

Date: August 18, 2021

Project: Critical Water Infrastructure Protection and Wildfire Management Ingress/Egress Improvement Project

Categorical Exemption Summary

The San Lorenzo Valley Water District (District, SLVWD) has determined that the Critical Water Infrastructure Protection and Wildfire Management Ingress/Egress Improvement Project (project) is categorically exempt under the California Environmental Quality Act (CEQA) Guidelines Section 15304, Class 4 for Minor Alterations to Land and Section 15301, Class 1, for Existing Facilities. A Class 4 exempt project consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. A Class 1 exempt project consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The project would involve vegetation reduction activities through the vegetation clearance and removal up to 100 feet around critical water infrastructure on SLVWD-owned and managed lands and 100 feet on either side of SLVWD-owned roadways. The scope of the project is consistent with a minor alteration to the condition of the vegetation around and maintenance of these existing facilities and roadways shown in Figure 1.

Background

SLVWD, established in 1941, supplies water to the communities of Boulder Creek, Brookdale, Lompico, Ben Lomond, Zayante, Mañana Woods and Felton, and to a portion of the City of Scotts Valley, through a network of over 185 miles of distribution lines, pump stations and reservoirs. There are more than 7,900 connections that serve approximately 26,000 customers throughout its service area. Several of the communities located within the District's service area have been identified by the California Office of the State Fire Marshall as communities at risk to wildfire, including Boulder Creek that borders the District's Ben Lomond Watershed Property. The CZU Lighting Complex, which ignited in fall 2020 and burned 80 percent of SLVWD-owned properties and destroyed or damaged 50 percent of the critical water infrastructure, resulting in interrupted supply of water to customers and substantial repair costs. Service has been restored, although most of the surface water supply remains offline, but future wildfires carry the same risk of interrupted or further loss of water supply and damage to the watershed. SLVWD seeks to protect its critical water-supply infrastructure from future wildfires by undertaking a variety of fuel reduction activities associated with its system. The District prepared a Post-Fire Recovery, Critical Asset Hardening, Vegetation, and Fuels Management Plan (Plan) that was adopted by the Board of Directors on June 3, 2021. The Plan identifies fuel management projects within the SLVWD service area including the Critical Water Infrastructure Protection and Wildfire Management Ingress/Egress

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Improvement Project located on SLVWD-owned land and SLVWD-managed easements, as shown in Figure 1.

Purpose and Need

The purpose of this project is to reduce or maintain lowered fuel loads, to increase fire resiliency, and to help reduce wildfire impacts to critical water infrastructure. The proposed defensible space treatments around water infrastructure would increase defensibility and reduce risk of damage to critical infrastructure in the event of a wildfire. Critical water infrastructure facilities serve a population of over 26,000 who would be protected by the proposed defensible space treatments. The proposed roadside and property boundary fuel reduction adjacent to residential areas would increase defensibility and provide fuelbreaks to help facilitate suppression actions should a wildfire ignite.

Project Description

Treatment

Treatments would be located on SLVWD-owned lands and SLVWD-managed easements in areas that were burned by the CZU Lightning Complex that have dead and dying trees and brush. Treatments would also occur in unburned areas outside the CZU Lightning Complex with high fuel loads. Treatments would be conducted up to 100 feet around critical water infrastructure, in accordance with Public Resources Code (PRC) §4291 and up to 100 feet around SLVWD-owned and maintained roads (refer to Figure 1). The width of the shaded fuelbreak around roadways would depend heavily upon site conditions. Many SLVWD-owned roads are steep and cut into slopes. Access, resources present, and topographical limitations may reduce the shaded fuelbreak size to as small as 10 or 20 feet on only one side of the road. Up to approximately 70 acres of shaded fuelbreak treatments along roadways, 15 acres of shaded fuelbreak along property boundaries, and 65 acres of defensible space treatments around infrastructure could be conducted. Treatment would consist of thinning the understory vegetation and ladder fuels to create a stand structure that would help slow fire spread and reduce flame lengths (fire intensity). Limbing would be conducted vertically at least up to 8 feet for larger trees or half the height of smaller trees. Hazardous trees (e.g., dead or dying trees) identified by an RPF, arborist, or qualified fire personnel would be removed as well as fire-hazardous trees up to 10 inches diameter at breast height (DBH) although typically fire-hazardous trees would be less than 6 inches DBH. Downed dead trees and logs would be removed and cleared. Standing dead vegetation would be removed and cleared, leaving mature, healthy trees. No healthy, mature, scenic trees would be removed under this project.

Treatment Method

Methods of treatment would consist primarily of manual and mechanical treatments (e.g., hand thinning, chipping, mastication). Defensible space treatments would be conducted

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primarily via hand with manual and mechanical hand tools. A mini excavator may be used along roads or flat areas near water facilities to remove downed logs and aid in hazard tree removals, depending upon site constraints. Along roadside and the property boundary fuelbreak, treatments would be performed with a combination of heavy equipment with cutting or masticating heads mounted on articulating arms and with power tools including chainsaws and brushcutters. Herbicide use may only be permitted on SLVWD-owned land if the contractor receives explicit permission from the SLVWD Board of Directors, which depends on type and method of application (SLVWD, 2021). Herbicides may be applied for spot treatments or on cut stumps and in accordance with the SLVWD Integrated Pest Management Policy (IPMP) (SLVWD, 2021).

Disposal

The method of disposal for the cut vegetative material would depend upon the site conditions. Where the work area is accessible via roads that are navigable by larger vehicles and equipment, a trailer-mounted or tracked chipper, and a chip hauling truck may be used to chip and haul cut vegetation. Chipped material may also be broadcast at work areas where appropriate and depending upon resource constraints or hauled away for disposal. Chipped material spread on site would be chipped to under 3 inches in size would be applied 2 to 4 inches in depth at most to minimize wildfire risk. At most one to two truckloads of chipped material (e.g., 16 to 32 cubic yards) could be generated a day, depending on number of crews operating. Disposal sites that would be used include Buena Vista Landfill and Ben Lomond Transfer Station. Chips may be brought to other SLVWD-owned properties adhering to forestry practices, such as those regarding minimizing spread of forest diseases and any other restrictions. Chips from trees affected by sudden oak death (SOD) would be left on-site, unless local facilities exist that may take these chips. Mastication treatments would occur when soils are adequately dry enough to mitigate potential compaction issues. For mastication treatments, slash would be shredded and left on site. In locations where a masticator or chipper cannot access the work area, such as steep, narrow roads, material may be lopped and scattered in place.

Cut material may be pile burned depending upon the conditions of the work area. Suitable work areas are typically flat and have open areas away from tree canopies and power lines. Piles would vary in size from 5 to 10 feet in diameter and 4 to 6 feet in height. Multiple piles may be burned on a single day. As part of the project no more than 20, 10-foot-wide by 6-foot-high parabolic piles of shrub/hardwood vegetation or equivalent (i.e., 8.5 tons) could be burned in any one day.

Workers

A crew of 5 to 10 contracted workers would conduct the treatments at any one location. Up to two crews may be operating at the same time across the work areas.

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Site Access

Vehicles and equipment would access sites from existing roadways. A tracked chipper and in rare circumstances, a mini excavator, may operate off-road, depending upon site conditions and resource constraints. Off-road driving would not be anticipated. Workers and equipment would be loaded and unloaded from existing paved and dirt roads for use at the work areas.

Schedule and Duration

It is estimated that defensible space treatments of up to 100 feet around an individual water facility (e.g., water tank) may take a crew up to 2 days to complete. On average, in a day, an approximately 440-foot stretch of 100-foot-wide shaded fuelbreak may be created, depending upon vegetation types and terrain. The proposed treatments are estimated to be completed over the course of several years. Work would not be performed on Red Flag Warning days. Pile burning typically occurs between November and May on days when weather conditions meet the specifications of the Monterey Bay Air Resources District (MBARD).

Treatments may begin as early as August 2021. An initial subset of treatments within the overall project would be conducted in 2021 and early 2022, for the projects funded by the California Coastal Conservancy Forest Health and Wildfire Resilience Program Grant. This grant provides funding for creation of defensible space around many critical water infrastructure facilities and shaded fuelbreak creation along either side of the road that traverses through the Ben Lomond Mountain Watershed Property. This initial subset of treatments would be conducted on up to 32 acres and is anticipated to be implemented over 120 workdays. The remainder of the project would be implemented in subsequent years.

Maintenance would be conducted to maintain reduced fuel loads. Defensible space and shaded fuelbreak reduction areas may be maintained by re-cutting vegetation every 3 to 5 years or as determined necessary, depending on vegetation conditions.

Project Design and Implementation Features

The following design and implementation features are part of the project:

CUL-1 Training

For all activities with the potential for ground disturbance (excluding vegetation and tree trimming, and hand pulling smaller vegetation) all contractors and workers will receive training prepared by and/or conducted by a Professional Archaeologist (who meets the U.S. Secretary of Interior's professional standards set forth in 48 CFR Parts 44738-44739 and Appendix A to 36 CFR 61) prior to beginning work. The training will address the potential for exposing subsurface resources, recognizing basic signs of a potential resource, understanding required procedures if a potential resource is exposed, including protecting the resource and reporting the resource to a Professional Archaeologist, and, understanding all procedures required under Health and Safety Code § 7050.5 and PRC §§ 5097.94, 5097.98, and 5097.99 for the discovery of human remains.

