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DATE: June 25, 2021

TO: California Coastal Commission and Interested Parties

FROM: Dan Carl, North Central Coast District Director
Madeline Cavalieri, Statewide Planning Manager
Shana Gray, Statewide Planning Supervisor
Daniel Nathan, Statewide Planning Analyst

PROJECT LOCATION: San Mateo County

SUBJECT: San Mateo County Resource Conservation District Forest Health and Fire Resilience Public Works Plan for vegetation treatment activities undertaken pursuant to the Board of Forestry's California Vegetation Treatment Program certified Program Environmental Impact Report to improve forest health, restore ecosystems, and increase wildfire resilience.

SUMMARY OF STAFF RECOMMENDATION

The San Mateo County Resource Conservation District (RCD) prepared the San Mateo County Forest Health and Fire Resilience Public Works Plan (PWP) to allow the RCD to help facilitate the planning, review, and authorization of vegetation treatment projects within the County's coastal zone to improve forest health, restore ecosystems, and increase wildfire resilience. Due to historic fire suppression that has led to an accumulation of fuel loads, coupled with drought, a warming climate, and the spread of invasive species, larger and more catastrophic wildfires are threatening the county's communities and natural resources. The PWP will address these risks through vegetation treatment that will align fire prevention planning with the protection of coastal resources to create healthy and resilient forests.

The PWP is designed to dovetail with the California Vegetation Treatment Program (CalVTP) program, which was developed under the direction of the California Board of Forestry and Fire Protection (BOF) and in cooperation with the California Department of Forestry and Fire Protection (CalFIRE) to reduce wildfire risks as one component of the range of actions being implemented by the State to respond to California's wildfire crisis. Importantly, the State's strategy relies on an increase in the pace and scale of

vegetation treatment to reduce those risks. In addition to compliance with the State's fire planning efforts, the PWP applies additional efficiencies over and above implementation of the CalVTP by addressing specific local coastal issues and ensuring full consistency with the San Mateo County Local Coastal Program (LCP). The PWP provides for efficient programmatic streamlining of both California Environmental Quality Act (CEQA) compliance and Coastal Act authorizations through a framework within which identified vegetation treatment projects can be analyzed and implemented under a coordinated plan that relies on the standards (called Standard Project Requirements, or SPRs) and mitigation measures adopted as part of the CalVTP Program Environmental Impact Report (PEIR), as well as coastal-specific standards (Coastal VTS) developed by Commission and RCD staff.

The PWP would enable the RCD and project partners to design and implement multiple mission-critical fire resilience projects throughout the PWP Program Area over a 10-year period. Vegetation treatment activities under this PWP are categorized as either "forest health" projects designed to restore and enhance ecosystems, including to prevent fire behavior to which the ecosystem is not adapted, or "fire prevention" projects that will protect existing structures and infrastructure, such as through strategic fuel breaks and defensible space clearances. Both types of projects are intended to enhance habitat values as much as possible when they affect habitat areas in the County. Vegetation treatment could be carried out using prescribed burning, mechanical treatment (e.g., use of masticators), manual treatment (e.g., use of chainsaws), prescribed herbivory, and/or herbicide application. As proposed under the PWP, projects would be designed in a manner that protects coastal resources while meeting fire resiliency goals. Qualifying projects must be covered by the PWP, must incorporate CalVTP PEIR and Coastal VTS requirements, and must include project and program monitoring.

Staff believes that the PWP will provide an important tool for helping to reduce fire danger in the County while simultaneously protecting forests and forest health. Importantly, although the PWP is designed to allow the RCD to facilitate regulatory authorizations for interested land managers and landowners in the County's coastal zone, it should be noted that such land managers and landowners are not limited to the PWP for permitting vegetation treatment projects. On the contrary, the PWP simply provides a streamlined Coastal Act authorization vehicle for such projects, but vegetation treatment activities may also continue to be authorized directly through the County pursuant to the LCP and consistent with any other necessary CEQA documentation.

In addition, should the PWP be certified by the Commission, RCD is also requesting that the Commission find the first proposed project under the PWP (for vegetation treatment activities at Camp Butano) consistent with the LCP and PWP, and to approve it as an integral component of the PWP. Staff's analysis has concluded that the PWP is consistent with the San Mateo County LCP, and that there are no other feasible alternatives or mitigation measures available that would further lessen any significant adverse effect that the approval would have on the environment. **Thus, staff recommends that the Commission certify the proposed PWP, as submitted.**

Further, staff has analyzed the proposed Camp Butano vegetation treatment project and has concluded that it is also consistent with the LCP, as well as the PWP. Thus, staff further recommends that the Commission approve the Camp Butano project. The necessary motions, of which there are two—one for the PWP and one for the project—are found on page 9 of the staff report.

ADDITIONAL INFORMATION

The final, locally-adopted June 2021 version of the PWP and attached appendices (i.e., the proposed PWP, also attached as Exhibit 1) can be accessed at: http://www.sanmateorcd.org/wp-content/uploads/2021/06/SMRCD_Forest-Health-and-Fire-Resilience-DraftPWP_RCDBoardApprovedCopy_06-17-2021.pdf

The certified CalVTP Program Environmental Impact Report can be accessed at: https://bof.fire.ca.gov/projects-and-programs/calvtp/calvtp-program-eir/

For questions and comments on the PWP, please contact the Commission's Statewide Planning Unit at: statewideplanning@coastal.ca.gov.

Table of Contents

EXHIBITS

I. LIST OF ACRONYMS

BOF	California Board of Forestry and Fire Protection
BMP	Best Management Practices
CalFIRE	California Department of Forestry and Fire Protection
CalVTP	California Vegetation Treatment Program
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
Coastal VTS	Coastal Vegetation Treatment Standards
CZ	Coastal Zone
ESHA	Environmentally Sensitive Habitat Area
GHG	Greenhouse Gas
IP	Implementation Plan
LCP	Local Coastal Program
LUP	Land Use Plan
NOID	Notice of Impending Development
PEIR	Programmatic Environmental Impact Report
PRC	Public Resources Code
PSA	Project-Specific Analysis
PWP	Public Works Plan
RCD	Resource Conservation District
RWQCB	Regional Water Quality Control Board
SMC	San Mateo County
SPR	Standard Project Requirement
SRA	State Responsibility Area
WLPZ	Watercourse and Lake Protection Zone
WUI	Wildland Urban Interface

II. PROCEDURAL BACKGROUND

The San Mateo County Resource Conservation District has prepared the PWP to function as a document for planning, reviewing, and authorizing vegetation treatment projects pursuant to the Board of Forestry's certified PEIR for the CalVTP. The PWP creates a framework within which identified projects can be analyzed and implemented under a coordinated plan. The goal of this process is to optimize the suite of proposed vegetation treatment types and activities so that wildfire management and ecological restoration goals are met in a manner that maximizes protection and enhancement of the County's significant coastal resources.

Public Works Plans
Coastal Act Section 30114 defines public works to include, among other things, the following:

(c) All publicly financed recreational facilities, all projects of the State Coastal Conservancy, and any development by a special district.

Section 30605 of the Coastal Act states, in part:

To promote greater efficiency for the planning of any public works … and as an alternative to project-by-project review, plans for public … may be submitted to the commission for review in the same manner prescribed for the review of local coastal programs set forth in Chapter 6 (commencing with Section 30500). … If any such plan for public works is submitted after the certification of local coastal programs, any such plan shall be approved by the commission only if it finds, after full consultation with the affected local governments, that the proposed plan for public works is in conformity with certified local coastal programs in jurisdictions affected by the proposed public works. … Where a plan for a public works … has been certified by the commission, any subsequent review by the commission of a specific project contained in the certified plan shall be limited to imposing conditions consistent with Sections 30607 and 30607.1. …

Thus, a PWP is one of the alternatives available to the Commission and project proponents for Commission review of large or phased public works projects, and remains under the authority of the Commission irrespective of local government coastal permit jurisdictional boundaries (here, as applies to San Mateo County). A PWP is an alternative to project-by-project review for public works (which, in this situation would require multiple coastal development permits (CDPs)). PWPs must be sufficiently detailed regarding the size, kind, intensity, and location of development to allow the Commission to determine consistency with the policies in Chapter 3 of the Coastal Act (pre-LCP certification) or the certified LCP (post-LCP certification). Once the Commission approves a PWP, no CDP is required for a specific project described within it; rather, before commencing each specific project, the project proponent needs to submit notice in the form of a Notice of Impending Development (NOID), which requires the Commission to determine whether the submitted project is consistent with the standards within the PWP, or if conditions are necessary to make it consistent.

PWP Project Review

Consistency determinations for individual projects proposed as part of the PWP are made by the Coastal Commission and are subject to public review and comment and a public hearing. Sections 30605 and 30606 of the Coastal Act and Title 14, Section 13359 of the California Code of Regulations (CCR) govern the Coastal Commission's review process for development proposed pursuant to a certified PWP. Section 30606 of the Coastal Act requires the applicant proposing the PWP project to provide a NOID to the Coastal Commission (and other interested parties, organizations, and governmental agencies), along with data demonstrating the project is consistent with the certified PWP. Once a NOID is deemed complete, it is scheduled for a public hearing within 30 working days, at which time the Coastal Commission is tasked with determining whether the project is PWP-consistent, or if it can be made PWP-consistent through conditions. If a project cannot meet those tests, then it is not covered by the PWP, and would need its own separate authorization through a CDP.

As applicable to this proposed PWP, development submitted to the Commission for review under the NOID process shall not be authorized unless it is of a type, location, and size as identified in Section III of the PWP (Exhibit 1), and it is demonstrated that project implementation is in compliance with all SPRs and Mitigation Measures of the CalVTP (Project Standard 2), as well as the more coastal-specific Coastal VTS development standards (Project Standard 3). Projects may also be conditioned by the Commission to ensure consistency with the PWP; however, the Commission cannot reject a proposed project if it is included within the listed projects approved as a part of the Commission's original PWP review and it is otherwise PWP-consistent.

The proposed PWP also identifies specific filing content requirements regarding future NOID submittals under Section VI, including preparation and submittal of draft and final Project-Specific Analyses, as required by the CalVTP PEIR, to determine whether the project qualifies as within the scope of the PEIR, or that the project will not result in any new or substantially more significant impacts than as described in the PEIR or CalVTP.

