Application Number: 231042

Applicant: Bringhurst LLC, Alaina Bringhurst **Agenda Date:** October 11, 2023

Stewart

 Owner: Bringhurst LLC
 Agenda Item #: 6

 APNs: 089-121-82 and 089-121-83
 Time: After 9:30 a.m.

Site Location: Adjacent to 15530 Forest Hill Drive, Boulder Creek

Project Description: Proposal to rezone a portion of one legal lot of record with two APN's (089-121-82, 089-121-83) from the Special Use (SU) zone district to the Timber Production (TP) zone district, via Adjacency Rezoning. The proposal would result in a split-zoned parcel, with TP zoning on the southern half, SU and PF (Public Facilities) on the northern half.

Location: Parcels are located east of the Bear Creek Estates Subdivision, which is approximately 2.2 miles northeast of the intersection of Bear Creek Road and Highway 9.

Permits Required: Zoning Map Amendment

Supervisorial District: 5th District (District Supervisor: Bruce McPherson)

Staff Recommendation:

• Adopt the attached resolution (Exhibit D), sending a recommendation to the Board of Supervisors to approve Application 231012, to adopt the ordinance rezoning the parcels from the Special Use (SU) zone district to the TP (Timber Production) zone district (Exhibit E), and to determine that the proposal exempt from further review under the Environmental Quality Act.

Project Description & Setting

The subject parcels are located approximately 2.2 miles northeast of the intersection of Highway 9 and Bear Creek Road, in the San Lorenzo Valley Planning Area. The vacant parcels, which do not have an assigned address, border the east side of the Bear Creek Subdivision with closest proximity to 15530 Forest Hill Road. Development in the vicinity ranges from the residential subdivision to the west to undeveloped or lightly developed TP (Timber Production) zoned parcels to the east, south, and north.

The two parcels, APNs 089-121-82 and 089-121-83, are one continuous 60-acre lot of record that is bisected by a tax boundary and assigned two separate parcel numbers. The larger portion, APN ending in -82, is approximately 40-acres and the smaller portion, APN ending in -83, is approximately 20-acres. Both portions of the parcel are characterized by steep slopes and heavy forest. Both portions of the parcel are zoned SU (Special Use) on their respective southern and northern portions, divided by a roughly 500-foot strip of PF (Public Facilities) zoned land. Of the approximately 60 acres of land, about 10-acres are zoned PF. The last timber harvest occurred

Application #: 231042

APN: 089-121-82 and 089-121-83

Owner: Bringhurst LLC

approximately 25- years ago, prior to the adoption of the current zoning regulations, which prohibits timber harvesting on SU-zoned parcels.

The proposed project would rezone the SU portions of the parcel to TP and retain the 10-acres of PF zoning. The proposal is facilitated under California Government Code Section 51113.5, which allows a property owner with timberland to rezone their contiguous land for additional timber production. The only requirements for this type of rezoning are that the parcels must meet the following definitions found in Government Code section 51104(f) and (g):

- (f) "Timberland" means privately owned land, or land acquired for state forest purposes, which is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, and which is capable of growing an average annual volume of wood fiber of at least 15 cubic feet per acre.
- (g) "Timberland production zone" or "TPZ" means an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h). With respect to the general plans of cities and counties, "timberland preserve zone" means "timberland production zone."

Subdivision (h) states as follows:

- (h) "Compatible use" is any use which does not significantly detract from the use of the property for, or inhibit, growing and harvesting timber, and shall include, but not be limited to, any of the following, unless in a specific instance such a use would be contrary to the preceding definition of compatible use:
 - (1) Management for watershed.
 - (2) Management for fish and wildlife habitat or hunting and fishing.
 - (3) A use integrally related to the growing, harvesting and processing of forest products, including but not limited to roads, log landings, and log storage areas.
 - (4) The erection, construction, alteration, or maintenance of gas, electric, water, or communication transmission facilities.
 - (5) Grazing.
 - (6) A residence or other structure necessary for the management of land zoned as timberland production.