CUL-2 Pre-Activity Cultural Resource Review and Avoidance During Work

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Prior to conducting an activity in a work area, a cultural records search of the work area(s) will be conducted by a Professional Archaeologist to determine whether any known cultural resources occur in or adjacent to the work area(s). Based on the findings, the Professional Archaeologist or RPF/contractor under the guidance of the Professional Archaeologist will flag the area to avoid and protect any recorded resources, or will provide detailed protocols to avoid resource impacts if work cannot avoid the protected area. Measures may include monitoring by a Professional Archaeologist of any potential subsurface impacts to avoid impacts; use of small hand or powered hand tools only in protected areas; no parking, turning or entry of vehicles of any kind within the protected area; no piling or burning slash within the protected area; any trees or vegetation removed within 100 feet of the protected area will be fallen away and supervised by the RPF on site; and, no displacement or removal of any archaeological materials by either the RPF or crew to facilitate work access or tasks.

CUL-3 Unanticipated Discovery

In the event that a previously unidentified cultural resource is discovered during implementation of an activity, all work within a minimum of 50 feet of the discovery will stop. The boundaries around the resource with a suitable buffer will be temporarily marked with visible protective fencing or visible flagging. A Professional Archaeologist will review the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts will occur, the resource will be documented on California State Department of Parks and Recreation cultural resource record forms (DPR 523) and a Primary Resources Number obtained from the California Historical Resources Information System, Northwest Information Center (CHRIS/NWIC). In addition, the resource will be located, identified, and recorded in the SLVWD cultural resources GIS database. No further effort will be required.

Data regarding archaeological and Tribal Cultural Resources will be kept confidential in accordance with state law, but may be shared with Native American tribes identified by the Native American Heritage Commission (NAHC) to be traditionally and culturally affiliated with the geographic area of the project site, if archaeological in nature and if the tribe has requested that such information be shared with them.

If the project proponent wishes to continue work in the discovery area and no additional finds are anticipated, the Professional Archaeologist will review the proposed work activity and develop appropriate measures to ensure avoidance of impacts to the resource. Measures may include monitoring by a Professional Archaeologist of any potential subsurface impacts; use of small hand or powered hand tools only; no parking, turning or entry of vehicles of any kind within the discovery area; no piling or burning slash within the discovery area; and, any trees or vegetation removed within 100 feet of the discovery will be fallen away and supervised by the RPF on site.

Alternatively, the Professional Archaeologist will evaluate the resource and determine if it is:

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- Eligible for the California Register of Historical Resources (CRHR) (and a historical resource for purposes of CEQA),
 - A unique archaeological resource as defined by CEQA, and/or,
 - A potential Tribal Cultural Resource (all archaeological resources could be a Tribal Cultural Resource).

If the resource is determined to be neither a unique archaeological resource; an historical resource; or, a potential Tribal Cultural Resource, work may commence in the area without further management. After work is completed, all cultural resource delineators (e.g., flags or fencing) will be removed in order to avoid potential vandalism, unauthorized excavation(s), etc.

If the resource meets the criteria for either a historical resource, a unique archaeological resource, and/or may be a potential Tribal Cultural Resource, work will remain halted in the buffered area around the resource. If the Professional Archaeologist determines that discovery may be a Tribal Cultural Resource, he or she will, within 48 hours of the discovery, notify and consult with each Native American tribe identified by the NAHC to be traditionally and culturally affiliated with the geographic area of the discovery. Tribal members will be invited to consult on the discovery and permitted to inspect the resource to determine if it constitutes a Tribal Cultural Resource. If no responses are received within 48 hours of the requests to the tribes, the Professional Archaeologist will continue the archaeological review.

If the Professional Archaeologist determines that the resource is eligible for the CRHR work will only be allowed within 100 feet of the discovery if it can be performed without affecting the resource.

BIO-1 Environmental Training for Biological Resources

All crew members and contractors will receive training from a qualified registered professional forester (RPF) or biologist prior to beginning any activity where sensitive biological resources could occur in the work areas. The training will describe the appropriate work practices necessary to effectively implement the appropriate project design and implementation features and to comply with the applicable environmental laws and regulations. The training will include the identification, relevant life history information, and avoidance of potentially present special-status species with potential to occur; identification and avoidance of sensitive natural communities and habitats with the potential to occur in the treatment area; best management practices; and reporting requirements. As appropriate, the training will include protocols for work, such as specific trimming methods, where applicable, and implementation of measures to avoid the spread of SOD and invasive species including the latest appropriate standard measures recommended by the California Oak Mortality Task Force. The training will instruct workers when it is appropriate to stop work and allow wildlife encountered during treatment activities to leave the area unharmed and when it is necessary to report encounters to a qualified RPF or biologist. The qualified RPF or biologist will immediately contact the California Department of Fish and Wildlife (CDFW) or

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United States Fish and Wildlife Service (USFWS), as appropriate, if any wildlife protected by the California Endangered Species Act (CESA) or Federal Endangered Species Act (ESA) is encountered and cannot leave the site on its own (without being handled).

BIO-2 Avoidance of Special-Status Plant Species and Sensitive Vegetation Communities

During design of an activity, a qualified biologist or RPF will determine which special-status plant species have the potential to occur in the specific work area(s). The RPF will design the activity with consideration for the plant species and sensitive vegetation communities that have the potential to occur. Design constraints may include but are not limited to the use of hand tools only in certain habitats or avoidance of scattering chips and cut vegetation. Prior to conducting the activity, the qualified biologist or RPF will conduct a survey of the work area and flag any special-status plant species and sensitive vegetation communities for avoidance if design constraints are not sufficient to avoid loss of species. As determined necessary by the qualified biologist or RPF, oversight throughout an activity in some sensitive vegetation communities may be required.

In riparian areas, activities will be limited to removal of unhealthy fuel loads (e.g., removing dead or dying vegetation), trimming/limbing of woody species as necessary to reduce ladder fuels, and select thinning of vegetation to restore densities that are representative of healthy stands of the riparian vegetation types that are characteristic of the region. Allowable activities include hand removal (or mechanized removal where topography allows) of dead or dying riparian trees and shrubs, invasive plant removal, selective thinning, and removal of encroaching upland species. Mature, healthy trees will not be removed from a riparian corridor. Any activities conducted within a riparian corridor will be conducted so as to avoid alteration to a bed, channel, or bank of a waterway and all debris, including sawdust, chips, or other vegetative material, will be prevented from entering the bed, channel, or bank of a waterway, unless a permit from the California Department of Fish and Game under Section 1600 is obtained.

NB-1 Nesting Bird Season Avoidance

Whenever possible, schedule work outside of the bird nesting season, which is generally from February 1 through August 31st.

NB-2 Nesting Bird Surveys

If work that has the potential to impact nesting birds commences between February 1 and August 31 (during the nesting season), a qualified biologist (whose qualifications have been approved by the SLVWD) will conduct a pre-activity survey for nesting birds.

Nesting bird surveys are recommended during the nesting season for work involving mowing with heavy equipment, other vegetation (including tree) removal or limbing and trimming activities, and prescribed (e.g., pile) burning. Low-impact activities including goat grazing, hand-pulling weeds, and herbicide application do not generally require nesting bird surveys. Determination of need for surveys for low-impact activities should be evaluated on a case-by-case basis in consultation with a qualified biologist or RPF.

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Nesting bird surveys will occur within no more than 7 days prior to work to ensure that no nests will be disturbed during vegetation management work. If work pauses for more than 7 days, a follow-up survey will be conducted prior to the restarting of work. Appropriate survey areas will be determined by the qualified biologist depending on the project footprint, type of activity proposed, and suitable habitat for nesting birds. If the qualified biologist determines that visibility is significantly obstructed due to on-site conditions (such as access issues, rain, fog, smoke, or sound disturbance [including high wind]), surveys will be deferred until conditions are suitable for nest detection.

NB-3 Nesting Birds - Active Nest Avoidance

If active nests (i.e., nest structure creation, attendance to nest, presence of eggs and/or chicks) are observed in areas that could be directly or indirectly disturbed (including noise disturbance), a temporary, species-appropriate no-disturbance buffer zone will be created around the nest sufficient to reasonably expect that breeding would not be disrupted. No work will occur inside the buffer zone.

The size of the buffer zone will be determined by the biologist, by considering factors including, but not limited to, the following:

- Noise and human disturbance levels at the site at the time of the survey prior to the activity and the noise and disturbance expected during the work; and
- Sensitivity of individual nesting species and behaviors of the nesting birds, taking into account factors such as topography, visibility to source of disturbance, noise/vibration, nesting phase, and other case-by-case specifics.

Buffer sizes may be altered during the course of work at the recommendation of the biologist. Raptor nests are subject to additional protections, including during the “branching” phase, when fledglings begin to fly but do not fully leave the nest. Buffers will be maintained until young fledge or the nest becomes inactive, as determined by the qualified biologist.

If work must occur within the buffer, proceed to NB-4.

NB-4 Nesting Birds - Active Nest Monitoring

If an avoidance buffer is not achievable, a qualified biologist may monitor the nest(s) during work activities within the recommended nest buffer to document that no take of the nest (nest failure) has occurred related to work activities. If it is determined that work activity is resulting in nest disturbance, work should cease immediately.

RB-1 Prework Survey

If vegetation management activities would (1) occur in trees with potential for roosting bat species, (2) would include removal or trimming of trees where a bat could be roosting, or (3) would involve removal or trimming of a tree with mechanized equipment adjacent to trees or structures that could have roosting bats and (4) the work would commence between March 1 and July 31, during the bat maternity period, a pre-activity survey will be conducted for roosting bats within 2 weeks prior to work to ensure that no roosting bats will be disturbed

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during work. This survey can be conducted concurrent with other surveys for other sensitive species. Trees and shrubs within the work footprint that have been determined to be unoccupied by roosting bats, or that are located outside the avoidance buffer for active roosting sites may be removed.