PWP Reporting Mechanisms

Proposed PWP Project Standard 4 requires PWP projects to adhere to the reporting and monitoring requirements as provided in the PEIR SPRs. More specifically, the administrative SPRs contained within the CalVTP PEIR ensure that projects are reported on and project data is available to the public. For example, SPR AD-7 of the PEIR requires a completed Mitigation Monitoring and Reporting Program to be submitted to CalFIRE and the BOF for all proposed, approved, and completed stages of vegetation treatment projects. This information will be posted to an online database available to the public and will ensure that the requirements of all relevant SPRs that are implemented are verified and monitored by the agency or organization responsible for ensuring that the SPRs are implemented. Similarly, SPR AD-6 ensures that public notifications for treatment projects are posted in conspicuous locations describing treatment activities and timing, as well as contact information. SPR-GHG-1 also requires project proponents subject to AB 1504[1] to provide all vegetation treatment data for carbon inventory tracking to the U.S. Forest Service and CalFIRE. Further, the PWP requires that individual projects be noticed in conjunction with Commission regulations.

In addition, pursuant to proposed PWP Project Standard 4, the PWP requires the RCD to prepare a five-year programmatic review identifying: the status of individual projects implemented under the PWP, as well as projects expected to be implemented under the PWP; level of program completion (e.g., number of acres treated, high priority areas for the subsequent five years); collective monitoring results; constraints and lessons learned; and program success. The programmatic review must be submitted to San Mateo County and the Coastal Commission for review. At the ten-year mark following certification of the PWP, a final programmatic review is to be prepared by RCD and submitted to the County and Coastal Commission for review.

Public Participation

[1] https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=200920100AB1504

A Public Review Draft of the PWP was first released to the public on May 5, 2021 for a six-week public review period. A revised, final draft of the PWP was adopted by the RCD Board on June 17, 2021. During that local hearing, the RCD considered additional public testimony. Following submittal of the locally-adopted PWP to the Commission on June 18, 2021, Commission staff continued to accept public comment on the PWP.

In addition, members of the public will have additional opportunities to comment on individual projects designed and implemented under the PWP. As part of the project design stage, the RCD must consult with parties interested in, with jurisdiction over, and/or affected by the proposed project. Further, persons residing within 100 feet of the project boundary, as well as within greater distances that may need to be noticed pursuant to the CalVTP SPRs and mitigation measures, or those persons, parties, and agencies who have requested to receive such notice, will receive a notice of a completed NOID to be submitted to the Commission for consistency review under the PWP. Once a NOID is submitted to the Commission and agendized for hearing, interested parties may also submit written comment to the Commission prior to the scheduled hearing on the NOID, and/or request to provide public testimony during the Commission hearing on the NOID (see the Procedures for PWP Filing and Certification section starting on page 24 of the PWP in Exhibit 1).

Local Government and Stakeholder Consultation
Throughout the development of the PWP, Commission staff and RCD staff have engaged with San Mateo County staff, as well as a variety of State agency representatives, including Cal FIRE. An initial field visit was held on November 6, 2019, with more focused meetings beginning in October 2020 and extending through the July 2021.

The development of the coastal-specific development standards (see Coastal VTS in Exhibit 1) and the PWP has been a collaborative process with representatives of CalFIRE and State Parks (in addition to San Mateo County and RCD staff) participating at various stages. San Mateo County staff have indicated that the County is in full support of the PWP and believes that it is consistent with the County's LCP.[2]

RCD also notified tribal individuals from the Amah Mutsun and Ramaytush Ohlone. Tribal entities were notified of the availability of the Public Review Draft PWP. Consultation with these and any other applicable tribes will also be undertaken during the project design and implementation stages consistent with the requirements of the CalVTP PEIR, including SPR CUL-1 through SPR CUL-8. These standards generally require pre-treatment research, surveying, and consultation with affected tribes, as well as compliance with stringent standards if cultural resources are discovered during treatment, including cessation of development activities and further consultation with tribal entities and qualified professionals. For a more detailed description of these standards, see the Cultural Resources section in this report.

[2] Commission staff received written correspondence from the County on June 17, 2021.

In addition, disadvantaged communities within San Mateo County will also be contacted for input during the project design stage where such projects may impact these communities. These and other stakeholders will have the opportunity to consult with the RCD and/or provide comments to the RCD and the Commission during the project design stage, including through the NOID submittal and Commission adoption process (see the Procedures for PWP Filing and Certification section starting on page 24 of the PWP in Exhibit 1).

Environmental Documents
Section 30605 of the Coastal Act and CCR Sections 13353 and 13357 require PWPs to include environmental information sufficient in detail to enable the Commission to determine the consistency of the plan with the policies of the Coastal Act or LCP, as applicable. Consistent with these requirements, the PWP relies, in part, on the analysis and conclusions in the Board of Forestry's certified Program Environmental Impact Report of December 2019 to examine potential environmental impacts of vegetation treatment projects being considered in the coastal zone. The CalVTP PEIR provides evidence that supports the Commission's analysis of the PWP's coastal resource impacts and contains standards that help protect coastal resources in a manner consistent with the LCP. Specifically, the PEIR provides a comprehensive framework for implementing vegetation treatment projects through the adherence to Standard Project Requirements and Mitigation Measures that will result in the avoidance and minimization of adverse impacts to environmental resources.

In addition to the CalVTP, the Coastal Vegetation Treatment Standards (see Coastal VTS in Exhibit 1) provide additional guidance and clarity for projects to be implemented within the Coastal Zone, including related to specific habitat considerations. All PWP projects must be consistent with all Project Standards outlined in Section IV of the PWP, including the CalVTP SPRs and Mitigation Measures and the Coastal VTS.

III. MOTIONS AND RESOLUTIONS

A. Certification of Public Works Plan

Staff recommends that the Commission, after public hearing, certify the proposed PWP as submitted. To do so, staff recommends a **YES** vote on the motion below. Passage of this motion will result in certification of the PWP as submitted and adoption of the following resolution and findings. The motion to certify passes only by affirmative vote of a majority of the appointed Commissioners.

> ***Motion:*** *I move that the Commission certify Public Works Plan PWP-2-VTP-21-0002-2 as submitted by the San Mateo County Resource Conservation District, and I recommend a yes vote.*
>
> ***Resolution to certify:*** *The Commission hereby certifies the San Mateo County Forest Health and Fire Resilience Public Works Plan as submitted and adopts the findings set forth below on the grounds that the Plan conforms with the San Mateo County Local Coastal Program. Certification of the Plan as submitted complies with the California Environmental Quality Act because either 1) feasible*

mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the Plan on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the Plan on the environment.

B. Approval of Public Works Plan Project 1

Staff recommends that the Commission, after public hearing, determine that the proposed PWP project for Camp Butano is consistent with the County's certified LCP. To do so, staff recommends a **YES** vote on the motion below. Passage of this motion will result in approval of the Camp Butano public works project as an integral component of the San Mateo County Forest Health and Fire Resilience Public Works Plan, and adoption of the following resolution and findings. The motion to approve passes only by affirmative vote of a majority of the Commissioners present.

Motion: *I move that the Commission* approve *the proposed Camp Butano public works project contained in the San Mateo County Forest Health and Fire Resilience Public Works Plan as submitted, and I recommend a yes vote.*

Resolution to find LCP consistency: *The Commission hereby approves the Camp Butano public works project as an integral component of the San Mateo County Forest Health and Fire Resilience Public Works Plan PWP-2-VTP-21-0002-2 and adopts the findings set forth below on the grounds that the project conforms with the Local Coastal Program of San Mateo County. Approval as submitted complies with the California Environmental Quality Act because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the project on the environment, or 2) there are no further feasible mitigation measures or alternatives that would substantially lessen any significant adverse impacts of the project on the environment.*

IV. FINDINGS AND DECLARATIONS

A. Background

CalVTP Background

Following Governor Brown's 2018 Executive Order B-52-18, which mandated a substantial increase in the pace and scale of vegetation treatment in California for the purpose of reducing wildfire threats, the BOF certified its final PEIR for the CalVTP in December 2019. As one approach to addressing the wildfire crisis, the CalVTP PEIR serves as the primary analysis tool to help reduce risks to life, property, and natural resources by targeting vegetation reduction and/or modification in the State Responsibility Area (SRA) for fire prevention and suppression. Based on the PEIR, the objectives of the CalVTP are to:

- Serve as the vegetation management component of the State's range of actions underway to reduce risks to life, property, and natural resources by managing the

amount and continuity of hazardous vegetative fuels that promote wildland fire consistent with California's 2018 Strategic Fire Plan (BOF and CalFIRE 2018).

- Substantially increase the pace and scale of vegetation treatments to contribute to achieving a statewide total of at least 500,000 acres per year on non-federal lands, consistent with the former Governor's EO B-52-18, which results in a CalVTP target up to 250,000 acres per year after considering other types and areas of vegetation treatments.
- Increase the use of prescribed burning as a vegetation treatment tool, consistent with the provisions of Senate Bill 1260, Statutes of 2018, and Public Resources Code (PRC) Section 4483(a).
- Contribute to meeting California's greenhouse gas (GHG) emission goals by managing forests and other natural and working lands as a net carbon sink, consistent with the California Forest Carbon Plan (Forest Climate Action Team 2018), California's 2017 Climate Change Scoping Plan (California Air Resources Board 2017), Fire on the Mountain: Rethinking Forest Management in the Sierra Nevada (Little Hoover Commission 2018), and California 2030 Natural and Working Lands Climate Change Implementation Plan (California Environmental Protection Agency et al. 2019).
- Improve ecosystem health in fire-adapted habitats by safely mimicking the effects of a natural fire regime, considering historic fire return intervals, climate change, and land use constraints.

Vegetation treatment consists of three treatment types, as described in the PEIR, including:

- Wildland-Urban Interface (WUI) Fuel Reduction: Located in WUI-designated areas, fuel reduction would generally consist of strategic removal of vegetation to prevent or slow the spread of non-wind driven wildfire between structures and wildlands, and vice versa.
- Fuel Breaks: In strategic locations, fuel breaks create zones of vegetation removal and ongoing maintenance, often in a linear layout, that support fire suppression by providing responders with a staging area or access to a remote landscape for fire control actions. While fuel breaks can passively interrupt the path of a fire or halt or slow its progress, this is not the primary goal of constructing fuel breaks.
- Ecological Restoration: Generally outside of the WUI in areas that have departed from the natural fire regime as a result of fire exclusion, ecological restoration would focus on restoring ecosystem processes, conditions, and resiliency by moderating uncharacteristic wildland fuel conditions to reflect historic vegetative composition, structure, and habitat values.

Within each of the three treatment types listed above, five treatment activities are identified in the PEIR, including:

- Prescribed Burning: Includes pile burning (prescribed burning of piles of vegetative material to reduce fuel and/or remove biomass following treatment) and broadcast burning (prescribed burning to reduce fuels over a larger area or restore fire resiliency in target fire-adapted plant communities; would be conducted under specific conditions related to fuels, weather, and other variables).
- Mechanical Treatment: Use of motorized equipment to cut, uproot, crush/compact, or chop existing vegetation.
- Manual Treatment: Use of hand tools and hand-operated power tools to cut, clear, or prune herbaceous or woody species.
- Prescribed Herbivory: Use of domestic livestock to reduce a target plant population thereby reducing fire fuels or competition of desired plant species.
- Herbicides: Chemical application designed to inhibit growth of target plant species.