In accordance with Section 51113.5 of the State Government Code, and Section 51104 by reference, the project meets the following criteria for rezoning to Timber Production:

- 1) The property is contiguous with Timber Production zoned property under the ownership of one person, as defined in Section 38106 of the Revenue and Taxation Code.
- 2) The property is timberland, as it is capable of producing an average of 55.3 cubic feet of timber per acre annually.
- 3) The uses on the parcel, including watershed, wildlife habitat, and timber management,

APN: 089-121-82 and 089-121-83

Owner: Bringhurst LLC

comply with the Timber Production Zone uses set forth in Section 13.10.372, and as determined in the materials submitted by the Registered Professional Forester (Exhibit C).

Zoning & General Plan Consistency

The parcel (APNs 089-121-82 and 089-121-83 combined) is currently split zoned and has two General Plan designations. The majority of the parcel zoned SU (Special Use) with an R-M (Mountain Residential) General Plan designation. A small portion of the parcel, (about 10-acres of 60 total acres) is zoned PF (Public Facilities) and has a P (Public Facility/Institutional) General Plan designation. The split zoning is reflective of previous land use and property ownership; the San Lorenzo Valley Water District had previously owned the land under a different parcel configuration.

TP is not an implementing zone district in the P General Plan designation; therefore, the proposal would not include rezoning the portions of the parcel that is currently zoned PF and the parcel would continue to maintain split Zoning and General Plan designations and resulting in General Plan consistency.

Conclusion

As proposed and conditioned, the project is consistent with all applicable codes and policies of the Zoning Ordinance and General Plan/LCP. Please see Exhibit "B" ("Findings") for a complete listing of findings and evidence related to the above discussion.

Staff Recommendation

• Adopt the attached resolution (Exhibit G), sending a recommendation to the Board of Supervisors to approve Application 231042, to adopt the ordinance rezoning the parcels from the Special Use (SU) zone district to the TP (Timber Production) zone district (Exhibit H), and to determine that the proposal exempt from further review under the Environmental Quality Act.

Supplementary reports and information referred to in this report are on file and available for viewing at the Santa Cruz County Planning Division, and are hereby made a part of the administrative record for the proposed project.

The County Code and General Plan, as well as hearing agendas and additional information are available online at: www.sccoplanning.com

Report Prepared By:

Evan Ditmars Santa Cruz County Planning 701 Ocean Street, 4th Floor Santa Cruz CA 95060

Phone Number: (831) 454-3227

Application #: 231042 Page 4

APN: 089-121-82 and 089-121-83 Owner: Bringhurst LLC

E-mail: evan.ditmars@santacruzcounty.us

Report Reviewed By:

Jocelyn Drake Assistant Director Development Review

Santa Cruz County Planning

Exhibits

- A. Statutory Exemption (CEQA determination)
- B. Assessor's, Location, Existing and Proposed Zoning and General Plan Maps
- C. Foresters Report, Prepared by DKM Forestry
- D. Planning Commission Resolution
- E. Ordinance for Proposed Rezoning
- F. Parcel information
- G. Comments & Correspondence

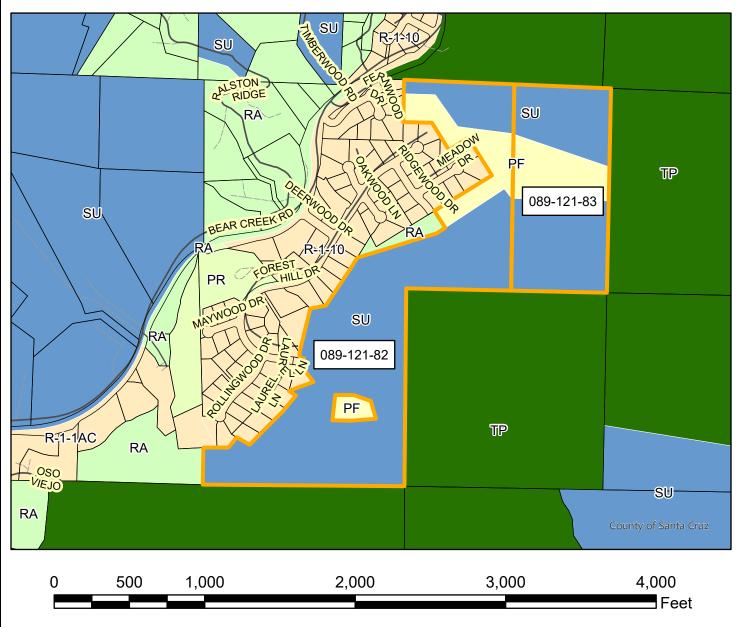
APN: 064-201-14, 064-20 Owner: Bringhurst LLC

