

Memorandum

Date: December 11, 2025
To: California Coastal Commission and Interested Parties
From: Kellyx Nelson, Executive Director, San Mateo Resource Conservation District
Timothy Federal, Senior Program Manager, San Mateo Resource Conservation District
Subject: **Notice of Impending Development for the Coastal Santa Cruz Mountains, State Parks Forest Health Initiative (SMC-NOID-0007-25)**

Pursuant to Public Resource Code Section 30606 and California Coastal Commission Regulations Section 13358 and Section 13359, this letter is presented to provide Notice of Impending Development (NOID) for the Coastal Santa Cruz Mountains: State Parks Forest Health Initiative project in San Mateo and Santa Cruz Counties. Such notice must be submitted to the Commission before a public agency proposing a public works project pursuant to a certified Public Works Plan (PWP) may commence the project.

Project Description

In the Fall of 2020, the CZU Lightning Complex fires (CZU Fire) burned 86,509 acres throughout Santa Cruz and San Mateo counties. This wildfire exhibited extreme fire behavior, fueled by dense vegetation and decades of accumulated forest debris. The fire burned through nearly the entirety of Big Basin Redwoods State Parks (BBRSP), portions of Año Nuevo State Parks (ANSP) and Butano State Parks (BSP), and much of the surrounding landscape. Its impact was catastrophic, affecting ecosystems, destroying homes and infrastructure, and tragically claiming one life. Prior to 2020, decades of fire suppression and recent droughts had led to heavy surface fuel buildup, creating conditions for a high-severity fire. These factors contributed to rapid fire spread, prolonged smoke impacts, and extensive damage to critical habitats and human communities.

Today, the aftermath of the CZU Fire presents ongoing challenges. Areas that burned at lower intensities now contain dense dead and dying understory vegetation, while higher-intensity burned areas hold large numbers of fire-killed trees. Without proactive management, these degraded conditions could accelerate shifts in vegetation types and further threaten forest health.

California State Parks and its partners are committed to protecting both natural resources and neighboring communities, and in order to do so must actively manage forested lands that remain vulnerable even after the 2020 fires. By reintroducing appropriate disturbances, such as removal of dead and dying trees, mastication of ladder fuels, prescribed fire and other vegetation management, this project aims to build more diverse, resilient forests and reduce the threat of catastrophic wildfire.

In 2023, CA State Parks, in collaboration with Save the Redwoods League, San Mateo RCD (SMRCD), and RCD of Santa Cruz County (RCDSCC), developed a Forest Management Strategy (FMS) to guide long-term forest restoration efforts throughout BBRSP, ANSP, and BSP. Subsequently, CEQA was completed for treatments proposed in the FMS by completing a Project-Specific Analysis (PSA) and Addendum to the California Vegetation Treatment Program (CalVTP), a statewide Programmatic Environmental Impact Report (PEIR) analyzing vegetation management

methods and their impacts. Included in the PSA for this project are the Coastal Vegetation Treatment Standards (CVTS) for Coastal Act compliance. This proposed project, the Coastal Santa Cruz Mountains: State Parks Forest Health Initiative, consists of vegetation treatments on up to approximately 11,995 acres of land managed by the Santa Cruz District of CA State Parks (CSP), Save the Redwoods League (STRL), and the Sempervirens Fund (SVF).

The mission of the California Department of Parks and Recreation is “To provide for the health, inspiration and education of the people of California by helping to preserve the state’s extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation.” This project will accomplish that by implementing ecologically restorative treatments using methods including manual and mechanical vegetation management, prescribed burning, and targeted herbicide application. Treatments will restore ecological processes by reintroducing periodic, low-intensity disturbance to prevent the overgrowth of understory vegetation and ladder fuels and promoting a mosaic of vegetation types, reducing the density and continuity of dead, dying, and overly dense vegetation, and improving habitat for rare, threatened, and endangered plant and animal species. The result will be forested areas that are healthier, more diverse, more resilient to threats such as wildfire, drought, pathogens, and pests, and able to store more carbon for longer periods of time to help combat climate change.