To avoid and minimize environmental impacts, the PEIR stipulates that project proponents must adhere to the PEIR's SPRs, which are development standards or best management practices (BMPs) designed "to integrate environmental protection into a comprehensive approach to reduce wildfire risk statewide through vegetation treatment." When designing projects to implement the CalVTP, project proponents are also required to complete a Project-Specific Analysis (PSA) to determine whether the proposed vegetation treatment project is "within the scope" of the PEIR or requires additional environmental documentation and review. As the PEIR states:

> *The purpose of the PSA is to evaluate the proposed site and the later activity to determine whether the environmental effects of the activity are addressed within the scope of this PEIR, consistent with Section 15168 of the CEQA Guidelines for later activities consistent with a program and its PEIR. The PSA also requires the project proponent to determine that all applicable SPRs and mitigation measures identified in the CalVTP PEIR have been incorporated into the project, and whether additional mitigation would be necessary.*

San Mateo County Existing Conditions

The San Mateo County coastal zone is particularly vulnerable to catastrophic wildfires. Like many areas of the State, forest, woodland, and grassland landscapes across San Mateo County are undergoing significant change. The climate is becoming warmer and drier, endemic species are at risk, invasive species are spreading, and sudden oak death has taken an immeasurable toll on regional ecosystems and overall forest health. At the same time, drier site-adapted conifer species are displacing hardwoods and other sensitive plant species, reducing biodiversity and affecting the suitability of these habitats for rare and special-status wildlife. Altered fire regimes and increased fuel loads are also driving larger and more catastrophic wildfire. The result has been damaging changes to ecosystems that require environmentally sensitive landscape-level

treatments to redirect the path of changing climates and ecological conditions impacting San Mateo County and its communities.

The 2020 CZU Lighting Complex Fire is a stark example of the level of risk, severity of wildfire, and impacts to our human and biological communities in this landscape. The CZU burned 86,509 acres in San Mateo and Santa Cruz Counties, destroyed 1,490 buildings, and exhibited extreme fire behavior. Initial estimates suggest that over 50% of the impacted area burned at high fire severities. Many forested stands that were topographically exposed to the extreme fire behavior experienced significant tree mortality and habitat losses that will take decades to recover. High priority forest health and fire prevention projects must be carried out on a routine basis to promote fire resiliency in these coastal areas.

The PWP covers an area within the County's LCP jurisdiction that stretches from the northern Santa Cruz County boundary to the outskirts of the City of Pacifica in the north. The PWP Program Area encompasses nearly 85,000 acres where potential future projects could take place. Map 1 (on page 9 of Exhibit 1) shows the geographic context within which the PWP would apply as well as the relationship between the PWP Program Area and the approved LCPs for cities within San Mateo County. Map 2 (on page 10 of Exhibit 1) displays the PWP Program Area overlayed on CalFIRE's Fire Severity Zone Maps to provide context for future planning efforts within the PWP Program Area. Map 3 (on page 11 of Exhibit 1) shows the CalVTP Treatable Landscapes map and how that program overlaps with the PWP Program Area. While the PWP has been developed as a companion to the CalVTP, it is expected that some high priority projects outside of the modeled treatable landscape will be developed and authorized through the PWP. Map 4 (on page 12 of Exhibit 1) provides additional context by illustrating the LCP land-use designations within the PWP Program Area.

San Mateo County Local Coastal Program

The San Mateo County LCP was one of the earliest LCPs submitted to the Coastal Commission and was first certified in April of 1981. The LCP was last comprehensively updated in 2012, though numerous amendments have been certified since then. The County's LCP is certified as a single element and the County issues CDPs throughout its coastal zone. The policies of the LCP Land Use Plan (LUP) are separate from the County's General Plan, while the coastal implementing actions (i.e., zoning regulations, etc., that make up the LCP Implementation Plan (IP)) that carry out these LUP policies are found within the County's code.

County staff have collaborated on the development of this PWP and have advised that the design of projects consistent with the CalVTP, including the SPRs and Mitigation Measures, and the Coastal VTS within the PWP sufficiently protect coastal resources consistent with the County's LCP.[3]

[3] Commission staff received written correspondence from the County on June 17, 2021.

B. Forest Health and Fire Resilience Public Works Plan Description

The PWP provides a cost-effective and programmatic approach to compliance with the California Coastal Act in order to increase the pace and scale of implementation of critical projects that will improve both ecological conditions (i.e., forest health) and the resilience of County landscapes to future climate change-induced wildfire (i.e., fire prevention). Over the proposed ten-year period of the PWP, the RCD plans to conduct high priority forest health and fire prevention projects with voluntary collaborating landowners within the PWP Program Area in moderate to very high wildfire hazard areas of the Coastal Zone (CZ) of San Mateo County.

While forest health projects will be explicitly designed to directly improve ecosystem health, fire prevention projects will also be designed to directly improve ecosystem conditions to the extent feasible (e.g., removal of dead, diseased, and overgrown vegetation, removal of non-native invasive plant species, management that mimics natural disturbance regimes, etc.). Fire prevention projects that cannot be designed to directly improve or restore ecosystems or ecosystem processes will be limited to projects that are required to protect existing structures and/or infrastructure, and will provide indirect ecosystem benefits by reducing the intensity, rate of spread, and extent of catastrophic wildfire on adjacent habitats and ecosystems.

Approved projects will be designed to:

- Proactively restore forest health, improve ecosystem resiliency, and conserve working forests by conducting ecologically minded forest health treatments, including by promoting a mosaic of native vegetation types and improving habitat for rare, threatened, and endangered plant and animal species.
- Protect State water supply sources by strategically implementing ecological restoration projects across priority watersheds.
- Encourage the long-term storage of carbon in forest and woodland trees and soils through the reduction of dense understory thus promoting larger healthier stands of mature trees.
- Minimize the loss of forest carbon from large, intense wildfires, through reduction of ladder fuels and brush resulting from years of fire suppression.
- Promote public safety, health, and welfare and protect public and private property through the implementation of ecologically restorative fuel reduction treatments in the wildland urban interface.

Five treatment activities may be carried out depending on the goals and objectives of each specific project, including prescribed burning, mechanical treatment (e.g., use of masticators), manual treatment, prescribed herbivory, and herbicide application. For a detailed description of these treatment activities, see the CalVTP Background section above, as well as Section III of the PWP in Exhibit 1.

C. Coastal Habitats

General Ecological Considerations

For the last century, fire suppression, and more recently, climate change, have resulted in unhealthy forests that set the stage for disease, pest infestations, and larger and more intense fires than would naturally occur in the absence of human interventions. Fire suppression has resulted in many forests characterized by dense overgrowth including too many trees and an unnaturally thick and impenetrable understory. These crowded forests, particularly when stressed by drought conditions, provide a ladder for flames to reach high into treetops or crowns and produce more intense fires that are challenging to manage. Additionally, buildup of live and dead understory vegetation reduces fire and drought resiliency. Without the more frequent burns that were associated with natural fire regimes and their generally lower intensity, forests are less healthy, wildlife habitat is lost, and communities and infrastructure are threatened by the increased risk of major fire events. The warmer temperatures, drier conditions, and extended droughts associated with climate change further exacerbate the problems facing forests and the likelihood of catastrophic fires.

Fire has been essential to the health of forest ecosystems for thousands of years. Untamed burns sparked by lightening have shaped the structure and diversity of forests around the world. Nearly 80 percent of the native vegetation in North America evolved with fire.[4] The intention of forest health projects is to restore forest communities to conditions mimicking the respective fire frequencies they would naturally be exposed to; that is to remove dead, diseased, and pest infested trees and brush, thin young saplings to allow mature trees to attain full growth, and to clear unnaturally thick understory vegetation while restoring wildlife habitat.

Commission ecologists helped develop the Coastal VTS for forest health and fire prevention projects in sensitive habitats. As part of a regional approach to fire planning, the Coastal VTS underwent several iterations following review and discussions with CalFire, the Counties of San Mateo and Santa Cruz, and the RCDs in both San Mateo and Santa Cruz Counties to ensure it was not redundant with the CalVTP PEIR and that applying the Coastal VTS would bring projects in the Coastal Zone into conformance with LCP coastal resource protection requirements.

California forests where fire has been suppressed and under the stress of climate change are ecologically impaired. The Commission's Ecologists believe that forest health projects that adhere to the Biological SPRs and the Coastal VTS constitute. restoration projects because they are designed to improve overall forest health by

[4] https://www.nature.org/en-us/about-us/where-we-work/united-states/idaho/stories-in-idaho/wildfires-and-forest-management/

restoring natural forest community structure, diversity, and associated ecological services and functions.

Fire prevention projects involve fuel reduction or vegetation management to protect existing structures and/or infrastructure to create defensible space that addresses public safety concerns. In addition to public safety, fire prevention projects are integral to a range of strategies that mitigate fire hazard on a regional and community scale to reduce the risk of uncontrolled fires which can adversely affect ecosystems in addition to life and property. Recent wildfires have demonstrated that if vegetation is allowed to grow unchecked, it becomes a hazard not only for an individual property, but for the neighboring properties, surrounding community, and adjacent natural areas. Without adequate vegetation management, catastrophic wildfires are likely to be more frequent and larger across the region, thereby causing damage or destruction to homes, businesses, utility lines, roads (including due to landslides caused by post-fire erosion events), other structures, and potentially natural lands subjected to unnatural fire regimes. Fuel reduction and fuel breaks are often necessary during an active fire and these cannot be designed with the typical ecological considerations under duress. As a result, proactively implemented fire prevention projects can be designed to use the CalVTP and Coastal VTS to minimize impacts to ecosystems in comparison to actions required under emergency conditions.

Under the PWP, fire prevention projects that affect coastal habitat resources are required to follow standards to first implement the strategies that would benefit forest health (e.g., removal of dead, diseased, and pest infested trees and brush, thinning young saplings to allow mature trees to attain full growth, and clearing unnaturally thick understory vegetation while restoring wildlife habitat) and secondarily, implement additional vegetation management measures only if necessary to achieve fire protection goals. While some fire prevention projects, for example, may need to remove more vegetation than might benefit forest health, Commission Ecologists believe that in some cases, fire prevention projects will be able to apply all the standards laid out in the Biological SPRs of the CalVTP PEIR and the Coastal VTS for forest health projects. Where fire prevention projects must go beyond forest health strategies to reduce fire risk for public safety, such projects must also be designed to avoid and minimize any adverse impacts to sensitive resources (including through habitat conversion) to the maximum extent feasible. Given the care and concern for protecting such resources provided by the CalVTP, along with the Coastal VTS, and the requirement to provide benefits to the habitat to the greatest extent possible, the Commission's Ecologists believe that the fire prevention projects can be implemented while imposing the least amount of ecological impact possible. Fire prevention projects are an integral part of an overall vegetation management regime and thus, though they may not directly provide restoration benefits in certain individual cases, they are a component of the overall effort to managing wildfire and enhancing forest health, and thereby can provide benefits to forest health in addition to protecting people and property.

