NOTICE OF EXEMPTION

State of California
The Natural Resource Agency
California Department of Forestry and Fire Protection (CAL FIRE)

PROJECT TITLE
Rainbow Conservation Camp Storage Shed Project

PROJECT LOCATION
8215 Rainbow Heights Road
Fallbrook, CA 92028
NW¼, Section 5, T9S, R2W, SSBM

COUNTY
San Diego

LEAD AGENCY
California Department of Forestry and Fire Protection (CAL FIRE)

CONTACT
Eric Just
CAL FIRE – Monte Vista Headquarters
Pre-Fire/Resource Management Office
2249 Jamaea Rd
El Cajon, CA 92019

PHONE
(619) 592-1224

This project proposes the placement of two (2) new 18-foot-wide by 24-foot-long prefabricated "Tough Shed" storage buildings separated by a 24-foot concrete pad at the existing CAL FIRE Rainbow Conservation Camp. Completed project dimensions are 24-feet by 60-feet. Foundations for the storage buildings will require two poured 6-inch-thick concrete slabs with 12-inch by 12-inch concrete footings. A final 6-inch-thick slab will be poured between the two storage building foundations for additional equipment storage. Implementation of this project will require minor leveling of the proposed area and excavation of footings with any spoil to be terraced into adjacent areas (approximately 6 cubic yards), placement of form boards and re-enforcing steel, placement of approximately 31 cubic yards of transit mix concrete. Necessary utility connections to these new buildings will require excavation of a 211-foot-long by 18-inch deep trench from the existing mechanics building electrical panel to the new storage buildings, placement of a 1-inch electrical conduit and backfill, compaction and leveling of trenches.

Site preparation, concrete forms, and concrete finishing will be completed by CAL FIRE crews. Concrete delivery, pouring, and building installation will be completed by approved contractors.

Rainbow Conservation Camp is located at 8215 Rainbow Heights Road and approximately two miles east of the town of Rainbow on the border between San Diego and Riverside Counties. The surrounding environmental setting is comprised of typical montane chaparral in steep foothill terrain. Rainbow Camp is in a rural area with controlled public access, and is accessed by a private road four miles from the I-15 Freeway.

EXEMPTION STATUS

☐ Categorical Exemption
☐ Statutory Exemption (state code section):
☐ Ministerial (§21080(b)(1); 15268)
☐ Declared Emergency (§21080(b)(3); 15269(a))
☐ Emergency Project (§21080(b)(4); 15269(b)(c))

15301, Existing Facilities
15304, Minor Alterations to Land

REASONS PROJECT IS EXEMPT

This project is contained within the descriptions of two Categorical Exemptions listed in the CEQA Guidelines: Class 1 pertaining to repair of existing facilities, and Class 4 pertaining to minor alterations to land. After completing an environmental analysis, the Department has determined this project will have no significant impact on the environment. This determination is based on field assessments, a CNDDB search, greenhouse gas emission calculations, and archaeological review completed by CAL FIRE Archaeological staff.

Field review by CAL FIRE staff confirmed that no exceptions apply which would preclude the use of a Notice of Exemption for this project. The Department has concluded that no significant environmental impact would occur to aesthetics, agriculture and forestland/timberland, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, or to utilities and service systems. Documentation of the environmental review completed by the Department is retained on file at CAL FIRE MVU Headquarters in El Cajon.

DATE RECEIVED FOR FILING

Governor’s Office of Planning & Research

JUL 25 2019
STATE CLEARINGHOUSE

Matthew Reischman, Assistant Deputy Director
Resource Protection and Improvement
California Department of Forestry and Fire Protection

Date
California Department of Forestry and Fire Protection
Environmental Review Report for an Exempt Project

Note: This report form is intended for use by California Department of Forestry and Fire Protection (CAL FIRE) staff to document a limited environmental impact analysis supporting the filing of a Notice of Exemption (NOE) document for a proposed CAL FIRE project. Although the project appears to fit within the descriptions for allowable Categorical Exemptions, this report presents CAL FIRE's review for possible "Exceptions" that would preclude the project to be categorically exempt as discussed in CEQA Guidelines Section 15300.2. This report will be filed with the CEQA administrative record for this project to document the environmental impact analysis conducted by the Department.

