance requirements.

14. Verification of Employment Eligibility.

By executing this Agreement, Consultant verifies that it fully complies with all requirements and restrictions of state and federal law respecting the employment of undocumented aliens, including, but not limited to, the Immigration Reform and Control Act of 1986, as may be amended from time to time, and shall require all subconsultants and sub-subconsultants to comply with the same.

15. USDA Natural Resources Conservation Service Requirements.

Consultant is hereby made aware of the requirements set forth in the USDA Natural Resources Conservation Service Grant Agreement entered into between the USDA Natural Resources Conservation Service and the Inland Empire Resource Conservation District, attached hereto as Exhibit "A," which are deemed to be a part of this Agreement, and Consultant agrees to abide by all such requirements when conducting the work described in the Scope of Services.

16. Laws and Venue.

This Agreement shall be interpreted in accordance with the laws of the State of California. If any action is brought to interpret or enforce any term of this Agreement, the action shall be brought in a state or federal court situated in the County of San Bernardino, State of California.

17. Termination or Abandonment.

a. District has the right to terminate or abandon any portion or all of the work under this Agreement by giving thirty (30) calendar days written notice to Consultant. In such event, District shall be immediately given title and possession to all original field notes, drawings and specifications, written reports and other documents produced or developed for that portion of the work completed and/or being abandoned. District shall pay Consultant the reasonable value of services rendered for any portion of the work completed prior to termination. If said termination occurs prior to completion of any task for the Project for which a payment request has not been received, the charge for services performed during such task shall be the reasonable value of such services, based on an amount mutually agreed to by District and Consultant of the portion of such task completed but not paid prior to said termination. District shall not be liable for any costs other than the charges or portions thereof which are specified herein. Consultant shall not be entitled to payment for unperformed services, and shall not be entitled to damages or compensation for termination of work.

b. Consultant may terminate its obligation to provide further services under this Agreement upon thirty (30) calendar days' written notice to District only in the event of substantial failure by District to perform in accordance with the terms of this Agreement through no fault of Consultant.

18. Documents.

Except as otherwise provided in "Termination or Abandonment," above, all original field notes, written reports, Drawings and Specifications and other documents, produced or developed for the Project shall, upon payment in full for the services described in this Agreement, be furnished to and become the property of the District.

19. Organization.

Consultant shall assign Joel Kramer as Project Manager. The Project Manager shall not be removed from the Project or reassigned without the prior written consent of the District.

20. Limitation of Agreement.

This Agreement is limited to and includes only the work included in the Project described above.

21. Notice.

Any notice or instrument required to be given or delivered by this Agreement may be given or delivered by depositing the same in any United States Post Office, certified mail, return receipt requested, postage prepaid, addressed to:

DISTRICT:	CONSULTANT:
Inland Empire Resource Conservation District	Resource Conservation District of Greater San Diego County
25864 Business Center Drive, Suite K	11769 Waterhill Road
Redlands, CA 92374	Lakeside, CA 92040
Attn: Mandy Parkes, District Manager	Attn: Ann Baldridge, Executive Director

and shall be effective upon receipt thereof.

22. Third Party Rights.

Nothing in this Agreement shall be construed to give any rights or benefits to anyone other than the District and the Consultant.

23. Equal Opportunity Employment.

Consultant represents that it is an equal opportunity employer and that it shall not discriminate against any employee or applicant for employment because of race, religion, color, national origin, ancestry, sex, age or other interests protected by the State or Federal

Constitutions. Such non-discrimination shall include, but not be limited to, all activities related to initial employment, upgrading, demotion, transfer, recruitment or recruitment advertising, layoff or termination.

24. Entire Agreement.

This Agreement, with its exhibits, represents the entire understanding of District and Consultant as to those matters contained herein, and supersedes and cancels any prior or contemporaneous oral or written understanding, promises or representations with respect to those matters covered hereunder. Each party acknowledges that no representations, inducements, promises or agreements have been made by any person which are not incorporated herein, and that any other agreements shall be void. This Agreement may not be modified or altered except in writing signed by both Parties hereto. This is an integrated Agreement.

