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CALIFORNIA ENVIRONMENTAL QUALITY ACT STATUTORY EXEMPTION FOR RESTORATION PROJECTS
CONCURRENCE NO. 21080.56-2023-039-R5

Project:	Volcan Mountain Nature Center Forest Resilience Project
Location:	San Diego County
Lead Agency:	Resource Conservation District of Greater San Diego County
Lead Agency Contact:	Ann Baldridge; ann.baldridge@rcdsandiego.org

Background

Project Location: The Volcan Mountain Nature Center Forest Resilience Project (Project) is located in eastern San Diego County, approximately three miles north of the town of Julian. The Project is located on the Volcan Mountain Foundation Nature Center, a 388-acre property. Approximate coordinates are 33.127882, -116.600959.

Project Description: The Resource Conservation District of Greater San Diego County (Lead Agency), in partnership with the Volcan Mountain Foundation (VMF), proposes to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend, and restore or provide habitat for California native fish and wildlife. The Project is designed to benefit California spotted owl (*Strix occidentalis*; Endangered Species Act Candidate for Listing), purple martin (*Progne subis*; Species of Special Concern (SSC)), Townsend's big-eared bat (*Corynorhinus townsendii*; SSC, Species of Greatest Conservation Need), and montane forest habitat. The Project will restore and re-create more natural, lower severity fire regimes and improve forest resilience. The Project includes the removal of ladder fuels, dead trees, and other combustible materials to reduce the potential severity of wildfires within three mixed conifer/hardwood montane forest groves. The Project will also remove encroaching chaparral vegetation followed by reforestation with native conifer and hardwood tree species. Further reforestation will occur on approximately 40 acres with native conifer and hardwood tree species to expand montane forest habitat. The Project will also address infestation by the invasive gold-spotted oak borer (*Agrilus coxalis;* GSOB) in the Project area.

The Project includes seven treatments that will be completed over time.

Treatment 1: Conserve Mature Forested Riparian Area by Improving Wildfire Resiliency (11.1 acres): Treatment 1 will occur within the riparian corridor of an unnamed tributary of Santa Ysabel Creek and entails the manual thinning and pruning of understory saplings, poles, and brush species to improve wildfire resiliency in a mature mixed conifer grove. This treatment

will also include the removal and treatment of GSOB-infested oaks following strict biosecurity protocols.

Treatment 2: Roadside Fuel Treatment to Protect Forest Resources and Subsequent Reforestation (3.1 acres): In order to improve and protect forest infrastructure, minimize roadside fire starts, and provide safe ingress/egress in the event of a wildfire, this treatment will remove chaparral species (e.g. Ceanothus), via mastication and hand removal, for 50 feet on each side of the roadway for a distance of 1,300 feet (0.25 mile). Where significant tree mortality has occurred, large woody biomass will also be removed within the 50-foot roadside zone. Chaparral regrowth will subsequently be managed via non-chemical methods (e.g., managed grazing). Follow-up treatment includes reforestation (see Treatment 6).

Treatment 3: Enhance Mixed Conifer/Montane Oak Woodland by Restoring Wildfire Resiliency and Protecting Oaks from GSOB (61.7 acres): Focused in and around the mature montane forest groves, this treatment will thin and prune excessively dense young/overstocked conifer saplings, pole-sized oaks, and brush species to enhance wildfire resiliency in the mature forest/oak/mixed conifer forest. This treatment will remove GSOB-infested oaks to reduce the spread of GSOB.

Treatment 4: Mechanical Site Preparation for Reforestation (37.3 acres): Site preparation to restore/reforest the site from the encroachment of brush species (e.g., *Ceanothus*), and planting of nursery raised conifer and hardwood seedlings, will occur in this treatment. Encroaching stands of chaparral will be grubbed, masticated, and mowed (where slopes allow) or cut with chainsaws. Small biomass may be dispersed following a lop and scatter methodology. Regrowth will be controlled via carefully managed grazing and/or broadcast burning.

Treatment 5: Site Preparation for Planting by Prescribed Burning (49.5 acres): This treatment will prepare a portion of the Nature Center for planting of conifer and oak species by conducting a prescribed burn to reduce competition from invasive annual grasses and forbs. This activity includes manual or mechanical creation of containment lines and removal of woody biomass/residue prior to ignition.