Author: Eric Just
Title: Unit Forester
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Phone: (619) 592-1224
Email: eric.just@fire.ca.gov

Project Name: Rainbow Conservation Camp Storage Shed Project
Project Number: MVU-2019-003
Program Type: New Construction
CAL FIRE Unit: MVU
County: San Diego
Acres (miles): <.05 acres
Legal Location: NW ¼, Section 5, T9S, R2W, SBBM
Name of USGS 7.5' Quad Map(s): Pechanga

Other Public Agency Review/Permit Required:

Would the project result in:

- alterations to a watercourse (CDFW - Lake and Stream Alteration Agreement)
- conversion of timberland (CAL FIRE - Conversion Permit or Exemption)
- demolition (Local Air District - Demolition Permit)
- soil disturbance over 1 acre (RWQCB - SWPPP)
- fill of possible wetlands (404 Permit - USACE)
- other;

Discuss any above-listed topic item checked Yes and consultation with agencies:

Project Description and Environmental Setting (Describe the project activities, project site and its surroundings, its location, and the environmental setting):

This project proposes the placement of two (2) new 18-foot-wide by 24-foot-long prefabricated “Tough Shed” storage buildings separated by a 24-foot concrete pad at the existing CAL FIRE Rainbow Conservation Camp. Completed project dimensions are 24-feet by 60-feet. Foundations for the storage buildings will require two poured 6-inch-thick concrete slabs with 12-inch by 12-inch concrete footings. A final 6-inch-thick slab will be poured between the two storage building foundations for additional equipment storage. Approximately half of the proposed site will replace an already existing concrete pad. Implementation of this project will require minor leveling of the proposed area and excavation of footings with any spoils to be terraced into adjacent areas (approximately 6 cubic yards), placement of form boards and re-enforcing steel, placement of approximately 31 cubic yards of transit mix concrete. Necessary utility connections to these new buildings will require excavation of a 211-foot-long by 18-inch deep trench from the existing mechanics building electrical panel to the new storage buildings, placement of a 1-inch electrical conduit and backfill, compaction and leveling of trenches. Site preparation, concrete forms, and concrete finishing will be completed by CAL FIRE crews. Concrete delivery, pouring, and building installation will be completed by approved contractors. The project work would be completed within two weeks.

The CAL FIRE Rainbow Conservation Camp is located at 8215 Rainbow Heights Road, east of the town of Rainbow on the border between San Diego and Riverside Counties. Rainbow is a rural, un-incorporated community located in the extreme northwest portion of San Diego County.
### Environmental Impact Analysis

#### Aesthetics

- [ ] This topic does not apply to this project and was not evaluated further.
- [x] This topic could apply to this project, and results of the assessment are provided below.

This project proposes the placement of two (2) new 18-foot-wide by 24-foot-long prefabricated “Tough Shed” storage buildings separated by a 24-foot concrete pad. These activities will be of limited visibility to the public due to the remote location, will not significantly alter the existing view, and therefore; will not have a significant impact to the public’s aesthetic view. Based on the above it has been determined this project will not have a significant impact on aesthetics.

#### Agriculture and Forest Resources

- [x] This topic does not apply to this project and was not evaluated further.
- [ ] Yes  [x] No  Would any trees be felled? If yes, discuss protection of nesting birds and compliance with FPRs.
- [ ] Yes  [x] No  Would the project convert any prime or unique farmland?
- [ ] Yes  [x] No  Would the project result in the conversion of forest land/timberland to non-forest use?

- [ ] This topic could apply to this project, and results of the assessment are provided below.

The area does not meet the definition of timberland under the California Forest Practice Rules. There will be no impact to agriculture or forest resources as a result of this project. No trees will be removed or impacted by this project.