Applicable LCP Coastal Habitat Provisions

The San Mateo County LCP requires that environmentally sensitive habitat areas (ESHA) and other sensitive habitats and species be preserved, restored, protected against significant disruptions, and any development authorized within or adjacent to these resources must maintain or enhance the habitat. LUP Policy 7.1 defines sensitive habitats as “any area in which plant or animal life or their habitats are either rare or especially valuable”, as well as any area that meets specific criteria such as habitats that contain or support rare and endangered species, existing wildlife reserves, perennial and intermittent streams, and coastal areas containing breeding or nesting sites. LUP Policy 7.3 prohibits “any land use or development which would have [a] significant adverse impact on sensitive habitat areas,” and also requires that development in areas adjacent to sensitive habitats be sited and designed to prevent impacts that could significantly degrade the sensitive habitats. Other LCP policies specifically protect riparian corridors, wetlands, and significant and Heritage trees by imposing buffers and other measures to limit impacts. See, for example, LCP Policies 7.4 – 7.21, 8.9.

Additional environmental protection standards for sensitive habitats are contained within the environmental review criteria for development undertaken within the Resource Management (RM) District and Timberland Preserve (TP) District, where much of the vegetation treatment is anticipated to occur. For the RM District, standards for the protection of sensitive habitats are contained under Sections 6912, as well as 6912.4, 6913.2, 6913.4, 6913.7, while Sections 6972 through 6975 provide for environmental protection standards in the TP District. Generally, these standards ensure protection of sensitive habitats and species by: restricting the use of herbicides and other chemicals that could have significant adverse environmental impacts, including their disposal into waterbodies; avoiding extensive changes to vegetation or significant reductions in primary habitat areas; avoiding adverse impacts to wildlife habitat and riparian habitat; and avoiding other noxious impacts from odors, noise, and light pollution.

PWP Coastal Habitat Protection Standards

Under the PWP, vegetation treatment activities that have the potential to adversely impact ESHA, special-status species, and other biological resources in the County’s treatable landscape must be designed and implemented to protect these resources consistent with the Project Standards. If vegetation treatment activities were not required to adhere to these protections, they could cause adverse impacts to biological resources such as through vegetation removal that disrupts and displaces sensitive habitat and species. In addition, workers carrying out manual treatment activities could adversely impact sensitive species if buffers and flagging (of sensitive species) is not carried out properly.

To protect ESHA and sensitive biological resources, the CalVTP and Coastal VTS include a significant number of safeguards (pursuant to Project Standards 2 and 3). In general, these safeguards aim to ensure review of site-specific records and reconnaissance-level surveying to determine the potential for sensitive species and habitat within treatment areas; resource-protection training for crews carrying out treatment activities; measures to protect against impacts to sensitive habitats and

species; and other appropriate mitigations designed to address habitat concerns. The SPRs and Coastal VTS standards are described in more detail below.

For biological resources, a number of SPRs provide for design and treatment measures protect against significant impacts. For example, SPR BIO-1 requires a qualified professional, such as biologist, to conduct a data review and reconnaissance-level survey prior to commencing with treatment activities. Where sensitive biological resources are found pursuant to this survey, SPR BIO-3, SPR BIO-7, and SPR BIO-10 require a protocol-level survey for special status plants and habitats, special-status plant species, and special-status wildlife species. Treatment must then be designed to protect against adverse impacts (e.g., SPR BIO-4 and -5). Further, work crews must undergo biological resource training, including proper implementation of biological SPRs and mitigation measures, as well as identification and avoidance of sensitive biological species (SPR BIO-2). A number of best management practices must also be implemented to prevent the spread of plant pathogens and invasive species, such as cleaning and sanitizing equipment, staging equipment in designated areas, and treating invasive biomass on-site (SPR BIO-6 and SPR BIO-9). Treatment will also help protect habitat by prioritizing retention of larger, healthy, native trees (e.g., SPR BIO-4 and BIO-8). Project proponents must also consult with Commission staff through the preparation of NOIDs to ensure projects are designed to avoid impacts to ESHA (SPR BIO-8). For a more detailed summary of these SPRs, see page 42 of Exhibit 1.

In addition, the CalVTP includes numerous mitigation measures for addressing any residual impacts to biological resources. In general, these mitigation measures require avoidance and protection of listed and non-listed special status plants, habitats, and wildlife species, through no-disturbance buffers (Mitigation Measures BIO-1a, 1b, 2a, and 2b). Where avoidance and protection of such biological resources in not feasible, compensatory mitigation is required, typically through the preservation and enhancement of similar species and/or habitat outside the treatment area, or through the purchasing of mitigation credits from conservation or mitigation banks (Mitigation Measures BIO-1c and 2c). Further, Mitigation Measure BIO-4 requires avoidance of impacts to wetlands, including through buffers and restrictions on mechanical treatment, as well as herbicide and prescribed herbivory usage. For a more detailed summary of these mitigation measures, see page 42 of Exhibit 1.

On top of these CalVTP requirements, the coastal-specific standards contained in the Coastal VTS provide additional standards for the protection of ESHA and biological resources in the county's coastal zone (see page 38 of Exhibit 1). The Coastal VTS requires that forest health projects restore and enhance ecosystems and forests, protect watersheds, and promote long-term storage of carbon; restore and maintain vegetation cover to thresholds reflecting appropriate fire-return intervals; maintain vegetation cover and composition to comply with the standards set forth in the second edition of the Manual of California Vegetation so that habitat type conversion is avoided; and provide for a mosaic of native plants. Fire prevention projects are required to follow these standards to the extent feasible, while still achieving fire protection goals, and are limited to projects that are required to protect existing structures and/or infrastructure. Critically, the Coastal VTS requires that all vegetation treatment activities, excluding

prescribed burning, follow a vegetation removal hierarchy that prioritizes thinning and removal of dead, dying, and diseased vegetation, followed by removal of invasive species, and lastly, removal of native species that are not endangered, threatened, rare or otherwise especially valuable.

The Coastal VTS also provides for additional standards that tier off the CalVTP SPRs. For example, the use of heavy machinery, herbicides, and prescribed herbivory must be limited to projects where their use is required and where demonstrated that they are the least environmentally damaging alternative. Further, the use of accelerants is limited to prescribed fire application where such use will not significantly disrupt or degrade ESHA, while riprap and chemical soil stabilizers that could significantly disrupt or degrade ESHA is prohibited. Similarly, wildlife-friendly fencing used pursuant to SPR BIO-11 must also allow for adequate ground clearance for smaller species to avoid entrapment and/or entanglement.

LCP Consistency Analysis

Proposed forest health projects aim to restore ecosystems and forests, including by restoring and maintaining appropriate vegetative cover, and are consistent with the County LCP given that restoration activities will be designed to sustain species composition and habitat integrity. As described above, the County LUP permits such management and restoration activities within sensitive habitat areas if adequate protection measures are implemented to minimize adverse impacts. Since the PWP relies on the SPRs, mitigation measures, and Coastal VTS to safeguard sensitive habitats and species, including through protocol-level and reconnaissance surveys prior to treatment activities (SPR BIO-1, SPR BIO-3, and SPR BIO-7), wetlands protection (Mitigation Measure BIO-4), design of treatment in a manner that avoids impacts to sensitive species (e.g., SPR BIO-1, SPR BIO-4, SPR BIO-5, SPR BIO-6, SPR BIO-8, and SPR BIO-12), and mitigation for significant environmental impacts within any sensitive habitat area (Mitigation Measures BIO 1c, 2c, and 3c), the PWP follows County LCP standards for both protection of ESHA and its restoration.

Further, forest health projects comply with the LCP's requirement to ensure that projects do not have a significant adverse impact on sensitive habitat areas and that development in areas adjacent to sensitive habitats be sited and designed to prevent impacts that could significantly degrade the sensitive habitats. As described above, a suite of measures will ensure that these projects are carried out in a sensitive manner in which, for example, adequate canopy cover is retained, treatments will be limited to the removal of uncharacteristic fuel loads, and treatment activities will be scheduled to avoid active nesting seasons. The requirement for retention of plant cover also ensures that these projects will be consistent with the LCP's habitat protections. In addition, the PEIR requires that a qualified biologist or other individual familiar with the ecology of the treatment area monitor all treatment activities in ESHAs to ensure that the various standards are met. Project proponents must also submit PSAs that will describe each project, potential alternative locations that could minimize impacts of the project, and other measures that will be taken to address project impacts. In addition, SPR AD-7 requires proponents of projects covered by the VTP PEIR to submit a completed Mitigation Monitoring and Reporting Program after project completion. Moreover, The

PWP is consistent with the County's Heritage Tree ordinance because it prioritizes and requires the retention of large, live, healthy, native trees (e.g., SPR BIO-4), and is consistent with the County's Significant Tree Ordinance because that ordinance allows removal of trees in order to address a hazard to life and personal property. The Coastal VTS and other standards will also ensure that use of herbicides will not cause significant disruption of ESHA. For example, Coastal VTS standard 6 states: "Herbicides shall be avoided to the maximum extent feasible and may be used only if such treatment activities are the least environmentally damaging feasible alternative and will not result in significant adverse impacts to sensitive ecological resources (e.g., when used to control of invasive species). Projects shall adhere to CalVTP SPRs HAZ-5, 6, 7, 8, and 9." As described above, other standards will also limit the use of herbicides in order to protect sensitive habitats (e.g., SPR BIO-4 disallows their use within wetland buffers, and the Coastal VTS standards require that herbicides "may be used only if such treatment activities are the least environmentally damaging feasible alternative and will not result in significant adverse impacts to sensitive ecological resources (e.g., when used to control of invasive species)"). These standards ensure consistency with the LCP's various resource protection policies.

Recent wildfires have demonstrated that if brush is allowed to grow unchecked, it becomes a hazard not only for an individual property, but for the neighboring properties and surrounding community as well. Without adequate vegetation management, including fuel breaks such as those proposed as fire prevention projects, catastrophic wildfires are likely to be more frequent and larger, thereby causing damage or destruction to homes, businesses, utility lines, roads (including due to landslides caused by post-fire erosion events), and other structures, as well as habitat degradation in certain cases. Fire prevention projects, which will generally be implemented as defensible spaces around existing structures in the WUI, or as fuel breaks along existing roads to provide strategic fire breaks and staging areas for fire fighters, can also be found consistent with the LCP. Unlike forest health projects, these projects are not explicitly designed for the purpose of ecological restoration, and by extension may have a greater likelihood of impacting coastal habitats and species. However, fire prevention projects are consistent with the LCP's allowance for maintaining the integrity of existing structures, roads, and other such development because they are necessary to maintain the safety, integrity, and utility of such development, and they are required to minimize and mitigate impacts to the extent feasible.

