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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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Contents

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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

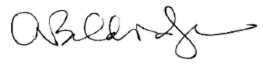
On the basis of this PSA and the substantial evidence supporting it:

☒ 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

August 21, 2023
Date

Ann Baldridge
Printed Name

Executive Director
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

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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.

Girl Scouts San Diego-Imperial Council, Inc. 2001. Biological Technical Report for Palomar Mountain Program Center, Escondido Program Center, Balboa Program Center, Eagle Peak Program Center, Camp Winacka, Whispering Oaks Program Center. Prepared by REC Consultants, Inc. La Mesa, CA.

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:

Amphibiaweblorg accessed 27 Dec 2022

Californiaherps.com accessed 27 Dec 2022

eBird. 2022. eBird: An online database of bird distribution and abundance [web application]. eBird, Cornell Lab of Ornithology, Ithaca, New York. Available: http://www.ebird.org. (Accessed: December 29, 2022).

Koch, Jonathan, James Strange and Paul Williams. 2012. Guide to Bumble Bees of the Western United States. FS-972(W) USDA Forest Service and the Pollinator Partnership. 143 p

Lemm, Jeffrey. 2006. Field Guide to Amphibians and Reptiles of the San Diego Region: California Plant Atlas Bird Page of San Diego Co, SDNHM accessed 28- 29 Dec 2022

Natural History Guide No. 89. University of California Press, Berkeley, CA. 326 p.

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.

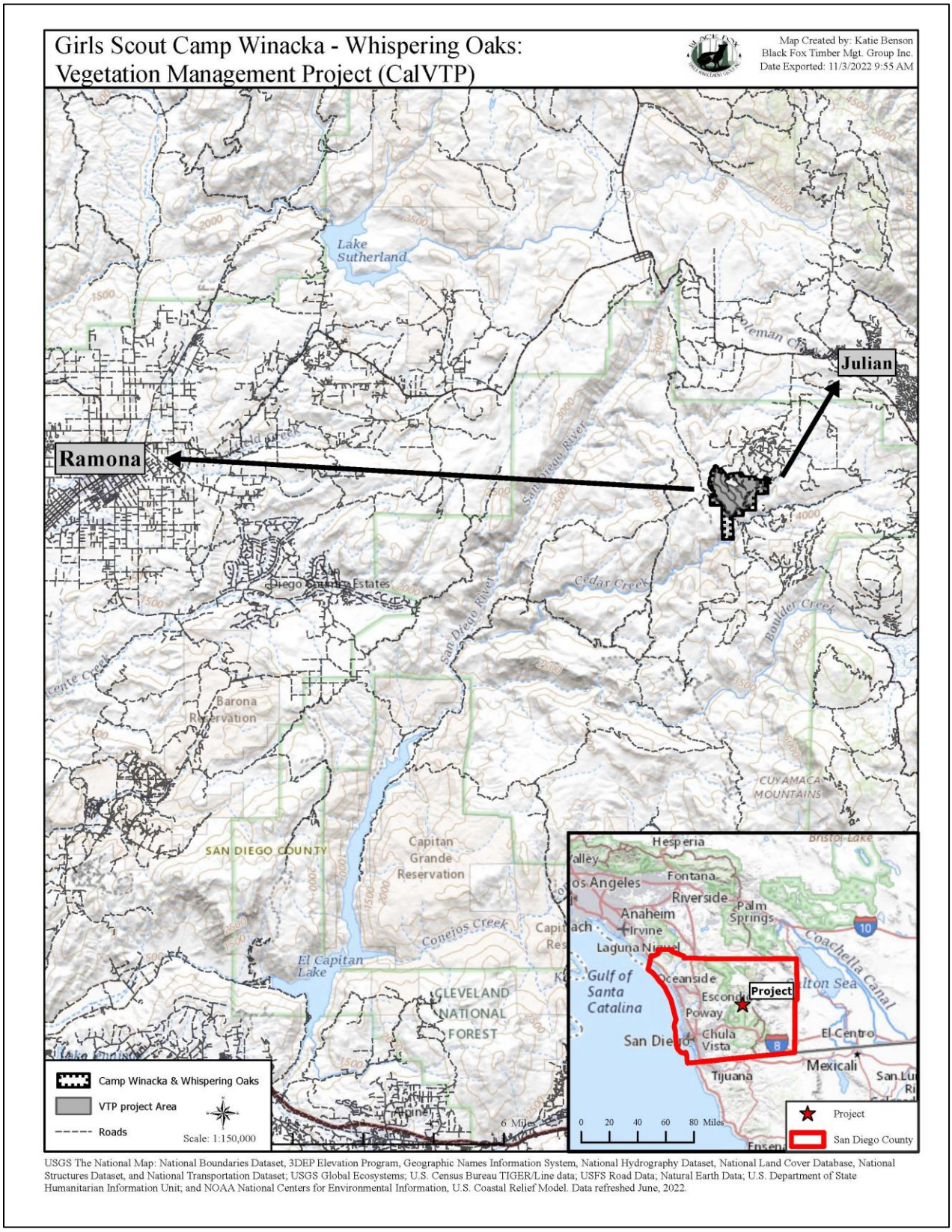
New Impacts to Wildfire

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.