#### Air Quality

- [ ] This topic does not apply to this project and was not evaluated further.
- [x] Yes  [ ] No  The local Air Quality Management District guidelines for dust abatement and other air quality concerns were reviewed for this project.
- [x] This topic could apply to this project, and results of the assessment are provided below.

This project proposes the placement of two (2) new 18-foot-wide by 24-foot-long prefabricated “Tough Shed” storage buildings separated by a 24-foot concrete pad. Project implementation will require minor site leveling, excavation of 12-inch-deep footings and excavation and backfill of 211 feet of electrical trench. To avoid the possibility of dust generation and to ensure proper compaction, water will be on site and appropriately applied whenever soil disturbance takes place. This project will require one piece of mechanized equipment. Contractor staff will commute and concrete mix will be delivered. The project would be completed within two weeks. The limited duration and limited use of mechanized equipment will not create a significant impact on air quality.
Biological Resources

☐ This topic does not apply to this project and was not evaluated further.
☒ Yes ☐ No Will the project potentially effect biological resources?
☒ Yes ☐ No Was a current NDDB review completed? Results discussed below:
☒ Yes ☐ No Was a biological survey of the project area completed? Results discussed below:
☐ This topic could apply to this project, and results of the assessment are provided below:

A query of CDFW's California Natural Diversity Database (CNDDB), BIOS, and RareFind 5 data was conducted on July 9, 2019. Species queried through the CNDDB include plants (CNPS List 3.2 and higher) and animals (Federal and State listed and special status species) that occur within the project boundaries and surrounding area to 0.5 miles from the project location. The results of this search yielded one (1) plant species of 1B or above. The identified plant species was outside the project boundary but within the 0.5-mile buffer. No other plant or animal species were identified. The results of this search and the biological assessment for the species to be potentially impacted by this project are included in the table below, Table 1: Biological Assessment for the Rainbow Conservation Camp Tough Shed Project, San Diego County, CA.

Based on these findings and due to all work being conducted on previously disturbed areas void of native vegetation, CALFIRE staff determined that adverse impacts to any biological resources are unlikely to occur because of this project. Impacts are less than significant.

Table 1: Biological Assessment the Rainbow Conservation Camp Tough Shed Project, San Diego County, CA.

<table>
<thead>
<tr>
<th>Plants</th>
<th>Scientific Name</th>
<th>Common Name</th>
<th>Federal Status</th>
<th>State Status</th>
<th>CA Rare Plan Rank</th>
<th>Habitat</th>
<th>Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arctostaphylos rainbowensis</td>
<td>Rainbow manzanita</td>
<td>None</td>
<td>None</td>
<td>1B.1</td>
<td></td>
<td>Chaparral. Usually found in Gabro chaparral, 100-870 m.</td>
<td>Site is located within station compound on previously disturbed ground leveled for station construction. Area is maintained free of vegetation. Project will have no impact on this species</td>
</tr>
</tbody>
</table>

Status Codes Key

<table>
<thead>
<tr>
<th>United States Fish &amp; Wildlife Service (USFWS)</th>
<th>CA. Department of Fish &amp; Wildlife (CDFW)</th>
<th>California Endangered</th>
</tr>
</thead>
<tbody>
<tr>
<td>PE</td>
<td>Federal Endangered</td>
<td>California Endangered</td>
</tr>
<tr>
<td>FT</td>
<td>Federal Threatened</td>
<td>California Threatened</td>
</tr>
<tr>
<td>SOC</td>
<td>Species of Concern</td>
<td>California Rare</td>
</tr>
<tr>
<td>FSC</td>
<td>species</td>
<td>California Species of Concern</td>
</tr>
<tr>
<td>BCC</td>
<td>Birds of Conservation Concern</td>
<td></td>
</tr>
</tbody>
</table>

California Native Plant Society Lists (CNPS)

List 1B: Plants rare, threatened, or endangered in California and elsewhere
List 2: Plants rare, threatened, or endangered in California, but more common elsewhere
List 3: Plants which need more species information
List 4: Plants with limited distribution (watch list)