RB-2 Avoidance of Maternity Roosts

If active maternity roosts are found within the project site, or in areas subject to disturbance from activities, avoidance buffers will be implemented. The buffer size will be determined in consultation with the qualified biologist or RPF.

RB-3 Bat Maternity Roosting Tree Removal – Seasonal Restrictions

Removal of trees identified as providing suitable maternity roosting habitat should be conducted during seasonal periods of bat activity, including:

- Between March 1 and April 15, or after evening temperatures rise above 45 degrees Fahrenheit and/or no more than ½ inch of rainfall within 24 hours occurs; or
- Between September 1 and about October 15, or before evening temperatures fall below 45 degrees Fahrenheit and/or more than ½ inch of rainfall within 24 hours occurs.

If it is determined that a colonial maternity roost is potentially present, the roost will be avoided and will not be removed during the breeding season (April 15 to August 31) unless removal is necessary to address an imminent safety hazard, which will be conducted in consultation with CDFW.

Operation of mechanical equipment producing high noise levels (e.g., chainsaws, heavy equipment) in proximity to buildings/structures supporting or potentially supporting a colonial bat roost will be restricted to periods of seasonal bat activity (as defined above), when possible.

GEO-1 Erosion and Soils Loss Stabilization Measures

Soils will be stabilized if a vegetation management activity may leave less than 70 percent groundcover or native mulch/organic material.

For areas between 50 percent and 70 percent ground cover left:

- Sow native grasses and other suitable native vegetation on denuded areas where natural colonization or other replanting will not occur rapidly; use slash or chips to prevent erosion on such areas.
 - Use surface mounds, depressions, logs, rocks, trees and stumps, slash and brush, the litter layer, and native herbaceous vegetation downslope of denuded areas to reduce sedimentation and erosion, as necessary to prevent erosion or slope destabilization.
 - Install approved, biodegradable erosion-control measures and non-filament-based geotextiles (e.g., coir, jute) when:
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- Conducting substantial ground-disturbing work (e.g., use of heavy equipment, pulling large vegetation) within 100 feet and upslope of currently flowing or wet wetlands, streams, lakes, and riparian areas;
 - Causing soil disturbance on moderate to steep (10 percent slope and greater) slopes; and
 - Removing invasive plants from stream banks to prevent sediment movement into watercourses and to protect bank stability.
- Sediment-control devices, if installed, will be certified weed-free, as appropriate. Sediment control devices will be inspected daily during active work to ensure that they are repaired and working as needed to prevent sediment transport into the waterbodies.

For areas with less than 50 percent ground cover:

- Any of the above measures
- Stabilize with mulch or equivalent immediately after project activities, to the maximum extent practicable.
- If project activities could result in substantial sediment discharge from soil disturbance, as determined by the qualified personnel (e.g., RPF), organic material from mastication or mulch will be incorporated onto at least 75 percent of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50 percent of the disturbed soil surface where soil erosion hazard is low to help prevent erosion.
- Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface.

Once work is completed, the areas will be inspected at least annually if accessible, until groundcover exceeds 70 percent or slopes have stabilized, as determined by a qualified professional. At that time, erosion-control and slope-stability devices may be removed.

HAZ-1 Leak Prevention and Spill Cleanup

The project proponent will, at a minimum, implement measures that address the following procedures related to the use of hazardous materials during work:

- Proper disposal or management of contaminated soils and materials (i.e., clean up materials)
 - Daily inspection of vehicles and equipment for leaks and spill containment procedures
 - Emergency response and reporting procedures to address hazardous material releases
 - Emergency spill supplies and equipment will be available to respond in a timely manner if an incident should occur
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- Response materials such as oil-absorbent material, tarps, and storage drums will be available in the plan area at all times during management activities and will be used as needed to contain and control any minor releases
 - The absorbent material will be removed promptly and disposed of properly
 - Use of secondary containment and spill rags when fueling
 - Discourage “topping-off” fuel tanks
 - Workers using fuels or other hazardous materials must be knowledgeable of the specific procedures necessary for hazardous materials cleanup and emergency response

HAZ-2 Wildfire Risk Reduction

The following measures will be implemented during activities that involve the use of equipment that can generate sparks or heat:

- Maintain fire suppression equipment (e.g., shovel, extinguisher) in work vehicles and ensure workers are trained in use
- Closely monitor for ignited vegetation from equipment and tool use
- Train workers to properly handle and store flammable materials to minimize potential ignition sources
- Prohibit smoking in vegetated areas
- Avoid use of spark- and/or heat-generating equipment during high fire danger days (e.g., Red Flag Days and Fire Weather Watch)
- Outfit off-road diesel vehicles and equipment with spark arrestors
- Avoid metal string or blade weed trimmers

HAZ-3 Pile Burning

The following measures will be implemented to reduce hazards associated with pile burning:

- Pile burning will only be allowed on days when fire is less likely to spread (e.g., wind speeds are less than 15 mph).
- Piles will not be constructed in areas where burning cannot be safely controlled, such as bottoms of steep, vegetated hills.
- Piles will be set back from public roads and trails as well as residential land uses at a distance to minimize risk to the public.
- Comply with all requirements of CAL FIRE, the local fire department, and/or the MBARD, including any permit, notification, burn bans, and reporting requirements.

NOI-1 Minimization of Noise Disruption to Nearby Neighbors and Sensitive Receptors

All projects will comply with applicable local noise ordinances. All powered equipment and power tools will be used and maintained according to manufacturer specifications. All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations.

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Measures to minimize noise disruption to nearby neighbors and sensitive receptors will be implemented as needed. These measures may include but are not limited to:

- Using noise control technologies on equipment (e.g., mufflers, ducts, and acoustically attenuating shields)
 - Locating stationary noise sources (e.g., pumps and generators) away from sensitive receptors.
 - Close engine shrouds during equipment operations
 - Shut down equipment when not in use. Equipment will not be idled unnecessarily.
 - Operate heavy equipment during daytime hours if such noise would be audible to receptors (e.g., residential land uses, schools, hospitals, places of worship).
 - Locate project activities, equipment, and equipment staging areas away from nearby noise-sensitive land uses (e.g., residential land uses, schools, hospitals, places of worship), to the extent feasible
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Discussion of Exceptions (Section 15300.2)

(a) Location:

Sensitive habitats, including watercourses and wetland areas would be avoided. Riparian woodlands may be encountered but any vegetation trimming or thinning would be conducted by hand and alteration to and deposition of debris avoided within the bed, channel, or bank of a waterway (BIO-2). Due to the scope and design of the project, it would not adversely affect riparian habitats as it would not affect shade or species diversity and could be beneficial if invasive species removal is needed therefore, exception (a) does not apply.

(b) Cumulative Impact:

The shaded fuelbreaks and vegetation removal treatments for defensible space may be maintained every 3 to 5 years to maintain ingress/egress along roadways and minimize wildfire risk for critical water infrastructure. Visual impacts from vegetation pattern changes would occur each time the vegetation is removed for maintenance, but the natural characteristic of the areas would be maintained, and no mature, healthy trees would be removed. Vegetation removal treatments and pile burning are characteristic of the area and would not be considered a visual degradation. The design and implementation of this project ensures that significant effects on environmental resources are avoided over successive years of maintenance. As such, the project would not contribute to any potential significant cumulative effect and therefore, exception (b) does not apply.

(c) Significant Effects due to "Unusual Circumstances":

The proposed vegetation management activities along roadways and critical water infrastructure is considered routine and typical throughout Santa Cruz County. Sensitive waterways and special-status species would be avoided. The project would modify the vegetation, but the natural character would remain, and the aesthetic change would not be

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substantial. Therefore, no unusual circumstances associated with the project or the environmental in which it would be implemented, and exception (c) does not apply.

(d) Scenic Highways:

State Routes (SR) 9 and 36 are eligible California State Scenic Highways within the SLVWD service area (Caltrans, 2021). Neither SR passes through SLVWD-owned land, and no roadside fuel treatments would occur along either SR. Several critical water infrastructure treatment areas are located adjacent to SR 9 and 36. Most of the proposed vegetation management activities would not be visible from SR 9 or 36. For the water infrastructure treatment areas that may be visible, visual impacts from changes to vegetation patterns from vegetation removal within 100 feet of the water infrastructure facility would occur. Piles for burning would be staged away from SR 9 and 36, and smoke plumes from pile burning may be visible from the scenic highways. Visual impacts from pile burning would be minimal since the pile burns would typically only last a day. The natural characteristic of the area along the roadways would remain and significant adverse changes to the visual environmental as seen from a scenic highway would not occur; therefore, exception (d) does not apply.

(e) Hazardous Waste Sites:

The current GeoTracker and EnvirStor databases show four active hazardous waste sites within the SLVWD service area, but not adjacent to any of the treatment areas.

Approximately 20 closed hazardous waste sites are located within the SLVWD service area, but not within the vicinity of any of the treatment areas (EnviroStor, 2021; SWRCB, 2021). No intense ground disturbing activities that could unearth potentially contaminated soils would occur; therefore, exception (e) does not apply.

(f) Historical Resources:

The project does not propose any intense ground-disturbing activities. Impacts to cultural resources from off-road heavy equipment use or pile burning could occur but is unlikely. Workers would be required to participate in cultural resources training and known resources flagged for avoidance (CUL-1, CUL-2). If previously unidentified cultural resources were discovered at the work area, work would halt and either the resource would be avoided or an investigation would be conducted (CUL-3). Project activities would not alter any built environment features and would not cause a substantial adverse change in the significance of a known or previously undiscovered resource. Therefore, exception (f) does not apply.

