COASTAL CONSERVANCY

Staff Recommendation
November 20, 2025

BIG BASIN REDWOOD WILDFIRE RESILIENCE PROJECT

Project No. 25-028-01
Project Manager: Kostoula Vallianos

RECOMMENDED ACTION: Authorization to disburse up to $3,050,000 to Sempervirens Fund to undertake the Big Basin Redwood Wildfire Resilience Project, consisting of vegetation fuels reduction and habitat enhancement on 215 acres in the old-growth coast redwood area of Big Basin Redwood State Park in Santa Cruz County, and project-related community engagement; and adoption of findings under the California Environmental Quality Act.

LOCATION: Big Basin Redwoods State Park, Santa Cruz County

EXHIBITS

Exhibit 1: Project Location Map

Exhibit 2: California Vegetation Treatment Program (CalVTP) Statewide Programmatic Environmental Impact Report (PEIR)

Exhibit 3: Project-Specific Analysis and Addendum to the CalVTP PEIR, Inland Big Basin Redwoods State Park Forest Health and Resilience Project (CalVTP Project ID: 2025-06)

Exhibit 4: Project Letters

RESOLUTION AND FINDINGS

Staff recommends that the State Coastal Conservancy adopt the following resolution and findings.

Resolution:

The State Coastal Conservancy hereby authorizes a grant of an amount not to exceed three million fifty thousand dollars ($3,050,000) to Sempervirens Fund (the "grantee") to undertake the Big Basin Redwood Wildfire Resilience Project, consisting of vegetation fuels reduction and habitat enhancement on 215 acres in the old-growth coast redwood area of Big Basin Redwood State Park in Santa Cruz County, and project-related community engagement (the "project").

Prior to commencement of the project, the grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (Executive Officer) the following:

1. A detailed work program, schedule, and budget.
2. Names and qualifications of any contractors to be retained in carrying out the project.
3. A plan for acknowledgement of Conservancy funding from the Safe Drinking Water, Wildfire Prevention, Drought Preparedness, and Clean Air Bond Act of 2024.
4. Evidence that all permits and approvals required to implement the project have been obtained.
5. Evidence that the grantee has entered into agreements sufficient to enable the grantee to implement, operate, and maintain the project.

Findings:

Based on the accompanying staff recommendation and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapter 3 of Division 21 of the Public Resources Code, regarding the Climate Ready Program.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria.
3. The Sempervirens Fund is a nonprofit organization organized under section 501(c)(3) of the U.S. Internal Revenue Code.
4. The Conservancy has independently reviewed and considered the California Vegetation Treatment Program (CalVTP) Statewide Program Environmental Impact Report (PEIR), which was certified by the California Board of Forestry and Fire Protection on December 30, 2019, pursuant to the California Environmental Quality Act ("CEQA") (Exhibit 2), and the Project-Specific Analysis and Addendum to the CalVTP PEIR, Inland Big Basin Redwoods State Park Forest Health Project (Cal VTP Project ID: 2025-06, PSA-Addendum) (Exhibit 3). The Conservancy finds:
    a. The Big Basin Redwood Wildfire Resilience Project is within the scope of the CalVTP, and the CalVTP PEIR adequately describes the Big Basin Redwood Wildfire Resilience Project for the purposes of CEQA.
    b. The PEIR and PSA-Addendum identify potentially significant impacts from the Big Basin Redwood Wildfire Resilience Project in the areas of Biological Resources and Hazardous Materials, Public Health, and Safety as identified in the accompanying staff recommendation. The Conservancy finds that the standard project requirements and mitigation measures identified in the PEIR and the PSA-Addendum will avoid, reduce, or mitigate these possible significant environmental effects to less-than-significant levels and that these mitigation measures have been required or incorporated into the project.

c. The PEIR and PSA-Addendum identify significant and unavoidable impacts from the Big Basin Redwood Wildfire Resilience Project in the areas of Air Quality; Archaeological, Historical, Tribal Cultural Resources; Greenhouse Gas Emissions; Transportation; and Public Services, Utilities, and Service Systems, but environmental and other benefits of the project as described in the accompanying staff recommendation outweigh or render acceptable these unavoidable adverse environmental effects to achieve the objectives of the project.

d. The Conservancy adopts the Findings regarding Significant Effects and Statement of Overriding Considerations set forth in the accompanying staff recommendation.

