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for the

ENVIRONMENTAL IMPACT REPORT

THE DRAFT MANAGEMENT PLAN FOR THE CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION'S (CDF) HISTORIC BUILDINGS AND ARCHAEOLOGICAL SITES

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INTRODUCTION

The California Environmental Quality Act (CEQA) requires the California Department of Forestry and Fire Protection (CDF), as lead agency, to make findings prior to the approval of the Management Plan for Historic Buildings And Archaeological Sites (Plan) pursuant to CEQA Section 21081 and Section 15091 of the CEQA Guidelines. Specifically, CEQA requires the lead agency to prepare a report explaining how it has addressed each significant environmental impact identified in an Environmental Impact Report (EIR). For each significant impact, the lead agency must reach one of three conclusions:

- that changes have been required of, or incorporated into, the proposed project to avoid or substantially reduce the significant environmental impact;
- that such changes are within the responsibility and jurisdiction of another agency and have been, or will be, adopted by that agency; or
- that specific economic, social, legal, technical, or other considerations make mitigation measures recommended or alternatives analyzed in the EIR infeasible.

Such findings must be accompanied by a brief rationale and be supported by substantial evidence in the administrative record for the proposed project.

Detailed information about the impacts of implementing the proposed project, mitigation measures to avoid or reduce such impacts, and alternatives to the proposed project are disclosed in the Draft EIR, the Final EIR, and specifically described in the Plan, all of which are incorporated into this document by reference.

The Mitigation Monitoring and Reporting Program (MMRP), a separate document, has been prepared for the Project, and is presented for adoption together with the Findings. The record of the EIR proceedings, including the Draft EIR, Final EIR, Plan, and all related documents and materials upon which the decision is based, is available for review at CDF's state headquarters in Sacramento.

For each of the significant environmental effects associated with the Project, the following information is provided in the Findings:

- **Significant Effect**

A description of each significant environmental effect identified in the Draft EIR and Final EIR.

- **Mitigation Measure Identified in the EIR**

Mitigation measures that were identified in the Draft EIR and Final EIR for each significant environmental Effect.

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- **Mitigation Measure Required**

Commitment that CDF shall adopt the specified mitigation measure to reduce the adverse effect as a condition of approval of the Project.

- **Finding**

Pursuant to CEQA Section 21081 and Section 15091 of the CEQA Guidelines, one of the three specific findings described above is made for each significant effect.

PROJECT PURPOSE AND NEED

CDF developed the Plan in response to California State Executive Order W-2692 and Public Resources Code (PRC) Section 5024, which direct all California State agencies to conduct inventories for significant heritage resources, appoint a Historic Preservation Officer, and develop policies and a management plan to protect and manage significant heritage resources. The purpose of the Project is to adopt a heritage resources management plan which will provide direction to CDF on how and what to preserve of its history, historic environmental, and archaeological sites. In addition to fulfilling the directive of Executive Order W-26-92, and in compliance with PRC Sections 5024 and 5024.5, long term planning and decision-making is needed to guide CDF in managing its extensive inventory of historic buildings and archaeological sites. As CDF's infrastructure ages, maintenance, remodeling, and abandonment of CDF facilities and buildings have been undertaken on a case-by-case basis. Adoption of a heritage resource management plan will enable CDF to focus its preservation efforts in an effective, orderly, and environmentally sensitive manner.

PROJECT GOALS

- Adopt a heritage resources management plan that will guide CDF in its efforts to preserve its history and the archaeological sites on lands CDF owns or manages.
- Provide a tool for CDF decision-making that will ensure that the Department takes a comprehensive approach to heritage preservation while carrying out CDF's infrastructure improvement program that is critical to CDF operations.
- Craft a heritage resources management plan that will focus the Department's preservation efforts on CDF historic buildings that best represent the CDF's history, are accessible to the public, and area cost-effective investment of the public dollar.

PROJECT DESCRIPTION

The Project consists of approval of the Plan, which proposes to protect and manage the Department's significant heritage resources, which include both historic buildings and known prehistoric and historic archaeological sites located on lands owned or managed by CDF. The Plan identifies 86 historically significant CDF buildings, and proposes a list

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of 29 of these buildings for preservation. The criteria for selection of buildings to be preserved were formulated by CDF during the course of Plan development, and are consistent with the Department's long-term goals for historical resource protection. 78 of the 86 CDF historic buildings have been determined to be eligible for listing in the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR). The remaining eight (8) CDF historic buildings were inventoried, but formal eligibility for listing in the NRHP and the CRHR has yet to be determined.