Environmental Assessment

Aesthetics		
Question	Yes	No
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

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Equipment and vehicles used for vegetation treatment could cause temporary visual degradation as they would be visible along roadways and around critical water infrastructure facilities during treatment. Vegetation management activities would only be conducted in any one location for a few days at most. Work would be performed in limited areas within the SLVWD lands or easements at any given time.

Changes to vegetation patterns would occur from manual and mechanical vegetation removal, and long-term visual impacts would depend on the type of work and the location of where the work was performed. Thinning vegetation and creating shaded fuel breaks would result in changes to vegetation patterns. Vegetative debris may be chipped and left in place, or chipped and hauled away. Slash from mastication treatments would be left on site. Vegetation may be lopped and spread on site along work areas where chippers or masticators have limited access. Vegetative debris left on site would be visible during decomposition. Viewers in the immediate vicinity of treatment areas may notice changes in the density (reduced density) and type of vegetation. However, vegetation management activities would not remove healthy, mature, scenic trees and would maintain the natural characteristics of the surrounding area. The visual impacts would be temporary, and the long-term effects of vegetation management would benefit the growth of healthy, native vegetation.

Pile burning, if conducted, would result in visual impacts from the staging of debris while the material dries for burning, burning the debris, smoke plumes from the burn, and the appearance of scorched vegetation. Pile would be located in open areas. While the piles may be visible to the public, vegetative material would not be out of character for the area and the piling prior to burning would be temporary. Pile burns may result in smoke plumes but would generally be smaller, although smoke may be visible from a distance. The visual exposure to the public from the smoke plumes would be minimal, since the burns would typically last a day. Significant impacts on views and visual quality from the vegetation management activities would not occur.

Agriculture and Forestry Resources		
Question	Yes	No
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

The proposed vegetation treatment activities would not convert designated farmland to non-agricultural uses. Project activities would primarily involve thinning and removal of shrubs and underbrush alongside roads and around critical water infrastructure. Healthy, mature trees would not be removed and as such would not result in the loss of forest land nor would it convert forestry land to non-forestry use. Adverse effects on agriculture and forestry resources would not occur.

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Air Quality		
Question	Yes	No
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Vegetation management activities would be conducted via manual and mechanical equipment and pile burning may be conducted for biomass removal. Vehicles and equipment utilized for vegetation management along roadside and defensible space treatment areas would emit diesel particulate matter and criteria air pollutants. Daily operation of vehicles and equipment would result in minimal daily emissions (CARB, 2021).

A permit for pile burning of vegetative debris disposal would be obtained from the CAL FIRE. Pile burning has been conducted by SLVWD on Olympia property within the last 10 to 20 years for removal of the Acacia invasive tree species. For the current vegetation management activities, pile burning may be used for disposal of cut material depending upon the conditions of the work area. Burning would emit air pollutants including particulate matter. No more than 20 piles of debris¹ would be burned in a single day, which would ensure that the pile burning and any ongoing treatment activities would not exceed the MBARD significance thresholds.

Workers may be exposed to levels of particulate matter that could negatively impact their health depending on conditions (e.g., wind) and method. Pile burning would be conducted by a qualified professional in accordance with the burn permit and standard industry practices including the California Forest Practice Rules, which would ensure the safety of the workers. Significant air quality impacts would not occur.

Biological Resources		
Question	Yes	No
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Biological database searches for the vicinity of the roadways were conducted (CDFW, 2021; CNPS, 2021). Of the species identified during the database search, species were determined to have potential to occur within the work areas if the species is known to occur in the vicinity of the work areas and if the work areas or immediate vicinity contains suitable habitat to support these species.

¹ Assuming 10-foot-wide by 6-foot-high parabolic piles of shrub/hardwood vegetation or equivalent (Urbanski, 2014; USFS, 2021).

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Special-Status Plants and Sensitive Vegetation Communities

Riparian, wetland, sandhill, or other sensitive habitats may occur within work areas. Maritime Coast Range Ponderosa Pine Forest and Northern Maritime Chaparral (rank of S1) vegetation communities have a high potential to occur in some of the work areas². Many of special-status plant species have a moderate to high potential to occur in work areas, depending upon the area, as shown in Table 1. The CZU Lighting Complex has altered the habitats within the burn perimeter. The level to which the wildfire affected special-status species is unknown and can vary. The wildfire may have benefited special-status species by opening up the canopy or stimulating the seedbank for some species, conversely, invasive, non-native species growth could be stimulated and outcompete special-status species.

Vegetation removal and thinning would occur via manual and mechanical methods. Vegetation could be chipped and scattered on-site or hauled away, depending on site conditions. Pile burning may be conducted. Activities would be designed with consideration for the special-status plants and sensitive communities that have a potential to occur in the work areas. Design features may include requiring workers to conduct activities with hand tools or to restricting where cut vegetative debris can be left in place. The qualified biologist or RPF would inspect work areas prior to activities and flag special-status plants and sensitive communities for avoidance, where appropriate (BIO-2). Workers would receive training from a qualified professional prior to beginning the vegetation treatments where sensitive biological resources could occur in the work areas, which would include identification of special-status plant species and sensitive communities for avoidance or, as appropriate, training for specific protocols for work, such as trimming methods or specifications for not spreading chipped material (BIO-1). Specifications would be developed for working in sandhill habitat through consultation with the United State Fish and Wildlife Service. The training for this project would involve identification of special-status plants and sensitive communities with a moderate potential to occur for avoidance if encountered within the work areas. The vegetation trimming and removal would generally focus on removing invasive and fire-hazardous species, leaving native species in place. Workers would be trained to clean equipment and handle vegetation to avoid spreading invasive species and plant pathogens such as SOD (BIO-1). Riparian woodlands may be encountered but any vegetation trimming or thinning would be conducted by hand and alteration to and deposition of debris avoided within the bed, channel, or bank of a waterway (BIO-2). All sensitive plant species have a low to no potential to be impacted by vegetation removal and thinning activities as shown in Table 1. The sensitive vegetation communities that could occur in some work areas would have a low potential to be impacted by vegetation removal and thinning activities. Significant impacts on native vegetation communities and special-status plants species would not occur.

Special-Status Wildlife

Several wildlife species have a moderate potential to occur in work areas as shown in Table 1. Project activities would generally be conducted August to February avoiding nesting birds and roosting bats. If activities must occur from February to August appropriate nesting bird

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and/or bat surveys would be conducted (NB-1, NB-2, NB-3, NB-4, RB-1, RB-2, RB-3). Training would include identification for avoidance of sensitive communities that provide habitats for several special-status species, such as wetlands (BIO-1). The Mount Hermon June beetle and Zayante bandwinged grasshopper occur in sandhill habitats. Activities would be conducted by hand in these areas based on the sensitive communities and special-status plants that have a potential to occur (BIO-2). These species would not be adversely affected as these species are mobile and could move away from any danger posed by hand-held equipment or humans.

Critical habitat for the Zayante bandwinged grasshopper overlaps with several work areas particularly in the area of the Olympia Property and between the town of Ben Lomond, Felton, and Scotts Valley (USFS, 2021). Designated critical habitat covers approximately 11,100 acres of land within and adjacent to SLVWD lands and assets. Proposed defensible space and fuel reduction treatments within designated critical habitat cover less than 50 acres. The primary threat to this species is habitat loss as well as conversion of vegetation communities (Santa Cruz Public Libraries, 2021). Invasive plants like broom and acacia are converting open canopy habitat into shrublands (McGraw, 2020). Canopy gaps important for maintaining plant diversity are likely also important for the unique sandhills fauna, which is impacted by canopy closure due to fire exclusion (SLVWD, 2009). Invasive and non-native species like European annual grasses and herbs are abundant in the sandhill habitats and are out competing native plants. Woody invasive species, such as French broom, Portuguese broom, and silver wattle have a significant negative effect on the sandhill habitat and associated endemic plants and animals (McGraw, 2020). Critical habitat for the coho salmon overlaps with one work area and is adjacent to many of the work areas (NOAA, 2021).

Vegetation treatment and removal would target invasive, non-native, and fire-hazardous vegetation and accumulative dead biomass along the roads. Small trees and hazard trees would be removed as part of defensible space, vegetation thinning, and ladder fuel removal. This vegetation would grow back and be retreated as needed. Given the work would be focused on vegetation thinning and invasive plant removal, the work would not be considered major habitat alteration for the Zayante bandwinged grasshopper, and may benefit the species.

Project activities would not typically reduce ground cover to the extent that erosion and sedimentation of streams could occur. For the instances where erosion could occur, erosion control measures would be implemented (GEO-1). Any streams that may intersect with the work areas would be avoided. Riparian woodlands may be encountered but any vegetation trimming, or thinning, would be conducted by hand and alteration to and deposition of debris avoided within the bed, channel, or bank of a waterway (BIO-2). Shade cover along

² Applicable to actions in northern Scotts Valley Area, Graham Hill Road Area, East Zayante Area, and western boundary area of lands west of Boulder Creek.

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streams would not be altered by project activities. Due to the scale and scope of the project activities, major habitat alteration of coho salmon habitat would not occur. Significant impacts on special-status wildlife species would not occur.

Wetlands

Seasonal streams intersect or occur adjacent to the work areas (USFWS, 2021). Existing infrastructure including culverts would not be altered as part of the project. Streams would be avoided by project activities. Due to the type of project and extent of the vegetation treatment activities, wetlands are not anticipated to be encountered and no activities would occur in wetlands. Training would ensure that workers avoid wetlands (BIO-1). Significant impacts on wetlands would not occur.

