

Humboldt County Resource Conservation District CEQA Findings and Statement of Overriding Considerations for Project-Specific Analysis and Addendum *McKinleyville Vegetation Treatment Project*

1 INTRODUCTION

The Humboldt County Resource Conservation District (HCRCD), in the exercise of its independent judgment, makes and adopts the following findings regarding its decision to approve the McKinleyville Vegetation Treatment Project, referred to herein as "vegetation treatment project," "treatment project," or "project," as within the scope of the California Vegetation Treatment Program (CalVTP). In accordance with the California Environmental Quality Act (Pub. Resources Code, Sections 21000 et seq.) (CEQA) and the CEQA Guidelines (Cal. Code Regs., Tit. 14, Sections 15000 et seq.), the HCRCD has considered the Program Environmental Impact Report prepared for the CalVTP, State Clearinghouse Number 2019012052, which was certified by the California Board of Forestry and Fire Protection in December 2019 ("CalVTP Program EIR"), and the Project-Specific Analysis (PSA) and Addendum thereto, dated December 2024, for the HCRCD's approval of the project ("PSA/Addendum").

The CalVTP Program EIR, including the information contained in the PSA/Addendum dated December 2024, contains the environmental analysis and information necessary to support approval of the project, as set forth below.

2 STATUTORY REQUIREMENTS FOR FINDINGS

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

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

- (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

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

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

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

Here, as explained in the Board of Forestry and Fire Protection’s Findings and the Draft Program Environmental Impact Report (Draft Program EIR) and the Final Program EIR (collectively, the “Program EIR”), the CalVTP would result in significant and unavoidable or potentially significant and unavoidable environmental effects to the following: Aesthetics; Air Quality; Archaeological, Historical, and Tribal Cultural Resources; Biological Resources; Greenhouse Gas Emissions; Public Services, Utilities, and Service Systems; and Transportation. For reasons set forth in the Board of Forestry and Fire Protection’s Statement of Overriding Considerations, however, the Board of Forestry and Fire Protection determined that overriding economic, social, and other considerations outweigh the significant, unavoidable effects of the CalVTP.

When an agency approves a vegetation treatment project using a within-the-scope finding for all environmental impacts, it must adopt its own CEQA findings pursuant to Section 15091 of the State CEQA Guidelines, and if needed, a statement of overriding considerations, pursuant to Section 15093 of the State CEQA Guidelines. (See CEQA Guidelines section 15096(h).) When an agency approves a vegetation treatment project using an addendum, it must also adopt its own CEQA findings pursuant to CEQA Guidelines Section 15164. Although each agency must adopt its own findings, such agencies have the option of reusing, incorporating, or adapting all or part of the findings adopted by the Board of Forestry and Fire Protection for the CalVTP Program EIR to meet the agency’s own requirements to the extent the findings are applicable to the proposed vegetation treatment project. The following document sets forth the required findings for an agency’s project-specific approval that relies on and implements the CalVTP Program EIR.

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

3 BACKGROUND AND PROJECT DESCRIPTION

3.1 BACKGROUND

The Board of Forestry and Fire Protection is supporting the preparation of PSA documents to create a library of example vegetation treatment projects that help guide state and local agencies in preparing their own PSAs under the CalVTP Program EIR, as well as to achieve CEQA compliance for the proposed project. The Board of Forestry and Fire Protection selected the HCRCD’s proposed vegetation treatment project to be one of the PSAs that provides CEQA compliance for project approval and implementation and serves as an example PSA for other agencies seeking to use the CalVTP Program EIR to accelerate approval of their own vegetation treatment projects.

Vegetation treatments are proposed on up to 3,641 acres, encompassing 3,043 acres of land owned by Green Diamond Resource Company (Green Diamond) and approximately 598 acres of land owned by the McKinleyville Community Services District (MCS D) in western Humboldt County. HCRCD will support Green Diamond and MCS D in the pursuit of grant funding and administration of funds received through the HCRCD or other organizations to

implement the proposed treatments. HCRCD staff will also support the monitoring of Green Diamond's implementation of CalVTP Standard Project Requirements and mitigation measures in accordance with the MMRP. The HCRCD is the project proponent and Green Diamond and MCSD are the implementing entities.

3.2 PROJECT DESCRIPTION

The vegetation treatment project consists of vegetation treatments for wildfire risk reduction and forest health improvement on approximately 3,641 acres, encompassing 3,043 acres of land owned by Green Diamond and approximately 598 acres of land owned by MCSD in western Humboldt County, between McKinleyville and Fieldbrook, two communities north of Arcata, California. The Green Diamond property is privately owned commercial forest land and the MCSD land is a publicly owned, community forest. The project area includes some areas that due to site-specific conditions, may not be treated because of unforeseen restrictions, such as operational considerations (e.g., steep slopes, road limitations), economic feasibility, or to avoid sensitive resources, including cultural sites and presence of special-status species or habitat.

The proposed treatment types (i.e., shaded fuel breaks and wildland-urban interface [WUI] fuel reduction) and the treatment activities (i.e., mechanical vegetation treatment, manual vegetation treatment, prescribed burning, and targeted herbicide application) are consistent with those evaluated in the CalVTP Program EIR. Maintenance treatments are included as part of the project and would involve the same vegetation treatment types and activities used in the initial treatments. Existing staff would implement project treatments.