25. Severability.

The unenforceability, invalidity or illegality of any provision(s) of this Agreement shall not render the provisions unenforceable, invalid or illegal.

26. Successors and Assigns.

This Agreement shall be binding upon and shall inure to the benefit of the successors in interest, executors, administrators and assigns of each party to this Agreement. However, Consultant shall not assign or transfer by operation of law or otherwise any or all of its rights, burdens, duties or obligations without the prior written consent of District. Any attempted assignment without such consent shall be invalid and void.

27. Non-Waiver.

None of the provisions of this Agreement shall be considered waived by either party, unless such waiver is specifically specified in writing.

28. Time of Essence.

Time is of the essence for each and every provision of this Agreement.

29. District's Right to Employ Other Consultants.

District reserves its right to employ other consultants, including engineers, in connection with this Project or other projects.

30. Prohibited Interests.

Consultant maintains and warrants that it has not employed nor retained any company or person, other than a bona fide employee working solely for Consultant, to solicit or secure this Agreement. Further, Consultant warrants that it has not paid nor has it agreed to pay any company or person, other than a bona fide employee working solely for Consultant, any fee, commission, percentage, brokerage fee, gift or other consideration contingent upon or resulting from the award or making of this Agreement. For breach or violation of this warranty, District shall have the right to rescind this Agreement without liability. For the term of this Agreement, no

director, official, officer or employee of District, during the term of his or her service with District, shall have any direct interest in this Agreement, or obtain any present or anticipated material benefit arising therefrom.

IN WITNESS WHEREOF, the Parties have executed this Agreement as of the date first written above.

INLAND EMPIRE RESOURCE CONSERVATION DISTRICT	RESOURCE CONSERVATION DISTRICT OF GREATER SAN DIEGO COUNTY
By: _____	By: _____
Richard Gomez, President	Ann Baldridge, Executive Director

EXHIBIT A

USDA Natural Resources Conservation Service Grant Agreement

Natural Resource Conservation Service - Disaster Recovery

Project Lead
Joel Kramer, Agricultural Specialist
Resource Conservation District of Greater San Diego County
11769 Waterhill Road, Lakeside, CA 92040
Phone: (619) 562 – 0096
Email: joel.kramer@rcdsandiego.org

Duration of Activities
Grant activities are planned for a six month period beginning in Summer of 2023.

Jurisdictional Boundaries
RCDGSDC provides conservation assistance within the majority of San Diego County, or approximately 2,886 square miles. Upon request, RCDGSDC is also available to provide Disaster Recovery services to Upper San Luis Rey RCD. A map showing the district boundaries of RCDs in San Diego County is included below.