STAFF RECOMMENDATION

PROJECT SUMMARY:

Staff recommends the State Coastal Conservancy (Conservancy) authorize a grant of up to $3,050,000 to Sempervirens Fund to undertake the Big Basin Redwood Wildfire Resilience Project, consisting of vegetation fuels reduction and habitat enhancement on 215 acres in the old-growth coast redwood area of Big Basin Redwood State Park in Santa Cruz County, and project-related community engagement (the project). The project will reduce rapidly growing fuel loads, while restoring forest structure to the old-growth forest, and increase the wildfire resilience of Big Basin Redwood State Park and nearby communities.

Big Basin Redwood State Park (BBRSP) is the oldest State Park in California. The park is comprised of over 18,000 acres of diverse ecosystems and sensitive habitats, including some of the last remaining old-growth coast redwoods in the Santa Cruz Mountains. In August 2020, the CZU Lightning Complex Fire burned 135 square miles in the Santa Cruz Mountains, consuming approximately 97% of BBRSP. The old-growth coast redwood forest area of the park sustained high- to very-high severity burn damage. Since the fire, substantial dead and downed woody fuels have accumulated, as has dense early and rapidly growing successional vegetation, such as 15-20 feet tall Ceanothus thyrsiflorus. These conditions threaten the integrity of the BBRSP's old-growth redwood stands and sensitive habitat, including historic and potential nesting habitat for the federally-threatened and California-endangered marbled murrelet, and increase risks to public safety in high-use visitor areas and along critical evacuation routes. Without intervention, the existing heavy fuel loads and altered forest structure will continue to increase the probability of high-intensity wildfire, jeopardizing ecological recovery of the park's sensitive habitat and species and the protection of nearby communities, park infrastructure, and adjacent forestland.

Following the CZU Fire, California State Parks prepared a comprehensive Forest Management Strategy for Big Basin, Butano, and Año Nuevo State Parks, which guides forest restoration, fuel reduction, and prescribed fire management across these parks. Beginning one year after the CZU Fire, California State Parks engaged stakeholders and partners in a visioning process for the park's future use known as Reimagining Big Basin. Both plans focus on the health of the old-growth redwoods, management of sensitive resources, and treatment of the proposed project area as a high priority.

Consistent with these planning efforts, Sempervirens Fund and California State Parks have identified 245 acres of priority vegetation management activities to address hazardous fuels in the park. These activities can be split into three components. The first and second components are not part of the project. The first component is led by Sempervirens Fund and focuses on volunteer-based fuel reduction activities in a 15 acre easily accessible area, where small dead and downed vegetation are collected into burn piles. The State Parks Natural Resource Field crews will then burn the piles each winter, through 2030. The second component is a demonstration project of approximately 15-18 acres located near the park's former day-use check-in kiosk. In this area, State Parks Natural Resource Field crews will manually remove dead and downed vegetation as well as some smaller select live vegetation, will construct burn piles, and burn the piles during wet periods. The treatment will retain at least 50% of existing understory cover to maintain habitat diversity. This work will be used to demonstrate expectations for prospective contractors on how work should be performed in the third component.

The project consists of the third component of the Sempervirens Fund and California State Park's priority vegetation management activities, which include vegetation fuel reduction and habitat enhancement on the entire 215 acre area in the old-growth redwood coast area of the park. Treatment areas will focus on the Highway 236 corridor, North Escape Fire Road, Lodge Road, Middle Ridge Fire Road, several hiking trails, and former campgrounds in the old-growth areas (Exhibit 1). Approximately 185 aces are accessible by heavy equipment. This area will be mechanically masticated and chipped. Following mechanical treatment, hand crews will manually remove larger dead trees and construct burn piles. Due to steep slopes prohibiting use of heavy equipment, an additional area of approximately 30 acres will be manually treated. The State Parks Natural Resource Field crews and Burn Bosses will then burn all constructed burn piles over the total 215-acre treatment area.