3.3 TREATMENT TYPES

Each treatment type (i.e., shaded fuel breaks and WUI fuel reduction) is described in more detail below and is consistent with the treatment types described in the CalVTP. Refer to Figure 2-1 for the location of each treatment type. Table 2-1 provides a summary of the proposed treatment areas and associated treatment types and activities.

Table 2-1 Proposed CalVTP Treatment Areas and Treatment Type

Treatment Type	Treatment Description	CalVTP Treatment Activity	Treatment Area Size by Land Ownership (acres)	
			Green Diamond Resource Company	McKinleyville Community Services District
Shaded Fuel Break	Implement shaded fuel breaks to reduce wildfire risk and aid in fire control and applying prescribed burning	Mechanical treatments (slopes less than 45%)	201	101
		Manual treatments (slopes greater than 45% and within riparian management zones where machinery is excluded)	223	11
		Targeted herbicide application	92	0
		Prescribed burning using piling and burning or broadcast burning	223	0
WUI Fuel Reduction	Reduce forest fuels by thinning understory and increasing the spacing between tree canopy, and applying prescribed burning	Mechanical treatments (slopes less than 45%)	2,098	384
		Manual treatments (slopes greater than 45% and within riparian management zones where machinery is excluded)	2,820	102
		Prescribed burning using piling and burning or broadcast burning	2,820	0
		Targeted herbicide application	2,110	0
Total Project Area¹			3,043	598

¹ In total, up to 3,641 acres may be treated, consisting of 3,043 acres on Green Diamond Resource Company land and 598 acres on McKinleyville Community Services District land. However, site-specific landscape conditions and implementation factors may preclude treatment within limited parts of the project area because of expected or unforeseen restrictions, such as operational considerations (e.g., steep slopes, road limitations), economic feasibility, or the presence of sensitive resources, including cultural sites, special-status species, or sensitive habitats.

3.3.1 Shaded Fuel Breaks

Fuel breaks are zones where vegetation (fire fuel) is modified in strategic locations, often in a linear layout, which reduces wildfire risk and supports fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. Fuel breaks also reduce the likelihood that a severe fire would occur within the fuel break by implementing maintenance treatments to manage regrowth over the long term. Additionally, fuel breaks may provide safe emergency egress during wildfires. Shaded fuel breaks retain a reduced portion of the canopy for its habitat and aesthetic values.

Shaded fuel breaks are proposed on up to 335 total acres of the project area (223 acres on Green Diamond lands and 112 acres on MCSD lands) with maximum widths of 200 feet. The fuel breaks are proposed along the western perimeter of the project area, along both sides of Murray Road, a public road along the northern perimeter of the project area, and along a north-south trending ridge that bisects the property from a gate at Murray Road to a gate at Timmons Lane. (Figure 2-1). The fuel breaks are intended to slow encroachment of a fire into or out of the project area and address fire risk associated with adjacent residences and public roads.

Within shaded fuel breaks, distances between vegetation would vary based on baseline conditions and feasibility of treatment. Trees would be spaced approximately 10 to 40 feet apart depending on stand age, and shrubs would typically be separated by 10 to 20 feet, depending on the size class of vegetation; where conditions vary, trees would be spaced consistent with basal area requirements of the California Forest Practice Rules. The remaining trees would be limbed approximately 10-15 feet in height to reduce the vertical continuity of fuels. Distances between retained vegetation may vary from this standard when safety or equipment limitations make access infeasible, or when vegetation retention conditions vary to protect sensitive resources. For example, retention of at least 75 percent surface cover is required within any watercourse and lake protection zone (WLPZ) pursuant to Standard Project Requirement (SPR) HYD-4 where fuel breaks overlap the WLPZ.

In forested areas of the shaded fuel breaks, trees would be thinned, and some shrubs would be removed mechanically and/or manually to establish spacing between vegetation, both vertically and horizontally. The increased space between vegetation would decrease the likelihood of fire spread and intensity of fires. Meanwhile, retained vegetation would provide shade and reduce growth rates of the understory by blocking sunlight and keeping the microclimate cool and relative humidity high for longer periods of time. Fuel breaks also reduce the likelihood that a severe fire would occur within the treated area by managing regrowth over the long-term.

On Green Diamond lands, manual and mechanical treatments, prescribed burning, and targeted herbicide application (as appropriate) would be conducted within shaded fuel breaks. Understory fuel not removed by manual or mechanical treatments would be treated with herbicides shortly after establishing the fuel break. The fuel breaks would require retreatment over time to maintain the desired fuel levels and distribution. To maintain the fuel breaks, mechanical and manual treatments, targeted herbicide application and prescribed burning would likely be used to prevent and manage shrub and tree regrowth. On MCSD lands, only manual and mechanical treatments would be conducted to establish and maintain fuel breaks. Prescribed burning and herbicide application would not occur on MCSD lands.