Specifically, like the Coastal Act, the County's IP identifies that authorizations for the maintenance of existing, legally-established structures, roads, and other such development is somewhat different than the manner in which most new development is authorized.[5] For situations involving Commission review of maintenance activities that take place in sensitive areas, the Commission does not analyze whether the existing underlying development that is being maintained is consistent with the LCP, as it was already authorized as required by the Coastal Act and LCP (or pre-dated such required

[5] See Coastal Act § 30610(d), 14 CCR § 13252, County IP § 6328.5.

authorization). Rather, the Commission only analyzes and regulates the methods of conducting the maintenance activities to ensure they are carried out in a manner most protective of coastal resources. Here, this means that the PWP may allow fire prevention activities that may affect coastal habitats, because such projects will help maintain the safety, integrity, and utility of existing structures, roads and other development. However, it must impose measures to avoid, reduce, or mitigate for any impacts to coastal resources caused by the projects, including by following the forest health project guidelines as much as possible.[6] In this case, the PWP implementation overall is also premised on overall habitat enhancement in the County, and in fact the RCD's proposal makes clear that the majority of affected PWP acreage will be forest health projects, and thus by definition will result in overall ecological enhancement. And even for the minority of PWP acreage that might be the subject of fire prevention projects, these projects are required by the PWP to incorporate ecological enhancement principals as much as possible, and thus the cases where there may be fire prevention projects that don't lead to overall habitat enhancement are expected to fairly limited.

In conclusion, the PWP provides a detailed series of prescriptions for protecting coastal habitats in San Mateo County, including CalVTP PEIR and the Coastal VTS requirements, protects coastal habitats and species, and provides appropriate mitigation for residual impacts. Therefore, the proposed PWP is consistent with the LCP's coastal habitat provisions.

D. Water Quality

The County's LCP generally prohibits water quality degradation. For example, LUP Policy 1.35 requires that all new development and activities protect coastal water quality through numerous BMPs. These may include site design measures that "prevent runoff pollution by reducing the potential soil erosion or contact of runoff with pollutants", or source control measures that provide for "structural or non-structural practices that minimize the contact between pollutants and runoff." Similarly, Section 6912.4 provides for the protection of water resources, including but not limited to: minimizing grading and other landscape alterations; erosion control measures; and methods for the "management of vegetative cover, surface water runoff, ground water recharge, and sedimentation processes to assure stability of downstream aquatic environments." Water quality protection is also important for maintaining healthy coastal habitats, in addition to the considerations detailed above.

[6] Further, and as described above, the PWP includes both CalVTP PEIR and related standards and mitigation measures that are designed to protect coastal habitats in fire prevention projects. For example, surveys will be conducted for sensitive species, project activities will halt if nesting birds are discovered, and non-shaded fuel breaks will mostly occur on ridges that are not adjacent to riparian areas and will include appropriate runoff control measures to ensure that sediment does not enter sensitive wetland or aquatic habitats. The Coastal VTS requires that removal of vegetation for fire prevention projects be "the minimum necessary to protect existing structures and infrastructure" and that such projects comply, to the maximum extent feasible, with various ecosystem protection measures.

Vegetation treatment activities under the PWP must be designed and implemented to protect water quality (consistent with Project Standard 2 and 3 of the PWP). Without these requirements, adverse impacts to water quality could result, such as through soil erosion or release of pollutants in surface and ground waters. The equipment used for mechanical removal of vegetation is also a potential risk to water quality through leaks and spills of fuels and other chemicals if such equipment is not maintained correctly, or if maintenance occurs near or within sensitive water resource areas. Lastly, where herbicides are applied, the risk for runoff, drift, and misapplication or spills can all threaten water quality, including leaching into groundwater.

To address these potential impacts, the CalVTP includes six SPRs that ensure the protection of water quality. For example, SPR HYD-1 requires project proponents to comply with the appropriate Waste Discharge Requirements and/or Basin Plan Prohibitions of the Regional Water Quality Control Board (RWQCB) to ensure that waste is disposed of in an appropriate manner. Similarly, prescribed herbivory must follow certain standards to guard against water quality impacts, including through the use of fencing or active herding within buffers adjacent to sensitive water resources and the provision of water sources outside of sensitive habitat for grazing animals (SPR HYD-3), while Watercourse and Lake Protection Zones are to be established to ensure buffers between heavy machinery and prescribed burning activities (SPR HYD-4). For herbicide use, SPR HYD-5 protects non-target vegetation and special-status species by restricting herbicide use within and/or adjacent to various waterbodies. Relatedly, SPR HYD-6 requires treatment activities adjacent to roadways with existing stormwater drainage infrastructure to be maintained. Lastly, SPR HYD-2 prohibits the construction or reconstruction of any new roads, including temporary roads. For a summary of these hydrological SPRs, see page 42 of Exhibit 1.

The CalVTP also includes a number of other SPRs that contribute to water quality protection, which are discussed in more detail under the relevant findings of this report (see Coastal Habitats and Coastal Hazards sections). These include measures for incorporating buffers around water resources (SPR BIO-1); designing treatment activities to prevent the spillage of pesticides (SPR HAZ-5); requiring measures to maintain heavy equipment and follow proper herbicide disposal procedures (SPR HAZ-1 and SPR HAZ-7); minimizing erosion through soil stabilization, restrictions on heavy machinery use, and monitoring (SPR GEO-1 through SPR GEO-4, as well as SPR GEO-8); prohibiting the use of heavy equipment in sensitive resource areas (SPR GEO-7); designing prescribed burning to avoid high-intensity, severe burns (SPR AQ-3); and requiring drainage features and conditions to remain unchanged following treatment activities (SPR BIO-4 and SPR BIO-5).

Given the above standards, vegetation treatment activities carried out under the PWP would be designed and implemented consistent with the LCP through a number of measures that would avoid potential adverse impacts to water quality (consistent with PWP Project Standards 2 and 3). As such, the PWP protects water quality and is consistent with the County LCP.

E. Visual Resources

The San Mateo County LCP protects coastal zone visual resources, particularly with regards to natural landforms and features providing unique views (see generally LUP Chapter 8). Scenic roads and corridors are also designated in the LCP and afforded protection through various zoning regulations, including Section 6912.2 of the Resource Management Zoning District, which prohibits new development from substantially detracting from the scenic and visual quality of the County. Section 6913.1 further provides for protection standards in Scenic Corridors and Primary Scenic Resources Areas.

Treatment activities under the PWP are not generally anticipated to result in visual resource impacts given that proposed treatments will be designed to guard against significant, visible alterations (consistent with PWP Project Standards 2 and 3). Indeed, the SPRs and Mitigation Measures ensure that project sites will be screened with sufficient vegetation within, at the edge of, or adjacent to treatment areas to screen views from outside the project area (SPR AES-3). Similarly, for mechanical and manual treatment, vegetation must be thinned and feathered to break up or screen linear edges to mimic forms of natural clearings to the extent feasible (SPR AES-1). Lastly, all treatment types must also avoid staging equipment, including vehicles and vegetation debris, within viewsheds to the extent feasible (SPR AES-2).

In general, proposed PWP vegetation treatment would be designed and implemented consistent with the county's scenic and visual resource protection policies because PWP development standards would avoid and minimize potential adverse visual resource and aesthetic impacts, which would be further evaluated and reduced during project-level analyses pursuant to future environmental review and/or NOIDs, as applicable. Therefore, the proposed PWP is consistent with the LCP provisions protecting scenic and visual resources.

F. Coastal Hazards

Many developed and undeveloped areas in San Mateo County are at risk from wildfires. The County's Hazard Mitigation Plan of 2016[7] identifies Shelter Cove, Moss Beach, Half Moon Bay, Sky Londa, and Crystal Springs Lake as highly vulnerable to recurring wildfires based on climatic, topographic, and vegetative conditions. The southern half of the County is also designated as moderate or high fire severity based on CalFIRE's Fire Hazard Severity Zone classification system. There are also a number of Wildland Urban Interface (WUI) areas where wildfires may threaten properties that are both within the County's fire protection jurisdiction and other fire protection services, such as CalFIRE. The County's Hazard Mitigation Plan also identifies climate change as a driver of

[7] See https://cmo.smcgov.org/sites/cmo.smcgov.org/files/documents/files/San%20Mateo%20HMP%20-%20Volume%20I%20-%20Final%20APA.pdf.

catastrophic wildfires, while landslides are recognized as a potential secondary natural hazard as a consequence of wildfires.

The County's LCP addresses these hazards with policies and ordinances that ensure that new development minimizes risk. Chapter 9 of the LUP contains these policies, including those relevant to the vegetation treatment activities proposed under the PWP. The County defines hazardous areas in LUP Policy 9.1 "as fault zones and land subject to dangers from liquefaction and other severe seismic impacts, unstable slopes, landslides, coastal cliff instability, flooding, tsunamis, fire and steep slopes (over 30%)." Fire hazards are defined by areas where there is a high potential for catastrophic wildfires (LUP Policy 9.4), these areas are designated as high fire risk areas on the County's Hazard Maps (LUP Policy 9.5), and the County Fire Code requires defensible space around structures.

LCP Section 6912.1 provides for protection from erosion when extensive changes to vegetative cover are proposed, and Section 6823 requires the County to employ numerous measures to reduce flood losses, including but not limited to the prohibition or restriction of uses that result in increased erosion or flooding. Toxic and hazardous materials are generally regulated by zoning district standards, where applicable, in the County LCP. For Resource Management Districts in the Coastal Zone, Section 6912.6 prohibits noxious chemicals, petroleum or other hazardous, flammable liquids and materials from being stored or manufactured in any hazard area identified by the County.

