

Memorandum

Date: October 20, 2023

To: Girl Scouts of Northern California for inclusion in the Skylark Ranch Forest Health Project file

From: Matt Abernathy, Senior Forest Health Program Specialist – Resource Conservation District of Santa Cruz County

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

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

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

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

The project description in the PSA describes the analysis that was conducted to generate the project's treatment areas. As described in Chapter 1.4. "Project Justification" of the PSA, "The Skylark Ranch treatment area development phase began by analyzing where sensitive resource areas were located (e.g., watercourses, steep slopes, sensitive vegetation communities/species, etc.). These types of resources were mapped and specific areas with increased feasibility and efficacy of treatment (e.g., less steep slopes, ridges, and areas away from watercourses, etc.) were field verified for access, to evaluate the level of impaired forest condition, and to consider treatment options." The initial mapping analyzed the slopes on the Skylark Ranch and had identified the mechanically operable slopes (slopes less than 50%) and high use areas where additional manual work should occur on slopes than 60%. Through further field investigation, it has been found that an additional 1.8 acres are mechanically operable, as they are less than 35% in slope. Including these additional 1.8 acres would promote better connectivity of treatment areas, making it easier to operate and resulting in fewer ground disturbing activities, and will increase the effectiveness of treatment. The inclusion of these 1.8 acres is in line with the original intent of this project to be "both cost-effective and to avoid and minimize resource impacts", as it will be both more time efficient for the heavy equipment operator to work progressively through the area, and it will result in less disturbance as the heavy equipment operator would no longer need to back out to avoid the erroneously omitted ground,

The current condition of the additional acreage identified during field investigations is the same as the treatment area already identified in the PSA. Omission of the 1.8 acres is likely due to the imprecision of available slope data; had more precise data been available, the RCD would have included this acreage in the PSA initially. The analysis in the PSA considered the potential impacts of using mechanical equipment and operating on steep slopes with the

implementation of SPRs GEO-1, GEO-2, GEO-3, GEO-4, GEO-5, GEO-7 and GEO-8. The additional acres would not result in any additional adverse effects to these resources beyond what was analyzed in the PSA, therefore, there are no new or additional analyses required in the PSA (Chapter 4).

For the reasons discussed above, these clarifications and minor revisions to the project description regarding the addition of mechanically operable acreage do not constitute changes to the project and all the environmental impact conclusions remain the same, so additional review under CEQA Guidelines Sections 15162 or 15164 is not warranted.

Clarifications to the PSA

Minor clarifications are described below in the attachments:

Attachment 1: Table 1 – Describing the total acreage by CalVTP treatment type and treatment descriptions.

Attachment 2: Figure 1 – Map depicting the additional acreage by CalVTP type over hillshade base map.

Attachment 3: Figure – Map depicting the total acreage by CalVTP type over aerial imagery.

Attachment 1:

Table 1 **CalVTP Treatments**

CalVTP Treatment Type	Treatment Description	CalVTP Treatment Activity	Treatment Size (acres)	Equipment Used for Treatments
Ecological Restoration	Habitat improvement/fire resiliency treatments	Manual and mechanical (cutting and masticating), and cut stump or foliar spray of herbicides	40.1	Chainsaws and/ or other mechanized hand tools, masticator, feller-buncher, skid steer, chipper (to chip biomass)
Shaded Fuel Break	Treatment of areas along Old Woman's Creek Road and access roads with heavy brush	Manual and mechanical (cutting, masticating, and mowing), and cut stump or foliar spray of herbicides	21.7	Masticator, feller-buncher, skid steer, chainsaws, chipper (to chip biomass)
Total Acres			61.8	