3.3.2 WUI Fuel Reduction

The WUI is the geographic overlap of wildland and nearby structures or infrastructure. Infrastructure and wildland vegetation in the WUI are close enough that an ignition puts nearby infrastructure at risk, complicates wildland firefighting, and threatens human life and private property. Land uses immediately west of the project area include a golf course, single-family residential neighborhoods and scattered rural homes, and various industrial and commercial businesses within the community of McKinleyville. The proposed WUI fuel reduction treatments would strategically reduce vegetation density and remove fuel in the project area to directly protect nearby communities,

which are at risk from wildfires originating in the adjacent wildlands. Additionally, treatment would protect the wildlands from fire ignitions which may start from human activities in developed areas. Where existing habitat within the WUI is degraded, such as by infestation of nonnative plant species, as well as needing fuel reduction, WUI treatments would also help enhance habitat quality.

WUI fuel reduction treatments encompass approximately 3,296 acres of the project area. Treatment methods proposed in the WUI fuel reduction areas are mechanical and manual treatment, prescribed burning, and herbicide application. Mechanical treatment methods would generally be restricted to slopes of less than about 45 percent. Manual treatment methods would generally be employed on slopes greater than 45 percent and within riparian management zones where the use of machinery is excluded. Prescribed burning and herbicide treatments would not be implemented on MCS D lands.

The objective of WUI fuel reduction treatment is to prepare the landscape for the occurrence of a fire so that fire behavior is ecologically beneficial rather than destructive. The prescription would reduce vegetative fuels so that vegetation is less connected, less dense, and is distributed evenly on the landscape. With the desired outcome, wildlife habitat function would be maintained through the retention standards described below. Soil and watershed processes would improve by reducing sources of ground-level fuels and overstory, which can lead to excessive adverse heat-related soil impacts when fire occurs under those conditions.

WUI fuel reduction treatments would occur in coastal mixed redwood, Douglas-fir, and spruce forests and minor other vegetation communities present in the project area. Tree species that would be retained would vary, but in general, would include redwood, Douglas-fir, and in discrete locations, grand fir and spruce. Within riparian areas, there would be retention of at least 75 percent of the overstory including alders and big leaf maple, and 50 percent of the understory canopy of native riparian vegetation.

Mechanical, manual, prescribed burning, and herbicide treatments would target invasive species (e.g., bromes [*Bromus* spp.]) that may occupy treatment areas, reduce vegetation in the overstocked understory, increase the average distance to the bottom of live crowns, and increase the spacing between canopy trees. Treatments would vary slightly depending on the vegetation type being treated and specific prescriptions would be reviewed by a registered professional forester (RPF) to maintain tree age class diversity and a sufficient number of young understory trees to facilitate forest regeneration and long-term maintenance of habitat function.

To maintain habitat function for special-status wildlife, WUI fuel reduction treatments would retain the following:

- ▶ hardwoods greater than 10 inches diameter at breast height (DBH) (e.g., alder, big-leaf maple) up to 5 percent of residual basal area;
- ▶ hardwoods greater than 12 inches DBH with basal hollows or other complex structural features;
- ▶ conifers greater than 14 inches DBH;
- ▶ up to three softwood snags per acre that are greater than 12 inches DBH and are more than 100 feet from structures and/or public roads;
- ▶ 50 percent of understory (i.e., shrubs, herbs) in WLPZs;
- ▶ downed woody debris larger than 18 inches diameter and 12 feet long; and
- ▶ canopy cover within forest habitats occupied or potentially occupied by northern spotted owl would be maintained at 60 percent or greater.

3.4 PROPOSED TREATMENT ACTIVITIES

The proposed vegetation treatment activities are mechanical treatments, manual treatments, targeted herbicide application, and prescribed burning (see Table 2-2). Each of these treatment activities is described in more detail below and is consistent with the treatment activities described in the CalVTP.

Treatment activities could occur during any time of year, although the nesting bird season (February 1 – August 31 or extended limited operating period for raptors as determined by a RPF or biologist) would be avoided when feasible. Treatment activities would generally occur Monday through Friday between 4:00 a.m. and 5:30 p.m. and when relative humidity is above 25 percent to increase fire safety during operation of mechanical equipment.

Table 2-2 Proposed CalVTP Treatment Activities

CalVTP Treatment Activity	Equipment Used for Treatments	Typical Duration of an Individual Treatment ¹	Maximum Treatment Size by Land Ownership (acres)		
			Green Diamond Resources Company	McKinleyville Community Services District	Total
Mechanical Treatments	Tracked feller-bunchers, wheeled skidding machines, skid steers, excavators, bulldozers, track or wheel mounted chippers, and/or track mounted masticators to implement treatments	3 days to 6 months	2,299	485	2,784
Manual Treatments	Chainsaws, hand saws, brush cutters, weed wrenches, chippers and loppers	3 months to 6 months	744	113	857
Herbicide Application	Batch truck, passenger vehicle, back-pack spray equipment, and all-terrain vehicles	1 week to 6 months	2,202	0	2,202
Prescribed Burning	Water truck, fire-truck, passenger vehicles, drip torch or propane torch, skidgine, fire hoses, bulldozers, skid steers & track mounted equipment to create fire line and other equipment suitable for fire suppression.	1 day to 7 days	3,043	0	3,043

¹ The duration of an individual treatment effort is based on the typical treatment effort conducted in a discreet treatment area, as described in the Program EIR. Many individual treatment efforts would occur over the course of the proposed project as a part of initial and maintenance treatment.