The Plan also includes management and preservation strategies for 166 known archaeological sites located on lands owned or managed by CDF (see DEIR, Table 2, page 28). The Plan contains descriptions of the sites and details on management measures (see DEIR, Appendix 7, page 68). Overall, the Plan would require CDF to continue its current archaeological site procedures. Archaeological sites are fully recorded, and most are protected by complete avoidance. However, there are a few known sites, which are located in roadbeds, and are continuously impacted through usage. However, these impacts are mitigated to the extent feasible during project-level analysis. There are also some instances where complete avoidance is not feasible, such as fire station construction, and in those cases, excavation is done where feasible. These actions have been, and will continue to be covered by a project-level CEQA analysis for each individual capital improvement activity.

The Plan provides information, direction, management options and review procedures for CDF's heritage resources to ensure that they will be given full consideration in all of CDF's land use and capital outlay decisions. The Plan specifies that, in consultation with the State Historic Preservation Officer (SHPO), CDF will review the Plan in the year 2010, and every ten years thereafter. This process will enable CDF to update the Plan, and make changes that may become necessary over time.

ALTERNATIVES TO THE PROPOSED PROJECT

The following alternatives to the proposed Project were analyzed in the EIR.

Alternative 1 (Full Preservation)

This alternative considers the adoption of a management plan that calls for the preservation of all 86 of CDF's significant historic buildings (see Draft EIR, Table 3, pages 31-33). Preservation could take several forms: continued use and maintenance of buildings that meet CDF's operational needs; repair and maintenance of particularly significant buildings that are abandoned; or transfer of buildings that no longer meet CDF's needs to other entities that will ensure their preservation. CDF would not demolish any significant buildings under this alternative or allow them to deteriorate. For those buildings situated on lands not owned or controlled by CDF (such as those on leased sites), preservation would also include programs to encourage and assist with preservation efforts by the landowner or controlling agency. Known archaeological sites would receive a comprehensive approach that provides for monitoring and inspections.

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Alternative 2 (Representative Sample)

This alternative considers the adoption of a management plan that calls for the preservation of approximately 30 of CDF's 86 historic buildings, similar to the proposed Project. However, the selection would be a representative sample of the different architectural styles or building classes in CDF's historic building collection (see Draft EIR, Table 3, pages 31-33). This plan would include preservation of some of the rare buildings (such as those constructed of adobe bricks, rock-wall construction, oil houses, tank towers, etc.) include more lookouts and a wider variety of lookouts to be preserved than in the proposed Project. Known archeological sites would receive a comprehensive approach that provides for monitoring and inspections.

Alternative 3 (Lookouts Only)

This alternative considers the adoption of a management plan that calls for the preservation of 20 of CDF's lookouts but no commitment to preserve historic buildings at CDF forest fire stations or administrative sites collection (see Draft EIR, Table 3, pages 31-33). Historic buildings at those sites would be kept and maintained as long as they remain functional to CDF operations, but they could eventually be replaced with modern buildings. There would be greater public or recreational benefit as more abandoned CDF lookouts could be restored and managed for public use. More opportunities would exist to create points of historical interest and forestry interpretation centers to those visiting lookouts in California's backwoods. Known archaeological sites would receive a comprehensive approach that provides for monitoring and inspections.

Alternative 4 (No Project)

This alternative would consist of CDF not adopting a statewide management plan for its historic buildings and archaeological sites. These resources would continue to be managed under existing policy as they have been managed in the past. Management of historical and archaeological sites would be on an individual project basis. Each of CDF's 86 significant historic buildings would remain as-is until an individual EIR was prepared for each future removal (see Draft EIR, Table 3, pages 31-33). It is anticipated that eventually most significant buildings could be demolished in order to achieve the Department's infrastructure improvement requirements. Known archaeological sites would not have monitoring or inspections other than those driven by individual projects.

EVALUATION OF ALTERNATIVES

As part of the project planning and development process leading to the environmental document, a range of alternatives was developed and evaluated against the Project Goals. The Draft EIR analyzed the environmental effects of the alternatives to the proposed Project, and provided an evaluation and comparison which is depicted in Table 3 of the Draft EIR (pages 31-33), and detailed in Section 4.5 of the DEIR (pages 36-37).