Source: Provided by Santa Cruz RCD in 2023

Attachment 2

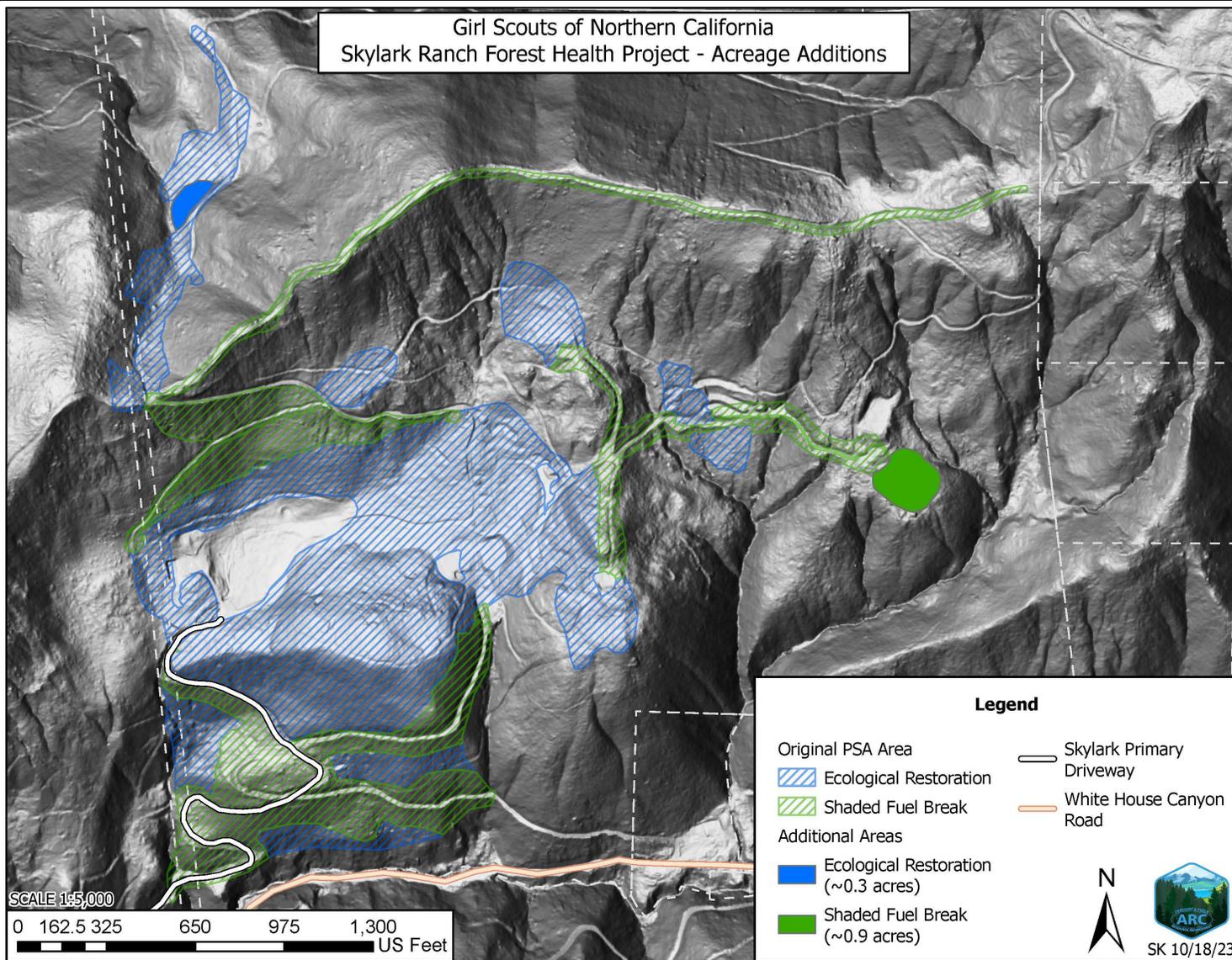


Figure 1: Map depicting the additional acreage by CalVTP type over hillshade base map.