3.4.1 Mechanical Vegetation Treatment

Mechanical vegetation treatments are proposed on up to 2,784 acres of the project area. Mechanical treatments may include mechanical tree removal (i.e., felling and skidding), mowing, masticating, and piling. Depending on conditions, up to four crews may operate at the same time across the project area. Typically, one crew (i.e., 3-6 workers) would use tracked feller-bunchers, wheeled skidding machines, skid steers, excavators, bulldozers, track or wheel mounted chippers, and/or track mounted masticators to implement treatments. Typically, treatments would require several days to several months to complete. Equipment would be operated on appropriate slopes subject to operational restrictions near sensitive resources (e.g., watercourses). Mechanical treatments would occur on slopes generally up to 45 percent or as appropriate.

Mechanical treatment activities would include three categories: heavy, moderate, and light.

- ▶ **Heavy Conditions:** targets dense hardwoods and/or conifers (e.g., high tonnage of fuels per acre, such as saplings, poles, and small saw logs) and includes shrubs.
- ▶ **Moderate Conditions:** includes treating shrubs, small hardwoods, and small conifers (e.g., saplings and small poles).
- ▶ **Light Conditions:** typically occurs in previously treated areas and the vegetation that would be removed would include small trees (e.g., seedlings, saplings), grasses, and shrubs.

The overall vegetation retention standards provided under "WUI Fuel Reduction" above would apply to mechanical and manual treatment activities. Cut vegetation would be left on-site by lopping or chipping and scattering on the landscape. There are currently no feasible options to move non-commercial biomass off-site at this time. To reduce soil impacts and erosion, equipment-mounted brush rakes would be used to pile residual surface fuels, shrubs, and overstocked understory hardwoods and conifers, as appropriate.

3.4.2 Manual Vegetation Treatment

Manual vegetation treatments are proposed on up to 857 acres of the project area and would generally be confined to riparian management zones near watercourse areas and on slopes over 45 percent. Manual treatments would be implemented with hand crews of approximately eight to 20 members using hand tools and hand-operated power tools, such as chainsaws, hand saws, pole saws, chippers, brush cutters, weed wrenches and loppers or other hand tools, to cut, clear, and prune trees, herbaceous vegetation, and woody shrubs and increase space between trees. Trees would be limbed up to 10-15 feet in height to reduce the vertical continuity of fuels.

Typically, individual treatments would require 1 to 3 months to complete, depending on the treatment size, steepness of terrain, and type and density of vegetation. Manual treatment activities may occur within 100 feet of Class I or II streams to improve habitat and reduce undesirable wildfire hazards. Manual treatment within 100 feet of Class I or II streams would occur outside of bird nesting season, if feasible.

Cut vegetation would be left on-site by lopping or chipping and scattering on the landscape. In some areas, removed vegetation would be hauled off-site. The same general guidelines for tree and vegetation removal and retention would be followed as described above for WUI Fuel Reduction.

Proposed manual treatment activities are:

- ▶ Thinning and limbing trees with chainsaws, pole saws, loppers, chippers, brush cutters, weed wrenches, pruners or other hand tools; and
- ▶ cutting shrubs to restore characteristic densities for the vegetation community present.

3.4.3 Prescribed Burning

Prescribed burning is proposed on up to 3,043 acres of Green Diamond lands within the project area. No prescribed burning is proposed on MCS D lands. Prescribed burning consists of two general types: pile burning and broadcast burning. Both types of prescribed burning would be used to implement the project.

While pile burning is proposed to occur on up to 3,043 acres of the project area, the total acreage of pile burning would likely be much less, given limitations due to slope and proximity to watercourses. Biomass from manual and mechanical treatment would be piled using equipment (e.g., skid steer, tractor, bulldozer, or excavator) or hand crews and left on site to dry out before burning. If mechanical equipment is used, bulldozers equipped with a brush rake would be used to reduce soil displacement and create dirt-free piles for burning. Pile burning requires fewer crew members (2 to 10) than broadcast burning, and a nearby water source. A hand-held drip torch and/or propane torch would be used to ignite burn piles. Pile burning would take place under the overstory or in areas with little to no live overstory, including areas that have experienced previous vegetation treatment or prescribed burning.

Broadcast burning would use low-intensity, ground-level fire within specific, managed burn areas and could occur over time on up to 3,043 acres of the project area. Initial broadcast burn units would typically be 30 contiguous acres or less. Broadcast burning could occur in the existing and proposed fuel breaks or in the WUI fuel reduction treatment area. It would be used to promote forest health and native flora and reduce biomass and fuel loading in woodland and forest vegetation in areas that have not burned recently. It would also promote a more natural, sustainable, and wildfire-resilient native landscape. Pretreatment of vegetation using mechanical and manual activities or targeted herbicide application would occur in areas proposed for broadcast burning to create safe conditions for burning. The goal of broadcast burning is to consume targeted ground-level vegetation and forest litter fuels. Generally, not all fuel is consumed during broadcast burns and substantial portions of the groundcover and understory typically remain in a mosaic pattern.

Understory broadcast burning would be implemented using patterned lighting techniques during appropriate conditions and under the supervision of a qualified technician. Generally, appropriate conditions are those that occur during periods of high humidity and moderate-to-high fuel moisture content and/or in advance of an incoming wet weather event. Broadcast burning requires the construction of control lines using manual or mechanical methods or

wet lines using a fire hose. Control lines are linear lengths of bare soil that help stop the horizontal progression of a fire. Dense patches of vegetation may be trimmed or removed manually or mechanically in advance of burning. Vegetation could also be pretreated with herbicides to kill the aboveground plant parts and cause them to dry out so they would be better consumed by fire. Prescribed broadcast burning would require approximately 10 and 50 crew members, depending on the size and site characteristics of the burn unit, water trucks, fire engines, skidgine, rubber tire skidders, and excavators, mowers or dozers to clear control lines. Typically, each burn would last 1 day to 1 week.