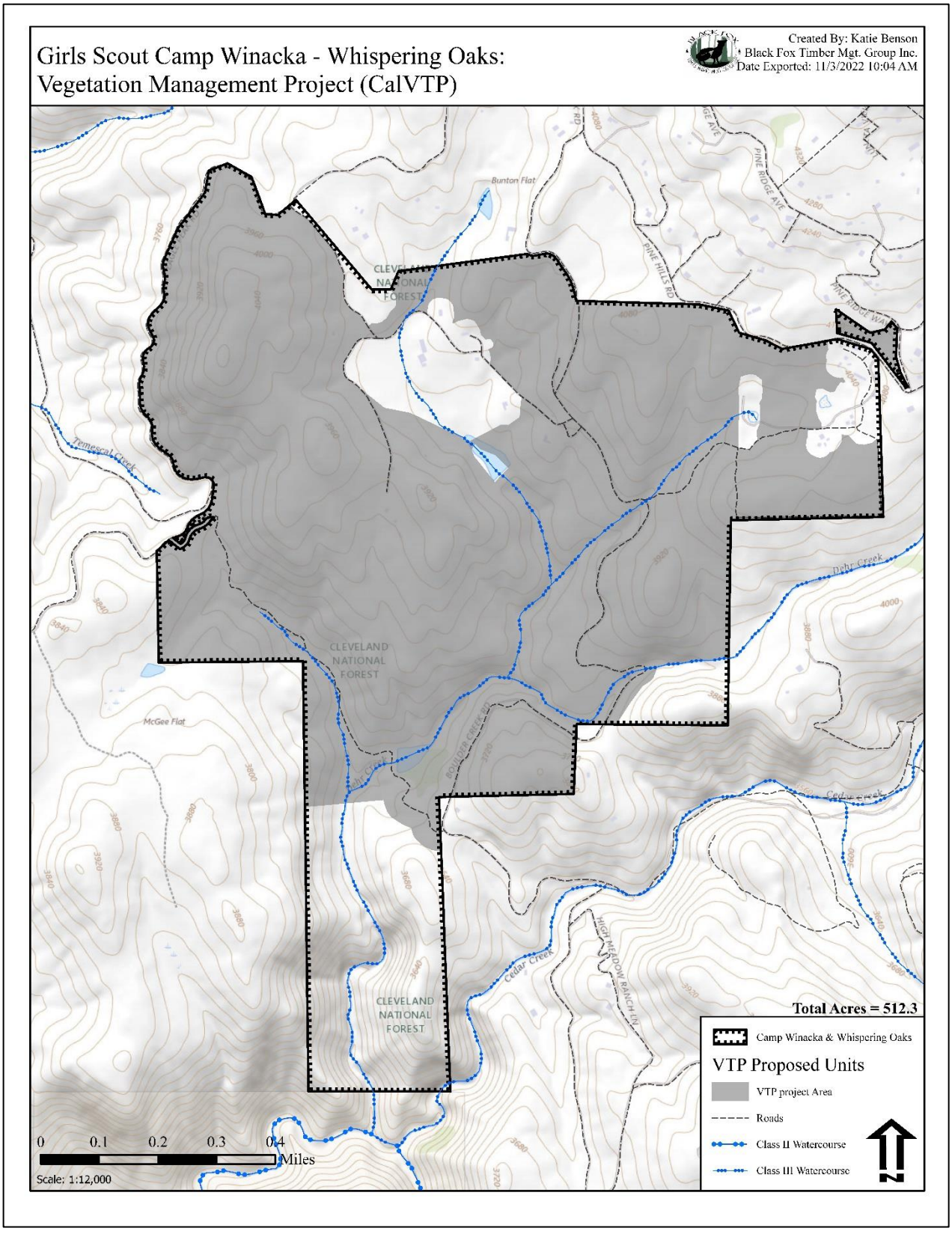
6. Map

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

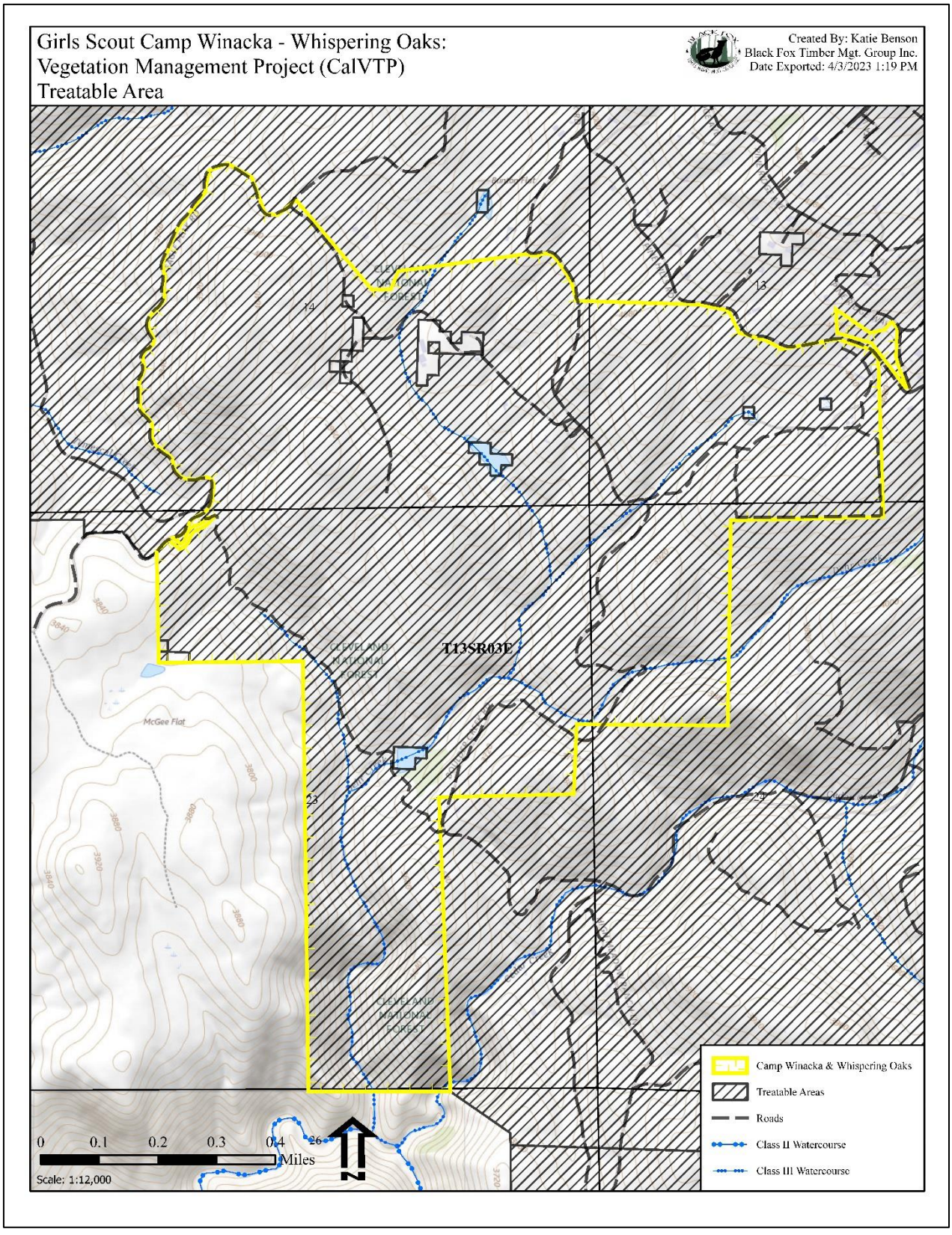
