



Memorandum

Date: July 25, 2023

To: Tim Hyland, California Department of Parks and Recreation for inclusion in the Butano State Park Forest Health Project file

From: David Cowman, Forest Ecologist – San Mateo Resource Conservation District

Re: **Minor Clarifications to the Butano State Park Forest Health Project PSA/Addendum**

The San Mateo Resource Conservation District (RCD) and California Department of Parks and Recreation (CSP) has discovered the need for minor clarifications to the project description in the Butano State Park Forest Health Project Specific Analysis and Addendum to the California Vegetation Treatment Program Programmatic Environmental Impact Report (CalVTP PEIR) 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, fuel break, and wildland urban interface (WUI) treatments within Butano State Park. The RCD and CSP 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 and Addendum to the PEIR. In October of 2022, the RCD and CSP completed a PSA/Addendum 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, prescribed burning, and targeted ground application of herbicides. The disposal of biomass associated with these treatment activities is disclosed in the PSA/Addendum.

As described in Section 2.0 – Project Description, Mechanical mastication as well as hand thinning will be utilized to treat dead, dying, and diseased vegetation, select live trees up to 16 inches in DBH, select live Douglas-fir trees up to 36 inches DBH (where they are converting grassland, shrubland, or hardwood forest habitat types through shading), understory vegetation, dead or downed material, and hazard trees of any size. Furthermore, in section 2.5.2 it's stated that Douglas-firs (≤ 36 inches DBH), which are not conducive to furthering forest health and climate resiliency goals may be removed. These conditions are then described in detail.

In section 2.6.2 of the PSA/Addendum, RCD and CSP discussed methods of biomass disposal associated with project treatment activities. These methods include mastication, chipping and broadcasting throughout the treatment area, lop and scatter, pile burning, and incineration with a curtain burner. Implied as part of this process includes the hauling, skidding, and decking of biomass to be processed, however, this was not explicitly stated in the project description. Additionally, in Section 3.15 EC – Public Services, Utilities and Service Systems, under Impact UTIL-2, the PSA states that biomass may be hauled off-site and that if that were the case, any transport of biomass will follow SPR UTIL-1. Therefore, the RCD and CSP plan to store whole logs on site for later



disposal, if current biomass disposal methods exceed immediate capacity, as well as haul excess chipped material off site to adjacent agricultural operations and/or biomass disposal facilities. In the interest of public disclosure, a minor clarification is included in the PSA/Addendum project description, regarding listed biomass disposal options, to include the storage of whole logs on site for storage or later disposal, as well as the hauling of material throughout the project area and off site. See "Clarifications to the PSA and Addendum below". No clarifications will be made to Impact UTIL-2, because in both the PSA/Addendum checklist and Mitigation and Monitoring Reporting Program (MMRP), the project proponent states that biomass may be hauled off site.

The analysis of the PSA/Addendum considered the potential impacts of the proposed clarifications, therefore there is no new or additional analysis required in the PSA/Addendum for the clarifications to the project description.

Clarifications to the PSA and Addendum

Minor clarifications to the process of chipping and whole log storage as a biomass disposal method are reflected in the PSA and Addendum to the CalVTP PEIR. Clarifying language is underlined and no language has been removed in the PSA/Addendum.