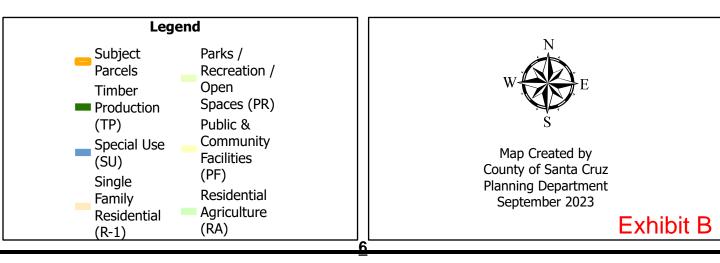
CALIFORNIA ENVIRONMENTAL QUALITY ACT NOTICE OF EXEMPTION

The Santa Cruz County Planning Division has reviewed the project described below and has determined that it is exempt from the provisions of CEQA as specified in Sections 15061 - 15332 of CEQA for the reason(s) which have been specified in this document.

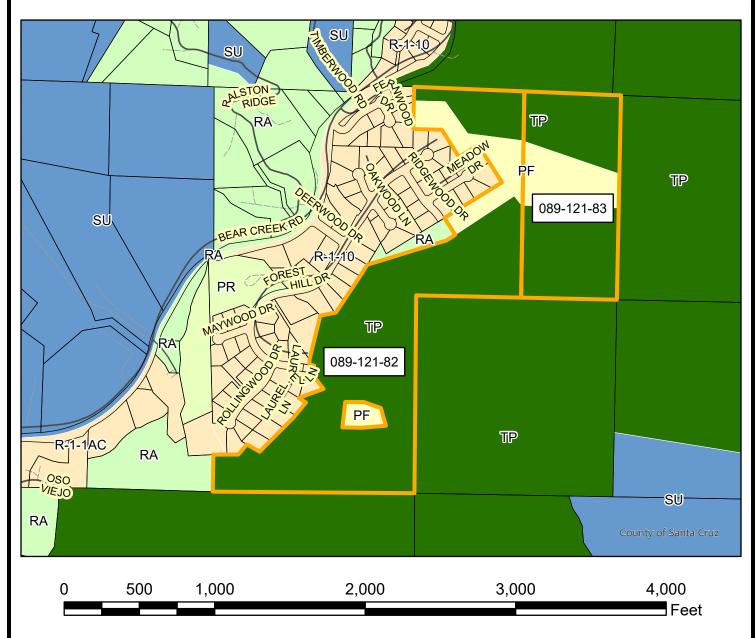
Application Number: 231042 Assessor Parcel Numbers: 089-121-82 and 089-121-83 Project Location: Just east of 15530 Forest Hill Drive, Boulder Creek
Project Description: Proposal to rezone two parcels from SU to TP
Person or Agency Proposing Project: Alaina Bringhurst Stewart, Bringhurst LLC
Contact Phone Number: (510) 846-3862
A The proposed activity is not a project under CEQA Guidelines Section 15378. B The proposed activity is not subject to CEQA as specified under CEQA Guidelines Section 15060 (c). C Ministerial Project involving only the use of fixed standards or objective measurements without personal judgment.
D. X Statutory Exemption other than a Ministerial Project (CEQA Guidelines Section 15260 to 15285).
E. <u>Categorical Exemption</u>
Specify type: Article 18, Section 15264
F. Reasons why the project is exempt:
Section 15264. Timberland Preserves: Local agencies are exempt from the requirement to prepare an EIR or Negative Declaration on the adoption of timberland preserve zones under Government Code Section 51100 et seq. (Gov. Code, Sec. 51119).
The proposed project would change the zoning designation of two parcels from Special Use (SU) to Timber Production (TP) for the purpose of facilitating a timber harvest.
In addition, none of the conditions described in Section 15300.2 apply to this project.
Date:
Evan Ditmars, Project Planner