Map 1: Vicinity Map



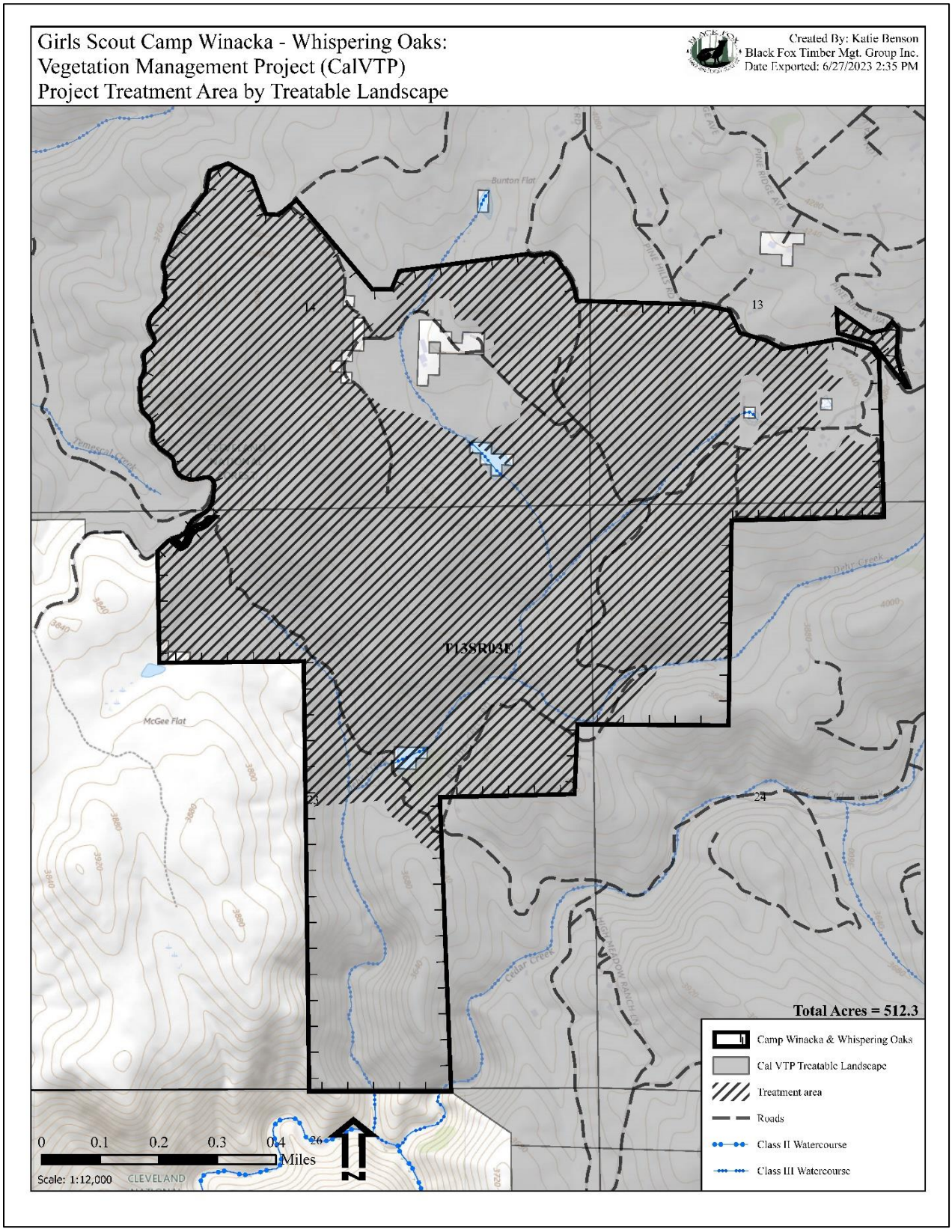
Map 2: Proposed Project Area



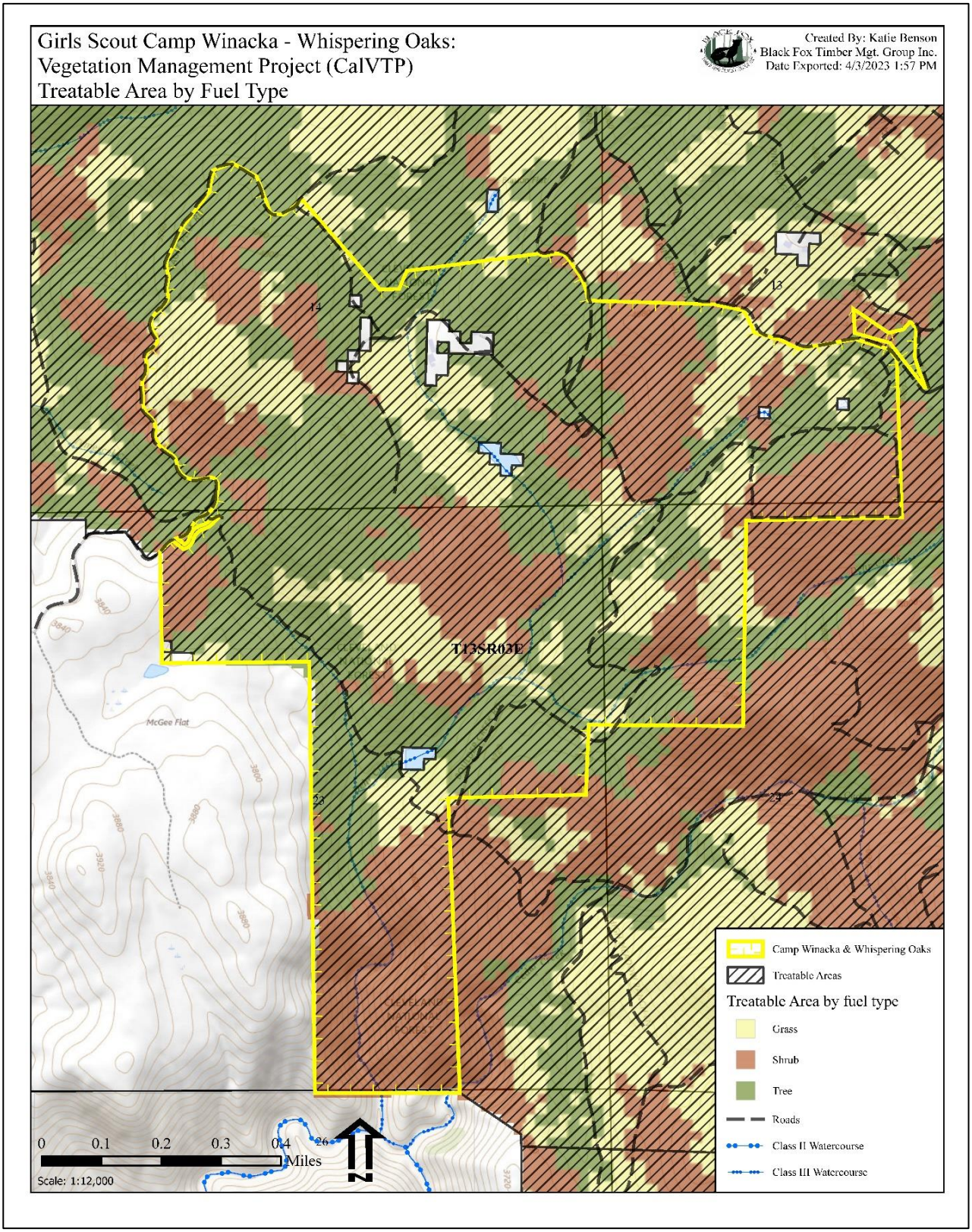
