

COASTAL CONSERVANCY

Staff Recommendation
September 3, 2020

MARTIN GRIFFIN PRESERVE NATIVE COASTAL PRAIRIE RESTORATION

Project No. 20-025-01
Project Manager: Julia Elkin

RECOMMENDED ACTION: Authorization to disburse up to \$84,250 to Audubon Canyon Ranch to restore native coastal prairie habitat and mitigate fire risk on the Martin Griffin Preserve, in Marin County, and to adopt findings under the California Environmental Quality Act.

LOCATION: Near the community of Stinson Beach, Marin County

PROGRAM CATEGORY: S.F. Bay Area Conservancy Program

EXHIBITS

Exhibit 1: [Project Location Map](#)

Exhibit 2: [Site Photographs](#)

Exhibit 3: [California Vegetation Treatment Program Statewide Programmatic Environmental Impact Report](#)

Exhibit 4: [Project Specific Analysis Checklist under the California Vegetation Treatment Program Statewide Programmatic Environmental Impact Report](#)

RESOLUTION AND FINDINGS:

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Section 31160 *et seq.* of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes the disbursement of an amount not to exceed eighty four thousand two hundred and fifty dollars (\$84,250) to Audubon Canyon Ranch (“the grantee”) to restore native coastal prairie habitat and mitigate fire risk on the Martin Griffin Preserve, Marin County.

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.
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3. A plan for acknowledgement of Conservancy funding.
4. Evidence that all permits and approvals required to implement the project have been obtained.”

In implementing the project, the grantee shall comply with all mitigation measures and monitoring and reporting requirements for the project that are identified in the EIR and in any permits, approvals or additional environmental documentation required for the project.

Staff further recommends that the Conservancy adopt the following findings:

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

1. The proposed authorization is consistent with Chapter 4.5 of Division 21 of the Public Resources Code, regarding the San Francisco Bay Area Conservancy Program.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. The Audubon Canyon Ranch 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 Final Program Environmental Impact Report (EIR) which was certified by the California Board of Forestry and Fire Protection on December 30, 2019 pursuant to the California Environmental Quality Act (“CEQA”) and the project-specific checklist prepared by the grantee (attached to the accompanying staff recommendation as Exhibits 3 and 4), and the Conservancy finds:
 - a. The proposed project is within the scope of the EIR.
 - b. The EIR identifies potentially significant impacts in the areas of Biological Resources and Transportation as identified in the accompanying staff recommendation. With implementation of mitigation measures, these impacts will be mitigated to a less than significant level.
 - c. The EIR identifies significant and unavoidable impacts in the areas of Air Quality and Greenhouse Gas Emissions. These greenhouse gas emissions (GHGs) and air quality impacts are due to vehicles, gas powered tools and prescribed burning associated with the initial and maintenance treatments. The standard project requirements and two mitigation measures will reduce these impacts but will not avoid them. The Conservancy finds it is infeasible to avoid, reduce, or mitigate the possible significant environmental effects of the project in these areas but that the specific environmental and other benefits of the proposed project as described in the Statements of Overriding Considerations contained in the EIR and in the accompanying Conservancy staff recommendation outweigh and render acceptable the significant unavoidable effects.

PROJECT SUMMARY:

Staff recommends that the Conservancy disburse up to \$84,250 to the Audubon Canyon Ranch to implement the Martin Griffin Preserve Native Coastal Prairie Restoration Project (project) on the Martin Griffin Preserve property in west Marin County. The project will assess the extent and health of remnant native bunchgrass stands on over 200 acres of the Martin Griffin Preserve and conduct restoration and fire reduction actions on 50 acres of the site to restore open, grassland stand structure characteristics of native coastal prairie systems.

California native coastal prairie grasslands are disturbance-dependent ecosystems characterized by high botanical diversity. Over the past several decades, land management practices removed disturbance cycles such as fire and grazing from much of the landscape. This has resulted in the rapid encroachment of coyote brush and Douglas fir into coastal prairie habitat, making coastal prairies among the most threatened native ecosystems in California. Habitat conversion from coastal prairie to scrub cover and fir forest reduces native biodiversity and significantly increases wildfire risk.