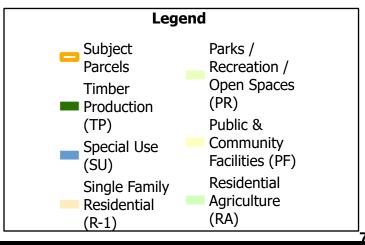
Existing Zoning





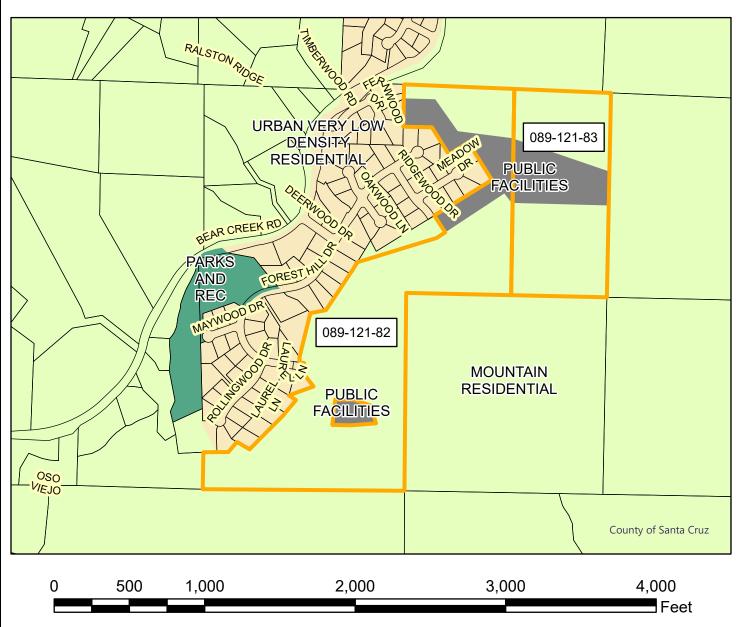
Proposed Zoning

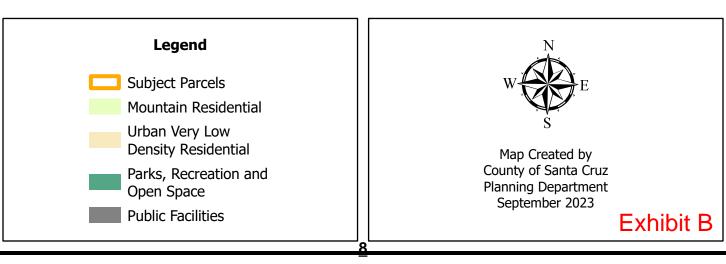






Existing and Proposed General Plan Designation







DKM Forestry Registered Professional Forester 3120

483 Spruce St. Half Moon Bay, CA. 94019

(650) 703-1452

dennis@dkmforestry.com dkmforestry.com

BRINGHURST LLC ADJACENCY REZONE

Introduction: I have been hired to assist the landowner, Bringhurst LLC, in rezoning Santa Cruz County Assessor parcel numbers (APN) 089-121-82 & 089-121-83. The parcels are listed on the County's GIS site as 15.23 acres and 19.63 acres, respectively and are both currently zoned as SU/PF. The subject parcels are adjacent to multiple properties zoned TP, including adjacent parcel 089-231-01 which is owned by Bringhurst LLC.

General Property Description: This property is located approximately one and a half miles East of Boulder Creek, Santa Cruz County, California, in portions of Section 16 & 21, Township 9 South, Range 2 West (MDB&M). The property is accessed from the North via Highway 9 to Bear Creek Road, then via a private forest road. There is a second route into the area via Love Creek Road.

The property rises from about 600 feet to about 1,300 feet at the top of the ridge near the east side of the property. It contains a mix of internal slope variation due to watercourse drainages but is estimated to be 60% northwest-facing, 10% east-facing, and 30% south-facing. The property's topography is highly variable, with steep canyon zones as well as mid-slope benches and flatter ridgetops. Midslopes vary from gentle (10-40%) to nearly flat along several of the trending ridges. The canyon zones average 40-65%, with some of the steepest areas more than 100%.

The Cooper-Clark Landslide Deposit Map for the Castle Rock Ridge Quadrangle shows many areas in the property as part of probable landslides. Present topography, such as undulating hillslopes and steep scarp faces, is consistent with an older slide. Based on plumb second-growth redwoods, plumb old-growth stumps, and rounded slide scarps, the inactive slides occurred hundreds of years ago. The property as a whole shows minor signs of recent activity.