Treatment 6: Restore/Reforest Conifer Forest Severely Damaged by Recent Wildfires (37.3 acres): This treatment will restore/reforest previously forested areas with native conifers, and plant approximately 6,000 conifer seedlings of assorted species [i.e., big-cone Douglas fir (*Pseudotsuga macrocarpa*), white fir (*Abies concolor*), incense cedar (*Calocedrus decurrens*), and Coulter pine (*Pinus coulteri*)]. Tree seedlings will be hand-planted, then shade cards and herbivory protection tubes will be installed.

Treatment 7: Site Monitoring and Seedling Care (162.6 acres): All the site monitoring and maintenance tasks including watering/irrigation of seedlings, hand weeding, and replacement of shade cards and herbivory tubes as necessary are included in this treatment.

Tribal Engagement: The Lead Agency and VMF notified tribal governments of the Project via email and U.S. mail on August 23, 2023. These communications were sent to 36 individuals of 20 tribes. To date, responses have been received from representatives from the Santa

Ysabel Tribe and the La Jolla Band of Luiseño Indians. The Project has also subsequently been discussed at an in-person gathering hosted by the La Jolla Band of Luiseño.

Continued engagement will occur in the form of a steering committee, including tribal representatives, to highlight how the Project can meet indigenous-led forestry, fire, and fuels crew's training needs. There is a site tour scheduled to further discuss the Project.

Interested Party Coordination: The Project is part of the Regional Priority Plan compiled by the Lead Agency with outreach to and input from 45 entities as part of the Regional Forest and Fire Capacity group. The Project has support from Julian Fire Safe Council (currently Back Country Communities Thriving). The Project proponents have also reached out to San Dieguito River Park Joint Powers Authority.

Anticipated Project Implementation Timeframes: Start date: September 2024
Completion date: April 2027

Lead Agency Request for CDFW Concurrence: On September 26, 2023, the Director of the California Department of Fish and Wildlife (CDFW Director) received a concurrence request from the Resource Conservation District of Greater San Diego (Lead Agency) pursuant to Public Resources Code section 21080.56, subdivision (e) (Request). The Request seeks the CDFW Director's concurrence with the Lead Agency's determination on September 25, 2023 that the Project meets certain qualifying criteria set forth in subdivisions (a) to (d), inclusive, of the same section of the Public Resources Code (Lead Agency Determination). The CDFW Director's concurrence is required for the Lead Agency to approve the Project relying on this section of the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.).

Concurrence Determination

The CDFW Director concurs with the Lead Agency Determination that the Project meets the qualifying criteria set forth in Public Resources Code section 21080.56, subdivisions (a) to (d), inclusive (Concurrence).

Specifically, the CDFW Director concurs with the Lead Agency that the Project meets all of the following conditions: (1) the Project is exclusively to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend; or is exclusively to restore or provide habitat for California native fish and wildlife; (2) the Project may have public benefits incidental to the Project's fundamental purpose; (3) the Project will result in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery; and includes procedures and ongoing management for the protection of the environment; and, (4) Project construction activities are solely related to habitat restoration. Pursuant to Public Resources Code section 21080.56, subdivision (g), CDFW will post this Concurrence on its CEQA Notices and Documents internet page: https://wildlife.ca.gov/Notices/CEQA.

This Concurrence is based on best available science and supported, as described below, by substantial evidence in CDFW's administrative record of proceedings for the Project.

This Concurrence is also based on a finding that the Project is consistent with, and that its implementation will further CDFW's mandate as California's trustee agency for fish and wildlife, including the responsibility to hold and manage these resources in trust for all the people of California.

Discussion

A. Pursuant to Public Resources Code section 21080.56, subdivision (a), the CDFW Director concurs with the Lead Agency that the Project will exclusively conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend; or restore or provide habitat for California native fish and wildlife.

   The Project will create and maintain a sustainable and fire-resistant montane forest community for range-restricted native species that rely upon mixed conifer/hardwood montane forest ecosystems. Removal of dead trees and ladder fuels, stand thinning and density reduction, and managed shaded fuel breaks, will improve forest resiliency by limiting wildfire intensity. Reforestation will also expand overall habitat in the Project area by planting native conifer species.

   These activities will benefit multiple native species that are being impacted by habitat loss from large stand replacing wildfire events. These species include but are not limited to: California spotted owl, purple martin, and San Diego mountain kingsnake (*Lampropeltis zonata pulchra*).