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Table 1 Special-Status Species with Potential to Occur in the Project Vicinity

Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
Sensitive Plants					
<i>Agrostis blasdalei</i>	Blasdale's bent grass	CRPR 1B.2 S2	Coastal bluff scrub; coastal dunes	No Potential	No Potential
<i>Amsinckia lunaris</i>	Bent-flowered fiddleneck	CRPR 1B.2 S3	Grassland, scrub	No Potential	No Potential
<i>Arctostaphylos andersonii</i>	Santa Cruz manzanita	CRPR 1B.2 S2	Broadleaf upland forest, chaparral, coniferous forests; open sites	Moderate ^{1,2,3}	Low – can be identified, flagged, and avoided ^{1,2,3}
<i>Arctostaphylos glutinosa</i>	Schreiber's manzanita	CRPR 1B.2 S1	Chaparral; closed cone pine forest	Low ⁵	Low – work conducted by hand; can be identified and avoided with training ⁵
<i>Arctostaphylos ohloneana</i>	Ohlone manzanita	CRPR 1B.1 S1	Closed cone pine forest; coastal scrub	Low ⁵	Low – work conducted by hand; can be identified and avoided with training ⁵
<i>Arctostaphylos regismontana</i>	Kings Mountain manzanita	CRPR 1B.2 S2	Broadleafed upland forest; chaparral; north coast coniferous forest Granite, sandstone	No Potential	No Potential
<i>Arctostaphylos silvicola</i>	Bonny Doon manzanita	CRPR 1B.2 S1	Chaparral; closed cone pine forest; Zayante sands	High ⁴	Low – can be identified, flagged, and avoided ⁴
<i>Arenaria paludicola</i>	Marsh sandwort	CE FE CRPR B.1 S1	Marshes and swamp	Low ⁴	Low – suitable habitat would be avoided ⁴

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
<i>Calyptridium parryi</i> var. <i>hesseae</i>	Sant Cruz Mountains pussypaws	CRPR 1B.1 S2	Zayante sandhills chaparral and pine forest	High ⁴	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut vegetation not spread on individuals ⁴
<i>Campanula californica</i>	Swamp harebell	CRPR 1B.2 S3	Marshes and swamps; closed-cone pine forest; coastal prairie; meadows and seeps; north coast coniferous forest	Low ⁴	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut vegetation not spread on individuals ⁴
<i>Carex saliniformis</i>	Deceiving sedge	CRPR 1B.2 S2	Mesic sites in coastal prairie	No Potential	No Potential
<i>Centromadia parryi</i> ssp. <i>congdonii</i>	Congdon's tarplant	CRPR 1B.1 S2	Mesic valley and foothill grassland (alkaline)	No Potential	No Potential
<i>Chorizanthe pungens</i> var. <i>hartwegiana</i>	Ben Lomond spineflower	FE CRPR 1B.1 S1	Maritime chaparral and ponderosa pine forest; Zayante sandhills	High ⁴	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut vegetation not spread on individuals ⁴
<i>Chorizanthe pungens</i> var. <i>pungens</i>	Monterey spineflower	FT CRPR 1B.1 S2	Sandy areas in chaparral (maritime); cismontane woodland; coastal dunes; coastal scrub; valley and foothill grassland	Low ⁴	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut vegetation not spread on individuals ⁴
<i>Chorizanthe robusta</i> var. <i>hartwegii</i>	Scotts Valley spineflower	FE CRPR 1B.1 S1	Valley and foothill grassland (mudstone, Purisima outcrops)	No Potential	No Potential
<i>Chorizanthe robusta</i> var. <i>robusta</i>	Robust spineflower	FE	Sandy areas in chaparral (maritime); cismontane	Low ⁴	Low – work conducted by hand in suitable habitat; can be identified,

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
		CRPR 1B.1 S1	woodland (openings); coastal dunes; coastal scrub		flagged, and avoided; cut vegetation not spread on individuals ⁴
<i>Cirsium andrewsii</i>	Franciscan thistle	CRPR 1B.2 S3	Mesic areas (sometimes serpentine) in broadleaved upland forest; coastal bluff scrub; coastal prairie; coastal scrub	No Potential	No Potential
<i>Cirsium fontinale</i> var. <i>campylon</i>	Mt. Hamilton thistle	CRPR 1B.2 S2	Seeps, mesic sites in creeks; woodland; grassland; serpentine	No Potential	No Potential
<i>Collinsia multicolor</i>	San Francisco collinsia	CRPR 1B.2 S2	Moist shady areas in closed-cone pine forest; coastal scrub; woodland	Low ^{3,4}	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided ^{3,4}
<i>Dacryophyllum falcifolium</i>	Tear drop moss	CRPR 1B.3 S2	Redwood forest on limestone outcrops	Low ³	Low – suitable habitat would be avoided ³
<i>Dirca occidentalis</i>	Western leatherwood	CRPR 1B.2 S2	Mesic areas in broadleaved upland forest; closed-cone pine forest; chaparral; redwood forest; riparian woodland	Low ³	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided ³
<i>Dudleya abramsii</i> ssp. <i>setchellii</i>	Santa Clara Valley dudleya	FE CRPR 1B.1 S2	Serpentine outcrops in woodland and grassland	No Potential	No Potential
<i>Eriogonum nudum</i> var. <i>decurrens</i>	Ben Lomond buckwheat	CRPR 1B.1 S1	Maritime chaparral and ponderosa pine forest; Zayante sandhills	High ⁴	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut vegetation not spread on individuals ⁴

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
<i>Eriophyllum latilobum</i>	San Mateo woolly sunflower	FE CE CRPR 1B.1 S1	Cismontane woodland (often serpentinite, roadcuts); coastal scrub; coniferous forest	No Potential	No Potential
<i>Erysimum ammophilum</i>	Sand-loving wallflower	CRPR 1B.2 S2	Openings in chaparral, sand dunes; sand substrate	Low ⁴	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut vegetation not spread on individuals ⁴
<i>Erysimum teretifolium</i>	Santa Cruz wallflower	FE CE CRPR 1B.1 S1	Openings in chaparral, ponderosa pine forest; Zayante sands	High ⁴	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut vegetation not spread on individuals ⁴
<i>Fissidens pauperculus</i>	Minute pocket moss	CRPR 1B.2 S2	Redwood forest on limestone outcrops	Low ³	Low – suitable habitat would be avoided ³
<i>Fritillaria liliacea</i>	Fragrant fritillary	CRPR 1B.2 S2	Ultramafic talus in chaparral and foothill woodland	No Potential	No Potential
<i>Grimmia torenii</i>	Toren's grimmia	CRPR 1B.3	Openings, rocky, boulder and rock walls, carbonate, in chaparral; cismontane woodland; coniferous forest	Low ³	Low – suitable habitat would be avoided ³
<i>Grimmia vaginulata</i>	Vaginulate grimmia	CRPR 1B.1 S1	Rocky, boulder and rock walls, carbonate in chaparral	Low ³	Low – suitable habitat would be avoided ³
<i>Hesperevax sparsiflora</i> var. <i>brevifolia</i>	Short-leaved evax	CRPR 1B.2 S3	Coastal bluff scrub (sandy); coastal dunes; coastal prairie	No Potential	No Potential

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
<i>Hesperocypris abramsiana</i> var. <i>abramsiana</i>	Santa Cruz cypress	FT CE CRPR 1B.2 S1	Coniferous forest and chaparral on sandstone and granitic derived soils	Low ⁵	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided ⁵
<i>Hesperocypris abramsiana</i> var. <i>butanoensis</i>	Butano Ridge cypress	FT CE CRPR 1B.2 S1	Coniferous forest and chaparral on sandstone	No Potential	No Potential
<i>Hoita strobilina</i>	Loma Prieta hoita	CRPR 1B.1 S2	Chaparral, cismontane woodland, riparian woodland with serpentine soils and mesic conditions	No Potential	No Potential
<i>Horkelia cuneata</i> var. <i>sericea</i>	Kellogg's horkelia	CRPR 1B.1 S1	Openings on old dunes and coastal sandhills	Moderate ⁴	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut vegetation not spread on individuals ⁴
<i>Horkelia marinensis</i>	Point Reyes horkelia	CRPR 1B.2 S2	Coastal dunes, prairies, scrub	No Potential	No Potential
<i>Legenere limosa</i>	Legenere	CRPR 1B.1 S2	Vernal pools	No Potential	No Potential
<i>Lessingia micradenia</i> var. <i>glabrata</i>	Smooth lessingia	CRPR 1B.2 S2	Serpentine soils in chaparral and grasslands	No Potential	No Potential
<i>Limnanthes douglasii</i> ssp. <i>sulphurea</i>	Point Reyes meadowfoam	CRPR 1B.2 S1	Mesic areas in coastal prairie; meadows and seeps; marshes and swamps; vernal pools	No Potential	No Potential