Burning would occur throughout the year and in accordance with regulations regarding the use of prescribed burning, including limitations to suitable weather and vegetation moisture conditions. This would include the preparation and implementation of a burn plan that includes a smoke management plan.

3.4.4 Herbicide Application

Targeted herbicide application may occur over 2,202 acres of Green Diamond lands within the project area, as allowed by standard project requirements and application instructions. No herbicide application is proposed on MCSD lands. Actual treated acres would be highly dependent on crew size, ground conditions, and topography. Herbicide application operations would comply with all US Environmental Protection Agency (EPA) label directions, as well as California Environmental Protection Agency (CalEPA) and California Department of Pesticide Regulation (DPR) label standards. All herbicide applications would be performed by certified and licensed pesticide applicators in accordance with all local, State, and federal regulations. Only targeted, ground-level application would occur; there would be no aerial spraying of herbicides. Herbicide application would also comply with all requirements of SPR HYD-5 to protect non-target vegetation and special-status species from herbicides (Attachment A). Several herbicide application methods would be used, including paint-on stems, backpack hand-applicator, or hack and squirt.

Herbicide treatments would typically require a multiple-person crew(s) ranging from three to 16 people, a batch truck, a passenger vehicle to transport the crew, backpack sprayers, and all-terrain vehicles to move materials to treatment sites. All-terrain vehicles would only be driven on established roads and skid trails. Ground-based application would occur throughout the year, approximately 9 to 15 months following vegetation cutting. However, hack and squirt application may occur at least 3 months prior to cutting of hardwoods, and stump treatment immediately following cutting of hardwoods may also be implemented.

The application method chosen for a specific site would depend on the written recommendations of an independent Pest Control Advisor licensed by DPR. The application of herbicides would be widely and effectively used in the project area to help maintain a manageable understory for fuel breaks and to reduce fuel connectivity.

To restore characteristic herbaceous species composition for the vegetation community, pre-emergent herbicides may also be used. Herbicides would also be used to reduce the spread of invasive species such as bromes. Herbicides may also be used to restore characteristic shrub densities for the vegetation community.

Herbicides that may be applied include those listed below, consistent with those considered for use in the CalVTP Program EIR:

- ▶ Clopyralid (monoethanolamine salt);
- ▶ Glyphosate (isopropylamine salt, potassium salt, dimethylamine salt & diammonium salt);
- ▶ Velpar (hexazinone);
- ▶ Imazapyr (isopropylamine salt);
- ▶ Sulfometuron methyl;
- ▶ Triclopyr (butoxyethyl ester & triethylamine salt);
- ▶ Nonylphenol 9 Ethoxylates (NP9E); and
- ▶ Esplanade (Indaziflam)

3.4.5 Biomass Disposal

The vegetative biomass generated by the proposed project would be disposed by several methods:

- ▶ hauling off-site to a biomass facility as biomass utilization product,
- ▶ lopping and scattering within treatment boundaries,
- ▶ piling and pile burning,
- ▶ broadcast burning
- ▶ leaving piles for wildlife habitat, or
- ▶ chipping and scattering chips onto the ground as mulch, not exceeding 18 inches in depth.

Invasive plant and noxious weed biomass would be treated on-site to eliminate seeds and propagules or would be disposed off-site at an appropriate waste collection facility to prevent reestablishment or spread of invasive plants and noxious weeds. Invasive plants and noxious weeds would not be chipped and spread, scattered, or mulched on site.

3.5 TREATMENT MAINTENANCE

Maintenance, or retreatment, of the areas treated as part of the proposed project would be conducted to control vegetative regrowth and remove invasive species. Maintenance would use the same treatment activities as the initial treatments: mechanical treatments, manual treatments, prescribed burning, and targeted herbicide application. Like the initial treatments, prescribed burning and herbicide application are not proposed for maintenance of MCSD lands. Maintenance treatments would occur as needed and would generally treat smaller acreages and use less equipment than the initial treatments. The interval between initial treatments and subsequent maintenance would be based on site monitoring for the effectiveness of the initial treatment, available funding, and other factors. Maintenance cycles would be dependent on regrowth conditions and would differ by location.

Maintenance prescriptions would be developed with consideration of the location's vegetation type and its rates of regrowth; fire return intervals vary by vegetation type and disturbance intensity. Manual treatments could also occur, such as hand pulling of invasive plants or hand thinning.

Prior to implementing a maintenance treatment, the implementing entity (Green Diamond or MCSD) would verify that the expected site conditions as described in the PSA/Addendum are present in the treatment area. As time passes, the continued relevance of the PSA/Addendum would be considered by the project proponent and agencies seeking to use this PSA for later discretionary approvals in light of potentially changed conditions or circumstances. If environmental conditions evolve or project approaches change to the degree that the project proponent finds new significant or substantially more severe significant impacts may occur, Green Diamond or MCSD would determine whether a new PSA/Addendum or other environmental analysis is warranted. In addition to verifying that the PSA/Addendum continues to provide relevant CEQA coverage for treatment maintenance, the PSA/Addendum would be updated at the time a maintenance treatment is needed when more than 10 years have passed since the approval of the PSA/Addendum or the latest PSA/Addendum update. For example, a reconnaissance survey may be conducted to verify conditions are substantially similar to those anticipated in the PSA/Addendum. Updated information would be documented.

