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.