Exhibit C

Information obtained to determine soil characteristics was taken from Natural Resources Conservation Service. Ben Lomond sandy loam, Ben Lomond-Catelli-Sur, Ben Lomond-Felton soil complexes, and Maymen Stony Loam underlies the property. The soil are well suited for the production of timber. They are deep and well-drained. They are formed in residuum derived from sandstone, siltstone, or shale. The permeability of the soils is rapid. Effective rooting depth is 40 to 60 inches and 20 inches for the Maymen Stony Loam.

The vegetation within the plan area is a typical second-growth redwood and Douglas-fir forest Santa Cruz County. Redwoods persist throughout the plan area overstory, with a small component of Douglas-fir. Redwood stem density is variable throughout the property, with larger-sized stems found near water sources and in the lower elevations giving way to smaller average diameters in the upper elevations. Averaged across the property, it is comprised of approximately 90% redwood and 10% Douglas fir in the overstory. There is a moderate component of hardwood intermixed within the stand. Hardwoods species composition consists of California Bay, tanoak, madrone, coast live oak and Big-leafed maple. Portions of the plan area have a dense understory of various brush species associated with the redwood forest type (i.e. California trailing blackberry, poison oak, and tanoak brush). Introduced invasive plants in the property include French broom, pampas grass, panic veldt grass, and oblong spurge. The forest floor is covered with various grasses and forbes.

Timber Harvest History: Like most other forestlands in this region, the property was clearcut around the turn of the 20th century. A well-stocked second growth redwood dominated forest regenerated subsequent to the clearcut era. The property was selectively logged for second growth twice approximately 25 years ago, resulting in open growing conditions with trees of all sizes. The property is generally comprised of an uneven-aged second growth forest with larger diameter redwoods and Douglas-firs in the overstory and released conifer saplings and seedlings mixing with hardwood species in the intermediate canopy and the understory. The stand has closed in on itself in the last 25 years and the second growth overstory trees are crowded.

Management Objectives and Goals: Upon the successful rezoning of the property, the Bringhurst's will continue to manage the forest for high-quality forest products, while enhancing aesthetic and wildlife values. Although state laws allow for a harvest every 10-years, it is advised that the cutting cycle be maintained nearer a 15-year interval to maximize the volume removed within each cycle and to minimize residual impacts. Future harvests shall focus on the following objectives:

- Prescribe and implement a forest improvement program to consistently improve stocking, maintain and increase tree vigor, and maximize growth.
- Maintain a healthy and vigorous forest of well-spaced trees growing at the highest rates feasible considering the other values of the forest.



- Restore and enhance the timber resource and understory species from past fire damages and reduce future fire hazards, creating a healthy and resilient forest.
- Maintain a high degree of aesthetic consideration during all aspects of forest management.
- Maintain and improve wildlife habitat where possible as part of continuing forest management.

Recommended Logging System

Appropriate logging systems shall incorporate a mix of tractor and cable yarding in order to reach all of the timber, and minimize impacts to the property.

Present and Future Stand Conditions: In early January 2023, I visited the property to conduct a logging feasibility analysis, establish timberland characteristics and inventory the current timber stocking levels. I inventoried 25 fixed area plots measuring height, diameter, and percent defect. A smaller subset of growth inventory was collected using an increment borer to determine the approximate growth capability of the timberland. The inventory was then processed to determine current stocking levels (volume per acre) and growth capability (accrued volume per acre per year) on the parcels. The results of this data are discussed below.

Timber Stocking: To rezone a property to the "Timber Production" zoning a property must meet the timber stocking standards set forth in Section 4561 of the Public Resources Code. Section 4561 states in part:

"The average residual basal area, measured in stems one inch or larger in diameter...in areas which the registered professional forester has determined are Site II classification or lower, the minimum average residual basal area shall be 50 square feet per acre. Rock outcroppings and other areas not normally bearing timber shall not be considered as requiring stocking."

The current timber stocking on parcels average 332 square feet per acre. The residual basal area following any future harvest is not expected to drop below 150 square feet per acre, which well exceeds the minimum stocking standards per PRC 4561.