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
<i>Malacothamnus arcuatus</i>	Arcuate bush-mallow	CRPR 1B.2 S2	Serpentine chaparral	No Potential	No Potential
<i>Microseris paludosa</i>	Marsh microseris	CRPR 1B.2 S2	Coastal grassy habitats (mesic)	No Potential	No Potential
<i>Monardella sinuata</i> ssp. <i>nigrescens</i>	Northern curly-leaved monardella	CRPR 1B.2 S2	Openings in chaparral, ponderosa pine forest; Zayante sands	High ⁴	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut vegetation not spread on individuals ⁴
<i>Monolopia gracilens</i>	Woodland Woollythreads	CRPR 1B.2 S3	Openings in redwood and mixed evergreen forests	Low ^{4,5}	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut vegetation not spread on individuals ^{4,5}
<i>Orthotrichum kellmanii</i>	Kellman's bristle moss	CRPR 1B.2 S1	Sandstone, carbonate in chaparral and montane woodland	Low ³	Low – suitable habitat would be avoided ³
<i>Pedicularis dudleyi</i>	Dudley's lousewort	CR CRPR 1B.2 S2	Redwood forest, moist areas near streams	Low ³	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided ³
<i>Penstemon rattanii</i> var. <i>kleei</i>	Santa Cruz Mountains beardtongue	CRPR 1B.2 S2	Sandy shale slopes in chaparral, coniferous forests	Moderate ³	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut vegetation not spread on individuals ³
<i>Pentachaeta bellidiflora</i>	White-rayed pentachaeta	FE CE CRPR 1B.1	Valley and foothill grassland, open dry rocky slopes, often on serpentine bedrock	Low ³	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
		S1			vegetation not spread on individuals ³
<i>Pinus radiata</i>	Monterey pine	CRPR 1B.1 S1	Closed-cone pine forest; cismontane woodland	No Potential	No Potential
<i>Piperia candida</i>	White-flowered rein orchid	CRPR 1B.2 S3	North coast coniferous forest, lower montane coniferous forest, broadleaved upland forest, on serpentine, mossy banks, rock outcrops	Low ³	Low – suitable habitat would be avoided ³
<i>Plagiobothrys chorisianus</i> var. <i>chorisianus</i>	Choris's popcorn flower	CRPR 1B.2 S1	Chaparral, coastal scrub, coastal prairie (mesic areas)	Low ⁴	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut vegetation not spread on individuals ⁴
<i>Plagiobothrys diffusus</i>	San Francisco popcorn flower	CE CRPR 1B.1 S1	Grassland, coastal prairie (mesic areas)	No Potential	No Potential
<i>Polygonum hickmanii</i>	Scotts Valley polygonum	FE CE CRPR 1B.1 S1	Grassland with sandstone or mudstone outcrops	No Potential	No Potential
<i>Sanicula saxatilis</i>	Rock sanicle	CR CRPR 1B.2 S2	Serpentine; rocky, talus in chaparral; woodland, grassland	No Potential	No Potential
<i>Stebbinsoseris decipiens</i>	Santa Cruz microseris	CRPR 1B.2 S2	Open areas, sometimes serpentine in broadleaved upland forest; closed-cone	Low ⁴	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
			pine forest; chaparral; coastal prairie; coastal scrub; valley and foothill grassland		vegetation not spread on individuals ⁴
<i>Streptanthus albidus</i> ssp. <i>albidus</i>	Most beautiful jewelflower	CRPR 1B.2 S2	Serpentine soils in chaparral and grasslands	No Potential	No Potential
<i>Trifolium buckwestiorum</i>	Santa Cruz clover	CRPR 1B.1 S2	Moist areas in broadleaved upland forest; cismontane woodland; coastal prairie;	Low ⁴	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut vegetation not spread on individuals ⁴
<i>Trifolium polyodon</i>	Pacific Grove clover	CR CRPR 1B.1 S1	Mesic areas in closed-cone pine forest; coastal prairie; meadows and seeps; valley and foothill grassland	Low ⁴	Low – work conducted by hand in suitable habitat; can be identified, flagged, and avoided; cut vegetation not spread on individuals ⁴
Sensitive Wildlife					
<i>Polyphylla barbata</i>	Mount Hermon June beetle	FE	Sparsely vegetated ponderosa pine and chaparral habitat with sandy soils in the Zayante Sandhills	Possible	Low – type of work not likely to affect beetle, which can disperse; work conducted by hand in suitable habitat ⁴
<i>Trimerotropis infantilis</i>	Zayante bandwinged grasshopper	FE	Open sandy ridges and hills with sparse, low, annual and perennial herbs and open ponderosa pine, within the Zayante Sandhills	Possible	Low – type of work not likely to affect grasshopper, which can disperse; work conducted by hand in suitable habitat ⁴
<i>Oncorhynchus kisutch</i>	Coho Salmon– Central California Coast ESU	FT/CT	Rivers and creeks with abundant, deep woody debris pools.	No	Low – work conducted by hand and no healthy, mature tree removal adjacent to waterways

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
<i>Oncorhynchus mykiss irideus</i>	Steelhead– Central California Coast DPS	FT	Rivers and creeks, downstream of migration barriers.	No	Low – work conducted by hand and no healthy, mature tree removal adjacent to waterways
<i>Lavinia symmetricus subditus</i>	Monterey Roach	SSC	Found in drainages of the Monterey Bay. Tolerant of warm waters and low oxygen content.	No	Low – work conducted by hand and no healthy, mature tree removal adjacent to waterways
<i>Dicamptodon ensatus</i>	California giant salamander	SSC	Larvae are found in perennial and intermittent drainages with cool, flowing water. Adults occur under cover in adjacent forests.	Low to moderate	Low – can disperse from other areas; suitable breeding habitat would be avoided; no ground disturbances (e.g., grading or discing) would occur
<i>Aneides niger</i>	Santa Cruz black salamander	SSC	Non-aquatic, but adults/juveniles often found adjacent to drainages. Found under cover and in small mammal burrows	Moderate	Low – can disperse from other areas; suitable breeding habitat would be avoided; no ground disturbances (e.g., grading or discing) would occur
<i>Rana boylei</i>	Foothill yellow- legged frog	CE	Inhabits drainages with riffles, cobble substrate and open/broken canopy to allow for sunlight penetration. Adults and juveniles mostly found in the vicinity of drainages, but overland movement known to occur during the rainy season.	Low	Low – work conducted by hand removal adjacent to waterways
<i>Rana draytonii</i>	California red- legged frog	FT	Breeds in upland ponds, freshwater marshes and off-channel pools. Non- breeding adults and	Low	Low – work conducted by hand removal adjacent to waterways

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
			subadults may be found along streambanks outside of the breeding season. Known to move overland great distances during dispersal and migration.		
<i>Emys marmorata</i>	Western pond turtle	SSC	Inhabits upland perennial ponds and deep pools of drainages. Nests in open, sparsely vegetated uplands, such as grasslands. May be found in uplands during nesting and dispersal/migration.	Low	Low – work conducted by hand removal adjacent to waterways; no ground disturbances (e.g., grading or discing) would occur
<i>Phrynosoma blainvillii</i>	Coast horned lizard	SSC	Occurs in a variety of habitats with open vegetation, sandy soils and native ant populations.	Low to Moderate	Low – no ground disturbances (e.g., grading or discing) would occur
<i>Anniella spp.</i>	California legless lizard	SSC	Occurs in a variety of habitats with open vegetation and sandy/sandy loam soils and alluvial deposits. Largely fossorial, but sometimes found under rocks, boards, woody debris and leaf litter.	Low to Moderate	Low – no ground disturbances (e.g., grading or discing) would occur
<i>Aquila chrysaetos</i>	Golden eagle	FP	Nests in secluded trees, on cliff faces and occasionally on transmission towers.	Low	Low – suitable nesting habitat not expected in work areas

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
<i>Elanus leucurus</i>	White-tailed kite	FP	Nests in oak woodlands and riparian forests in the vicinity of open foraging habitat (e.g., grasslands and agricultural fields). Generally absent as a nester in highly urbanized situations	Moderate	Low – work would occur outside nesting season or surveys conducted
<i>Haliaeetus leucocephalus</i>	Bald eagle	CE, FP	Populations in California are recovering. Bald eagles select nest sites near aquatic foraging habitat but secluded from human activities. Nests are built in tall trees and pairs exhibit very high site fidelity	Low	Low – suitable nesting habitat not expected in work areas
<i>Falco peregrinus anatum</i>	American peregrine falcon	FP	Nests on secluded cliff faces, sometimes on bridges and tall buildings.	Low	Low – suitable nesting habitat not expected in work areas
<i>Brachyramphus marmoratus</i>	Marbled murrelet	FT, CE	Seabird that forages and rests offshore, but nests on large platform limbs in old-growth and mature second-growth redwood forests.	Low	Low – suitable nesting habitat not expected in work areas
<i>Asio otus</i>	Long-eared owl	SSC	Nests in conifer-hardwood forests, dense live oak woodlands and riparian, in close proximity to open meadows for foraging.	Low	Low – work would occur outside nesting season or surveys conducted

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
<i>Chaetura vauxi</i>	Vaux's Swift	SSC	Mainly nests in large snags of old-growth and mature second-growth redwood forests.	Low	Low – work would occur outside nesting season or surveys conducted
<i>Contopus cooperi</i>	Olive-sided flycatcher	SSC	Nests along forest edges, interior of broken stands and eucalyptus groves. Uses tall trees as singing posts to attract mates and defend territories.	Moderate	Low – work would occur outside nesting season or surveys conducted
<i>Progne subis</i>	Purple martin	SSC	Nests in snags of upper elevation coniferous forests (e.g., knobcone pine, Douglas fir).	Moderate	Low – work would occur outside nesting season or surveys conducted
<i>Antrozous pallidus</i>	Pallid bat	SSC	Roosts in snags, tree cavities, rock outcrops, abandoned buildings, under bridges. Occurs in a variety of habitats.	Moderate	Low – work would occur outside the bat maternity roosting period or surveys conducted
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	SSC	Typically roosts in secluded caves, large snags and buildings.	Low	Low – work would occur outside the bat maternity roosting period or surveys conducted
<i>Lasiurus blossevillii</i>	Western red bat	SSC	Locally, a coastal winter migrant that roosts in the foliage of trees and shrubs. Prefers inland regions of the Central Valley during the breeding season.	Moderate	Low – work would occur outside the bat maternity roosting period or surveys conducted