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As a result of completing the environmental documentation and having considered comments regarding that documentation from agencies and the public, the following findings are made regarding the alternatives:

- 1. Alternative 1 (Full Preservation) is rejected because it does not adequately meet most of the Project Goals.**

Alternative 1 would have a less than significant impact on the Department's historical resources. Of the four alternatives considered, Alternative 1 has the least environmental impacts, and is the environmentally superior alternative. Under Alternative 1, all of CDF's significant historic buildings, regardless of building type, location, or condition would be protected from demolition. Known archaeological sites would have monitoring and inspections.

Alternative 1 fails to satisfy most of the Project Goals. The cost of Alternative 1 would be prohibitive, diverting scarce resources toward the preservation of 86 historic buildings and away from other activities. In the long run, efforts to preserve all significant historical resources could result in their deterioration due to lack of resources. Many of these buildings preserved under this alternative would be unfit for re-use as CDF fire control or resource management facilities, and would stand vacant, subject to deterioration. The current condition of several would require extensive and costly repairs, while others would remain inaccessible to the public. Unusable buildings would significantly impact CDF's ability to implement its infrastructure improvement program and provide for the operational needs of the Department. Alternative 1 is not a comprehensive approach to historical resource preservation and fails to focus the Department's efforts on the historic buildings that best represent CDF's history.

- 2. Alternative 2 (Representative Sample) is rejected because it does not adequately meet most of the Project Goals and its impacts are practically identical to the Proposed Project.**

Alternative 2 would cause significant adverse impacts that are practically identical to the proposed Project: 56 versus 57 historical buildings, respectively, could be lost. However, under this alternative, the mix of buildings to be preserved differ slightly. Known archaeological sites would have monitoring and inspections.

While a representative sample of CDF historic buildings is appealing, it fails to meet some of the Project Goals. Alternative 2 results in a number of the buildings slated for preservation that are not necessarily accessible, in the best condition, capable of being reused or transferred, resulting in a collection that is more costly for CDF to maintain and is not frequented by the public.

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- 3. Alternative 3 (Lookouts Only) is rejected because it does not adequately meet most of the Project Goals and has greater impacts than the Proposed Project.**

Alternative 3 would result in significant adverse impacts that are greater than those caused by the proposed Project. 57 historic buildings could be demolished under the Project, and 66 historic buildings could be demolished under Alternative 3. While a more extensive collection of lookout towers would be preserved under this alternative, it would be at the expense of the other 66 historical resources found at CDF fire stations and administrative facilities. Known archaeological sites would have monitoring and inspections.

Alternative 3 fails to satisfy all of the Project Goals. The protection of only lookout towers fails to adopt a comprehensive approach to CDF historic preservation, leaving out other important components of CDF's history. It is also not cost effective in that lookouts are frequently in the greatest disrepair and are less likely to be re-used or transferred to other entities. The cost of maintaining these facilities would divert funds from other preservation efforts. Lookouts are also the least accessible to the public and their presence is likely to preclude the site's use for other CDF purposes, interfering with the Department's capital improvement program.

- 4. Alternative 4 (No Project) is rejected because it does not adequately meet the Project Goals and is likely to result in greater impacts than the Proposed Project.**

Alternative 4 will likely result in greater adverse impacts than the proposed Project due to the fact that all of the significant historic buildings may eventually be demolished. Under Alternative 4, there is no guarantee that any CDF buildings would be preserved as in the Project. Known archaeological sites would not have monitoring and inspections other than those driven by individual projects.

In addition, the No Project Alternative does not meet many of the Project Goals. The lack of a Plan would leave CDF to determine the fate of historic buildings on a case-by-case basis, and would not preserve any historic buildings. In all likelihood, all historic resources could eventually be lost. Many would continue to degrade through neglect and continue to expose CDF to liability by putting the public at risk at abandoned, unmanaged historic buildings. Dealing with historic buildings on a case-by-case basis is not a comprehensive approach. Alternative 4 would require the preparation of EIR's for all historic building demolitions, removals, replacements, and possibly alterations as well. This would be both costly and time-consuming, and would ultimately interfere with the Department's infrastructure improvement efforts. Alternative 4 has cost benefits in that there may not be any expense associated with maintaining historic buildings. However, the cost of preparing EIR's for each project involving removal,

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replacement, and/or alteration of a significant CDF historic building will be costly, and might easily exceed the maintenance costs. In addition, CDF would be in a position of non-compliance with Executive Order W-26-92 that mandates all State agencies to prepare heritage resource management plans in consultation with the SHPO.