California State Parks intends to reintroduce prescribed fire to the park on an ongoing basis. However, current vegetation conditions preclude safe and effective prescribed broadcast burning due to potential negative impacts on old-growth redwood trees. The project will facilitate safe reintroduction of prescribed fire by reducing fuel loads specifically around old-growth redwoods and around roads, trails, and high visitor use areas. The project will develop post-fire treatment specifications to protect redwoods and reintroduce prescribed fire and historic fire regimes. Lessons from the project could be applied across the Santa Cruz Mountains and potentially to other areas of coast redwood central and northern ranges.

The project will also reduce wildfire risk and increase wildfire resilience across the park and nearby community. The treatments will occur along major road corridors and in the most heavily visited areas of the park. Reducing fuels in these areas can reduce human-caused ignitions. In addition, reduction of fuels along Highway 236 and Lodge Road is critical to ensure their continued safe use as evacuation routes. For instance, multiple communities consisting of several hundred people live along Highway 236 and would benefit from this project.

The project will also engage the community including activities such as community meetings/webinars, social media posts, videos, outreach material, and potential volunteer

opportunities. By engaging the community, the project will offer opportunities for the public to learn about proactive forest restoration and wildfire resilience.

Site Description: Big Basin Redwoods State Park, established in 1902, is home to the largest and southernmost continuous tract of old-growth redwoods south of San Francisco. BBRSP welcomed approximately 1 million visitors annually before the 2020 CZU Lightening Fire burned 97% of the park. Current conditions of the project area include heavily burned old-growth redwoods with an understory dominated by *Ceanothus thyrsiflorus* (blue blossom ceanothus); a fast-growing, fire following shrub species; and significant accumulations of dead and downed woody material. Sensitive habitats present within the project area include old-growth redwood stands with complex canopy structures, and historic and potential nesting habitat for the federally-threatened and California-endangered marbled murrelet (Exhibit 1). The project area is within the vicinity of the former visitor center which burned down in the CZU fire. The project area also includes several former campgrounds (Huckleberry, Sempervirens, and Blooms Creek campgrounds), hiking trail corridors (Dool Trail, Sunset Trail, portions of Skyline to the Sea Trail) and sections of Highway 236, Middle Ridge Road, and Lodge Road.

Grant Applicant Qualifications: Sempervirens Fund, the state's first and oldest land trust, has purchased over 36,000 acres in the Santa Cruz Mountains, most of which is now part of California State Parks, including Big Basin, Butano, and Castle Rock. The organization currently has stewardship responsibility for 12,000 acres, including conservation easements. Sempervirens Fund is well-equipped to complete this project and has experience receiving state grants from the Conservancy, Wildlife Conservation Board, California Department of Fish and Wildlife, and California State Parks. Since the CZU Lightning Fire, Sempervirens Fund has significantly increased its stewardship capacity, including staffing, expertise, and relationships. This expanded capacity will help the organization build on its established track record of partnership and grants management. Sempervirens Fund, specifically its Director of Land Stewardship, will work closely with the Santa Cruz State Parks District on this project. The Santa Cruz State Parks District is exceptionally well equipped and experienced in using prescribed fire to maintain healthy forests. The District has been implementing prescribed burns in Big Basin Redwoods State Park since 1978, supported by a dedicated wildland fire–trained field crew. With three qualified Burn Bosses, extensive equipment, the Santa Cruz State Park District is uniquely positioned to continue leading safe and effective prescribed fire operations that strengthen forest health and reduce wildfire risk. Sempervirens Fund and California State Park's long-time partnership and organizational resources will benefit the project.

CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA:

The proposed project is consistent with the Conservancy's Project Selection Criteria, last updated on September 23, 2021, in the following respects:

Selection Criteria Extent to which the project helps the Conservancy accomplish the objectives in the Strategic Plan.

See the "Consistency with Conservancy's Strategic Plan" section below.

1. Project is a good investment of state resources.

The proposed project is a good investment of state funding. The project is feasible, has a reasonable budget, and addresses a demonstrated need. The project implements many statewide wildfire and forest resiliency goals. The project is consistent with several state plans, and specifically with the following:

- The Forest Management Strategy for Big Basin, Butano, and Año Nuevo State Parks (California State Parks Santa Cruz District, August 2024), which guides forest restoration, fuel reduction, and prescribed fire management across these parks. The plan includes five specific old-growth redwood forest goals and priority treatment units to improve ecological health and wildfire resilience of this habitat.
- The California's Wildfire and Forest Resilience Action Plan (Governor's Forest Management Task Force, January 2021), which calls for activities, such as fuels reduction, forest thinning, vegetation management, prescribed fire, shaded fuel breaks, defensible space, and enhancement of fire-prone habitats to reduce fire risk.
- The California's Strategic Plan for Expanding the Use of Beneficial Fire (Governor's Forest Management Task Force, March 2022), which builds on the Wildfire and Forest Resilience Action Plan and lays out goals and actions to increase beneficial fire, including prescribed fire and cultural burning.
- The California Forest Carbon Plan (California Natural Resources Agency, 2018), which calls for restoration of natural fire regime and forest composition through a multitude of approaches, including thinning, prescribed burns, invasive vegetation management, and shaded fuel breaks.
- The Community Wildfire Prevention & Mitigation Report (CAL FIRE, 2019), which urges state and local agencies to implement the goals of the Carbon Forest Plan and lays out recommendations to agencies to increase the scale and pace of management and mitigation actions to improve forest health and resiliency.

Lessons learned from this project may be applied to other post fire treatments of coast redwoods and a safe phased approach to ultimately reintroducing broadcast burning to these ecosystems..

2. Project includes a serious effort to engage tribes. Examples of tribal engagement include good faith, documented efforts to work with tribes traditionally and culturally affiliated to the project area.

Both Sempervirens Fund and California State Parks have existing tribal relationships that have and continue to inform the proposed project. State Parks has made tribal consultation central to the Reimagining Big Basin planning and engaged with tribes throughout the process. Planning documents developed through Reimaging Big Basin process reflect this engagement and affirm that Indigenous knowledge, leadership, and cultural practices are foundational to the park's future, with Traditional Ecological Knowledge—including cultural fire—formally integrated into forest management.

Sempervirens Fund has a long-standing working relationship with the Amah Mutsun Land Trust (AMLT). Sempervirens Fund will be working with AMLT to learn how AMLT wishes to

work with Sempervirens Fund through this project and will establish further partnership activities based on that guidance.

3. **Project benefits will be sustainable or resilient over the project lifespan.**

   Fire resilience is a critical issue due to increased average temperatures, reduced marine fog, and longer and more severe droughts. California is facing unprecedented fire risk due to climate change and a growing populace. The 2020, 2021, and 2024 fire seasons broke numerous records. The January 2025 catastrophic wildfires in southern California make this year the second most destructive fire year in California history.

   This project will increase wildfire resilience of BBRSP and that of surrounding communities. The project will provide learnings and a model to expand similar post-fire treatments, including prescribed burns, to other areas in the park and throughout the Santa Cruz Mountains. The project is the essential first step towards using prescribed fire as a maintenance tool throughout Big Basin Redwoods State Park, particularly in and adjacent to old-growth stands and within the footprint of this project area.

4. **Project delivers multiple benefits and significant positive impact.**

   The project will result in multiple co-benefits.

   - Restore 215 acres of old-growth coast redwood fire-damaged forest;
   - Protect and enhance critical habitat for the federally-threatened and California-endangered marbled murrelet (and other sensitive species);
   - Increase community wildfire resilience by reducing fuels along critical evacuation routes and fire containment lines; and
   - Provide volunteer opportunities in redwood forest restoration and wildfire resiliency work.