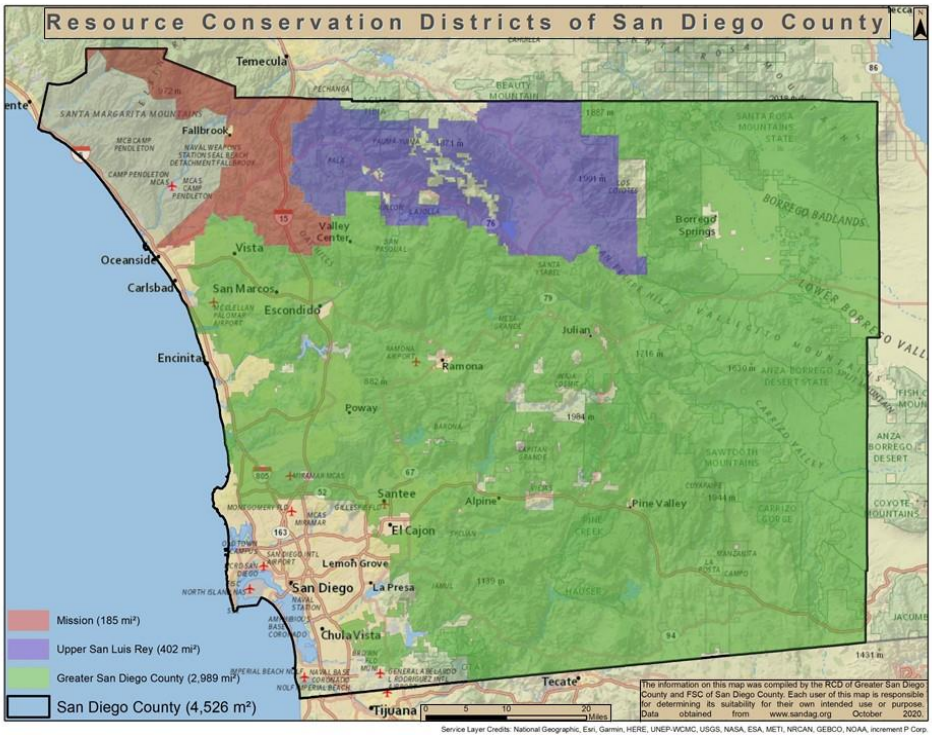

Figure 1. San Diego County Resource Conservation District Boundaries

Partner Background

The renewal of this agreement is for the Resource Conservation District of Greater San Diego County (RCDGSDC) to support Inland Empire Resource Conservation District (IERCD) for their grant with the Natural Resources Conservation Service (NRCS) in providing post disaster recovery efforts throughout the Southern California region. The RCDGSDC manages the programs and the funds of the Fire Safe Council of San Diego County (FSCSDC) and has a strong reputation for supporting landowners in the wildland-urban interface. In addition, RCDGSDC maintains a network 300 local agricultural producers, contacts for more than 1,000 agricultural producers and maps of active agricultural land within the County; in total, NRCS records more than 5,000 producers throughout the extent of San Diego County. Outreach through existing RCDGSDC agriculture programs will contribute to this effort, including a Cooperative Agreement with NRCS California, Economic Relief grant from California Department of Food and Agriculture and an NRCS Equity Block Grant managed by the California Association of RCDS. RCDGSDC and NRCS have a common interest to protect and preserve natural resources as well as to provide pre- and post-disaster recovery assistance to its communities. RCDGSDC and IERCD actively work toward this goal through the Southern California Soil and Water Conservation Hub.

Scope of Work

The objectives of this agreement are to (1) coordinate disaster recovery activities with NRCS staff in San Diego County, (2) reach agricultural producers that have been affected by recent natural hazards, and (3) aid NRCS and agricultural producers by initiating the process for post natural-hazard assistance. Technical Assistant Elizabeth Garcia will be the project lead for all four activities. The four grant activities incorporate the following activities to achieve NRCS objectives:

i. Producer Outreach

a. Mapping of agricultural parcels affected by wildfire and related natural hazards since 2020; natural hazards which occurred earlier will be included with approval from NRCS and IERCD.
b. Conducting outreach to 100 regional producers through monthly bilingual newsletter, direct phone calls, social media, personalized mail, and partner organization networks.
c. Prioritizing outreach to underserved producers who identify as an ethnic minority, tribes and urban producers, and by offering written translation to Spanish as needed, including at least 10% of producers served

ii. Impact and Eligibility Assessment

d. Assessing resource concerns resulting from natural hazard events on 15 farms and ranches to identify opportunities for implementation of conservation alternatives. Primary impacts throughout the region are anticipated to be from wildfire, while other natural hazards are more localized. For example, flooding has heavily impacted farms in the Tijuana River Valley.
e. Targeting technical assistance to self-identified as Historically Underserved, tribal members or urban farms, including at least 10% of producers served

f. Participating in training on the use of agency-approved resource assessment tools to report assessment results to the NRCS District office in a useful format, such as Conservation Desktop

iii. Application Assistance

1. Referring five to 15 participants to NRCS programs including the Environmental Quality Incentives Program and Conservation Stewardship Program, as relevant
2. Providing support to five producers with applications for disaster recovery assistance to NRCS, as eligible and needed

iv. Reporting and Financial Tracking

1. Quarterly financial reporting (invoicing and audit record-keeping)
2. Final performance reporting to IERCD in coordination with the NRCS Escondido Service Center