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
<i>Neotoma fuscipes annectens</i>	San Francisco dusky-footed woodrat	SSC	Occurs in a variety of wooded habitats with dense understory. Typically builds stick houses, but will den in rubble.	Moderate	Low – stick nests identified and avoided with training
<i>Taxidea taxus</i>	American badger	SSC	Most abundant in grasslands and drier, open stages of shrub and forest, with friable soils and abundant prey (small burrowing mammals).	Low to Moderate	Low – no ground disturbances (e.g., grading or discing) would occur
<i>Bassariscus astutus</i>	Ringtail	FP	Occurs in a variety of habitats including oak woodland, scrub and conifer forests, where prey (rodents) is abundant. Dens in rock piles, hollow trees and mammal burrows.	Low to Moderate	Low – suitable snags with at least 3-inch diameter hollows would be identified and avoided with training; no ground disturbances (e.g., grading or discing) would occur

Zones for special-status species:

¹ – Applicable to actions in/near Felton Empire Grade

² – Applicable to actions in Brookdale, Fern Avenue Tank Area

³ – Applicable to actions west of Boulder Creek

⁴ – Applicable to actions in northern Scotts Valley Area, Graham Hill Road Area, East Zayante Area, Eleana Drive Pipeline Area, Navarro Drive Tank Area, and Stanford Drive Tank Area (i.e., sandhill habitat)

⁵ – Applicable to western boundary area of lands west of Boulder Creek

FE Federally Endangered

FT Federally Threatened

FC Federal Candidate

CE California State Endangered

CC California State Candidate

FP Fully Protected

SSC California State Species of Special Concern

CRPR California Rare Plant Ranks

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Scientific Name	Common Name	Sensitive Status	Habitat Types	Potential to occur in work areas	Potential to be impacted by treatments
CT	California State Threatened		S	State Rank	

Source: (CDFW, 2021; CNPS, 2021; CDFG, 2003; Hickman, 1993; Stebbins, 2003)

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Cultural Resources and Tribal Cultural Resources ³		
Question	Yes	No
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Manual and mechanical hand tools used for vegetation management that have limited ground disturbance would be unlikely to cause any impacts to cultural resources due to the low potential of disturbing the ground surface. Use of heavy equipment off-road for vegetation removal along SLVWD roadways and property boundaries (i.e., masticating, chipping, cutting) could potentially damage or destroy cultural resources on or directly below the soil surface. Pile burning would not cause ground disturbance that could potentially damage or destroy cultural resources underneath or adjacent to the piles via scorching, creating a buildup of residue on the resource, fracturing the resource, or destroying the resource (NPS, 2021). Workers would participate in cultural resource training prior to project implementation and known resources identified during cultural records searches would be flagged for avoidance (CUL-1, CUL-2). Previously unidentified cultural resources discovered at the work area would require work to halt and either the resource would be avoided or an investigation would be conducted (CUL-3). If any human remains are uncovered, all project site activities would be required to comply with state policies. All site disturbance would halt until the County Coroner has made a determination as to the status of the human remains (Health and Safety Code 7050.5-7055). If the human remains may be those of a Native American, the Native American Heritage Commission shall be contacted, and the appropriate treatment identified for the remains (Health and Safety Code 7050.5.(b); Public Resources Code Section 5097.98). Significant impacts on cultural resources and human remains would not occur.

Energy		
Question	Yes	No
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Vehicles and equipment utilized for establishing shaded fuel breaks and defensible space would use energy, including gas, diesel, and motor oil. Vehicle engines and fuel used for vegetation management would comply with State and local energy reduction and efficiency requirements. The use of fuel to implement the vegetation management activities would be considered beneficial and necessary to improve routes for ingress/egress and protect critical

³ No tribal consultation requirement is associated with filing a notice of exemption per Assembly Bill 52 (PRC §21080.3.1.(b)).

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water infrastructure. Project activities would not cause a significant impact, due to wasteful, inefficient, or unnecessary consumption of energy resources.

Geology and Soils		
Question	Yes	No
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Vegetation removal and cutting is expected in most areas to maintain at least 70 percent of groundcover, and thus, would not result in substantial erosion (Lang & McDonald, 2005). In areas where erosion could occur due to slope and soil exposure, erosion control devices would be installed (GEO-1). Vegetation debris piles are localized and relatively small in size at a maximum of 10 feet in diameter. Burns scars from pile burning would not be significant enough to result in increased soil erosion and topsoil loss. Significant impacts related to erosion and loss of topsoil would not occur.

Greenhouse Gas Emissions		
Question	Yes	No
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Vegetation management activities would consist of manual and mechanical vegetation removal, chipping debris, and pile burning. GHG emissions from pile burning would vary daily depending on the number of piles burned each work day. However, the proposed vegetation management activities would reduce the risk of wildfires, and pile burns would have low GHG emissions compared to GHG emitted from a catastrophic wildfire. Due the limited duration and types of activities, significant GHG emissions are not anticipated⁴. The project would involve vegetation thinning and would not remove any healthy, mature trees. Thinning can result in greater sequestration rates by reducing competition for the larger, more resilient trees (CAL FIRE, 2018). These processes are not quantified but would fluctuate during initial treatment and future maintenance. Due to the current higher fuel loads, it is anticipated that a net release of carbon from removal of vegetation could occur, at least in the near-term as the ecosystem fuel loads are restored closer to pre-fire suppression conditions and wildland fire risk is minimized. The fluctuation would be insignificant compared to overall carbon stock in Santa Cruz County. Significant GHG impacts would not occur.

⁴ MBARD has established a GHG threshold for stationary sources, but this threshold is not relevant for vegetation-management projects (MBARD, 2016; Frisbey, 2020).

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Hazards and Hazardous Materials		
Question	Yes	No
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Vegetation management activities would include manual and mechanical treatments that would utilize heavy machinery and herbicide usage for spot treatments. Workers handling hazardous materials are required to adhere to the Occupational Safety and Health Administration (OSHA) and the California Division of Occupational Safety and Health (Cal/OSHA) health and safety requirements to protect workers. Vehicles and equipment would be kept in good working order. Spill and prevention response measures would be implemented to ensure hazardous materials are properly stored on-site and that any accidental release of hazardous materials would be properly controlled and clean-up (HAZ-1).

There are several hazardous facilities located within the SLVWD service boundary. Four sites are considered active clean-up sites and 20 are considered closed sites (EnviroStor, 2021; SWRCB, 2021). All four active cleanup sites are not located within or adjacent to any treatment areas.

Herbicide use, if implemented, would be conducted according to the SLVWD IPMP, which requires approval by the SLVWD Board of Directors. The formulations and application would be selected to ensure that harm to the environment, wildlife, or human health would not occur. Once approved, notification would be conducted and workers trained for application per the SLVWD IPMP. The U.S. Environmental Protection Agency oversees herbicide use and health and safety through the Worker Protection Standard (WPS). The WPS contains requirements to minimize risk to herbicide applicators, including use of personal protective equipment, restricted-entry intervals after herbicide application, decontamination supplies, and emergency medical assistance. Compliance with the IPMP, WPS, OSHA, and Cal/OSHA would minimize risk to herbicide applicators, the public, and the environment.

Safety measures would be taken to reduce the possibility of igniting a wildfire during pile burning. Piles would be assembled and burned in areas of lowest risk for fire spread and would only be performed with a CAL FIRE burn permit by qualified personnel. Vegetation management crews would maintain fire suppression equipment (e.g., Pulaski axe, shovel, fire extinguisher) in work vehicles during activities that can generate sparks or heat (HAZ-2). Pile burns will be conducted in areas and under conditions to ensure control of the burn (HAZ-3). Significant impacts related to hazards and hazardous materials would not occur.

Hydrology and Water Quality		
Question	Yes	No
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

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Vegetation would be removed using manual and mechanical tools and equipment. Off-road equipment use could occur. No intense ground disturbance such as grading, or discing, use would occur. Generally, soil-disturbing work, resulting in groundcover of less than 70 percent and 100 feet upslope of a waterway or riparian corridor, could have some potential to cause more substantial sedimentation of the waterway or habitat (Lang & McDonald, 2005). The majority of the proposed manual and mechanical vegetation removal activities would not result in circumstances that would result in significant ground cover removal and, thus, significant erosion and subsequent sedimentation. For the instances where erosion could occur, erosion control measures would be implemented (GEO-1). Any streams that may intersect with the work areas would be avoided. Riparian woodlands may be encountered but any vegetation trimming, or thinning, would be conducted by hand and alteration to and deposition of debris avoided within the bed, channel, or bank of a waterway (BIO-2). Pile burning would affect areas of 5 to 10 feet in diameter for each pile and would not impact a large enough area to cause a significant change in stormwater runoff patterns that could result in sedimentation or siltation. Significant water quality impacts would not occur.

Land Use and Planning		
Question	Yes	No
Relevant to the project?	☐	☒
Potential for significant impact?	☐	☒

The shaded fuel break and defensible space treatment activities would not involve any new development or changes to land uses that would physically divide a community. All activities would comply with local land use regulations and policies.

Mineral Resources		
Question	Yes	No
Relevant to the project?	☐	☒
Potential for significant impact?	☐	☒

Vegetation management activities would not result in the loss of known mineral resource. The vegetation thinning and removal intended to reduce fuel loads would not alter land uses, access, or subsurface areas that could impact mineral resources.