Map 3: Property Boundary – Treatable Landscape



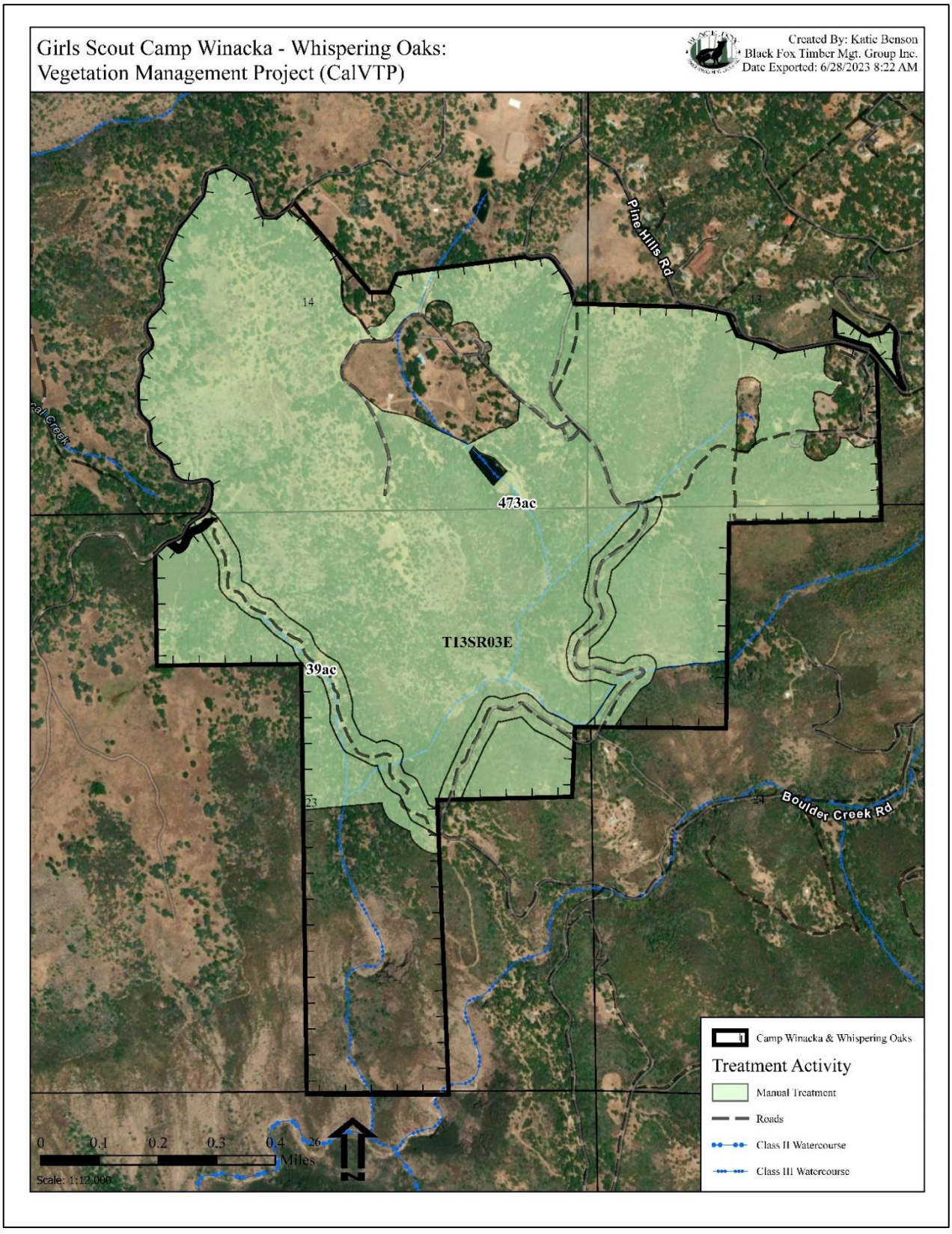
Map 4: Project Treatment Area by Treatable Landscape