5. **Project planned with meaningful community engagement and broad community support.**

   State Parks has been actively engaging the public, partnering agencies, stakeholders, and partner organizations on future plans for forest management at Big Basin since the CZU Fire in 2020. In addition, through Reimagining Big Basin Visioning process, California State Parks hosted webinars, public meetings, and surveys to gather input on forest management goals and proposed treatments.

PROJECT FINANCING

Coastal Conservancy	**$3,050,000**
Project Total	**$3,050,000**

The anticipated source of Conservancy funding is a fiscal year 25-26 appropriation of the Safe Drinking Water, Wildfire Prevention, Drought Preparedness, and Clean Air Bond Act of 2024, also known as the 2024 Climate Bond or Proposition 4 (Public Resources Code (PRC), Section 90000 to 95015). The 2024 Climate Bond, Chapter 3, makes funds available, upon appropriation

by the Legislature, for wildfire prevention, including reducing community wildfire risk and restoring the health and resilience of forests and landscapes (PRC Section 91500). Under Chapter 4 of the 2024 Climate Bond, the Conservancy may grant funding for "watershed improvement, wildfire resilience, chaparral and forest restoration, and workforce development that addresses needs related to this subdivision and is designed to create career pathways for individuals from disadvantaged communities, severely disadvantaged communities, or vulnerable populations" (PRC Section 91520(k)). The proposed project is consistent with the 2024 Climate Bond because it will increase wildfire resilience of old-growth coast redwoods and nearby communities.

Unless specifically identified as "Required Match," the other sources of funding and in-kind contributions described above are estimates. The Conservancy does not typically require matching funds or in-kind services, nor does it require documentation of expenditures from other funders or of in-kind services. Typical grant conditions require grantees to provide any funds needed to complete a project.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

The recommended project would be undertaken pursuant to Section 31113 of Chapter 3 of Division 21 of the Public Resources Code.

Pursuant to Section 31113(a), the Conservancy will administer the Climate Ready Program to address the impacts and potential impacts of climate change on resources within the Conservancy's jurisdiction. Pursuant to Section 31113(b), the Conservancy may undertake projects within its jurisdiction that address extreme weather events, sea level rise, storm surge, water intrusion, flooding, and other coastal hazards that threaten coastal communities, infrastructure, and natural resources. Pursuant to Section 31113(c), the Conservancy, to the extent allowed, must prioritize grants for projects that maximize public benefits and have one of several purposes, including reducing emissions of greenhouse gases and preserving natural lands. Section 31113(d) requires the Conservancy to prioritize projects that provide multiple public benefits, including protection of communities, natural resources, and recreational opportunities.

Consistent with Section 31113, the proposed project will reduce vegetation fuel loads and enhance habitat to increase resiliency of one of California's last remaining old-growth coast redwood forests to catastrophic wildfire, which will provide multiple public benefits, including protecting communities, and may ultimately reduce greenhouse gas emissions released from increased wildfires due to climate change.

CONSISTENCY WITH CONSERVANCY'S 2023-2027 STRATEGIC PLAN:

Consistent with **Goal 3.2, Enhance Habitats,** and **Goal 4.2, Wildfire Resilience**, the proposed project will treat hazardous fuels of 215 acres, increasing wildfire resilience and enhancing old-growth coast redwood habitat.

CEQA COMPLIANCE:

The California Vegetation Treatment Program Environmental Impact Report (PEIR) evaluates the environmental impacts of the CalVTP. The CalVTP is described in Chapter 2 of the PEIR. The PEIR was prepared under the direction of the lead agency, the California Board of Forestry and Fire Protection (Board of Forestry and Fire Protection); in cooperation with the California Department of Forestry and Fire Protection (CAL FIRE); and in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code, Section 21000-21189.91) and the CEQA Guidelines (California Code of Regulations, Title 14, Sections 15000-15387). The Board of Forestry and Fire Protection certified the PEIR and approved the CalVTP on December 30, 2019.