Noise		
Question	Yes	No
Relevant to the project?	☐	☐
Potential for significant impact?	☐	☐

All treatment areas are located within unincorporated areas in Santa Cruz County, except for two treatment areas that are located within the City of Scotts Valley. Vegetation management activities in unincorporated areas would comply with the Santa Cruz County Noise

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Ordinances § 8.30.010, which prohibits offensive noise with consideration for the loudness and necessity of the noise. Project areas within the City of Scotts Valley boundaries would comply with Noise Ordinance § 5.17.040⁵, which restricts activities to between 8 a.m. and 10 p.m. Measures to minimize noise disruption to nearby neighbors and sensitive receptors would be implemented, as needed (NOI-1). Exceedances of local noise standards would not occur (given the short duration of noise generation in any one location and existing noise environments that include similar types of noises periodically) and significant noise impacts would not occur.

Population and Housing		
Question	Yes	No
Relevant to the project?	☐	☒
Potential for significant impact?	☐	☒

Contractor crews conducting the vegetation management activities would be sourced from the existing businesses. The project would not induce population growth, and no impact related to population and housing would occur.

Public Services		
Question	Yes	No
Relevant to the project?	☐	☒
Potential for significant impact?	☐	☒

The project would not directly or indirectly induce population growth that would require construction of additional public services. No new or physically altered governmental facilities would be required as a result of this project. No impact related to public services would occur.

Recreation		
Question	Yes	No
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Vegetation removal activities would occur around critical water infrastructure, along portions of property boundaries adjacent to residential uses, and along roadways. SLVWD does not

⁵ While these activities are not construction and do not require a construction permit, some of the equipment generates noise levels similar to construction equipment (e.g., noise level of a chainsaw is ≤ 82 dBA L_{max} at 50 feet (USDOT, 2008) such that a comparison could be made and justification for ensuring work hours conform.

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actively manage their lands for recreational uses, except for a written agreement with the Santa Cruz County Horseman's Association (SCCHA) that allows the use of the Olympia Property for equestrian recreation on marked trails with permission (SLVWD, 2011). Four treatment areas are located within the Michael Gray Field Park to protect critical water infrastructure. All other treatment areas are located outside of local and state park boundaries. Work areas that are accessible to the public would be closed during vegetation management activities for safety. Although access to discrete areas that recreationalists may use in Olympia Property or the Michael Gray Field Park may be unavailable during vegetation management activities, the treatments would be for a short duration in one area, typically only a few hours to a few days. Ample recreational opportunities are available within and surrounding the SLVWD service area (e.g., Big Basin Redwoods State Park, Castle Rock State Park, etc.) that recreationalists could use if discrete areas on SLVWD-owned lands or the Michael Gray Field Park are unavailable due to vegetation management activities. The project would not directly or indirectly induce population growth that could increase the use of recreational facilities. Significant recreational impacts would not occur.

Transportation		
Question	Yes	No
Relevant to the project?	☐	☒
Potential for significant impact?	☐	☒

A maximum of 20 workers could be conducting vegetation management activities on SLVWD lands and easements in a single day. An estimated 44 daily one-way vehicle trips would occur, which would not exceed 110 trips per day. Implementation of the project would not conflict with State CEQA Guidelines section 15064.3, subdivision (b).

Vegetation removal activities would not typically be conducted along public roadways. Land closures are not anticipated. If activities do necessitate operation of vehicles or equipment within public roadways an encroachment permit would be acquired. The project would comply with the California Manual on Uniform Traffic Control Devices (MUTCD). The MUTCD requires warning signs to alert motorists and other roadway users to the presence of roadside workers as well as flaggers to direct flow. The MUTCD also requires crew to wear safety equipment, such as high-visibility vests, when operating vehicles or equipment near public roads.

Pile burning would be conducted as a method of vegetative debris disposal. Pile burns would be performed away from roadways and would not be a hazard to passing motorists or recreationalists due to the small size of the burns and monitoring during the burn. No significant traffic impacts would occur.

Utilities and Service Systems		
Question	Yes	No
Relevant to the project?	☒	☐

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Potential for significant impact?

☐☒

Some of the cut vegetation material would be processed using a chipper, depending upon whether a chipper can access the site. The chipped debris may be broadcasted on the work areas or hauled to a disposal facility. Up to two truckloads of chipped material could be processed a day, totaling up to 32 cubic yards (approximately 45 tons) of material. Disposal sites for the hauled chipped debris would include the Buena Vista Landfill and Ben Lomond Transfer Station, which have a combined permitted capacity of over 1,138 tons per day and would be able to accept chipped material (CalRecycle, 2021). Fuel reduction maintenance would be required every 3 to 5 years and would likely require additional chipping and hauling of vegetative debris. The vegetation management activities would not require the construction of new or expanded utilities or generate waste in excess of the capacity of local infrastructure. No impact related to utilities and service systems would occur.

Wildfire		
Question	Yes	No
Relevant to the project?	☒	☐
Potential for significant impact?	☐	☒

Most of the SLVWD service area is located within the State Responsibility Area (SRA) and classified as either moderate or high fire hazard severity zones (CAL FIRE, 2007/2008). Most of the work areas are within the SRA. The purpose of this project is to reduce fuel loads, which would reduce the spread and intensity of a wildfire, should one occur. The project would not impair an adopted emergency response plan or evacuation plan, but would rather enhance emergency response. Pile burning would not exacerbate fire risk as the piles would be relatively small and would be monitored during the burn. Pile burning would be conducted by a qualified professional in accordance with the burn permit and standard industry practices including the California Forest Practice Rules, which would ensure that people and structures would not be exposed to significant risks. Impacts to people and structures from increased fire risk would not occur.

Preparers

This section lists those individuals who prepared the preparation of this memorandum.

Table 2 Preparers

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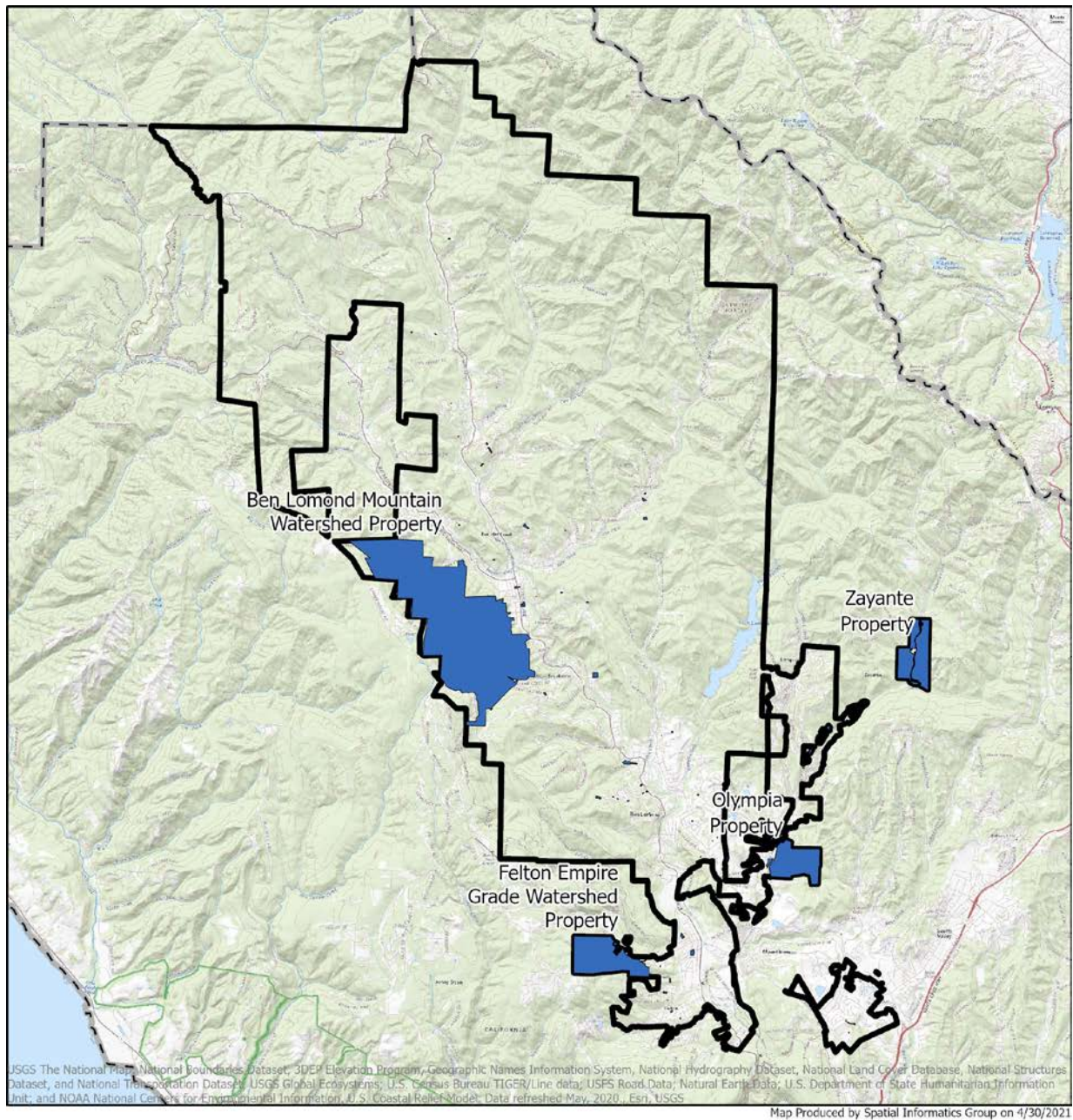
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Figure 1 San Lorenzo Valley Water District Service Area and Lands



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