

Exhibit D

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Fire Fuel and Forest Health Management Plan for Santa Cruz County Certified by the California Coastal Commission.

The California Coastal Commission recently (July 8, 2021) approved and certified the **Santa Cruz County Resource Conservation District Forest Health and Fire Resilience Public Works Plan** for vegetation treatment activities undertaken pursuant to the Board of Forestry's California Vegetation Treatment Program. The CCC also certified a similar Public Works Plan for vegetation treatment for San Mateo County. These plans are designed to meet all state and federal regulatory requirements, while permitting fire fuel management beyond individual lots, extending to tens of thousands of acres, as in the case of Santa Cruz County. Following is a copy of the CCC staff report recommending approval of the Plan for Santa Cruz County.

SUMMARY OF STAFF RECOMMENDATION The Santa Cruz County Resource Conservation District (RCD) prepared the Santa Cruz County Forest Health and Fire Resilience Public Works Plan (PWP) to allow the RCD to help facilitate the planning, review, and authorization of vegetation treatment projects within the County's coastal zone to improve forest health, restore ecosystems, and increase wildfire resilience. Due to historic fire suppression that has led to an accumulation of fuel loads, coupled with drought, a warming climate, and the spread of invasive species, larger and more catastrophic wildfires are threatening the county's communities and natural resources. The PWP will address these risks through vegetation treatment that will align fire prevention planning with the protection of coastal resources to create healthy and resilient forests. The PWP is designed to dovetail with the California Vegetation Treatment Program (CalVTP), which was developed under the direction of the California Board of Forestry and Fire Protection (BOF) and in cooperation with the California Department of Forestry and Fire Protection (CalFIRE) to reduce wildfire risks as one component of the range of actions being implemented by the State to respond to California's wildfire challenges. Importantly, the State's strategy relies on an increase in the pace and scale of PWP-3-VTP-21-0003-1 Santa Cruz County Forest Health and Fire Resilience Public Works Plan 2 vegetation treatment to reduce those risks. In addition to compliance with the State's fire planning efforts, the PWP applies additional efficiencies over and above implementation of the CalVTP by addressing specific local coastal issues and ensuring full consistency with the Santa Cruz County Local Coastal Program (LCP), which is the standard of review for this PWP. The PWP provides for efficient programmatic streamlining of both California Environmental Quality Act (CEQA) compliance and Coastal Act authorizations through a framework within which identified vegetation treatment projects can be analyzed and implemented under a coordinated plan that relies on the standards (called Standard Project Requirements, or SPRs) and mitigation measures adopted as part of the certified CalVTP Programmatic Environmental Impact Report (PEIR), as well as coastal-specific standards (Coastal Vegetation Treatment Standards, or Coastal VTS) developed collaboratively by Commission and RCD staff. The PWP would enable the RCD and project partners to design and implement multiple critical fire resilience projects throughout the 52,500-acre PWP program area over a 10- year period. Vegetation treatment activities under this PWP are categorized as either "forest health" projects designed to restore and enhance ecosystems, including to prevent fire behavior to which the ecosystem is not adapted, or "fire prevention" projects that will protect existing structures and infrastructure, such as through strategic fuel breaks and defensible space clearances. Both types of projects are intended to enhance habitat values as much as possible when they affect habitat areas in the County, and the RCD indicates that the majority of PWP projects would be forest health projects. Vegetation treatment could be carried out using prescribed burning, mechanical treatment (e.g., use of

masticators), manual treatment (e.g., use of chainsaws), prescribed herbivory, and/or herbicide application. As proposed under the PWP, projects would be designed in a manner that protects coastal resources while meeting fire resiliency goals. Qualifying projects must be covered by the PWP, must incorporate CalVTP PEIR and Coastal VTS requirements, must incorporate certain specific LCP habitat and cultural resource protection standards, and must include project and program monitoring. Staff believes that the PWP will provide an important tool for helping to reduce fire danger in the County while simultaneously protecting forests and forest health. Importantly, although the PWP is designed to allow the RCD to facilitate regulatory authorizations for interested land managers and landowners in the County's coastal zone, it should be noted that such land managers and landowners are not limited to the PWP for permitting vegetation treatment projects. On the contrary, the PWP simply provides a streamlined Coastal Act authorization vehicle for such projects, but vegetation treatment activities may continue to be authorized directly through the County pursuant to the LCP and consistent with any other necessary CEQA documentation. Staff's analysis has concluded that the PWP is consistent with the Santa Cruz County LCP, and that there are no other feasible alternatives or mitigation measures available that would further lessen any significant adverse effect that the approval would have on the environment. Thus, staff recommends that the Commission certify the PWP-3-VTP-21-0003-1 Santa Cruz County Forest Health and Fire Resilience Public Works Plan 3 proposed PWP as submitted