Treatments may occur on up to 11,994.7 acres, of which 8,876 acres lie within the Coastal Zone in Santa Cruz County, and 2,569.6 acres lie within the Coastal Zone of San Mateo County. There are 550.1 acres analyzed in the PSA outside the Coastal Zone. Within San Mateo County, (SMC) prescribed broadcast burning is proposed for approximately 395.1 acres, and prescribed pile burning is proposed to be allowed across approximately 2,569.6 acres of the project area. Pile burning is used as a means of biomass disposal following manual thinning of vegetation and prescribed broadcast burning will occur seasonally as weather windows and resources become available, with the hopes of reintroducing low intensity fire in areas where it can safely occur. Mechanical treatments are proposed for approximately 627.4 acres in SMC and will occur primarily on flat to moderate slopes less than 40% and no greater than 50%. Machinery may be used to remove dense stands of understory vegetation and ladder fuels to maintain a healthy overstory and prepare an area for a prescribed burn. Manual treatments are proposed for up to 2,569.6 acres in SMC. These treatments use hand tools and hand-operated power tools, are generally not limited by slopes and can be implemented in locations otherwise not accessible for mechanical treatment. Like mechanical treatments, manual treatments will remove dense stands of understory vegetation and ladder fuels to maintain a healthy component of existing vegetation. Mechanical and Manual methods may be used in preparation for prescribed burning by reducing ladder fuels, and to create control lines around proposed burn blots to allow for safe use of beneficial fire. Herbicide would be used to prevent the spread and regrowth of invasive species within the treatment areas and is expected to occur on less than 2 acres total in the SMC project area. All treatments will be implemented as described in the PSA, except that treatment in chaparral or coastal sage scrub through this NOID may only occur if one of the following applies: (a) ecological restoration treatments consisting of removal of flammable, non-native vegetation; or (b) treatments where the stand of chaparral or coastal sage scrub has a state rarity rank of S4 (apparently secure) or S5 (demonstrably secure) according to CDFW (<https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#listsExternal Link>), and has generated following a fire within the last 15 years in an area previously characterized by woodland or forest before the fire, as evidenced by satellite imagery and as defined in accordance with the Key to Main Vegetation Categories in the CNPS *Manual of California Vegetation*. CSP will provide annual updates on the project website

(<https://reimaginingbigbasin.org/forest-stewardship/>) of treatments implemented in the past year including the treatment type, acres treated, a map of where treatment has occurred, and will highlight upcoming treatments.

Environmental Documents

The SMRCD's San Mateo County Forest Health and Fire Resilience Public Works Plan, and the RCDSCC's Santa Cruz County Forest Health and Fire Resilience Public Works Plan (PWP), have both been certified by the Commission. The PWPs require adherence to the Coastal Vegetation Treatment Standards within each PWP and additional information about project design within the Santa Cruz and San Mateo County Coastal Zones. The PWPs also provide a streamlined mechanism for Coastal Act compliance in combination with the CEQA compliance process facilitated by the CalVTP Program Environmental Impact Report.

The CalVTP PEIR was certified by the California Board of Forestry and Fire Protection in 2019. It evaluates the potential environmental effects of implementing qualifying vegetation treatments to reduce the risk of wildfire throughout the State Responsibility Area (SRA) in California. It was designed for use by many state and local agencies and special districts to accelerate vegetation treatment project approvals by finding them to be within the scope of the PEIR through the preparation of a Project Specific Analysis (PSA). The PSA must demonstrate that the proposed activities and their impacts are included in the CalVTP PEIR, and Standard Project Requirements and (SPRs) and mitigation measures from the CalVTP PEIR will be integrated into the project to avoid and minimize impacts. The CalVTP PEIR provides a streamlined mechanism for CEQA compliance for vegetation treatment projects.