B. Pursuant to Public Resources Code section 21080.56, subdivision (b), the CDFW Director concurs with the Lead Agency that the Project may have incidental public benefits, such as public access and recreation.

   The Project will have incidental public benefits of enhanced safety for neighboring lands, and increased education and research opportunities. The Project will reduce hazardous fuels, restore forest health, and increase wildfire resilience, which will in turn help protect the surrounding communities from the risk of catastrophic wildfire.

   There will also be increased opportunities for environmental education for youth – local Title I school and schools from local Native American Reservations. VMF hosts several programs that promote environmental education on their property.

C. Pursuant to Public Resources Code section 21080.56, subdivision (c), the CDFW Director concurs with the Lead Agency that the Project will result in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery, and includes procedures and ongoing management for the protection of the environment.

   Long-term Net Benefits to Climate Resiliency: The Project will support climate resiliency by creating a more fire resilient montane forest habitat. Project treatments will replicate a more natural and less severe fire regime and result in a forest

ecosystem more representative natural montane forest habitat that has not been impacted by fire suppression.

The Project will also have long-term carbon sequestration benefits by reducing potential emissions from intense stand-replacing crown fires.

Long-term Net Benefits to Biodiversity: The Project will have long-term net benefits to biodiversity through enhancement of montane forest habitat, improved fire resiliency, and reducing the potential habitat type conversion from forest to shrublands or grasslands. The treatments in this Project will increase the resilience of high-value groves of mixed conifer/hardwoods and help ensure more rare native species survive in the ecosystem, by providing these montane-dependent species with suitable habitat and refugia. Furthermore, maintaining montane conifer hardwood species will reduce accelerated fire cycles and restored forests are expected to be more resistant to future wildfires. Restored groves of montane conifer and hardwood species will provide refugia for species that rely upon this habitat for foraging and breeding.

Long-term Net Benefits to Sensitive Species Recovery: The Project will have benefits for species recovery through the restoration and protection of habitats. Mature mixed conifer/hardwood forest groves support California spotted owl, purple martin, and Townsend's big-eared bat. The Project will likely benefit other species that have current or historical presence on the property such as Crotch bumblebee (*Bombus crotchii*; CESA Candidate Species), coast patch-nose snake (*Salvadora hexalepis virgultea*), American badger (*Taxidea taxus*), and southern California ringtail (*Bassariscus astutus octavus*).

Procedures for the Protection of the Environment: The Project includes activities that will protect the environment and measures for the protection of the environment. Project activities will ultimately protect biological resources through fuel reduction and limiting catastrophic wildfire and management of ladder fuels that cause tree mortality, stand replacement, and habitat loss.

Specific measures for the protection of the environment include: minimizing herbicide use; avoiding work activities during nesting season; biological resource monitoring; Project area delineation and avoidance of wetlands, streams, and watercourses; delineation and fencing of environmental sensitive habitat areas; and species-specific protective measures.

Ongoing Management for the Protection of the Environment: VMF is dedicated to perpetual land stewardship on its property and will include ongoing management of vegetation and chaparral encroachment into montane forest habitats. Long-term success criteria will be monitored throughout the life of the Project. VMF will continue its activities to preserve native habitat on its lands for twenty years as part of its land stewardship program.

D. Pursuant to Public Resources Code section 21080.56, subdivision (d), the CDFW Director concurs with the Lead Agency that the Project does not include any construction activities, except those solely related to habitat restoration.

The Project does not include construction activities.

Scope and Reservation of Concurrence

This Concurrence is based on the proposed Project as described by the Lead Agency Determination and the Request. If there are any subsequent changes to the Project that affect or otherwise change the Lead Agency Determination, the Lead Agency, or any other public agency that proposes to carry out or approve the Project, shall submit a new Lead Agency Determination and request for concurrence from CDFW pursuant to Public Resources Code section 21080.56. If any other public agency proposes to carry out or approve the Project subsequent to the effective date of this Concurrence, this Concurrence shall remain in effect and no separate concurrence from CDFW shall be required so long as the other public agency is carrying out or approving the Project as described by the Lead Agency Determination and the Request.

Other Legal Obligations

The Project shall remain subject to all other applicable federal, state, and local laws and regulations, and this Concurrence shall not weaken or violate any applicable environmental or public health standards. (Pub. Resources Code, § 21080.56, subd. (f).)

CDFW Director's Certification

By: _____ Date: 11/15/23

Charlton H. Bonham, Director
California Department of Fish and Wildlife