4 ENVIRONMENTAL REVIEW PROCESS

The project PSA/Addendum was prepared in compliance with CEQA to document the HCRCD's determination that the portions of the project area that are within the CalVTP treatable landscape are within the scope of the CalVTP Program EIR and that a subsequent or supplemental EIR is not required for the portions of the project area that extend outside of the CalVTP treatable landscape. The PSA/Addendum contains a detailed and comprehensive review of the project and the resulting impacts, and concludes that implementation of the project would not cause any new significant environmental impacts nor an increase in the severity of significant impacts previously identified and studied in the CalVTP Program EIR. There have not been any substantial changes with respect to the circumstances under which implementation of the project would be undertaken that would require major revisions to the previously certified CalVTP Program EIR. In addition, there is no new information of substantial importance, which was not known and could not have been known at the time that the CalVTP Program EIR was certified, showing that new or more severe environmental impacts not addressed in the CalVTP Program EIR would occur, that mitigation measures or alternatives found infeasible in the CalVTP Program EIR would in fact be feasible, or that different mitigation measures or alternatives from those analyzed in the CalVTP Program EIR would substantially reduce one or more significant impacts.

The PSA/Addendum analyzes the environmental effects of the project in relation to the environmental analysis in the CalVTP Program EIR with regard to the following environmental topic areas: Aesthetics; Agricultural and Forestry Resources; Air Quality; Archeological, Historical, and Tribal Cultural Resource; Biological Resources; Energy; Geology and Soils; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning and Population and Housing; Noise; Public Services, Utilities, and Service Systems; Recreation; Transportation; and Wildfire. It also identifies standard project requirements (SPRs) and mitigation measures adopted as part of the CalVTP Program EIR relevant to the project that have been incorporated into and must be implemented as part of the project. All SPRs and mitigation measures in the CalVTP Program EIR relevant to the project, as well as all components of the project described in the PSA/Addendum, are included in the Approval and are made conditions of the project.

The HCRCD followed the evaluation and reporting process outlined in the PSA and required under the CalVTP, as explained below.

On June 13, 2024, the HCRCD submitted to CAL FIRE the required information regarding this project when it began preparing the PSA. The submittal included:

- ▶ project location (as a point);
- ▶ project size;
- ▶ planned treatment types and activities; and
- ▶ contact information for a representative of the HCRCD.

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

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

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

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

5 RECORD OF PROCEEDINGS

In accordance with Guidelines Section 15091 (b), the record of proceedings for the HCRCD's decision to approve the vegetation treatment project under the CalVTP includes the following documents at a minimum:

- ▶ The certified Final Program EIR for the CalVTP, including the Draft Program EIR, responses to comments on the Draft Program EIR, and appendices;
- ▶ All recommendations and findings adopted by the Board of Forestry and Fire Protection in connection with the CalVTP and all documents cited or referred to therein;
- ▶ All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the treatment project prepared by the HCRCD, consultants to the HCRCD, or responsible or trustee agencies with respect to the HCRCD's compliance with the requirements of CEQA and with respect to the HCRCD's action on the CalVTP;
- ▶ Matters of common knowledge to the HCRCD, including but not limited to federal, state, and local laws and regulations; and
- ▶ Any documents expressly cited in these findings, in addition to those cited above.

After project approval, the substantial evidence in the record that supports the decision and the findings, in accordance with Guidelines Section 15091 (b), are available for review upon request during normal business hours at 5630 South Broadway, Eureka, CA 95503. The custodian of these documents is Jill Demers, Executive Director. The certified Final CalVTP Program EIR and CalVTP Findings/Statement of Overriding Consideration are also available on the Board of Forestry and Fire Protection's CalVTP webpage.

6 MITIGATION MONITORING AND REPORTING PROGRAM

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

7 FINDINGS FOR DETERMINATIONS OF LESS THAN SIGNIFICANT

The HCRCDD has reviewed and considered the information in the Final Program EIR for the CalVTP addressing potential environmental effects, proposed mitigation measures, and alternatives. The HCRCDD, relying on the facts and analysis in the Final Program EIR and the treatment project PSA/Addendum, which were presented to the HCRCDD Board of Directors and reviewed and considered prior to any approvals, concurs with the conclusions of the Final Program EIR and the treatment project PSA/Addendum regarding the potential environmental effects of the CalVTP and the treatment project.

