



Memo

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Date: April 4, 2024
To: Stephanie Moreno, North Santa Clara Resource Conservation District
From: Heather Blair, Ascent
Subject: Agency Use of the CalVTP PSA/Addendum

The Santa Clara County Fire Safe Council (SCC FSC) is developing a landscape-scale vegetation treatment project in Santa Clara County that could encompass more than 150,000 acres of land owned by public agencies and private entities. It is expected that California Environmental Quality Act (CEQA) compliance coverage would be achieved by preparing a Project-specific Analysis (PSA) using the California Vegetation Treatment Program Environmental Impact Report (CalVTP Program EIR).

The PSA will evaluate if the proposed vegetation treatments are within the scope of the CalVTP Program EIR. If a proposed vegetation treatment project is covered by the evaluation of environmental effects in the Program EIR, it may be approved using a finding that the project is within the scope of the Program EIR, consistent with State CEQA Guidelines Section 15168(c)(2). For elements of the proposed project that are different than those described in the CalVTP Program EIR (e.g., treatment area extensions beyond the geographic area covered in the Program EIR), an Addendum to the Program EIR can be integrated into the PSA if the proposed changes or revisions would not result in new or substantially more severe significant environmental impacts, consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168.

NORTH SANTA CLARA RCD'S ROLE AS CEQA LEAD AGENCY

Established as an independent special district by the California State Legislature, the North Santa Clara RCD's mission is to provide education and technical assistance to constituents and watershed stakeholders to sustainably manage soil, water, and wildlife with the best available science. This mission is directly affected by the ecological health of Santa Clara County watersheds and their resilience to wildfire.

The North Santa Clara RCD would serve in the role of CEQA lead agency for preparation of the CalVTP PSA/Addendum, because it would be providing technical assistance to landowners and stakeholders that would be implementing vegetation treatments within the project area. Technical assistance may include convening partnerships or seeking grant funding for treatment implementation or overseeing/assisting with project implementation. The PSA/Addendum would provide environmental information to the RCD in its consideration of approval of funding allocations and implementation of the work by the RCD and the public and private agency landowners in partnership with the SCC FSC.

As the CEQA lead agency, North Santa Clara RCD would be responsible for ensuring that implementation of mitigation measures and standard project requirements (SPRs) related to its discretionary approvals occurs in accordance with the Mitigation Monitoring and Reporting Program (MMRP) pursuant to Section 15097(a) of the State CEQA Guidelines.

USE OF THE PSA/ADDENDUM BY OTHER AGENCIES

The PSA/Addendum, in conjunction with the CalVTP Program EIR, may be used for CEQA compliance by other public agencies acting in a responsible agency role, when a discretionary approval is needed pertaining to covered activities in the project area, including for public funding through other sources (e.g., CAL FIRE Forest Health Grants). That responsible agency would consider its action in light of the PSA/Addendum, and confirm its environmental effects are covered. If so, the responsible agency would adopt its findings, using the North Santa Clara RCD findings as a guide if desired, adopt the MMRP as it pertains to their project-related approval, and file a Notice of Determination regarding their project-related approval. In the circumstance where another public agency seeks to use the PSA/Addendum for CEQA compliance and there is no related discretionary approval required of the North Santa Clara RCD, the RCD would have no involvement, oversight, or other obligation in the approval, implementation, or documentation of that agency's actions.