The PEIR is consistent with CEQA Guidelines Section 15168 for streamlining of later activities. To use the PEIR for a particular project, CAL FIRE or other project proponents must evaluate the later activities associated with each vegetation treatment project to determine whether such activities have been analyzed in this PEIR. Such evaluations must ascertain whether these future vegetation treatment projects are consistent with the activities contained in the CalVTP and would have effects that were analyzed in the PEIR. If the project proponent finds that the impacts were analyzed in the PEIR, and no new or substantially more severe significant effects could occur or no new mitigation measures would be required for a subsequent treatment project, the project can be found to be "within the scope" of this PEIR. In this circumstance, no additional CEQA documentation would need to be prepared or publicly circulated.

The Big Basin Redwood Wildfire Resilience Project is addressed in the "Project Specific Analysis and Addendum to the PEIR for the Inland Big Basin Redwoods State Park Forest Health and Resilience Project" (PSA-Addendum; Exhibit 3) prepared and adopted by California State Parks in May 2025. The PSA-Addendum evaluates the "Forest Management Strategy for Big Basin Redwoods State Park, Butano State Park, and Año Nuevo State Park," which includes wildfire resilience treatments through-out 9,977.25 acres of Big Basin Redwood State Park. Since preparation of the PEIR, no new circumstances have occurred, and no new information has been identified requiring new analysis or verification. Staff, therefore, recommends that the Conservancy find that no additional CEQA documentation beyond the PSA-Addendum is required for the Big Basin Redwood Wildfire Resilience Project.

Pursuant to the Conservancy's obligation as a responsible agency under CEQA, Conservancy staff have reviewed the PEIR and the PSA-Addendum. The proposed project area is located within the PSA-Addendum's 5,229.66 acres of CalVTP treatable landscape and the recommended CEQA findings address the Big Basin Redwood Wildfire Resilience Project. The proposed treatment type for this PSA/Addendum is ecological restoration, which is consistent with the PEIR. The treatment activities for the Big Basin Redwood Wildfire Resilience Project include mechanical and manual methods and pile burning. The project does not include broadcast burning and targeted herbicide application.

The PSA-Addendum identifies the standard project requirements (SPRs) and mitigation measures (MMs) from the CalVTP that are applicable to the specific project. SPRs are similar to best management practices and are incorporated into the project activities. While the Conservancy has reviewed the SPRs, the Conservancy's analysis focuses on the MMs.

For the following resource areas, the PSA-Addendum indicated that the specific project will have potentially significant environmental effects; however, changes or alterations have been required in, or incorporated into, the project through SPRs and MMs that mitigate to less than significant each of the potentially significant effects:

- Biological Resources
- Hazardous Materials, Public Health, and Safety

For the following resource areas, the PSA-Addendum indicated that the specific project will have significant environmental effects that although minimized or reduced by mitigation measures will not be less than significant level, either because no mitigations measures are available or mitigation measures were considered but identified as infeasible due to specific economic, legal, social, technological, or other considerations:

- Air Quality
- Archeological, Historical, and Tribal Cultural Resources
- Greenhouse Gas Emissions
- Transportation
- Public Services, Utilities, and Service Systems

The PSA/Addendum indicates that these significant and unavoidable impacts are within the scope of the PEIR. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PEIR. A summary of each impact, and associated mitigation measures are included below.

1. Findings for Significant Effects that can be Mitigated to Less-Than-Significant Levels

Biological Resources

Impact	Mitigation Measure
Impact BIO-1: Substantially Affect Special-Status Plant Species Either Directly or Through Habitat Modifications.	MM Bio-1a avoids and protects special status plant species listed under the federal Endangered Species Act (ESA) or California Endangered Species Act (CESA) by establishing buffers around areas where they occur. MM BIO-1b avoids and protects non-listed special status plant species that meet the definition of special status by establishing buffers around areas where they occur and designing treatments to maintain the function of special-status plant habitat. MM BIO-1c will be implemented if avoiding impacts to these species is not possible. In which case, a Compensatory Mitigation Plan will be prepared and the impacts will be compensated by restoring or preserving habitat equivalent to habitat function removed or degraded as a result of treatments.