The HCRCDD concurs with the conclusions in the Final Program EIR and treatment project PSA/Addendum that all of the following impacts will be less than significant or no impact:

7.1 AESTHETICS AND VISUAL RESOURCES

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

7.2 AGRICULTURAL AND FORESTRY RESOURCES

- Impact AG-1:** Directly Result in the Loss of Forest Land or Conversion of Forest Land to a Non-Forest Use or Involve Other Changes in the Existing Environment Which, Due to Their Location or Nature, Could Result in Conversion of Forest Land to Non-Forest Use

7.3 AIR QUALITY

- Impact AQ-2:** Expose People to Diesel Particulate Matter Emissions and Related Health Risk
- Impact AQ-5:** Expose People to Objectionable Odors from Diesel Exhaust

7.4 ARCHAEOLOGICAL, HISTORICAL, AND TRIBAL CULTURAL RESOURCES

- Impact CUL-1:** Cause a Substantial Adverse Change in the Significance of Built Historical Resources
- Impact CUL-3:** Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource
- Impact CUL-4:** Disturb Human Remains

7.5 BIOLOGICAL RESOURCES

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

7.6 ENERGY RESOURCES

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

7.7 GEOLOGY, SOILS, AND MINERAL RESOURCES

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

7.8 GREENHOUSE GAS EMISSIONS

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

7.9 HAZARDOUS MATERIALS, PUBLIC HEALTH AND SAFETY

- Impact HAZ-1:** Create a Significant Health Hazard from the Use of Hazardous Materials
- Impact HAZ-2:** Create a Significant Health Hazard from the Use of Herbicides

7.10 HYDROLOGY AND WATER QUALITY

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

7.11 LAND USE AND PLANNING, POPULATION AND HOUSING

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

7.12 NOISE

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

7.13 PUBLIC SERVICES, UTILITIES, AND SERVICE SYSTEMS

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

7.14 RECREATION

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

7.15 TRANSPORTATION

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

7.16 WILDFIRE

- Impact WIL-1:** Substantially Exacerbate Fire Risk and Expose People to Uncontrolled Spread of a Wildfire
- Impact WIL-2:** Expose People or Structures to Substantial Risks Related to Post-Fire Flooding or Landslides

8 SIGNIFICANT EFFECTS AND MITIGATION MEASURES

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

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

Not every individual treatment project will have all of the significant environmental impacts that the CalVTP was determined to contribute to or cause. The impacts and mitigation measures identified below reflect the conclusions of the PSA by indicating which of the CalVTP's impacts that this treatment project will contribute to or cause. By indicating the project-specific effects of this treatment project as follows, the HCRCD's decisionmaker or decision making body is hereby making the required findings under CEQA regarding the application or feasibility of mitigation measures to reduce those impacts.

8.1 FINDINGS FOR IMPACTS MITIGATED TO LESS THAN SIGNIFICANT

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

Biological Resources

- Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications**
 - Mitigation Measure BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA
 - Mitigation Measure BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA
 - Mitigation Measure BIO-1c: Compensate for Unavoidable Loss of Special-Status Plants
- Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications (all wildlife species except bumble bees)**
 - Mitigation Measure BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)
 - Mitigation Measure BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)
 - Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
 - Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
 - Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
 - Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands
- Impact BIO-3: Substantially Affect Riparian Habitat or Other Sensitive Natural Community Through Direct Loss or Degradation that Leads to Loss of Habitat Function**
 - Mitigation Measure BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands
 - Mitigation Measure BIO-3b: Compensate for Loss of Sensitive Natural Communities and Oak Woodlands
 - Mitigation Measure BIO-3c: Compensate for Unavoidable Loss of Riparian Habitat
- Impact BIO-4: Substantially Affect State or Federally Protected Wetlands**
 - Mitigation Measure BIO-4: Avoid State and Federally Protected Wetlands
- Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries**
 - Mitigation Measure BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites

Hazardous Materials, Public Health and Safety

- Impact HAZ-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites**
 - Mitigation Measure HAZ-3: Identify and Avoid Known Hazardous Waste Sites

8.2 FINDINGS FOR SIGNIFICANT AND UNAVOIDABLE IMPACTS

The CalVTP Program EIR determined that some impacts of the program would be significant and unavoidable or potentially significant and unavoidable, even after implementation of all feasible mitigation. The Program EIR noted that the majority of qualifying treatments under the CalVTP would result in less-than-significant impacts or be potentially beneficial; however, because of uncertainty related to future predictions of environmental conditions or implementation of mitigation by other agencies, the Program EIR noted for CEQA purposes of good-faith disclosure that the possibility exists for impacts to be significant and unavoidable, although the expected outcome would be less than significant or potentially beneficial. Despite the expected less-than-significant outcomes or benefits of treatments, impacts determined to be significant or potentially significant and unavoidable in the Program EIR because of the uncertainties, are recognized as significant and unavoidable or potentially significant and unavoidable for the purpose of these Findings.

The HCRCD finds that the treatment project would contribute to or cause the following significant and unavoidable or potentially significant and unavoidable impacts. Incorporating and implementing the following feasible mitigation measures indicated to be applicable to the treatment project will reduce the severity of this impact, but not to a less-than-significant level. The HCRCD will adopt and implement these mitigation measures. The HCRCD therefore finds that changes or alterations have been required in, or incorporated into, the treatment project that will substantially lessen, but not avoid, the significant environmental effect as identified in the Program EIR and PSA/Addendum.

The HCRCD finds that fully mitigating these impacts to a less-than-significant level is not feasible; there are no feasible mitigation measures beyond those described below to reduce these impacts. These impacts will remain significant and unavoidable or potentially significant and unavoidable. The HCRCD concludes, however, that the benefits of the CalVTP and the vegetation treatment project outweigh the significant or potentially significant unavoidable impacts of the Program and treatment project, as set forth in the Board of Forestry and Fire Protection's Statement of Overriding Considerations and the HCRCD's own Statement of Overriding Considerations, if any.