Extensions to List Categories

.1 Seriously endangered in California
.2 Fairly threatened in California
.3 Not very threatened in California
Geology and Soils

☒ This topic does not apply to this project and was not evaluated further.
☒ This topic could apply to this project, and results of the assessment are provided below:

The project does not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong ground shaking, ground failure or landslides. The Rainbow Conservation Camp is not located near a fault zone and is identified as a moderate to low shake area in the event of an earthquake. Additionally, the project area is not located on a geologic unit or soils that are unstable or that would become unstable because of the proposed project, nor will the project have an impact with regard to expansive soils.

Implementation of this project will require temporary soil disturbance. CAL FIRE will ensure that proper storm water Best Management Practices (BMPs) are implemented to avoid any erosion during project construction. The project will not result in impacts on geology or soils.

Cultural Resources

☒ This topic does not apply to this project and was not evaluated further.
☒ Yes ☒ No Was a current archaeological records check completed? Results discussed below:
☒ Yes ☒ No Was a CAL FIRE Staff or Contract Archaeologist consulted? Results discussed below:
☒ Yes ☒ No Was an archaeological survey of the project area completed? Results discussed below:
☒ Yes ☒ No Will the project affect any historic buildings or archaeological site?
☒ This topic could apply to this project, and results of the assessment are provided below:

An archaeological survey of the project area was conducted by CAL FIRE staff on July 16, 2019. This field survey yielded negative results. No evidence of prehistoric or historic activity was observed within or near the project boundaries. CAL FIRE Senior Archaeologist Larrynn Carver determined that the project would have no impacts to cultural resources based on the negative results of the survey conducted by staff and a query of the archaeological database conducted on July 16, 2019. A letter has been placed in the project file detailing these findings on July 17, 2019.

Greenhouse Gas Emissions

☒ This topic does not apply to this project and was not evaluated further.
☒ Yes ☒ No Would the project generate significant greenhouse gas (GHG) emissions?
☒ Yes ☒ No Would these GHG emissions result in a significant impact on the environment? Discuss below:
☒ Yes ☒ No Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? Discuss below:

GHG emissions calculations were based on estimates of total fossil fuel consumption by motorized equipment required for facilitation of this project. Estimates were based on high end usage projections. Conversion factors utilized were obtained from the California Climate Action Register (CCAR) General Reporting Protocol (CCAR 2009). The results are detailed below:

Total CO2e produced under the scope of this project this will result in net release of 0.97 metric tons of CO2e.

<table>
<thead>
<tr>
<th>Greenhouse Gas (GHG) Emissions Worksheet</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transportation Vehicles</td>
</tr>
<tr>
<td>Miles (MILES)</td>
</tr>
<tr>
<td>Staff vehicle - Gas</td>
</tr>
<tr>
<td>Other Vehicle Gas</td>
</tr>
<tr>
<td>Crew Vehicle - Diesel</td>
</tr>
<tr>
<td>Stake Side Trk. - Diesel</td>
</tr>
<tr>
<td>Engine FTH- Diesel</td>
</tr>
<tr>
<td>Other Vehicle Diesel</td>
</tr>
<tr>
<td>Other Vehicle Diesel</td>
</tr>
<tr>
<td>Construction Equipment</td>
</tr>
<tr>
<td>Hours (HOURS)</td>
</tr>
<tr>
<td>Dozer/Loader/Grader - Diesel</td>
</tr>
<tr>
<td>Misc. Equipment - Diesel</td>
</tr>
<tr>
<td>Misc. Equipment - Gas</td>
</tr>
<tr>
<td>Chainsaw /Weedeater/ Ect.</td>
</tr>
<tr>
<td>Misc. Handheld gas</td>
</tr>
<tr>
<td>TOTALS</td>
</tr>
</tbody>
</table>


<table>
<thead>
<tr>
<th>Total Gasoline Consumption</th>
<th>52.0</th>
<th>8.18</th>
<th>425.36</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Diesel Consumption</td>
<td>50.0</td>
<td>10.15</td>
<td>507.50</td>
</tr>
<tr>
<td>Total Metric Tons CO2e - Gas</td>
<td>0.43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Metric Tons CO2e - Diesel</td>
<td>0.51</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Metric Tons CO2e</td>
<td>0.93</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The significance threshold CAL FIRE used to determine significance is thresholds established by the California Air Pollution Control Officers Association is 900 tons/yr for indirect sources (combined construction and operational emissions). Based upon this threshold, impacts to greenhouse gas emissions are less than significant.