Impact BIO – 2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications	MM BIO-2a protects wildlife and habitat function for wildlife species listed under the ESA and CESA by requiring project activities to be conducted outside of sensitive periods (breeding and nesting periods) and outside of occupied habitat. MM BIO-2b consists of avoiding injury, mortality, or disturbance and maintaining habitat function for special status wildlife not listed under the ESA or CESA but which meet the definition of special status and are observed during SPRs surveys, by implementing no disturbance buffers with clearly defined markers, and ensuring no project activities are conducted in the area until a biologist or Registered Professional Forester (RPF) determines that the species has vacated the site or is no longer active. For prescribed burning activities, treatments will occur outside of sensitive periods of the species lifecycle. MM BIO-2c will be implemented if impacts to these species are not avoidable. In which case, a Compensatory Mitigation Plan will also be developed and the impacts will be compensated by restoring or preserving habitat equivalent to habitat function removed or degraded as a result of treatments. MM BIO-3a consists of designing treatments to avoid loss of sensitive natural communities and restore natural fire regime and vegetation composition. MM BIO-3b will be implemented if impacts to sensitive natural communities cannot be feasibly avoided, a Compensatory Mitigation Plan will be developed and impacts compensated by restoring or preserving equivalent to habitat function removed or degraded as a result of treatments. MM Bio-3c will be implemented, if after implementation of SPRs, unavoidable loss of riparian habitat a Compensatory Mitigation Plan will be developed and impacts compensated by restoring or preserving equivalent to habitat function removed or degraded as a result of treatments.
Impact BIO-5: Interfere Substantially with Wildlife Movement Corridors or Impede Use of Nurseries	MM BIO-5 will be implemented if nursery sites are detected during SPRs surveys, which requires preserving nursery habitat and applying a no disturbance buffer to avoid nursery sites as established by a biologist or RPF.

Hazardous Materials, Public Health, and Safety

Impact	Mitigation Measure

Impact Haz-3: Expose the Public or Environment to Significant Hazards from Disturbance to Known Hazardous Material Sites within the project area.	MM Haz-3 consists of identifying hazardous waste sites prior to vegetation treatment activities that require disturbing soil such as mechanical treatments or prescribed burning. If planned treatment locations are found on the DTSC EnviroStor website as containing potential soil contamination that has not been cleaned up and deemed closed by DTSC, the area will be marked and no prescribed burning or soil disturbing treatment activities will occur within 100 feet of the site boundaries.

2. Findings for Potentially Significant and Unavoidable Effects

Air Quality

Impact	Mitigation Measure	Determination
Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that Would Exceed California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS)	MM AQ-1 requires, where feasible, the implementation and documentation of emission reduction techniques for on road and off road equipment.	Impact remains potentially significant and unavoidable.
Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk	SPRs applicable to prescribed burning are designed to reduce risk of exposing people to smoke, but prescribed burning could result in short term exposure to toxic air contaminants. No feasible mitigation measures exist, other than what is listed in the SPRs.	Impact remains potentially significant and unavoidable.
Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning	Implementation of SPRs applicable to burning are designed to reduce risk of exposing people to smoke, including odor, but exposure to objectionable odor may still exist during prescribed fire. No additional mitigation measures are feasible	Impact remains potentially significant and unavoidable.

The determination that the mitigation measure, where feasible, will reduce the impact to Air Quality, but the impact will remain potentially significant and unavoidable, is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PSA.