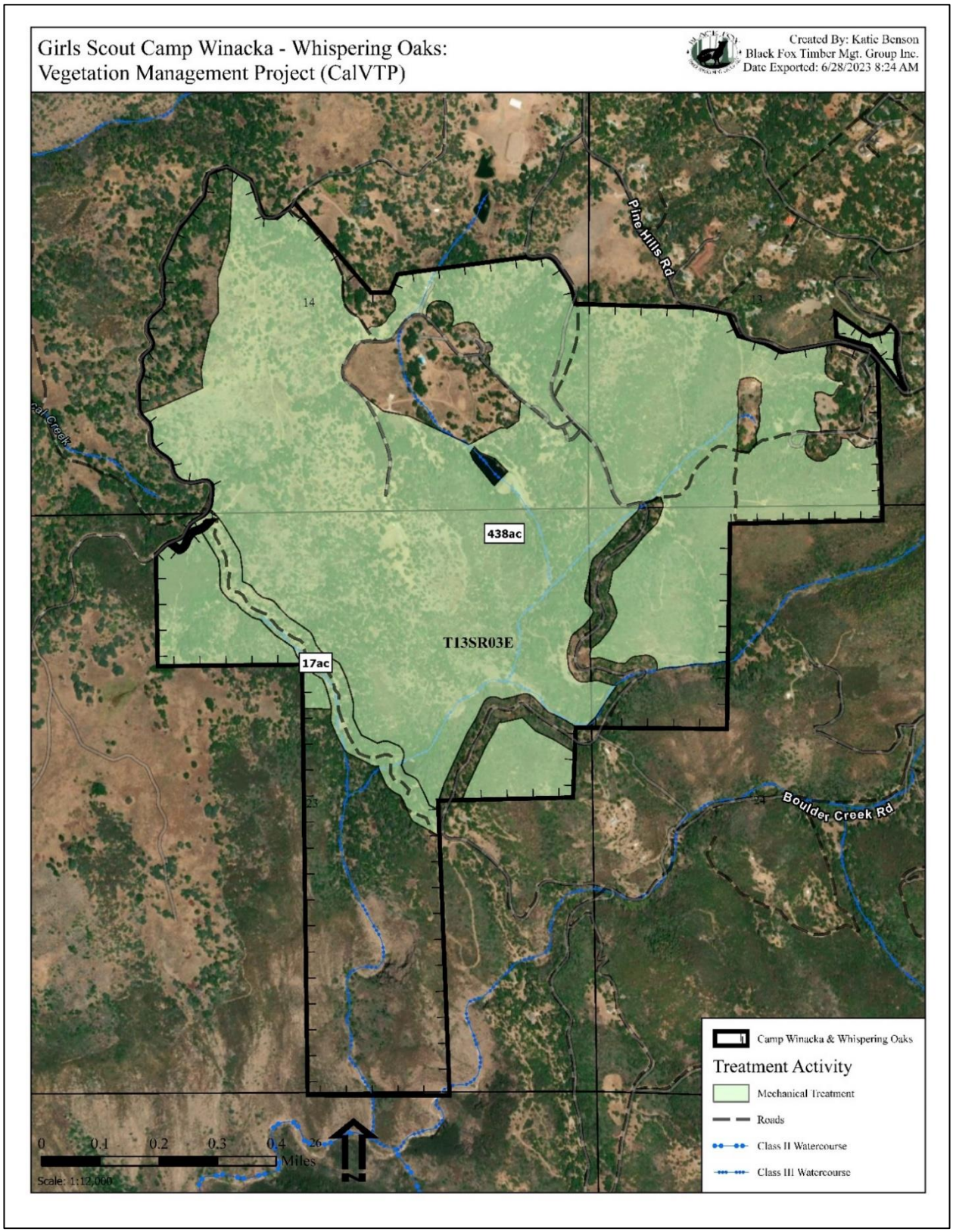
Map 5: Treatable Landscape – Fuel Type



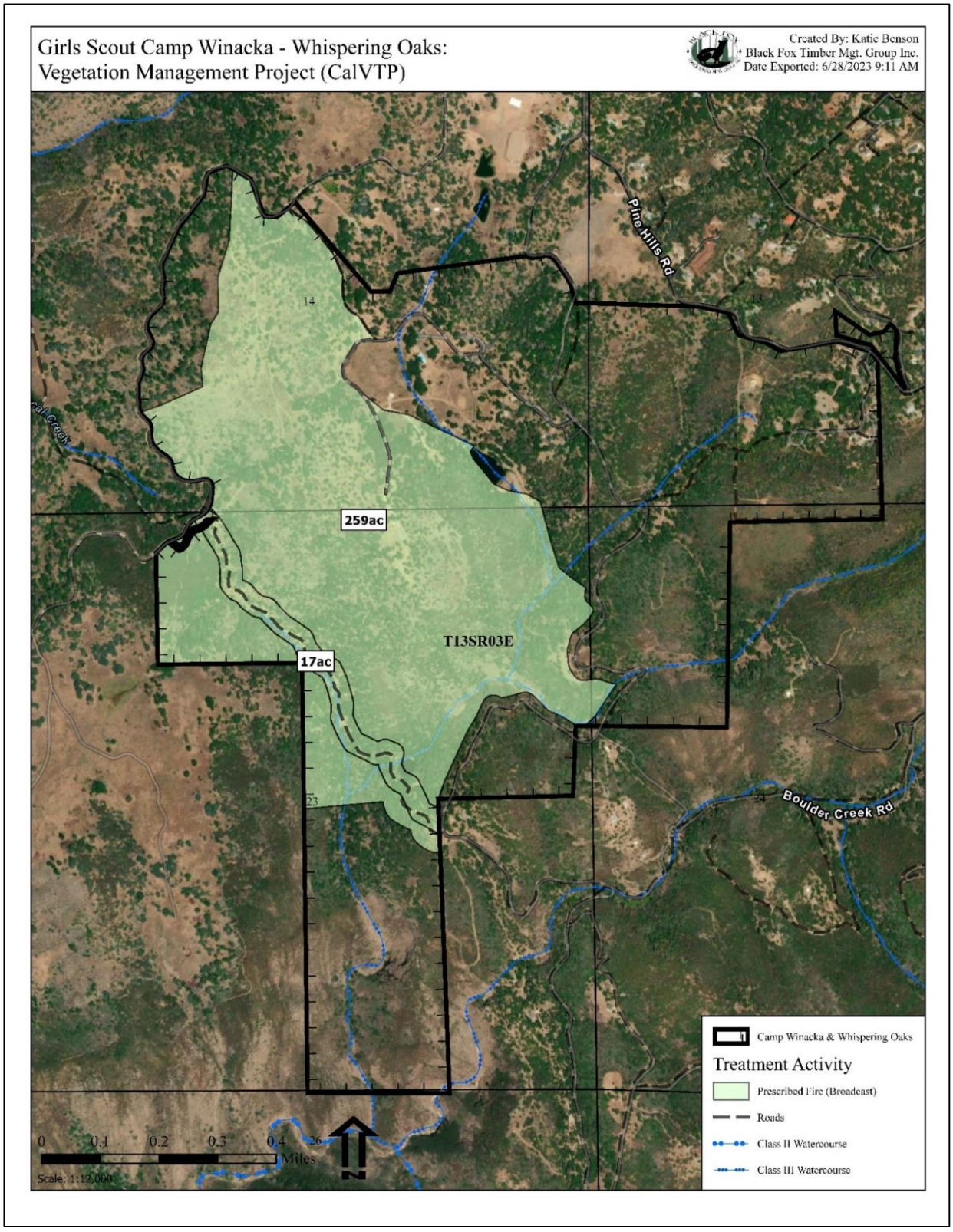
Map 6: Manual Treatment