Timberland: To rezone a property to TP, the property must meet the definition of "timberland". California Government Code Section 51104 defines timberland as:

"Privately owned land capable of growing an average annual volume of wood fiber of at least 15 cubic feet per acre."

The parcels proposed for rezoning are capable of growing an average annual volume of wood fiber of 166 cubic feet per acre and therefore meet and exceed the definition of timberland and the State's stocking standards.

Compatible Use: Current property use of the parcels include watershed, wildlife habitat and timberland. The property is open space land comprised of a mixed redwood/Douglas-fir forest with a mixed hardwood understory. The previous harvest occurred approximately 25 years ago and was selectively harvested. Existing harvest infrastructure, including landings, tractor skid trails, and haul roads are present throughout the property from the previous harvest. The existing infrastructure is suitable to facilitate future harvests. The current and future planned use of the property is expected to be compatible with growing and harvesting timber.

Split Zoning: Parcel 089-121-82 and 83 was formerly owned by the San Lorenzo Valley Water District, and portions are zoned Public Facilities reflecting ownership by the public agency. The property was illegally subdivided into six parcels (3458 O.R. 401). These parcels have been recombined and an affidavit to retain them as one parcel filed with the County Recorders Office (1998-0065520). The county's general plan still uses the legacy boundaries of the illegal subdivision. Meaning that portions for parcels 82 and 83 are currently zoned as SU while other parts are zoned PF. The general plan reflects conditions that are 40 years out of date. This application does not attempt to rectify the legacy general plan and resulting split zoning but rather to work within the legacy system to rezone the SU portions to TP.

Old survey monuments and fence lines exist from when the subject parcels were subdivided, making determining the boundary between the two planning zones possible. The boundary will be flagged with "timber harvest boundary" flagging tape before timber operations. An existing truck road does cross into the PF zoned area for a short distance before crossing back out to the proposed TP zone. This truck road is the main legal access to the property, and through this stretch is in good condition. The road will be maintained as part of any timber harvest. This road is deeded access per 2876 O.R 349.

The portions of the property currently zoned PF qualify as timberland per GOV §51104 but are not stocked with readily merchantable species. Reducing the incentive for the Landowner to pursue a change in the general plan and rezoning these portions. These areas can be described as the top of a sub-ridge with lower site soils supporting Doug-fir and hardwoods. The PF areas have logging infrastructure from 90'. The western portion of the PF zoning, adjacent to the Bear Creek Estates neighborhood, has a conservation easement owned by The Santa Cruz County



Land Trust (5468 O.R. 166). Aside from road maintenance, the PF portions will not be affected by timber harvesting. These areas exist uphill/upstream of timber harvesting and are away from merchantable trees.

Conclusion: The property is well suited for future timber management. The property has been selectively managed for second growth timber in the past and the forest resources are healthy and vigorous resulting in productive-growth rates. The Bringhurst's have indicated that they want to manage the timber resource and stand conditions warrant a harvest. Harvest operations are planned to commence upon the successful rezone to TP, and/or the approval of the appropriate CALFIRE Harvesting Permit.