Vegetation treatment activities proposed under the PWP will be designed and implemented to protect coastal resources and avoid and/or minimize risks from hazards (consistent with PWP Project Standards 2 and 3). If these measures were not required, existing or new coastal hazards could result in hazardous situations, including the uncontrolled spread of wildfires, post-fire flooding or landslides, or the inadvertent discharge of hazardous materials (e.g., accelerants, herbicides) into the environment. Further, a number of SPRs address the potential for hazards to affect health and safety, including exposure to hazardous materials or to physically hazardous situations. For hazards associated with machinery and equipment, the CalVTP requires that all machinery and equipment be maintained in accordance with manufacturing guidelines, as well as State and federal emissions requirements, including the use of spark arrestors for mechanized hand tools (SPR HAZ-1 and SPR HAZ-2). Tree cutting crews must also carry one fire extinguisher for every inventoried chainsaw, while every vehicle must be equipped with one long-handled shovel and one axe consistent with PRC Section 4428 (SPR HAZ-3). For herbicide use, a licensed Pest Control Advisor is required to prepare a Spill Prevention and Response Plan prior to beginning any herbicide treatment activities to provide protection to onsite workers, the public, and the environment from accidental leaks or spills of herbicides, adjuvants, or other potential contaminants (SPR HAZ-5). Project proponents must also coordinate all herbicide use with the applicable County Agricultural Commissioner(s) and obtain all required licenses and permits and follow all recommendations and regulations pertaining to the safe use of pesticides, including adherence to herbicide application parameters during application to minimize drift into public areas (SPR HAZ-6 and SPR HAZ-8). Disposal of

herbicide containers must also adhere to regulations to ensure the prevention of contamination of waterbodies (SPR HAZ-7). Lastly, project proponents must post signage of herbicide usage occurring within or adjacent to sensitive areas such as schools and residential areas, as well as within 500 feet of any public area (SPR HAZ-9). A summary of the hazard SPRs can be found in Exhibit 1.

In addition, the CalVTP includes a mitigation measure that requires the identification and avoidance of known hazardous waste sites. Because mechanical treatment and prescribed burning may result in soil disturbance that could disperse existing hazardous materials in the soil, Mitigation Measure HAZ-3 stipulates that project proponents must "make reasonable efforts…to determine if there are any sites known have previously used, stored, or disposed of hazardous materials." Where hazardous materials are discovered, no soil disturbing activities or prescribed burning is to occur within 100 feet of the site boundaries. This would ensure that hazardous waste sites are identified and avoided so that "exposure-related risks associated with the disturbance of a hazardous waste site" would not occur.

Related to unstable geology and soils, the CalVTP includes eight geological SPRs. In general, these standards ensure that treatment activities do not contribute to erosion. For example, mechanical treatment and herbicides use must cease under specified environmental conditions, such as precipitation (SPR GEO-1 and SPR GEO-2). Project proponents must also stabilize soil disturbed during mechanical treatment, prescribed herbivory treatments, and prescribed burns through the use of mulch or an equivalent medium immediately after treatment activities, to the maximum extent feasible, to minimize the potential for substantial sediment discharge (SPR GEO-3). Potential for erosion must be assessed prior to treatment activities, while inspections for erosion during and following treatment activities are also required, including remediation where necessary (SPR GEO-4). Other erosion control measures address storm runoff (SPR GEO-5) and slope gradients through limitations on heavy equipment (SPR GEO-7 and SPR GEO-8), while burn piles must not exceed specified land area so that soil damage is minimized (SPR GEO-6). Overall, the various SPRs and other measures will ensure that there is not removal of vegetation to such a significant degree that would lead to uncontrolled runoff or hazardous erosion conditions, and that would ensure protection of safety as well as biological resources. A summary of these geological hazard SPRs can be found in Exhibit 1.

Lastly, the Coastal VTS limits the use of herbicides, herbivory and heavy equipment and machinery to the maximum extent feasible. These standards will help ensure that sensitive resources and communities are protected from inadvertent exposure to hazardous materials and from adverse impacts stemming from the use of heavy machinery or herbivory, such as on slope stability.

The PWP development standards (i.e., SPRs and Coastal VTS) are therefore consistent with the San Mateo County LCP provisions for coastal hazards. Accordingly, the PWP is consistent with the hazard provisions of the County's LCP.

G. Cultural Resources

The County's LUP includes a suite of policies for the protection of archaeological, paleontological, and historical resources (hereafter collectively referred to as cultural resources). For example, LUP Policy 1.25 requires the determination of potential archaeological/paleontological resources in areas where new development is proposed and that prior to approval of development proposed in these areas a mitigation plan "adequate to protect the resource" must be developed. Similarly, the County LUP protects "any structure or site listed as an Official County or State Historic Landmark or [that] is listed in the National Register of Historic Sites" (LUP Policy 8.26).

The County's IP carries out the aforementioned cultural resource protection policies of the LUP in greater specificity. For example, Section 6912.5 requires cessation of all development activities that could damage archaeological sites where such resources are discovered during construction activities. A qualified professional must investigate the site within 15 days. Depending on the significance of the archaeological site found, excavation may proceed and must be completed within a specified timeframe under supervision of a qualified professional.

The PWP provides for the protection of cultural resources through a number of measures. Without these measures, vegetation treatment activities could potentially impact known and unknown cultural resources through treatment that involves soil disturbance. For example, the removal of vegetation through manual treatment activities will result in the presence of workers in geographic areas that may include unknown cultural resources. Similarly, mechanical treatment could also result in the physical disturbance of land surfaces (e.g., masticator churning up the surface), which could impact shallow, undiscovered artifacts.

The CalVTP includes significant measures to protect cultural resources. Only qualified professionals or trained workers are authorized to implement the SPRs and Mitigation Measures, while pre-treatment research and reconnaissance surveying of treatment areas is required for treatment activities. For example, SPR CUL-1 requires an archaeological and historical resource record search to be conducted pursuant to local or state agency procedures; SPR CUL-2 stipulates that California Native American Tribes in the counties where the treatment activity is located to be contacted and provided with a written description of the project objectives and location; SPR CUL-3 necessitates a pre-field research to "inform survey design, based on the types of resources likely to be encountered within the treatment area, and to be prepared to interpret, record, and evaluate these findings within the context of local history and prehistory"; and SPR CUL-4 requires an archaeologist to conduct a site-specific survey of the treatment area and to provide a survey report.

Where cultural resources are known to exist or are discovered through project activities, the CalVTP requires additional protection measures. First and foremost, SPR CUL-8 requires that all project crew members and contractors be trained in the protection of cultural resources, including halting work where archaeological resources are encountered and treatment activities involve soil disturbance. Relatedly, SPR CUL-5

and SPR CUL-6 both necessitate consultation with the culturally affiliated tribe(s) to develop protection measures for cultural resources in the treatment area. Such protection measures may include adjustments to the treatment location so that impacts to cultural resources are avoided, and/or changing the treatment design so that adverse impacts to cultural resources do not occur. Lastly, SPR CUL-7 requires project proponents to avoid treatment activities near historical resources (as defined by Section 15064.5 of the State CEQA Guidelines), including by prohibiting prescribed burning and mechanical treatment within 100 feet of such resources.

Despite the aforementioned measures to protect cultural resources, the CalVTP recognizes that ground disturbance during vegetation treatment activities could result in inadvertent damage to or destruction of cultural resources that are discovered during project operations. As such, Mitigation Measure CUL-2 requires all ground-disturbing activities within 100 feet of a discovered cultural resource to cease where such resources are discovered. A qualified archaeologist is also required to assess the resource and develop procedures to protect its integrity, including in-situ preservation amongst other measures.

Given that the PWP adheres to the cultural resource SPRs and Mitigation Measures of the CalVTP PEIR, proposed vegetation treatment projects would be designed and implemented consistent with the county's cultural resource policies that require protection of such resources (consistent with PWP Project Standards 2 and 3). The PWP also requires surveys of treatment areas and consultation with tribal entities with regard to design treatment activities where known cultural resources exist or are discovered during treatment activities. As such, the proposed PWP is consistent with the LCP provisions protecting cultural resources.

H. Public Access and Recreation

The County's LCP ensures that coastal public access and recreation is protected and maximized by defining these resources and amenities and requiring their protection and provision based on locational criteria and minimum development criteria. In general, the LUP encourages the provision of public access to appropriate beach and coastal areas (see LUP Chapters 10 and 11).

The proposed PWP includes measures to ensure impacts to public access and recreation are avoided and minimized. Without such measures, vegetation treatment activities could impact public access and recreation in that certain treatment activities, such as herbicide application and prescribed burning, could require temporary closure of such areas and facilities to ensure public safety. Indeed, vegetation treatment could result in access restrictions or nuisance impacts (e.g., dust and smoke) to the extent that access and recreation is disrupted temporarily. SPR REC-1 addresses these impacts by requiring project proponents to coordinate with the owner or manager of any public recreation area or facility that would require temporary closure to post notifications of the closure at least two weeks prior to the commencement of the treatment activities. This would help to avoid and minimize disruptions to recreational users by notifying them in advance of their proposed recreational use. Similarly, SPR

HAZ-9 requires project proponents utilizing herbicide application within or adjacent to public recreation areas to post signs at each end of herbicide treatment area and any intersecting trails. Further, SPR TRAN-1 would require the preparation of a Traffic Management Plan (TMP) "if traffic generated by the project would result in obstructions, hazards, or delays exceeding applicable jurisdictional standards along access routes for individual vegetation treatments." Measures included within a TMP could mitigate traffic impacts through signage, flaggers, or treatment schedule restrictions that aim to avoid peak vehicle traffic times.

In addition, the coastal-specific standards in the Coastal VTS (see page 38 of Exhibit 1) include a public access and recreation provision requiring the protection of public access and public recreational areas and facilities during project operations to the maximum extent feasible. Measures to be implemented include minimization of trail closures, limiting the use of public parking spaces for staging operations, posting available accessway signage, and using flaggers, and designing construction access corridors in a manner that has the least impact on public access. Completed vegetation treatment projects must also ensure that any impacted coastal public access and recreational amenities are restored to existed conditions. Thus, this standard ensures that impacts to access and recreational amenities are avoided and minimized, as well as restored upon project completion.

Overall, proposed PWP vegetation treatment projects would be designed and implemented consistent with the county's public access and recreation policies because PWP development standards would ensure that adverse impacts to public access and recreation would be avoided where possible, or minimized where avoidance is not feasible (consistent with PWP Project Standards 2 and 3). Any potential disruption of public access and recreational use would also be temporary, while such resources would be restored to existing conditions following project implementation, pursuant to the Coastal VTS. Therefore, the proposed SCC PWP is consistent with the LCP provisions protecting public access and recreation.

I. Air Quality and Greenhouse Gas Emissions

Within the County's IP, Chapter 36A.2 provides for Development Review Criteria within the Resource Management-Coastal Zone District, including environmental quality criteria under Section 6912.1. This section generally requires that standards for air pollutant emissions be complied with for the protection of the natural environment and public health. Development is also prohibited from introducing significant noxious odors into the environment.

The PWP includes measures to avoid and minimize impacts to air quality. Without these measures, vegetation treatment within the county coastal zone could adversely impact air quality. Primary impacts could occur from prescribed burning activities that would release smoke and odors from the burning of vegetation. Similarly, the use of heavy machinery, such as off-road equipment, vehicles for worker transport and hauling materials, machine-powered hand tools, and masticators could result in the release of air pollutants.