Archaeological, Historical, and Tribal Cultural Resources

Impact	Mitigation Measure	Determination
Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources	The heavy equipment used may result in ground disturbance as vegetation is removed. Prescribed burning could damage above ground archaeological features, such as bedrock mortars, lithic scatters, historic-era foundations, and historic-era trash scatters. MMCUL-2 requires that if a prehistoric or historic-era subsurface archaeological feature or deposit is discovered, all ground-disturbing activities within 100 feet of the resource will be halted and a qualified archaeologist will assess the significance of the find. If an archaeologist finds that the discovery is significant, the archaeologist will work with the project proponent to develop appropriate procedures to protect the integrity of the resource.	Impact remains potentially significant and unavoidable.

The determination that the mitigation measure will reduce the impact to Archaeological, Historical, and Tribal Cultural Resources if there is an inadvertent discovery, but the impact will remain potentially significant and unavoidable, is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PSA.

Greenhouse Gas (GHG) Emissions

Impact	Mitigation Measure	Determination
Impact GHG-2: Generate GHG Emissions through Treatment Activities due to the use of equipment and prescribed burning, including pile burning	MM GHG-2 requires implementation of measures to reduce GHG emissions from prescribed burning, such as reducing the total area burned, reducing fuel loading by removing fuels before ignition, and scheduling burns before new fuels appear.	Impact remains potentially significant and unavoidable.

The determination that the mitigation measure will reduce the impact to Greenhouse Gas Emissions, but the impact remains potentially significant and unavoidable, is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PSA.

Transportation

Impact	Mitigation Measure	Determination

Impact TRAN-3: Result in a Net Increase in vehicle miles traveled	Treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the proposed project would require vehicle trips to transport crew members and equipment to the treatment areas. The increase in vehicle trips would be temporary and dispersed over multiple roadways. MM AQ-1 encourages workers to carpool and/or use public transportation when it is feasible to reduce vehicular trips for vegetation treatments; however, carpooling and public transportation may not be feasible for most workers.	Impact remains potentially significant and unavoidable.

The determination that the mitigation measure, where feasible, will reduce the impact to Transportation, but the impact remains significant and unavoidable, is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PSA.

Public Services, Utilities, and Service Systems

Impact	Mitigation Measure	Determination
Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity	No feasible mitigation measures are available. SPR UTIL1 requires that solid waste disposition plan is developed for any biomass material that is disposed outside the project area.	This impact is identified as potentially significant and unavoidable for the full Project area covered by the PSA. However, the biomass generated through the project is not expected to be removed to an offsite location, but rather be disposed of through pile burning or mastication as chips or lop and scattered for habitat features. Therefore, the project may not exceed the capacity of existing local infrastructure in Santa Cruz County.

No feasible mitigation measures are available. Per the PSA, the impact to Public Services, Utilities, and Service Systems remains potentially significant and unavoidable, consistent with the PEIR, and would not constitute a substantially more severe impact than what was covered in the PSA.

3. Statement of Overriding Considerations

If a project has unavoidable significant environmental effects, the CEQA Guidelines, Section 15093, require the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific benefits of the project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable." The overall environmental benefits of the project, as detailed in the Project Summary section of this staff recommendation warrant the Conservancy's decision to approve the project.

The project's public benefits that justify proceeding with the project despite the unavoidable environmental risks include reducing risk to life, natural resources, and property in Santa Cruz County; enhancing one of California's last remaining old-growth coast redwood forests; creating a natural environment that's more resilient to wildfire; expediting restoration and forest management; and leveraging current science to ensure the project remains adaptable.

For these reasons, Conservancy staff recommend that the Conservancy find that the project, as mitigated, avoids or reduces to less than significant all potentially significant environmental effects, except for the unavoidable significant environmental effects to Air Quality; Archeological, Historical, and Tribal Cultural Resources; Greenhouse Gas Emissions; Transportation; and Public Services, Utilities, and Service Systems. With respect to these unavoidable significant environmental effects, Conservancy staff recommend that the Conservancy find that the economic, social, environmental, and public safety benefits of the project outweigh the unavoidable significant environmental effects, thereby warranting its approval.

Upon approval of the project, Conservancy staff will file a Notice of Determination.