Thank You,

Dennis McCorkle

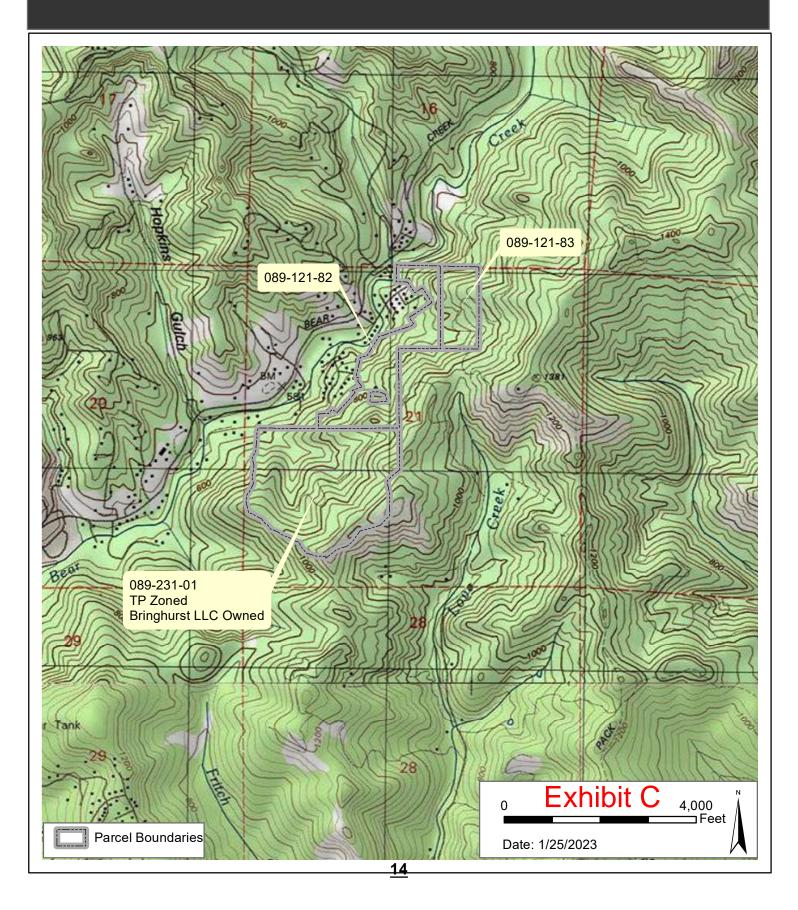
Registered Professional Forester # 3120

M Color

Location

Bringhurst Rezone

LOCATED WITHIN PORTIONS OF SEC 16 & 21, T 9S, R 2W, MDB&M USGS Castle Rock Ridge. SANTA CRUZ COUNTY



BEFORE THE PLANNING COMMISSION OF THE COUNTY OF SANTA CRUZ, STATE OF CALIFORNIA

RESOLUTION NO.

On the motion of Commissioner: duly seconded by Commissioner: the following Resolution is adopted:

PLANNING COMMISSION RESOLUTION SENDING RECOMMENDATION TO THE BOARD OF SUPERVISORS ON PROPOSED REZONING

WHEREAS, the Planning Commission has held a public hearing on Application No. 231042, an application to rezone a portion of one legal lot of record with two APN's (089-121-82, 089-121-83) from the Special Use (SU) zone district to the Timber Production (TP) zone district. The subject parcels are located just east of 15515 Forest Hill Drive in the San Lorenzo Valley Planning Area.

WHEREAS, the Planning Commission has considered all testimony and evidence received at the public hearing and detailed in the attached staff report.

NOW, THEREFORE, BE IT RESOLVED, that the Planning Commission recommends that the Board of Supervisors determine the proposal is exempt from further environmental review under the California Environmental Quality Act (CEQA) pursuant to Section 15264, Statutory Exemption for Timberland Preserves.

BE IT FURTHER RESOLVED, that the Planning Commission recommends that the Board of Supervisors adopt the attached Ordinance amending the County's Zoning Plan and Map pursuant to Santa Cruz County Code Section 13.10.215.

BE IT FURTHER RESOLVED, that the Planning Commission incorporates the findings on the proposed Zoning Map Amendment as contained in the Report to the Planning Commission and in Section II of the attached Ordinance.

PASSED	AND ADOPTED by the Plann	ning Commission of the County of Santa Cruz, State
of California,	, this day of	, 2023, by the following vote:
AYES:	COMMISSIONERS	
NOES:	COMMISSIONERS	
ABSENT:	COMMISSIONERS	
ABSTAIN:	COMMISSIONERS	
		Rene Shepard, Chairperson
ATTEST:		_
JO	OCELYN DRAKE, Secretary	

Exhibit D

APPROVED AS TO FO	ORM:
COUNTY COUNSEL	

ORDINANCE NO	
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ORDINANCE AMENDING ZONING PLAN AND MAP PURSUANT TO CHAPTER 13.10 OF THE SANTA CRUZ COUNTY CODE CHANGING FROM ONE ZONE DISTRICT TO ANOTHER

The Board of Supervisors of the County of Santa Cruz ordains as follows:

SECTION I

The Board of Supervisors finds that the public convenience, necessity and general welfare require the amendment of the County zoning plan and map pursuant to Santa Cruz County Code section 13.10.215, to maintain a stable, desirable, well-balanced pattern of development throughout the County. The Board of Supervisors desires to implement the policies of the County General Plan and Local Coastal Program Land Use Plan regarding two vacant parcels located east of the Bear Creek Estates Subdivision, which is approximately 2.2 miles northeast of the intersection of Bear Creek Road and Highway 9, and that the zoning to be established herein is consistent with all elements of the California Government Code, Santa Cruz County General Plan, and the Santa Cruz County Code.