Budget

The total budget request is $29,627.15. RCDGSDC Staff contributing to this project will include Technical Assistant Elizabeth Garcia, Conservation Planner Gregg Cady, Agricultural Specialist Joel Kramer and Director of Finances Chris Kelley. Fringe benefits for staff are charged at a rate of 50%. Travel expenses will include mileage for field assessments of agricultural operations. Printing and postage costs will be used to conduct outreach. Contractor budget will be used to translate written materials to Spanish as needed. Indirect costs are charged at a rate of 12%. All project expenses are summarized in the table below.

Activity	**Personnel / Item**	**Rate**	**Quantity**	**Total Cost**
1, 2, 3, 4	Technical Assistant, Elizabeth Garcia	$37.80/hour (incl. fringe)	276 hours	$10,432.80
2	Conservation Advisor, Gregg Cady	$57.88/hour (incl. fringe)	180 hours	$10,418.63
4	Agricultural Specialist, Joel Kramer	$53.55/hour (incl. fringe)	32 hours	$1,713.60
4	Director of Finances, Chris Kelley	$75.92/hour (incl. fringe)	32 hours	$2,429.28
Staff Subtotal (includes wage and fringe benefits at 50%)				$24,994.31
1	Printing (B&W)	$0.02	375	$7.50
1	Printing (Color)	$0.13	150	$19.50
1	Postage	$0.63	75	$47.25

1	Spanish Translation by Life Translated	$50/hour or $50/2 pages	10 hours or 20 pages	$500.00
2	Travel	$0.655/mile	1,350 miles incl. 15 site visits avg. 90 miles	$884.25
Costs Subtotal (includes Staff, Supplies, Contractors and Travel)				$26,452.81
Indirect Costs (12% Rate)				$3,174.34
Total Request				$29,627.15

RESOURCE CONSERVATION DISTRICT
Greater San Diego County

Resource Conservation District of Greater San Diego County
11769 Waterhill Rd., Lakeside, CA 92040
Phone: (619) 562-0096 Fax: (619) 562-4799
Website: www.rcdsandiego.org

Date: August 16, 2023

Agenda Item 4-4: Resolution 2023-16 Board Appointment of Michael McGrath to seat #2

Discussion / History:

In February 2023, Michael McGrath became an Associate Director of the RCDGSDC Board of Directors. Mr McGrath is a stormwater consultant with an interest in environmental regulations relating to water qaulity and preservation of existing natrual geography. He is knowledgeable about the Clean Water Act and CA stormwater regulations, and has experience interfacing between the general public and govermnetal agengies on these issues. He currently also serves on the Lakeside Chamber of Commerce.

In August 2023, the Board of Directors would like to appoint Mr. McGrath to fill seat #2 on the Board of Directors for a four year term. A resolution is attached.

Financial Impact: No impact

Staff Recommendation to Board: Staff recommends that the Board authorize Don Butz to sign Resolution 2023-16 on behalf of RCDGSDC.