- 5. The proposed Project (the Draft Management Plan for CDF's Historic Buildings and Archaeological Sites Project) is selected for implementation.**

For the reasons outlined above, the proposed Project is selected for implementation. The remainder of this document and the MMRP assume this selection.

FINDINGS ON SIGNIFICANT IMPACTS OF IMPLEMENTING THE PROJECT

The Draft EIR for the Project identifies six significant or potentially significant environmental effects or impacts to heritage resources as a result of the Project. Two of these effects can be mitigated to a level of less than significant through adoption of the feasible mitigation measures proposed in the Draft EIR and Final EIR. The implementation and monitoring actions and schedules for these mitigation measures are described in detail in the MMRP.

CDF makes the following findings in regard to the potentially significant impacts identified in the EIR:

SIGNIFICANT IMPACT 1: the Demolition, Removal, or Replacement of 57 Known Significant Buildings

Under Alternative 4 (No Project), all 86 significant buildings would eventually be removed. Under the proposed Project, 29 historic buildings would be preserved, and 57 historic buildings would eventually be lost. The loss of significant historic buildings under the proposed Project is less than under Alternative 4 (No Project). However, the loss of any significant historic resource is a significant effect.

Mitigation Measure Identified in the EIR

CDF will mitigate this significant impact by implementing an internal procedure for evaluating known significant buildings on a case-by-case basis before making the decision to demolish. This internal procedure has been developed in consultation with the State Historic Preservation Officer (SHPO), and is enumerated in detail in the DEIR, FEIR, and the MMRP. The SHPO has agreed to consider delegating the authority to evaluate these known significant buildings individually to the CDF Historic Preservation Officer. The purpose of this internal process is to conduct a specific review to evaluate the feasibility of management alternatives other than demolition.

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CDF's internal procedure consists of consideration of the feasibility of management alternatives other than demolition based on the following options, ranked in priority order:

1. Adaptive Re-Use
2. Transfer of Ownership or Management
3. Relocation
4. Management as a Standing Ruin

If none of these four management options are feasible, CDF may approve demolition if required by a capital outlay project. The CDF Historic Preservation Officer may consult with the SHPO before approving demolition. If demolition will take place, the CDF Historic Preservation Officer shall prepare a supplement to the Historic Building Record (Building Structure and Object Record, DPR 523B). The completed supplement shall be forwarded to the appropriate center for entry into the California Historical Resource Information System (CHRIS) as an official record of the State of California.

Mitigation Measure Required

CDF shall adopt this mitigation measure as a condition of approval of the Project that will reduce this adverse effect.

Finding

Changes have been incorporated into the Project to avoid or substantially reduce the significant environmental impact. However after mitigation, some of the 57 historic buildings will be demolished and therefore a significant effect remains. Fiscal constraints and operational needs of CDF make adoption of the alternatives infeasible.

Changes have been incorporated into the Project to avoid or substantially reduce the significant environmental impact. Because this mitigation measure increases the likelihood that some of the 57 known historic buildings will be protected, it reduces this significant effect. However, despite this measure, the operational needs of CDF make adoption of any of the alternatives infeasible. The Department's fiscal resources are fully committed to carrying out its firefighting and resource protection mission, and the improvement of the aging CDF infrastructure is essential to the ability of CDF to fulfill that mission (for more details, see page 5 of the Plan). As a result, some of the 57 historic buildings will be demolished and therefore a significant effect remains.

SIGNIFICANT IMPACT 2: the Demolition, Removal, or Replacement of Buildings that could become Significant

Under Alternative 4 (No Project), buildings with a NRHP rating of 4 that become significant when they reach 50 years of age, if their integrity was restored or when other similar properties are lost and their rarity value increases would eventually be removed. Under the proposed Project, prior to demolition of any building with a NRHP rating of 4,

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CDF shall first consider the feasibility of adopting other management options and shall follow the procedures specified in Section 2.6.1 of the Draft EIR. Some buildings with a rating of 4 will be protected, while other will be lost. While the loss of buildings that become significant under the Project would be less than under Alternative 4 (No Project), the loss of any significant historical resource is a significant effect.

