

## Vegetation Treatment Projects in the Coastal Zone of Santa Cruz and San Mateo Counties

1. All projects shall comply with and carry out the requirements of the CalVTP PEIR, including use of approved treatment methods, treatment activities and all applicable standard project requirements (SPRs).
2. Project-Specific Analyses (PSAs) shall be submitted to the Executive Director of the California Coastal Commission (CCC) for review and approval for the purpose of coastal development authorization prior to conducting projects. Coordination between the project proponent and CCC shall occur as early as feasible in the design process in order to avoid delays related to Coastal Act consistency.
3. PSAs shall include clear problem and goal statements (i.e., overall project goals, fire prevention goals, ecological goals, etc.) associated with each project proposed pursuant to this [master permit or public works plan]. These statements are intended to assist project proponents and CCC in developing mutual understanding of the potential impacts and benefits – both short and long term – for each project. It is expected that this information will be incorporated into item #6 of each PSA.
4. In the coastal zone, vegetation treatment projects fall into two categories: (1) Forest Health projects (i.e., Ecosystem Restoration) and (2) Fire Prevention projects (i.e., Fuel Breaks and Wildland Urban Interface). The purpose of forest health projects is to restore and enhance ecosystems, including to prevent fire behavior to which the ecosystem is not adapted. The ecosystems that can be treated under this category include forested ecosystems as well as other ecosystems such as woodland and scrub dominated systems. The purpose of fire prevention projects is to protect existing structures and infrastructure, including access roads. Fire prevention projects shall be limited to the applicable defensible space requirement (which is typically 100 feet, but can range to as much as 300 feet under specific circumstances), unless accompanied by a clear rationale, provided by a qualified professional, as to why additional defensible space is required to protect existing structures and infrastructure.
5. In the coastal zone, environmentally sensitive habitat area (ESHA) is defined as any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and that could be easily disturbed or degraded by human activities and developments (see Coastal Act Section 30107.5). Rarity determinations for habitats and species are made by CDFW, USFWS, and CNPS, and are used to support a CCC ESHA determination.<sup>1</sup> In addition, an ESHA determination may be made on the basis of an area constituting ‘especially valuable habitat’ where it is of a special nature and/or serves a special

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<sup>1</sup> CDFW defines natural communities, animals, and plants with a global or state ranking of 1, 2, or 3 as rare and the CCC typically finds these to be ESHA. CCC also typically considers plant and animal species listed by the federal and state endangered species acts (ESA and CESA, respectively) and/or identified under other special status categories (e.g., California Species of Special Concern) and/or identified by the California Native Plant Society (CNPS) as ‘1B’ and ‘2’ plant species as constituting ESHA.

role in the ecosystem, such as providing a pristine example of a habitat type or supporting important ecological linkages. The Coastal Act requires that ESHA be protected against any significant disruption of habitat values and only allows uses dependent on the ESHA resources within those areas (see Coastal Act Section 30240). It is anticipated that many of the Forest Health and Fire Prevention activities pursued within the coastal zones of these two counties will take place within natural communities that qualify as ESHA (e.g., Redwood forest, Monterey Pine forest, Douglas Fir/Tan Oak forest, etc.).