SECTION II

The Board of Supervisors hereby adopts the Zoning Plan Amendment as described in Section III, and adopts the findings in support thereof without modification as set forth below:

- 1. The proposed zone district will allow a density of development and types of uses which are compatible with the objectives, policies and programs, and land use designations of the adopted General Plan, and conforms with, and is adequate to carry out, the coastal resource protection provisions of the certified Land Use Plan; and
- 2. The proposed zone district is appropriate for the level of utilities and community services available to the land; and
- 3. The character of development in the area where the land is located has changed or is changing to such a degree that the public interest will be better served by a different zone district; and
- 4. The proposed rezoning maintains and provides for priority uses consistent with Sections 2.22.1 and 2.22.2 of the certified Land Use Plan.
- 5. The property meets the requirements of Government Code section 51113.5 and County Code Section 13.10.375(c).

SECTION III

Chapter 13.10 - Zoning Regulations of the Santa Cruz County Code is hereby amended by amending Section 13.10.210 - Zoning Plan to change the following properties from the existing zone district to the new zone districts as follows:

Assessor's Parcel 1	<u>Numbers</u>	Existing Zone Distr	<u>New Zone District</u>
089-121-82 a 089-121-83		SU (Special Use)	TP (Timber Production)
		SECTION IV	
This ordinance shall t	ake effect on	the 31st day after the d	late of final passage.
PASSED AND ADO of the County of Sant			2023, by the Board of Supervisor
AYES: SUPE NOES: SUPE ABSENT: SUPE ABSTAIN: SUPE	RVISORS RVISORS RVISORS RVISORS		
		Chairman of	f the Board of Supervisors
ATTEST: Clerk of th	e Board		
APPROVED AS TO	FORM:		
Assistant County Cou	ınsel		
Exhibit: Rezoning M	ap		
DISTRIBUTION:	County Cour Planning Assessor County GIS	nsel	

Application #: 231042

APN: 064-201-14, 064-201-20 Owner: Bringhurst LLC

Parcel Information

Services Information

Urban/Rural Services Line: ___ Inside ___X_ Outside

Water Supply: N/A Sewage Disposal: N/A

Fire District: County Fire District (CalFire)

Drainage District: Flood Control Zone 8

Parcel Information

Parcel Size: 19 and 40-acres Existing Land Use - Parcel: Vacant, undeveloped

Existing Land Use - Surrounding: Timber production, Residential, Public Facilities Project Access: Proposed access from adjacent APN 089-231-01

Planning Area: San Lorenzo Valley

Land Use Designation: R-M (Mountain Residential), P (Public

Facilities/Institutional)

Zone District: SU (Special Use), PF (Public Facilities)

Comm.

Environmental Information

Geologic Hazards: Not mapped/no physical evidence on site

Fire Hazard: SRA-Moderate

Slopes: >50% over majority of site

Env. Sen. Habitat: Not mapped/no physical evidence on site

Grading: No grading proposed

Tree Removal: Tree removal pending State approval

Scenic: Not a mapped resource

Archeology: Not mapped/no physical evidence on site

Evan Ditmars

From: Blake Stanley <blakehstanley@gmail.com>

Sent: Friday, August 25, 2023 8:57 AM

To: Evan Ditmars

Subject: Application 231042 information request

****CAUTION:This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Evan,

I left you a voicemail yesterday, and I'm sure you are very busy, so I thought an email may be easier to respond to. I would like to request information regarding application number 231042 to rezone for timber harvesting the hillside adjacent to my community. I see the initial application was in February and I'm just hearing about this which is why I have a sense of urgency.

I'm interested in the following details of the proposal if available:

- 1. County rules around what constitutes selective harvesting. Percentage able to be cut, tree selection criteria
- 2. Proposed access plan for equipment and logging trucks
- 3. Plan to prevent soil erosion and landslides as the property in question abuts a cliff down to bear creek and homes
- 4. Are all trimmings from trees required to be removed to prevent accumulation of forest fire fuel?

Thank you for your help.

-Blake Stanley