Resource Conservation District of Greater San Diego County
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RESOLUTION 2023-16

RESOLUTION FOR INTERIM APPOINTMENT OF DIRECTOR BY THE BOARD OF DIRECTORS OF THE RESOURCE CONSERVATION DISTRICT OF GREATER SAN DIEGO COUNTY

WHEREAS, the Resource Conservation District of Greater San Diego ("RCD") is a public agency formed and regulated under Divison 9 of the California Public Resources code; and

WHEREAS, the Resource Conservation District of Greater San Diego County has declared a vacancy in Seat #2 (an arbitrary numbering system for internal tracking purposes) as a result of open vacancy; and

WHEREAS, pursuant to Division 9352 and 9316, Board of Supervisors' Policy A-134 and government Code1780, the RCD Board of Directors is authorized to make interim appointments to fill vacancies from a list of qualified applicants,

Now, therefore be it RESOLVED, that the Board of Directors of the RCD of Greater San Diego County hereby formally approves and appoints the following Associate Director to Interim Board of Directors positions:

- Mr. Michael McGrath (resident of Supervisorial District 2) for Interim Director of the RCD for a four year term. The oath of office was administered on 8/16/23.

PASSED AND ADOPTED at the RCD regular meeting held on August 16, 2023 by the following vote:

Ayes:
Nays:
Abstain:
Absent:
Attest:

_____ _____

Donald H Butz, Board President Joanne Sauerman, Board Clerk

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Date: August 16, 2023

Agenda Item 4-5: Informational item – County Water Authority Agricultural Water Management program

Discussion / History:

This item is to update the Board that the County Water Authority are in the process of drafting a new contract for the Agricultural Water Management Program. The contract was previously held between CWA and Mission RCD, but this revision will include the RCDs of Greater San Diego County and Upper San Luis Rey as partners in implementing this program. The RCD Master MOU will outline the roles, relationships, scope of work, and budget once the contract is finalized.

This program will complement our Irrigation Audit program funded by CDFA's Water Efficiency Technical Assistance program. Through the CWA program, eligible producers can receive rebate for installing more efficient irrigation systems.

Staff will keep the Board updated of progress with the contract.

Financial Impact: RCDGSDC will receive funding (amount to be determined) to provide irrigation assessments to farmers and ranchers in our service area.

Staff Recommendation to Board: No action to be taken at this time.

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Date: August 16, 2023

Agenda Item 4-6: Informational item – Request for Proposals, Tijuana River Valley

Discussion / History:

RCD staff have been exploring options to create greater stability at Wild Willow Farm. One option is to expand farming to another site in the Tijuana River Valley that is less vulnerable to flooding. An opportunity has arisen to submit a proposal to the County of San Diego to develop the land that was formerly Suzie's Farm. The County has issued a Request for Proposals (RFP) from interested parties to develop and lease the site.

The land must be used for active recreation but the RCD believes that farming and active recreation are compatible uses and would like to propose a partnership where the RCD and partner(s) share management of the site. RCD would develop a portion (up to a third) of the site for agricultural activities that benefit the local community, small scale growers in the South Bay, and that would expand WWF's capacity. These include:

Wild Willow Farm: production and sales row crops for retail and whole sale, agritourism activities such as pick-your-own and pumpkin patches, a farm stand, compost facilities, and potentially the development of a produce distribution hub for South Bay growers. Food could be produced and sold during sporting events, and the community could participate in farming and harvesting activities.

Support for South Bay growers: finding and accessing land for farming in the South Bay is a challenge identified in the SALC project and through other outreach to farmers. At this site, we would include a set number of larger incubator plots to accomodate farmers who have grown out of their quarter-acre farm plots and those who are looking for more land. These growers would also have access to the distribution hub, if developed.

We have identified a potential partner in ACA, a non-profit organization that runs a soccer league in the South Bay. They echo the challege of finding and accessing land for their recreational activities and see value in sharing the space with an agricultural operation. Among other initiativies, such a partnership is well aligned with Live Well San Diego.

The RCD will need further discuss the partnership and what the roles and responsibilities would look like before submitting a proposal. Staff is interested in receiving feedback from the Board.

Financial Impact: None at this time.

Staff Recommendation to Board: Informational item only.