Mitigation Measure Identified in the EIR

CDF will mitigate this significant impact by implementing the internal procedure described under Significant Impact 1 prior to demolition of any building with a NRHP rating of 4 (may become eligible for listing in the NRHP as a separate property). Also included in this mitigation measure is any CDF building with a rating of, 4S1 (may become eligible for listing in the NRHP separate when it becomes old enough), 4S2 (may become eligible for listing in the NRHP as separate with more research), 4S3 (may become eligible for listing in the NRHP as separate if context information is expanded), 4S4 (may become eligible for listing in the NRHP as separate if more appropriate property type is defined), 4S5 (may become eligible for listing in the NRHP as separate when register requirements clarified), 4S6 (may become eligible for listing in the NRHP as separate when evaluated in another context), 4S7 (may become eligible for listing in the NRHP as separate when its integrity is restored), or 4S8 (may become eligible for listing in the NRHP as separate when other like properties are lost).

Mitigation Measure Required

CDF shall adopt this mitigation measure as a condition of approval of the Project that will reduce this adverse effect.

Finding

Changes have been incorporated into the Project to avoid or substantially reduce the significant environmental impact. However after mitigation, some of the CDF buildings (with the NRHP rating of 4) that may become eligible for listing could be removed, and therefore a significant effect remains. Fiscal constraints and operational needs of CDF make adoption of the alternatives infeasible.

Changes have been incorporated into the Project to avoid or substantially reduce the significant environmental impact. Because this mitigation measure increases the likelihood that more of the CDF buildings with a NRHP rating of 4 will be protected, it reduces this significant effect. However, despite this measure, the operational needs of CDF make the implementation of the alternatives infeasible. The Department's fiscal resources are fully committed to carrying out its firefighting and resource protection mission, and the improvement of the aging CDF infrastructure is essential to the ability of CDF to fulfill that mission (for more details, see page 5 of the Plan). As a result, some of the CDF buildings (with the NRHP rating of 4) that may become eligible for listing could be removed, and therefore a significant effect remains.

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SIGNIFICANT IMPACT 3: the Demolition, Removal, or Replacement of Buildings that become 50 Years Old

Under Alternative 4 (No Project), buildings that become 50 years old (historic) could eventually be removed. Under the Project, prior to demolition of any building found to be 50 years of age or older and potentially eligible for listing on the NRHP and therefore significant, CDF shall first consider the feasibility of adopting other management options. Some buildings that become 50 years of age and are significant will be protected, while others will be lost. While the loss of buildings that become 50 years of age and are significant under the Project could be less than under Alternative 4, the loss of any significant historical resource is a significant effect.

Mitigation Measure Identified in the EIR

CDF will mitigate this significant impact by implementing the internal procedure described under Significant Impact 1 prior to demolition of any building with that is 50 years old or older. The CDF Historic Preservation Officer shall first make a determination of significance. If the building is found to be ineligible for listing on the NRHP or CRHR, it is not significant and need not be further considered. If the building is found to be significant or potentially eligible for listing, it shall be given consideration for management as a heritage resource.

Mitigation Measure Required

CDF shall adopt this mitigation measure as a condition of approval of the Project that will reduce this adverse effect.

Finding

Changes have been incorporated into the Project to avoid or substantially reduce the significant environmental impact. However after mitigation, a significant effect remains because CDF buildings that reach 50 years of age and become eligible for listing may be demolished. Fiscal constraints and operational needs of CDF make adoption of the alternatives infeasible.

Changes have been incorporated into the Project to avoid or substantially reduce the significant environmental impact. Because this mitigation measure increases the likelihood that more of the CDF historic buildings that may become significant will be protected, it reduces this significant effect. However, despite this measure, the operational needs of CDF make the implementation of the alternatives infeasible. The Department's fiscal resources are fully committed to carrying out its firefighting and resource protection mission, and the improvement of the aging CDF infrastructure is essential to the ability of CDF to fulfill that mission (for more details, see page 5 of the Plan). As a result, a significant effect remains because CDF buildings that reach 50 years of age and become eligible for listing may be demolished.

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SIGNIFICANT IMPACT 4: the Demolition, Removal, or Replacement of Buildings that are not yet 50 Years Old, but are part of a Historic Compound

Under Alternative 4 (No Project), buildings that are located within a historic compound could eventually be removed. Under the Project, prior to demolition, removal, or replacement of any CDF building within an historic compound, consideration must be given to the overall historic integrity of the compound in accordance with Section 2.5 of the Draft EIR. The integrity of some historic compounds will be protected, while others will be lost. The loss of historic compounds is significant under the Project, but it would be less than under Alternative 4. The loss of any significant historical resource is a significant effect.