However, the PWP includes measures to reduce adverse impacts from prescribed burning, including limitations on the duration of prescribed burning activities; restrictions on the types and amounts of materials authorized for burning, as well as location; and adherence to appropriate climatic and meteorological conditions to lower smoke impacts. Further, one of the main goals of the PWP is to reduce the risk of wildfires, which are a major contributor to GHG emissions in the State, and therefore, implementation of the PWP will lead to reduced GHG emissions over time. In fact, one of the main objectives of the CalFire VTP is to contribute to statewide GHG emissions reduction goals by reducing carbon emissions associated with wildfire.

Six SPRs provide for the protection of air quality under the CalVTP, with four specifically addressing prescribed burning. SPR AQ-1 requires all project proponents undertaking prescribed burning activities to comply with the applicable air quality requirements of the air district in which the project is located. This standard will ensure that prescribed burns are carried out under the standards set by the Bay Area Air Quality Management District. SPR AQ-2 requires project proponents to prepare and submit a smoke management plan for prescribed burning activities to the applicable air district, unless the burn is less than 10 acres and will not be conducted near smoke sensitive areas (unless otherwise directed by the applicable air district). This SPR ensures that burning will be conducted in compliance with an authorized burn plan that identifies the location of smoke sensitive areas and the appropriate meteorological conditions necessary for burning; provides for contingency actions (such as fire suppression or containment) that will be taken if conditions deviate from those specified in the plan; requires vegetation to be in a condition that will minimize the smoke emitted during combustion when feasible, considering fire safety and other factors; and requires piled materials to be prepared so that it will burn with a minimum of smoke. Relatedly, SPR AQ-3 requires that project proponents prepare a Burn Plan (with input from a qualified professional) for all prescribed burns. For more detail on these SPRs, see page 42 of Exhibit 1.

In addition to prescribed burning, all treatment activities must adhere to SPR AQ-4 and SPR AQ-5. Under the former, project proponents must implement measures to minimize dust during vegetation treatment, including: limiting the speed of vehicles and equipment traveling on dirt roads to 15 miles per hours; wetting appurtenant, unpaved, and dirt roads with non-toxic chemical dust suppressants if road use creates excessive dust; removing visible dust, silt, or mud tracked-out on to public paved roadways where access to available water supplies is sufficient; and suspending ground-disturbing treatment activities, such as land clearing and bulldozer lines, if dust transport is visible outside the treatment boundary and it may cause public health impacts. Under the latter, project proponents must avoid ground-disturbing activities in areas identified as containing naturally occurring asbestos.

The proposed PWP vegetation treatment projects would thus be designed and implemented consistent with the county's standards for air quality and GHG emissions reductions (consistent with PWP Project Standards 2 and 3). Moreover, air quality impacts from controlled burns would generally be favorable to uncontrolled, extreme wildfires. As such, the proposed PWP is consistent with the County's LCP provisions protecting air quality and GHG emissions.

J. Camp Butano Project-Specific Analysis

Under Section 13358 of the Commission's Regulations, the Commission may concurrently consider a PWP with a specific project or projects associated with it. As part of this PWP application, the San Mateo County RCD also proposes to conduct approximately 44 acres of shaded fuel break treatments within the Girl Scouts of Northern California Camp Butano Creek property (Exhibit 2).[8] Camp Butano is a private recreational property located along Canyon Road, which runs adjacent to Butano Creek in the unincorporated Pescadero area of the southern portion of the County, and is generally bound by Butano State Park forests to the southeast and a community of rural homes to the northwest, creating the WUI (Exhibit 2). The property exhibits unhealthy forest characteristics, including densely overstocked tan oak and redwood trees that results in weaker forest stand conditions where vegetative organisms compete for resources and are more susceptible to disease, such as sudden oak death. Some shrub fuels are also located in the understory, consisting of native shrub species such as huckleberry, poison oak, and manzanita, as well as invasive species such as French broom.

RCD proposes to conduct 44 acres of shaded fuel break treatments through a combination of mechanical and manual treatment activities. Mechanical treatment would be performed on approximately 38.9 acres using low-pressure masticators (less than 20,000 lbs.) and other tracked equipment to remove understory vegetation; dead, diseased, or dying material; hazard trees; invasive exotic trees and vegetation; and live trees up to 8 inches diameter at breast height (DBH). Mastication would leave root systems intact for resprouting, while masticated debris would be lopped and scattered throughout the treatment area. Manual treatment would consist of crews using chainsaws, chippers and other mechanized or hand tools for approximately 5.4 acres.

Numerous public agencies were contacted during the PSA design stage, including San Mateo County, the California Department of Fish and Wildlife (CDFW), and the San Francisco Bay Regional Water Quality Control Board.

LCP consistency analysis is provided for each applicable coastal resource below. For a detailed description of the applicable LCP policies and zoning regulations, as well as SPRs and mitigation measures, refer to the findings above.

Coastal Habitats

The Camp Butano project involves mechanical and manual treatment activities to create a shaded fuel break and restore forest health. Treatment will entail alterations to ladder fuels through mastication of understory vegetation, live trees up to 8 inches DBH, and dead, dying, and diseased trees, as well as manual treatment where heavy machinery is restricted from operating. Treatment will promote the health and resiliency of the residual stand where approximately 80% of the native vegetative cover will be

[8] While this project is proposed by the San Mateo County RCD, the project proponent undertaking the treatment activities is CalFIRE San Mateo – Santa Cruz Unit (CZU).

maintained. Vegetation within the Camp Butano property is comprised of forests dominated by second growth coastal redwood, Douglas-fir, and mixed hardwood forests. The understory is comprised of native brush and shrub species, such as huckleberry, poison oak, and manzanita, while french broom is a common invasive species located within the project area.

The proposed project has been designed to safeguard ESHA and other sensitive biological resources in the project area from adverse impacts. Pursuant to SPR BIO-1, a data review of project-specific biological resources as well as a reconnaissance survey to identify sensitive species and habitats was conducted in May of 2021. A total of two special-status plant species and nine special-status wildlife species were determined to have the potential to occur within the project area. However, following a pre-treatment biological survey in May of 2021, no special status plant or wildlife species were identified in the project area. Nevertheless, due to the potential presence of these special-status plant and wildlife species, a number of mitigation measures will be applied to minimize residual impacts where such species are discovered (Mitigation Measures BIO-2a, BIO-2b, BIO-3a, BIO-3b, and BIO-3c). These include measures such as avoiding treatment within occupied habitat by establishing a 100-foot no-disturbance buffer and/or implementing treatment outside the sensitive period of the species' life. Treatment activities will also be designed to maintain habitat function for the affected wildlife species, such as through the retention of habitat features that are critical for wildlife species' survival.

In addition, the project proponent will require crew members and contractors to receive biological resources training from a qualified forester or biologist prior to commencing with treatment activities (SPR BIO-2). This will ensure that impacts to biological resources are minimized during treatment operations. Further, mechanical treatment within riparian habitats will be restricted to outside the Watercourse and Lake Protection Zones (WLPZ) to ensure that habitat function is not lost or degraded. At least 75 percent of the overstory and 50 percent of the understory of riparian habitats will also be retained, while treatment will follow a vegetation removal hierarchy that prioritizes removal of uncharacteristic fuel loads (e.g., dead and dying vegetation) and invasive species, such as french broom. BMPs (such as cleaning and sanitizing vehicles and equipment) will also ensure that invasive species and plant pathogens, including Phytophthora (Sudden Oak Death), are not spread throughout sensitive habitat areas (SPR BIO-6 and BIO-9).

Site-specific surveying and mapping of sensitive natural communities were also conducted pursuant to SPR BIO-3. Since the proposed project contains a natural redwood forest habitat, treatment has been designed to restore the natural fire regime and return vegetation composition and structure to its natural condition. This will be done through the removal of fuel loads, retention of root systems for resprouting, and understory thinning that will increase the site's carrying capacity for stand volume, which would increase the growth of the residual trees. Treatment activities will thus result in modification of the existing fuels that will ultimately support native species regeneration and restore habitat conditions including, but not limited to, habitat quality and natural fire processes.

The County LCP requires that ESHA and other sensitive habitats and species be preserved, restored, and protected against significant disruptions, while any development authorized within or adjacent to ESHA must maintain or enhance the habitat. As proposed, the Camp Butano project aims to restore forest health and enhance the natural community while also directly benefiting nearby communities and assets at risk by providing strategic, shaded fuel breaks. Proposed treatment activities have been designed to protect ESHA through the identification of sensitive species (through data review and surveying) and the proposed implementation of protection measures to avoid direct and indirect adverse impacts, including the establishment of buffers to avoid sensitive resources, limiting vegetation removal to uncharacteristic fuel loads, and scheduling treatment to avoid active bird nesting seasons. No development is proposed in wetlands, while other measures will protect soil stability and water quality. Thus, the proposed project is consistent with the LCP provisions protecting coastal habitats.

Water Quality

The proposed project involves mechanical and manual treatment activities that will result in ground disturbance, which could degrade water quality through erosion, sedimentation, and discharge or runoff of pollutants from equipment if adequate controls are not implemented. The project area contains a Class II watercourse, Girl Scout Creek, as well as several Class III watercourses.

To guard against impacts to these watercourses, the project proponent will flag WLPZs prior to commencing with treatment activities and adhere to the protection measures required for treatment within these buffer zones. The project proponent will “retain at least 75 percent surface cover and undisturbed area to act as a filter strip for raindrop energy dissipation and for wildlife habitat” (SPR-HYD-4). Vehicle and equipment use will also be restricted, including by prohibiting equipment servicing within these WLPZs and by limiting operation to existing roads or crossings that keep vehicle tracks or tires dry. Equipment will also be excluded 25 feet from Class III watercourses for slopes less than 30% and 50 feet for slopes greater that 30%. All equipment will be maintained per manufacturer’s specifications to minimize impacts resulting from fuel leaks, while treatment activities will ensure erosion is minimized, including by suspending heavy machinery use during precipitation events and restricting usage on steep slopes, as well as by monitoring for erosion and stabilizing disturbed soils. The project proponent will also comply with the San Francisco Bay Regional Water Quality (Region 2) Waste Discharge Requirements and San Francisco Bay Basin Plan Prohibitions, which generally prohibit discharge of sediment, felled trees, vegetation, slash, fuels, soil and other contaminants into watercourses, or storing these wastes near watercourses. No new roads will be constructed under the proposed project, while prescribed herbivory and herbicide use is not proposed.

Treatment activities proposed within the Camp Butano property are therefore consistent with the County’s LCP provisions safeguarding water quality. As required by the LCP, the proposed project has been designed to avoid potential impacts to water quality through the establishment of buffer zones around sensitive waterbodies and the restriction of development activities to areas outside these buffers. The project also

includes numerous BMPs to avoid or minimize erosion and sedimentation, including by retaining vegetative cover and avoiding development where environmental conditions contribute to erosion. Further, pollutant discharge from heavy machinery and equipment use will be minimized through proper maintenance. Accordingly, the proposed project is consistent with the County LCP.