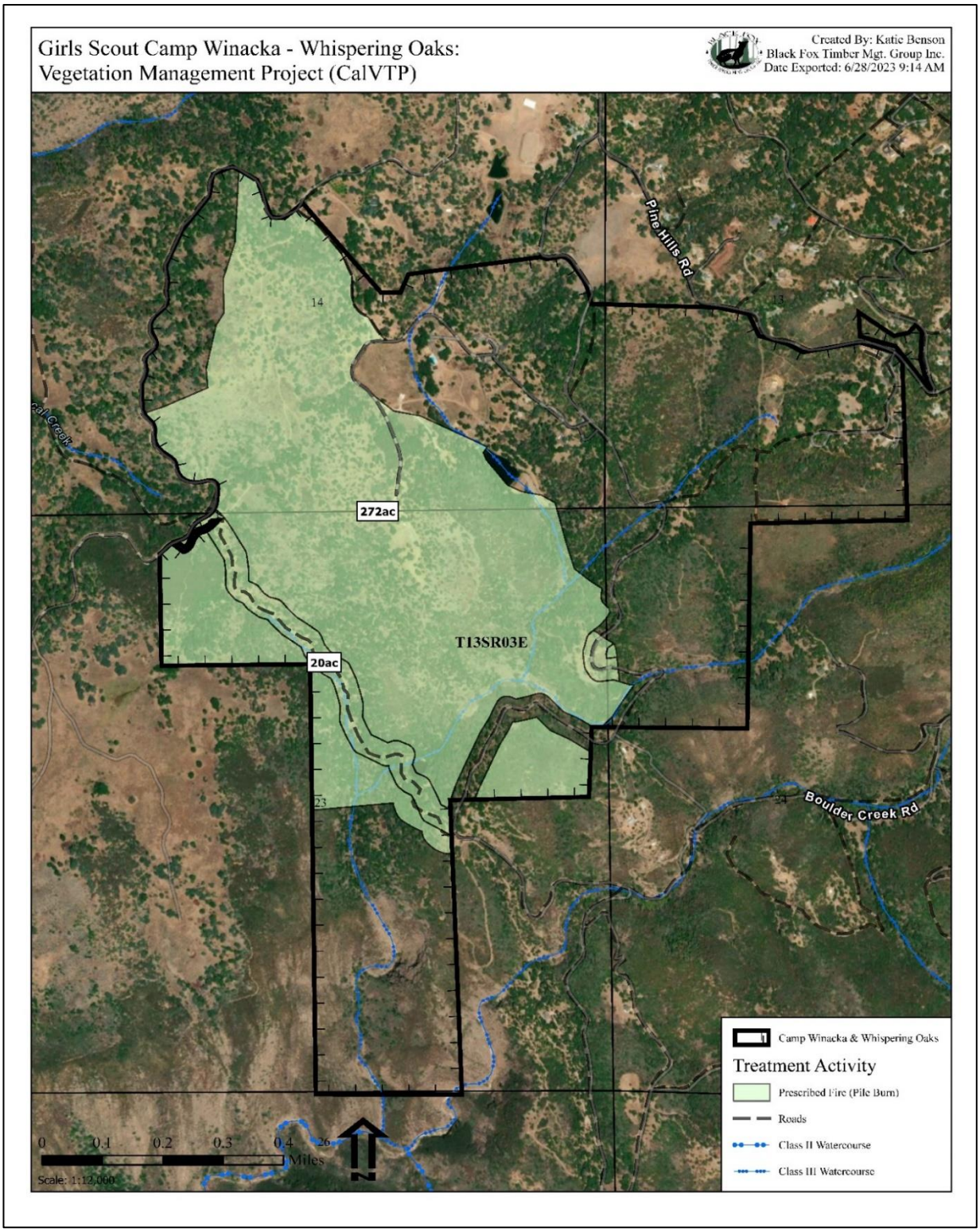
Map 7: Mechanical Treatment



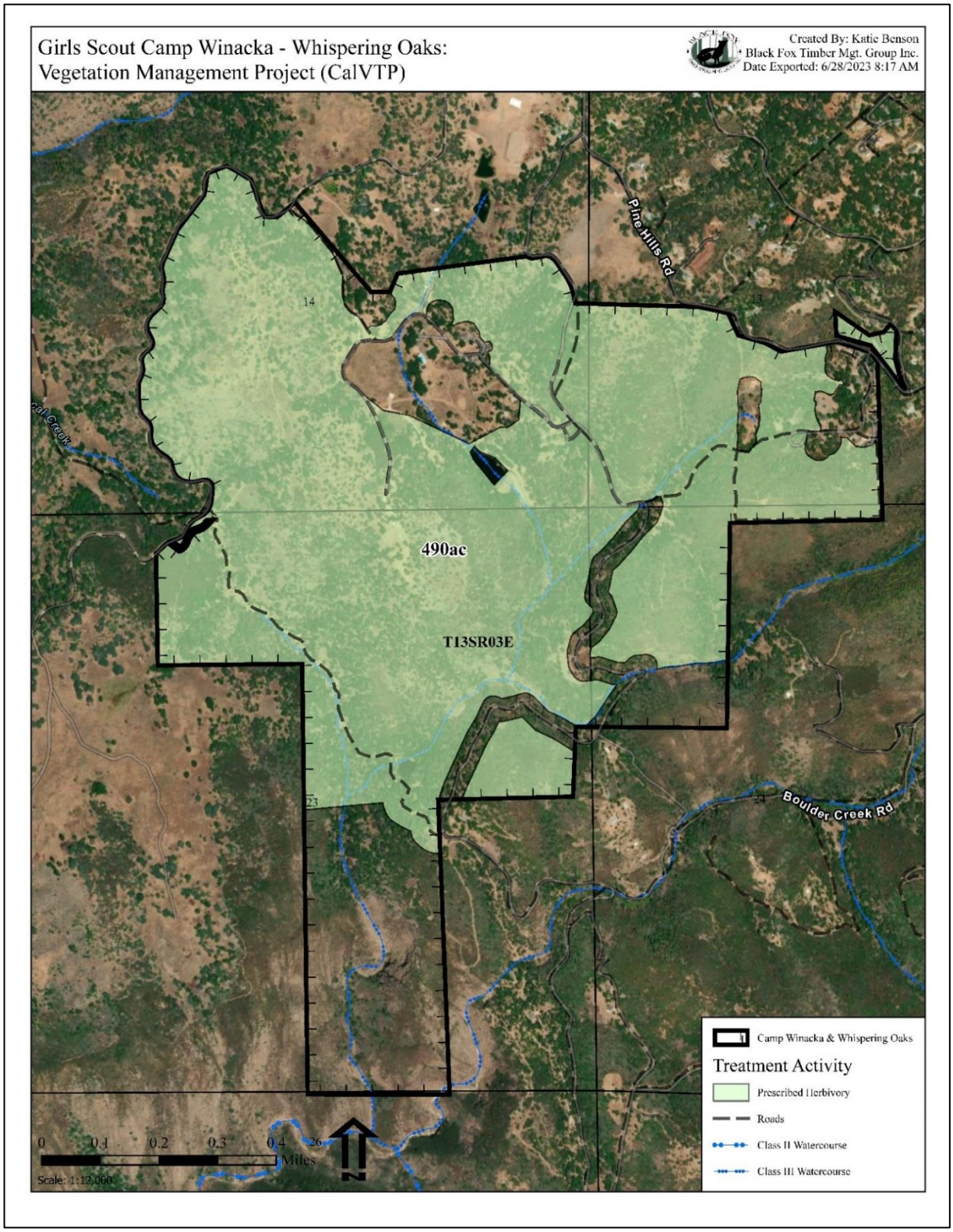
Map 8: Prescribed Broadcast Burning