Mitigation Measure Identified in the EIR

CDF will mitigate this significant impact by consulting with the CDF Historic Preservation Officer prior to demolition of any CDF buildings that are not yet 50 years old, but are part of a historic compound. The CDF Historic Preservation Officer will review how the removal and replacement of non-significant buildings may affect the historical setting and integrity of the historic compound. The CDF Historic Preservation Officer may consult with the SHPO prior to approving demolition.

Mitigation Measure Required

CDF shall adopt this mitigation measure as a condition of approval of the Project that will reduce this adverse effect.

Finding

Changes have been incorporated into the Project to avoid or substantially reduce the significant environmental impact. However after mitigation, a significant effect remains because the integrity of a significant historical resource may be adversely affected. Fiscal constraints and operational needs of CDF make adoption of the alternatives infeasible.

Changes have been incorporated into the Project to avoid or substantially reduce the significant environmental effect. Because this mitigation measure increases the likelihood that the integrity of the historic compound will be protected, it reduces this significant effect. However, despite this measure, the operational needs of CDF make the alternatives infeasible. The Department's fiscal resources are fully committed to carrying out its firefighting and resource protection mission, and the improvement of the aging CDF infrastructure is essential to the ability of CDF to fulfill that mission (for more details, see page 5 of the Plan). As a result, a significant effect remains because the integrity of a significant historical resource may be adversely affected.

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SIGNIFICANT IMPACT 5: Buildings Identified for Protection Under this Plan may lose their Significance due to Neglect, Deterioration, Misuse, or Alteration

Under Alternative 4 (No Project), all 86 significant CDF buildings and buildings that might become significant in the future could eventually be removed. Under the Project, 20 historic buildings will be preserved and others may eventually be preserved as they become eligible. Under both scenarios, there is the possibility that significant CDF buildings will lose their significance due to neglect, deterioration, misuse, or alteration. Under Alternative 4 (No Project), the loss of significance is expected to be less because preservation measures are an integral part of the Project (and the Plan). The loss of any significant historical resource due to neglect, deterioration, misuse, or alteration is a significant effect.

Mitigation Measure Identified in the EIR

CDF will mitigate this significant impact by adopting the Plan. The Plan identifies 29 significant historic CDF buildings that the Department commits to preserve (see the Draft EIR, Final EIR, Draft Plan, and MMRP for details). This mitigation measure will reduce the adverse effect to a level of less than significant.

Mitigation Measure Required

CDF shall adopt this mitigation measure as a condition of approval of the Project that will reduce this adverse effect to a level of less than significant.

Finding

Changes have been incorporated into the Project to avoid or substantially reduce the significant environmental impact. After mitigation, this significant effect will be reduced to a level of less than significant.

Changes have been incorporated into the Project to avoid or substantially reduce the significant environmental impact. Because this mitigation measure consists of Plan adoption, and the Plan identifies specific measures for the protection and long term preservation of 29 significant historic CDF buildings this significant effect will be fully mitigated.

SIGNIFICANT IMPACT 6: Allow the Transfer of Significant Buildings to another Entity thereby resulting in their Demolition, Removal, or Replacement

Under both the Project and Alternative 4 (No Project), significant historic buildings will be transferred to other entities, as CDF no longer has a need for the building. There is the possibility that the transfer of these significant buildings can result in their loss. Under both the Project and Alternative 4 (No Project), there are measures to ensure that these transfers result in the long-term protection of these buildings. The loss of a historic building through a transfer would be a significant effect.

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Mitigation Measure Identified in the EIR

CDF will mitigate this significant impact by requiring the application of the internal procedure described under Significant Impact 1, and enumerated in detail in the Draft EIR, Final EIR, and MMRP, whenever considering the transfer of a significant CDF historic building to another entity. This mitigation measure will reduce this adverse effect to a level of less than significant.

Mitigation Measure Required

CDF shall adopt this mitigation measure as a condition of approval of the Project that will reduce this adverse effect to a level of less than significant.

Finding

Changes have been incorporated into the Project to avoid or substantially reduce the significant environmental impact. After mitigation, this significant effect will be reduced to a level of less than significant.

Changes have been incorporated into the Project to avoid or substantially reduce the significant environmental impact. Because the internal procedure provides for selection of a feasible option that will be incorporated into a proposed project or action, or if not feasible, CDF will consider the Transfer of Ownership or Management only if the new owner or manager of a significant CDF historic building commits to long-term historic preservation, the implementation of this mitigation measure will fully mitigate this significant effect.