Visual Resources
The Camp Butano shaded fuel break involves mechanical and manual treatment activities that will occur predominately in the understory. The property is located outside of the viewshed of any State highway or public viewpoints, while equipment staging will not occur within areas visible to the public using Canyon Road or from areas frequented by campers and staff, to the extent feasible. While removal of understory will result in open areas, plants will regenerate and sprout shortly after the treatments are implemented. In addition, treatment will remove dead and burnt understory fuel loads that are a product of the 2020 CZU Lightning Complex Fires. As such, impacts to visual resources are anticipated to be insignificant and temporary, as the proposed project involves removal of vegetation and trees to create a shaded fuel break that mimics natural vegetation densities. Treatment will thus result in open, park-like understories with feathered vegetation densities. Accordingly, the proposed project is consistent with the County of San Mateo LCP because treatment activities would be designed to minimize potential adverse visual resource and aesthetic impacts, including by minimizing vegetation removal and maintaining landscape features along the edges of the project boundary to provide partial screening from public roads.

Coastal Hazards
Treatment activities in Camp Butano entail mechanical and manual vegetation removal for the purpose of creating shaded fuel breaks that could be used to slow a wildfire's rate of spread, thereby providing nearby communities time to escape and firefighters' additional area to contain a wildfire. The proposed project has been designed to avoid disturbing topsoil or increasing erosion impacts by complying with measures that avoid or reduce geological hazards. For example, any soil that is disturbed from treatment activities will be stabilized by using chipped materials to reduce the amount of exposed bare soil and the potential for substantial sediment discharge. Crew members will also monitor for erosion during treatment activities and adjust erosion control measures as needed.

Because treatment will involve heavy machinery and equipment containing fuels, oils, and other chemicals, the potential for leaks, exposure and resultant fires is possible. However, the proposed project has been designed to comply with the protection measures of the PWP to ensure that such hazards are avoided and/or minimized. For instance, all equipment will be maintained to manufacturer's specifications to prevent leaks, as well as all State and federal emissions requirements. Mechanized hand tools will contain spark arrestors and crew members will carry fire extinguishers, shovels, and other equipment to address potential ignitions. Pre-operational research has also been conducted to identify whether any known sites containing hazardous materials are present; based on this research, it has been determined that no such sites exist in the project area.

As such, the proposed project is consistent with the hazard provisions of the County's LCP.

Cultural Resources
The proposed project is designed to protect cultural resources through compliance with a number of protection measures that must be implemented prior to and during treatment activities. Research has been conducted for potential archaeological and historical resources (with results kept confidential pursuant to State law), applicable Native American tribes were contacted on May 4, 2021 (see Camp Butano PSA in Exhibit 2), and an Archaeological Survey Report has been completed and submitted to CalFIRE. Further, crew members will undergo training on the protection of sensitive cultural resources that may be discovered during treatment activities. The proposed project has also been designed to adhere to cultural resource protection standards during treatment activities, including halting treatment activities if cultural resources are discovered, contacting qualified professionals and relevant tribal entities to consult with if such resources are encountered, and redesigning project activities to avoid and minimize impacts to any discovered cultural resources. Accordingly, the shaded fuel break project proposed at Camp Butano would be designed and implemented consistent with the county's LCP cultural resource provisions.

Public Access and Recreation
Camp Butano is a private recreational facility on private property. Campers and staff use the site for recreational use seasonally. While initial treatment and maintenance activities may result in limited or restricted access to the site, the project will not impact public access or recreation otherwise. Further, the proposed project has been designed to provide notification to potential recreational users at least two weeks prior to treatment activities, including by placing signage along Canyon Road where it would be visible to the public. Thus, the proposed project is consistent with the County LCP given that adverse impacts to public access and recreation would be negligible.

Air Quality and Greenhouse Gas Emissions
The proposed project will involve the use of mechanical equipment, including vehicles for transportation and hauling, as well as machinery like masticators, chippers, and chainsaws, that could expose nearby communities to increased diesel particulate matter emissions, odors, and dust from ground disturbing activities. However, the project has been designed to comply with the Bay Area Air Quality Control District's regulations and will minimize air quality impacts by minimizing dust through vehicle restrictions (e.g., limiting the speed of vehicles, suspending ground-disturbing activities when climatic conditions exacerbate air pollution, and using water trucks to wet dusty roads) and implementing exhaust emission reduction techniques (e.g., encouraging crew members to carpool, substituting gasoline-powered equipment for renewable fuel-based equipment where feasible). As such, the proposed project is consistent with the County's LCP provisions protecting air quality.

K. California Environmental Quality Act

Pursuant to Public Resources Code Section 21067 and Sections 15050 and 15051 of Title 14 of the California Code of Regulations, the Board of Forestry is the lead agency for CEQA purposes, as it is the public agency with principal responsibility for carrying out the CalVTP, while the San Mateo County Resource Conservation District is a responsible agency tasked with implementing vegetation treatment under the PWP. As the lead agency under CEQA, the BOF certified its PEIR in December 2019 in accordance with State CEQA Guidelines Section 15168(c) for streamlining later vegetation treatment activities.

As an agency with a certified regulatory program under CEQA Section 21080.5, the Commission must consider alternatives and mitigation measures that would substantially lessen any significant adverse environmental effects that the proposal would otherwise have on the environment. Sections 13371 and 13356(b)(2) of Title 14 of the California Code of Regulations require that the Commission not approve or adopt a PWP unless it can find that: "…there are no feasible alternatives, or feasible mitigation measures,…available which would substantially lessen any significant adverse impact that the development…may have on the environment."

Alternatives to the proposed PWP were analyzed for their potential to substantially lessen any significant adverse impacts that the development may have on the environment. No such feasible alternatives were found.

The No Project alternative was determined not to meet the primary project objectives. Risks from wildfire are present in many areas of California, including natural areas and habitats in the coastal zone. The PWP is intended to allow a streamlined process to help increase the pace and scale of vegetation management activities intended to prevent damaging wildfires. The PWP would help the State meet its goals by authorizing projects over a 10-year period that reduce those fire risks. Without a PWP, vegetation management projects could be authorized through other channels, such as individual CDPs, but likely at a slower pace. If fewer projects move forward, adverse impacts to coastal habitats and species caused by vegetation management might be reduced, depending on which projects were undertaken. However, there would also be fewer habitat benefits from forest health projects, as fewer of these types of restoration projects would likely be carried out. Essentially, without a certified PWP, risk reduction through fuel management in the project area would be minimal, whereas risk reduction through fuel management is intended to be a key strategy in the State's fire prevention efforts. In addition, existing, artificially-high fuel loads in habitat areas would remain roughly the same, allowing for continued risk of hotter fires that risk damage to the habitat itself. In sum, without the PWP, there would be fewer restoration projects proposed and carried out, fewer fire prevention projects overall (which could lead to larger and more destructive wildfires), and potentially more requests for emergency permits and individual permits for smaller projects, which would fail to provide the region-wide, systematic approach to fuel management that the State has found is needed to deal with the fire risks in San Mateo County and throughout the State. The "no project" alternative would not meet the project objectives, nor would it be less

environmentally damaging overall, although it may reduce near-term impacts to some areas depending on which projects were undertaken per the PWP.

Another alternative would be to limit the types of projects that could be implemented under the PWP to only forest health projects. The PWP would allow for the implementation of forest health projects and fire prevention projects in the project area to accommodate all aspects of the State's CalVTP. The PWP commits to a majority of the total acreage of covered projects to be forest health projects to ensure that benefits to the environment are maximized through forest health and ecological restoration planning in the PWP Program Area. Under an alternative that only permits forest health projects, a majority of the areas proposed for treatment under the PWP would still be eligible for treatment, and the fire prevention projects, which are less directly beneficial to the immediate habitat where they would occur, would not be allowed under the PWP (though still might be permitted on a case-by-case basis through CDPs). This alternative would have fewer impacts on habitat areas. However, recent wildfires have demonstrated that if brush is allowed to grow unchecked, it becomes a hazard not only for an individual property, but for the neighboring properties and surrounding community as well. Fire prevention projects are a necessary part of fighting wildfires, as fuel breaks provide strategic locations for firefighters to stage equipment and potentially contain fires, while fire prevention around properties and infrastructure provide for a defensible space from approaching wildfires. Without these projects, the County could not achieve the fundamental objectives of the CalVTP to reduce wildfire risks and would not accommodate efforts to reduce the risk of wildfires with the most potential for harm to life and property. In the long-term, a suite of fire risk reduction measures is needed to protect habitat from severe fires, so the full benefits of a forest health only program wouldn't be achieved if the fire prevention projects weren't incorporated.

A third alternative is to reduce the overall PWP Program Area available for projects. The PWP Program Area covers approximately 85,000 acres of unincorporated San Mateo County coastal zone, encompassing all moderate, high, and very high fire hazards areas. A reduced program area alternative would limit the area where vegetation treatment activities could occur. By their nature, the proposed Program activities must take place within wildland areas of the County, many of which include coastal habitats protected under the LCP. As a result, projects will occur directly within these habitat areas. There are no alternative Program Area configurations that would avoid such areas. In addition, while the potential area for vegetation treatment projects is extensive, limiting the extent of the program area would not likely reduce impacts because implementation of the PWP treatment activities are not intended to occur throughout the entire Program Area. Rather, the PWP is designed to allow flexibility on the location of vegetation treatments based on treatment prioritization over a ten-year period, including by consideration of available funding, priority for high fire risk areas and communities in need, and available entities both willing and able to carry out treatment activities. The number and extent of projects in the proposed Program Area are not currently known; however, the Program Area is not anticipated to be the target of extensive funding and treatments. Maintaining a larger Program boundary allows the necessary flexibility to design projects that maximize effectiveness, as funding and circumstances arise. Therefore, the "reduced program area" alternative would not be less environmentally

damaging overall, since the treatment activities will take place in habitat areas regardless of design, and confining the projects to a smaller area would not reduce the potential number or extent of treatment activities, but would merely limit flexibility on design and implementation.

The Commission incorporates its findings on LCP consistency at this point as if set forth in full. These findings address and respond to all public comments regarding potential significant adverse environmental effects of the project that were received prior to preparation of the staff report. For the reasons discussed in this report, the PWP, including the Camp Butano specific project, is consistent with the County LCP, and the Camp Butano specific project is also consistent with PWP requirements. There are no other feasible alternatives or mitigation measures available that would further lessen any significant adverse effect that the PWP, including the Camp Butano project, would have on the environment. Thus, the PWP is consistent with CEQA.

APPENDIX A – SUBSTANTIVE FILE DOCUMENTS

- San Mateo County Local Coastal Program
- Board of Forestry Certified Programmatic Environmental Impact Report (December 2019)
- San Mateo County Resource Conservation District Forest Health and Fire Resilience Public Works Plan
- Camp Butano Project-Specific Analysis