**Hazards and Hazardous Materials**

- [X] This topic does not apply to this project and was not evaluated further.
- [ ] This topic could apply to this project, and results of the assessment are provided below:

This project proposes the placement of two (2) new 18-foot-wide by 24-foot-long prefabricated “Tough Shed” storage buildings separated by a 24-foot concrete pad. The project location is on previously disturbed areas within the existing camp compound and is not on or near a listed hazardous materials site, will not result in creating a hazard to the public through the routine transport, use, or disposal of any hazardous materials or release hazardous materials into the environment. The project site is not located within an airport land use plan or within the vicinity of a private airstrip and will not interfere with an emergency response plan. Implementation of this project will not have an impact regarding hazards and hazardous materials.

**Hydrology and Water Quality**

- [ ] This topic does not apply to this project and was not evaluated further.
- [ ] Yes  [X] No . Will the project potentially affect any watercourse or body of water?
- [X] This topic could apply to this project, and results of the assessment are provided below:

This project proposes the placement of two (2) new 18-foot-wide by 24-foot-long prefabricated “Tough Shed” storage buildings separated by a 24-foot concrete pad at Rainbow Conservation Camp. Project implementation will have no impact on local ground water tables or result in an increase in water usage. The project will not result in any additional run-off. BMP’s shall be employed during project work to minimize any storm water run-off or soil erosion to a less than significant level should a heavy rain storm occur. This project will not have a significant effect on current or future hydrology or water quality.

**Land Use and Planning**

- [X] This topic does not apply to this project and was not evaluated further.
- [ ] This topic could apply to this project, and results of the assessment are provided below:

This project will not have an effect on current or future land use and planning.

**Mineral Resources**

- [X] This topic does not apply to this project and was not evaluated further.
- [ ] This topic could apply to this project, and results of the assessment are provided below:

This project will have no impacts to mineral resources.

**Noise**

- [ ] This topic does not apply to this project and was not evaluated further.
- [X] This topic could apply to this project, and results of the assessment are provided below:

This project will utilize CAL FIRE crews and expertise as well as private contractors to complete proposed work. Work will occur Monday-Friday 8:00 AM to 4:00 PM and noise levels are expected to be consistent with hand operated construction tools and equipment and is for a limited time period. Additionally, the project is in a controlled location that is remote from any public presence or access. Once completed noise levels will return to pre-project levels. There will be no significant impacts from the noise generated by this project.
Population and Housing

☒ This topic does not apply to this project and was not evaluated further.
☐ This topic could apply to this project, and results of the assessment are provided below:

This project will have no effect on population or housing.

Public Services

☒ This topic does not apply to this project and was not evaluated further.
☐ This topic could apply to this project, and results of the assessment are provided below:

This project will have no adverse effects on public services.

Recreation

☒ This topic does not apply to this project and was not evaluated further.
☐ This topic could apply to this project, and results of the assessment are provided below:

This project will have no impact to recreation.

Transportation/Traffic

☐ This topic does not apply to this project and was not evaluated further.
☒ This topic could apply to this project, and results of the assessment are provided below:

Contractors origination location is assumed to be the City of Escondido, the closest large metropolitan area, located 50 miles from the project site and would require six round trip commutes. Technical staff will be commuting from CAL FIRE Monte Vista headquarters near El Cajon for a total of four days each throughout project implementation. Cement and materials delivery will be from Escondido and require a total of five trips. Mini Excavator will require a one-time haul in and remain on site for duration of need. All vehicles and construction equipment used during project implementation would access Rainbow Conservation Camp via Interstate 15 north to Rainbow and then via Rainbow Heights Road. The project would not conflict with any applicable plan, or policy establishing service level standards as the transportation system has adequate capacity.