6. In addition to the requirements of the CalVTP PEIR, the following standards shall also be met in the coastal zone:
  - **Protect Ecosystem.** Forest Health projects shall: (a) proactively restore and enhance ecosystems and forests, protect watersheds, and promote long-term storage of carbon, including through the minimization of forest carbon loss from large and intense wildfires; (b) restore and maintain vegetation cover to a threshold that reflects appropriate fire frequencies (i.e., fire-return intervals) on the landscape, considering estimated pre-European settlement conditions as well as future climate change, and the maintenance or improvement of ecosystem health; (c) maintain vegetation cover and composition to comply with the standards (membership rules) set forth in the second edition of the Manual of California Vegetation (MCV2) to avoid unintended habitat conversion;<sup>2</sup> and (d) provide for a mosaic of appropriate native plants by age, size, and class that support the overall habitat. Fire Prevention projects shall meet all of the above requirements to the maximum extent feasible, while achieving overall project goals and necessary fire prevention goals, and any deviations shall be clearly explained and identified in the PSA.
  - **Vegetation Removal Hierarchy.** Except for prescribed fire project components, a vegetation removal hierarchy shall be identified and implemented for each project to obtain the vegetation cover threshold identified by a Registered Professional Forester or qualified professional as necessary while ensuring that unintended habitat conversion does not occur and that vegetation cover is sufficient to support the project's ecological goals. In order of priority and application, the hierarchy shall be as follows: (1) thinning and removal of dead, dying and diseased foliage, shrubs (except that some snags should be retained to provide wildlife shelter, dens, etc.); (2) removal of invasive species; and (3) removal of native species that are not listed as endangered, threatened, rare, or otherwise especially valuable, with the end goal of having appropriate species composition in the plant community with a mix of vegetation age, height and density. In all cases, indicator species and diagnostic species appropriate to the habitat type shall be maintained in accordance with the standards (membership rules) set forth by the second edition of the Manual of California Vegetation (MCV2), with the intention of maintaining cover and composition consistent with meeting project ecological goals. For Fire Prevention projects, additional vegetation removal may be allowed if maintaining such vegetation consistent with project ecological goals would result in an unacceptable

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<sup>2</sup> Membership rules are quantitative definitions used to assign field samples to vegetation types based on data analysis and can include species constancy, cover values, and the presence of indicator species.

fire risk to existing structures and infrastructure, and the removal is the minimum necessary to protect existing structures and infrastructure. Any such additional removal shall be clearly explained and identified in the PSA. Lastly, if vegetation cover threshold goals, as articulated in the MCV2, cannot be met, then removal of endangered, threatened, rare or otherwise especially valuable species and habitats shall be prohibited unless: such removal is critical to reduce the area's fire risk; removal is accompanied by restoration or enhancement such that the overall project provides net benefits to the habitat; and no other alternative exists that meets the project goals.

- **Limit Equipment Types.** All projects shall be carried out using the least invasive type of equipment feasible. Projects shall avoid the use of large masticators, track vehicles, and other heavy equipment, where feasible. When such heavy equipment is used, it shall remain on existing roads to the extent feasible. In riparian habitat, the use of heavy equipment shall be prohibited, except when authorized through a valid Stream and Lakebed Alteration Agreement and/or, if applicable, Clean Water Act 401 Certification, and when reviewed and approved by CCC. Projects shall adhere to CalVTP SPR GEO-2 limiting heavy equipment use and SPR HYD-4 prohibiting heavy equipment use in WLPZ except on existing roads.
- **Limit Herbicide Use.** 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.
- **Prescribed Herbivory Use.** Prescribed herbivory may be allowed if it is found to be the least environmentally damaging feasible alternative to achieving project goals. Prescribed herbivory shall be conducted pursuant to an approved plan that ensures protection of habitat and other coastal resources, as documented in the PSA.
- **Control Invasive Species.** Treatment activities and treatment types shall limit the spread of invasive species and prevent the spread of plant pathogens in all habitats, including those habitats that are not determined to be sensitive natural communities, riparian habitats, or oak woodlands subject to CalVTP SPRs BIO-4 and 9.
- **Limit Fencing.** The use of wildlife-friendly fencing for prescribed herbivory activities subject to CalVTP SPR BIO-11 shall require adequate ground clearance for smaller species to avoid entrapment and/or entanglement.
- **Accelerants.** Accelerants shall only be allowed for use in prescribed fire applications. The use of accelerants that could significantly disrupt or degrade ESHA is prohibited.
- **Soil Stabilization.** The use of riprap and/or chemical soil stabilizers that could significantly disrupt or degrade ESHA is prohibited.

- **Protect Coastal Public Access and Recreation.** Forest Health projects and Fire Prevention projects shall ensure that coastal public access and recreational opportunities are preserved during project operations to the maximum extent feasible, including by, but not limited to, minimizing trail closures, limiting the use of public parking spaces for staging operations, posting accessway signage and using flaggers, and designing construction access corridors in a manner that has the least impact on coastal public access. Following the completion of Forest Health projects and Fire Prevention projects, all impacted coastal public access and recreational amenities shall be restored to existing conditions, in a manner that maximizes coastal public access and recreation.