A PSA was prepared that evaluates this project as a later activity covered by the CalVTP PEIR as required pursuant to CEQA and includes information that demonstrates consistency with the CVTS as required pursuant to the Coastal Act and PWP. Direct response to the CVTS for the project can be found in Attachment E of the PSA.

Consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168, an Addendum to an EIR is appropriate when the previously certified EIR has been prepared and changes or revisions to the project are proposed, or the circumstances surrounding the project have changed. This is valid as long as these changes or revisions would not result in any new or substantially more severe significant environmental impacts than were covered in the PEIR. This PSA proposes the inclusion of areas outside of the CalVTP treatable landscape, which constitutes a proposed change or revision to the project, compared to the originally certified PEIR. Each impact analysis in the PSA/Addendum includes additional specific justification for inclusion of areas outside of the treatable landscape, which supports an Addendum to the CalVTP PEIR. The impact analysis within the PSA/Addendum evaluates whether including an addition of geographic area, would result in significant impacts that would be substantially more severe than those covered in the CalVTP PEIR, or would result in any new impacts that were not analyzed in the PEIR. For this project, analyses have indicated that the inclusion of areas outside of the originally determined treatable landscape will not result in any new or more severe impacts than those analyzed in the CalVTP PEIR.

This NOID, as well as all supporting environmental documents, including the PSA and the CVTS are available for public review at the Coastal Commission office located at 455 Market Street, Suite 300, San Francisco, California 94105, beginning December 11, 2025, and continuing through the Commission's hearing for this matter at its meeting February 4-6, 2026. At least 10 days prior to the Coastal Commission's February 4-6 meeting, the documents will also be available for review and

download online on the California Coastal Commission's Agenda webpage, found under Meetings, Monthly agenda: <https://www.coastal.ca.gov/>. Additionally, the QR code below links to a webpage with links to all of the relevant documents and websites discussed in this NOID.

Consistency with PWP

The final San Mateo County Forest Health and Fire Resilience PWP was approved by the RCD's Board of Directors on June 17, 2021 ([Notice of Forest Health and Fuel Reduction Public Works Plan | San Mateo RCD](#)). The PWP was certified by the California Coastal Commission on July 8, 2021. The project will be carried out pursuant to the PWPs as documented in the PSA/Addendum and CVTS.

Approval Process

For the purposes of CEQA, CA State Parks is the project proponent and acting as the lead agency for the preparation of the PSA/Addendum. The San Mateo Resource Conservation District and the California Coastal Commission (CCC) are all responsible for reviewing the PSA and response to the CVTS and the CCC is solely responsible for determining whether the proposed project is consistent with the PWP. Coastal Commission review of a proposed project is deemed complete on the date of a Commission determination that the project is consistent with the PWP. The PWP clearly articulates the process for all entities to review, determine consistency, and approve the project. SMRCD's role solely pertains to the project areas within San Mateo County. Submittal of this NOID constitutes SMRCD's approval of the project to be included in SMRCD's PWP.

The RCD staff contact for this project is:

Timothy Federal, Senior Program Manager
San Mateo Resource Conservation District
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650-712-7765 x.125

Consistent with the requirements of the PWP, the RCDs notified the Commission in advance of its intent to submit a NOID for the project. After receiving the NOID, the Commission has five working days to deem the NOID complete and filed or request additional information. The Commission is also responsible for reviewing the PSA and response to the CVTS and determining whether the project is consistent with the PWP. Commission review of a proposed project is deemed complete on the date that the project is determined to be consistent with the PWP. The proposed Commission hearing to approve the PSA/Addendum and act on the NOID will occur:

FEBRUARY 4 - 6, 2026

Oceano Hotel & Spa
280 Capistrano Rd.
Half Moon Bay, CA 94019

The specific date that this item will be considered by the Commission can be found by viewing the Coastal Commission's Agenda webpage, found under Meetings, Monthly agenda: <https://www.coastal.ca.gov/>. The Coastal Commission staff contact for this project is:

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Figure 1: Scan QR Code for list of links relevant to this notice