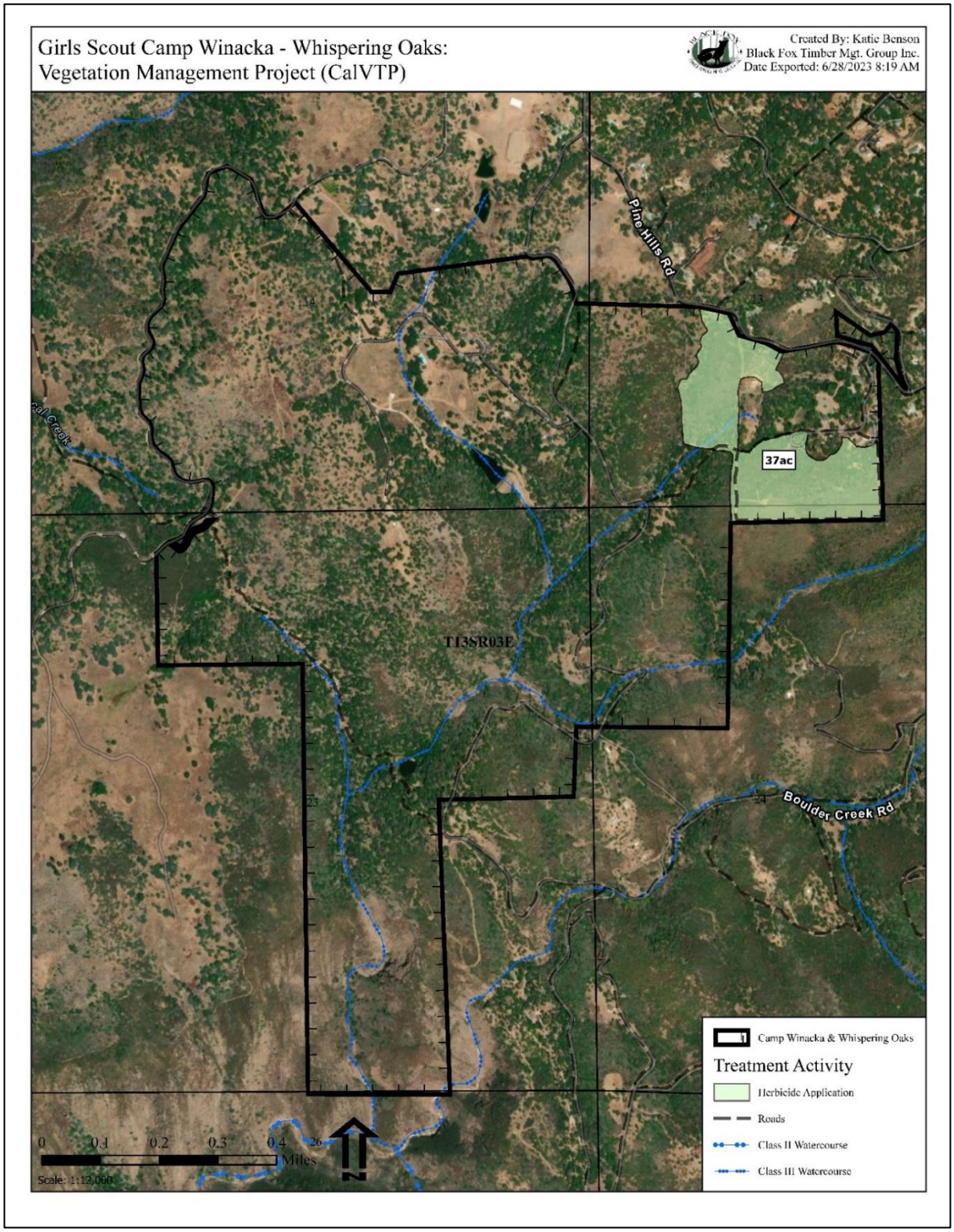
Map 9: Prescribed Pile Burning



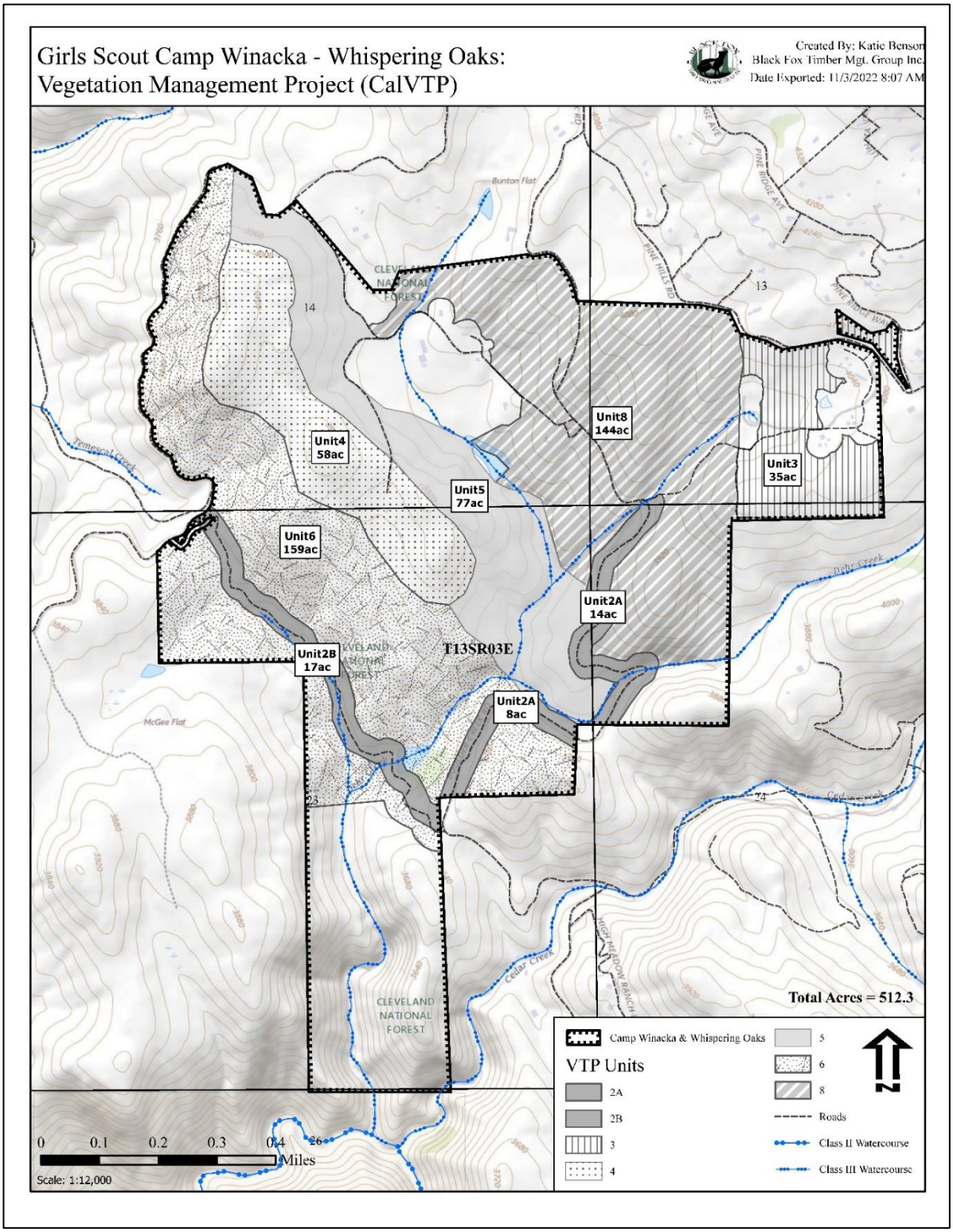
Map 10: Prescribed Herbivory



Map 11: Herbicide Treatment



Map 12: Treatment Units – Topographic



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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