SIGNIFICANT AND UNAVOIDABLE IMPACTS

Archaeological, Historical, and Tribal Cultural Resources

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

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

Refer to Section 8.2.3, "Archaeological, Historical, and Tribal Cultural Resources," of the CalVTP CEQA Findings of Fact and Statement of Overriding Considerations for the CalVTP findings. The HCRCD incorporates by reference the Board of Forestry and Fire Protection's CEQA findings for this impact.

POTENTIALLY SIGNIFICANT AND UNAVOIDABLE IMPACTS

Air Quality

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

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

Refer to Section 8.2.2, "Air Quality," of the CalVTP CEQA Findings of Fact and Statement of Overriding Considerations for the CalVTP findings. The HCRCD incorporates by reference the Board of Forestry and Fire Protection's CEQA findings for this impact.

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

No feasible mitigation is available

Refer to Section 8.2.2, "Air Quality," of the CalVTP CEQA Findings of Fact and Statement of Overriding Considerations for the CalVTP findings. The HCRCD incorporates by reference the Board of Forestry and Fire Protection's CEQA findings for this impact.

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

No feasible mitigation is available

Refer to Section 8.2.2, "Air Quality," of the CalVTP CEQA Findings of Fact and Statement of Overriding Considerations for the CalVTP findings. The HCRCD incorporates by reference the Board of Forestry and Fire Protection's CEQA findings for this impact.

Greenhouse Gas Emissions

Impact GHG-2: Generate GHG Emissions through Treatment Activities

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

Refer to Section 8.2.5, "Greenhouse Gas Emissions," of the CalVTP CEQA Findings of Fact and Statement of Overriding Considerations for the CalVTP findings. The HCRCD incorporates by reference the Board of Forestry and Fire Protection's CEQA findings for this impact.

Transportation

Impact TRAN-3: Result in a Net Increase in VMT for the Proposed CalVTP

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

Refer to Section 8.2.6, "Transportation," of the CalVTP CEQA Findings of Fact and Statement of Overriding Considerations for the CalVTP findings. The HCRCD incorporates by reference the Board of Forestry and Fire Protection's CEQA findings for this impact.

Public Services, Utilities and Service Systems

Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity

No feasible mitigation is available

Refer to Section 8.2.7, "Public Services, Utilities, and Service Systems," of the CalVTP CEQA Findings of Fact and Statement of Overriding Considerations for the CalVTP findings. The HCRCD incorporates by reference the Board of Forestry and Fire Protection's CEQA findings for this impact.

9 STATEMENT OF OVERRIDING CONSIDERATIONS

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

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

Exercising its independent judgment and review, the HCRCD concurs that the benefits of the CalVTP and the treatment project outweigh the significant environmental effects and hereby incorporates by reference and adopts the Board of Forestry and Fire Protection's Statement of Overriding Considerations for the CalVTP. The certified Final CalVTP Program EIR and CalVTP Findings/Statement of Overriding Consideration are available on the Board of Forestry and Fire Protection's CalVTP webpage.

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

- ▶ The McKinleyville Vegetation Treatment Project, as an implementation action of the CalVTP, will reduce dire risks to life, property, and natural resources in California.
- ▶ The McKinleyville Vegetation Treatment Project, as an implementation action of the CalVTP, reflects the most current and commonly accepted science and conditions in California and allows for adaptation in response to potential evolution and changes in science and conditions.
- ▶ The McKinleyville Vegetation Treatment Project, as an implementation action of the CalVTP, reflects the Board of Forestry and Fire Protection's and CAL FIRE's goals. The CalVTP will help the Board of Forestry and Fire Protection and CAL FIRE achieve their central goals for reducing and preventing the impacts of fire in the state, as outlined in the *2018 Strategic Fire Plan for California*. The CalVTP will help to establish a natural environment that is more resilient and built assets that are more resistant to the occurrence and effects of wildland fire.
- ▶ The McKinleyville Vegetation Treatment Project, as an implementation action of the CalVTP, will help implement Executive Orders, including:
 - EO B-42-17: Governor Brown's order issued to bolster the state's response to unprecedented tree die-off through further expediting removal of millions of dead and dying trees across the state; and
 - EO B-52-18: Governor Brown's order to improve forest management and restoration, provide regulatory relief, and reduce barriers for prescribed burning.
- ▶ The Board of Forestry and Fire Protection is required by law to comply with SB 1260, signed into law by Governor Brown in February 2018, which improves California forest management practices to reduce the risk of wildfire in light of the changing climate and includes provisions for the CalVTP Program EIR to serve as the programmatic CEQA coverage for prescribed burns within the SRA. The McKinleyville Vegetation Treatment Project, as an implementation action of the CalVTP, will bring the Board of Forestry and Fire Protection into compliance with these requirements.
- ▶ The McKinleyville Vegetation Treatment Project, as an implementation action of the CalVTP, will help to meet California's GHG emission goals consistent with the California Forest Carbon Plan, California's 2017 Climate Change Scoping Plan, Fire on the Mountain: Rethinking Forest Management in the Sierra Nevada, and California 2030 Natural and Working Lands Climate Change Implementation Plan.