The vehicle trips created by the proposed project will not create a significant impact on transportation and traffic as the traffic generated is not substantial and is of limited duration.

Utilities and Service Systems

☐ This topic does not apply to this project and was not evaluated further.
☒ This topic could apply to this project, and results of the assessment are provided below:

This project proposes the placement of two (2) new 18-foot-wide by 24-foot-long prefabricated “Tough Shed” storage buildings separated by a 24-foot concrete pad. This project will not result in any increase of waste water volume, require or result in the construction of new storm water drainage facilities or expansion of existing ones. Net water draw from area aquifers will remain unchanged. This project will have no impact on existing municipal utilities or services.

Changes Made to Avoid Environmental Impacts:

Best management practices, including dust abatement and erosion control devices consistent with minor soil disturbance have been incorporated into the design of this project. There are no known cultural or biological concerns present within the project area. Protective measures outlined the Cultural Resource section of this document will be implemented.
### Mandatory Findings of Significance

<table>
<thead>
<tr>
<th></th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?</td>
<td>☐</td>
<td>✗</td>
</tr>
<tr>
<td>(b) Does the project have impacts that are individually limited, but cumulatively considerable? (&quot;Cumulatively considerable&quot; means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects)</td>
<td>☐</td>
<td>✗</td>
</tr>
<tr>
<td>(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</td>
<td>☐</td>
<td>✗</td>
</tr>
</tbody>
</table>

### Justification for Use of a Categorical Exemption

The project is consistent with Categorical Exemptions: 15303, Class 3 New Construction or Conversion of Small Structures and 15304, Class 4 Minor Alterations to Land. This project proposes the placement of two (2) new 18-foot-wide by 24-foot-long prefabricated “Tough Shed” storage buildings separated by a 24-foot concrete pad at the existing CAL FIRE Rainbow Conservation Camp. Completed project dimensions are 24-feet by 60-feet. Foundations for the storage buildings will require two poured 6-inch-thick concrete slabs with 12-inch by 12-inch concrete footings. A final 6-inch-thick slab will be poured between the two storage building foundations for additional equipment storage. All of these activities are consistent with the exemptions listed above.

### Conclusion

- ✗ After assessing potential environmental impacts and evaluating the description for the various classes of Categorical Exemptions to CEQA, CAL FIRE has determined that the project fits within one or more of the exemption classes and no exceptions exist at the project site which would preclude the use of this exemption. The Department considered the possibility of (a) sensitive location, (b) cumulative impact, (c) significant impact due to unusual circumstances, (d) impacts to scenic highways, (e) activities within a hazardous waste site, and (f) significant adverse change to the significance of a historical resource. A Notice of Exemption will be filed at the State Clearinghouse.
- ☐ After assessing potential environmental impacts and evaluating the description for the various classes of Categorical Exemptions to CEQA, CAL FIRE has determined that the project does not fit within the description for the various exemption classes or has found that exceptions exist at the project site which precludes the use of a Categorical Exemption for this project. Additional environmental review will be conducted and the appropriate CEQA document used may be a Negative Declaration or a Mitigated Negative Declaration.
Figure 1. Project Vicinity Map for the Rainbow Conservation Camp Tough Shed Project, showing general location of project within San Diego County, CA.
Figure 2. Location of tough shed placement (yellow polygon) and electrical trench (brown dotted line). Blue polygon indicates property boundary.
Figure 3. Contractor provided image of single Tough Shed design. Two will be placed at Rainbow Conservation Camp as part of this project.
Photo 1: Overview of project area looking North.

Photo 2: Close-up photo of project area looking West.
Photo 3: Looking East, trench run from project site to electrical panel on Mechanics Building.

Photo 4: Mechanics Building will be source of electrical connection.