

Memo

The logo for ASCENT, featuring the word "ASCENT" in a bold, white, sans-serif font on a dark grey, tilted rectangular background.

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Date: April 28, 2023

To: Matt Abernathy, Resource Conservation District of Santa Cruz County for inclusion in the Skylark Ranch Forest Health Project file

From: Ted Thayer and Heather Blair, Ascent Environmental

Subject: Minor Clarification to the Skylark Ranch Forest Health Project PSA

The Resource Conservation District of Santa Cruz County (RCD) has discovered the need for minor clarifications and revisions to a Standard Project Requirement (SPR) and project description in its Skylark Ranch Forest Health Project CEQA documentation and, therefore, is preparing this memorandum to keep in the project records.

The RCD received a California Department of Forestry and Fire Protection (CAL FIRE) Forest Health Grant to implement ecological restoration and shaded fuel break treatments within portions of the Skylark Ranch property that were burned during the 2020 CZU Lightning Complex. The RCD evaluated these vegetation treatments for CEQA compliance as later activities covered by the Program Environmental Impact Report (Program EIR) for the California Vegetation Treatment Program (CalVTP), using its Project-Specific Analysis (PSA) checklist. In March of 2022, the RCD completed a PSA and concluded that all proposed treatments were within the scope of the CalVTP Program EIR.

The CalVTP vegetation treatment activities evaluated in the PSA are mechanical treatment, manual treatment, and targeted ground application of herbicides. The implementation timing of these treatments and the disposal of biomass associated with these treatment activities is disclosed in the PSA.

The project description in the PSA indicated that the timing of the initial CalVTP treatments would occur between May and August of 2022. As described in Chapter 2, "Project Description" of the PSA, "the timeframe may need to change in the event of delays, such as weather." Due to delays the project was not implemented in 2022 and is planned to start in May of 2023 and last through August 2023. Based on the original and revised timeframe, project-specific implementation of SPR GEO-1 was written to limit work to occur only outside of the wet season (i.e., the first frontal rain system depositing a minimum of 0.25 inch of rain after October 15 through April 15). This language is unintentionally contradictory to the language in the Project Description that allows for the project timeframe to change due to delays. A clarification to SPR GEO-1 is needed to resolve this contradiction and allow for work to occur year-round, albeit during dry conditions, which would expand the period within which work could occur while avoiding impacts that could result from work occurring during wet conditions. Based on specific language regarding the timing of work in the Coastal Vegetation Treatment Standards and the language change to SPR GEO-1, changes are needed to both Appendix A, "Mitigation Monitoring and Reporting Program for the Skylark Ranch Forest Health Project," and Appendix F, "Coastal Vegetation Treatment Standards". In addition, a clarification to the project description and Appendix A, "Mitigation Monitoring and Reporting Program for the Skylark Ranch Forest Health Project," are needed to revise the anticipated dates when initial treatments would occur. See "Revisions to the PSA," below.

The discussion of biomass disposal in the PSA indicated that chipping locations would be prioritized at previously disturbed sites, such as roads and trails. Remaining chips would be used in staging areas and may be spread in the treatment area, if needed. The project description in the PSA stated that chips would not exceed 4 inches in depth in any area. This language unintentionally implies that the limitation of 4 inches extends beyond treatment areas and also applies to previously disturbed sites, roads, trails, and staging areas. Clarification is needed in the PSA project description to apply this 4-inch chip depth limitation only to treatment areas and not disturbed sites, roads, trails, and staging areas. Furthermore, the project description in the PSA stated that much of the vegetative debris would be mulched using a masticator concurrently with vegetation removal. Given the amount of hazard trees to be removed, there will be more biomass than is needed to meet down wood and snag retention standards or could be masticated or chipped or while meeting the aforementioned depth requirements. Therefore, the RCD additionally proposes to store whole logs on site for later disposal. A minor revision is needed in the PSA project description to include the storage of whole logs on site for later disposal among the biomass disposal options. See "Revisions to the PSA," below.

The analysis in the PSA considered the potential impacts of the proposed application of chips within the project area. Previously disturbed areas such as roads and trails and staging areas do not provide suitable habitat for special-status species or contain other resources that would be adversely affected by the application of more than 4 inches of chips. The decking of whole logs would also occur in previously disturbed areas, and like the application of more than 4 inches of chips, would not adversely affect sensitive resources in these areas. Therefore, there is no new or additional analysis required in the PSA (Chapter 4) for the clarifications to the biomass disposal section of the project description. The analysis in the PSA also considered the potential impacts of the project to biological resources and soils (erosion) from operation of mechanical equipment with the implementation of SPR GEO-1, which originally required work to occur outside the "wet season" (i.e., between April 16 and October 14). The refinement of SPR GEO-1, would not result in additional adverse effects to these resource areas beyond what was analyzed in the PSA, because it would continue to limit mechanical treatments to dry periods between precipitation events. Therefore, there is no new or additional analysis required in the PSA (Chapter 4) for the clarification of SPR GEO-1.

For the reasons discussed above these clarifications and minor revisions to the project description regarding biomass disposal and SPR GEO-1 do not constitute changes to the project and all the environmental impact conclusions remain the same, so additional review under CEQA Guidelines Sections 15162 or 15164 is not warranted.

Revisions to the PSA

The minor revisions to Chapter 2 of the PSA, Appendix A, "Mitigation Monitoring and Reporting Program for the Skylark Ranch Forest Health Project," (i.e., timing of initial treatments, SPR GEO-1) and Appendix F, "Coastal Vegetation Treatment Standards" are signified by strikeouts (~~strikeouts~~) where text is removed and by underline (underline) where text is added. The full text of the PSA, Appendix A, and Appendix F with these minor revisions is attached to this memo. The minor clarifications to the process of chipping and whole log storage as a biomass disposal method are reflected in the PSA and Appendix A; and the PSA, Appendix F, and Appendix A reflect the clarifications to the SPR GEO-1.