Attachment 3

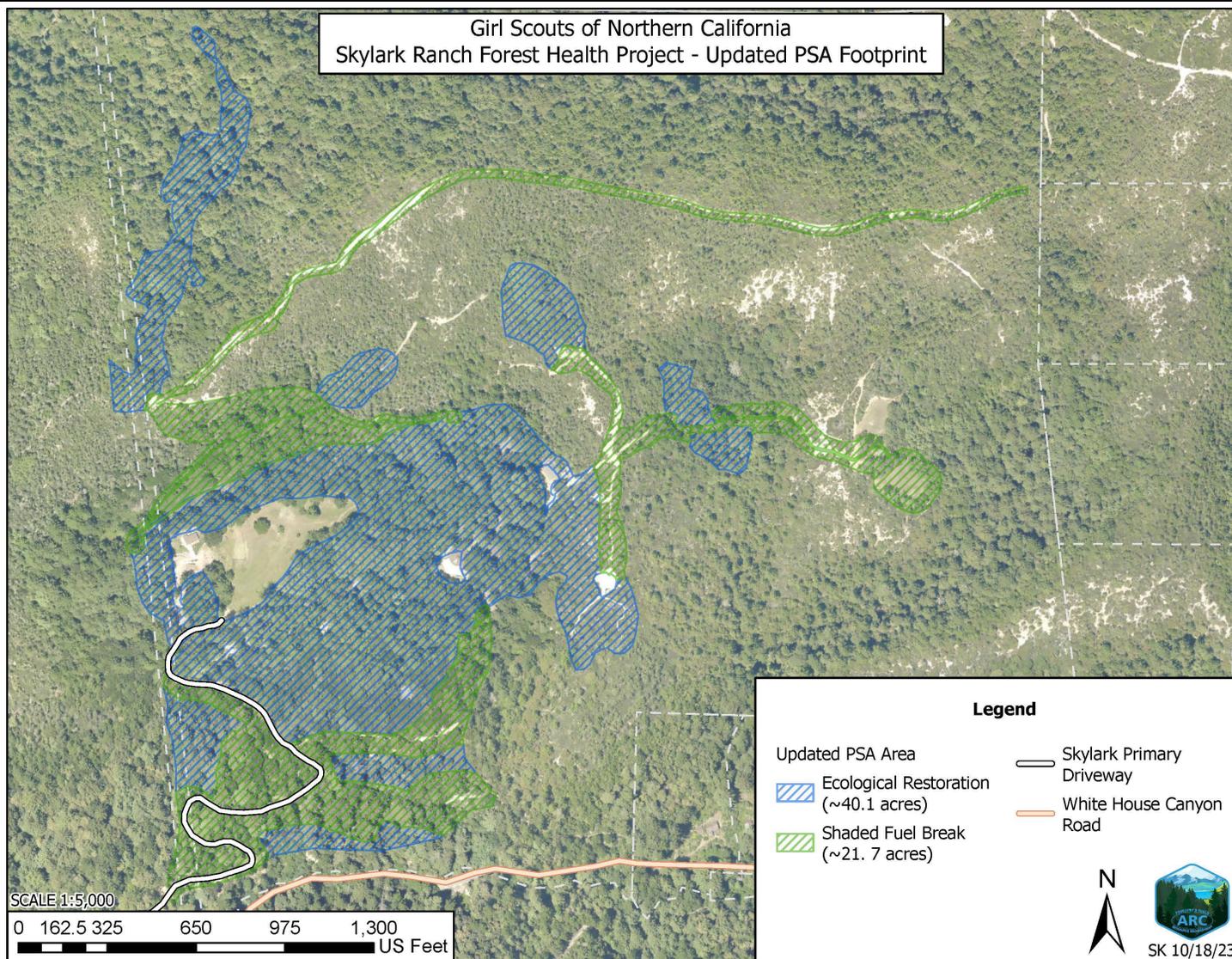


Figure 2: Map depicting the total acreage by CalVTP type over aerial imagery.