Martin Griffin Preserve, located on the Marin coast eastward of Bolinas Lagoon (Exhibit 1), has lost over 91 percent of its native prairie habitat cover since 1962 due to habitat conversion. This change has resulted in a significantly less ecologically diverse and less fire-resilient landscape, as dense coyote brush and Douglas fir have dominated the formerly open grass stand, fuel-light ridgelines (Exhibit 2). Remnant native bunchgrass stands that are the foundation of coastal prairie ecosystems can still be found scattered throughout the Preserve's ridge tops. Without intervention, these remnant stands will soon disappear under a fast-closing, low-diversity scrub and forest canopy.

Audubon Canyon Ranch (ACR) intends to address this issue by manually removing coyote brush and Douglas fir trees encroaching on extant native bunchgrass meadows, followed by patch and pile burning and the collection and dispersal of native grass seed into burn areas. These restoration actions will improve native bunchgrass health, population size and stand extent, and prepare the project site for long-term maintenance utilizing broadcast burning and/or targeted cattle grazing (referred to as "prescribed herbivory" in the CALVTP PEIR). The project will result in the dual benefit of restoring approximately 50 acres of native coastal prairie habitat and lowering fire risk in the preserve.

Upon project completion, ACR will feature the project as a demonstration site for best management practices in dealing with coyote brush and Douglas fir encroachment and rapidly disappearing native coastal prairie.

Site Description: Martin Griffin Preserve is a 1,000-acre property located in West Marin along Highway 101, approximately 2.5 miles north of the town of Stinson Beach and adjacent to Bolinas Lagoon, which tidally connects to the Pacific Ocean. The property is owned and managed by Audubon Canyon Ranch, who acquired it in 1962 as a wildlife sanctuary that runs educational programming. The native coastal prairie restoration project area consists of approximately 206 acres across the property's two ridgelines which were historically dominated by biologically diverse coastal prairie grasslands that have been encroached upon over the past several decades by coyote brush and Douglas fir monocultures (see Exhibit 2).

Grantee Qualifications: ACR has undertaken many environmentally significant projects since its founding in 1962. Recognizing the threat of wildfire, ACR’s Fire Forward team works with CAL FIRE, partners in the Sonoma Valley Wildlands Collaborative, and other regional landowners to increase the resilience of North Bay ecosystems, pairing fuels treatments with monitoring protocols and data collection to inform management moving forward. Over the past year, ACR’s Fire Forward team has completed thinning treatments on approximately 10 acres of the Preserve that were initially identified as both high-priority and readily accessible. This successful initial effort established a baseline understanding for the work ahead and refined the project approach for scaling up treatments as funding support becomes available.

ACR has extensive experience managing diverse funding from private grants and family charitable foundation. The organization has a long-standing track record of fiscal responsibility and success to protect the investment in this restoration effort in the long term.

Project History: ACR brought this project to the Coastal Conservancy through the Conservancy’s general application process. Given the recent devastating wildfires that have occurred in the region, the project presents a compelling opportunity to protect coastal resources through the use of the innovative California Vegetation Treatment Program Programmatic Environmental Impact Report authorized in December 2019 by CalFire, to increase the pace and scale of ecologically beneficial vegetation management treatments to achieve wildfire risk reduction.

PROJECT FINANCING

Coastal Conservancy	\$84,250
Project Total	\$84,250

The anticipated source of Conservancy funds is the Conservancy’s FY 2019-2020 appropriation of the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006, Public Resources Code Section 75001 et seq. (Proposition 84). This funding may be used for the preservation of watersheds in the San Francisco Bay Area that drain directly to the ocean, pursuant to Chapter 4.5 of the Conservancy’s enabling legislation, Division 21 of the Public Resources Code. (Pub. Res. Code Section 75060(c)). Consistent with this chapter, the proposed project will restore native coastal prairie habitat and reduce wildfire risk in the Bolinas Lagoon watershed, which drains directly to the ocean.

Section 75060(b) specifies that projects undertaken with funds allocated to the Conservancy must be consistent with the Conservancy’s enabling legislation, Division 21 of the Public Resources Code (Sections 31000-31414), Strategic Plan and Project Selection Criteria. Consistent with these requirements, the project proposals for funding was evaluated by Conservancy staff to assure its consistency with the Proposition 84 fund source, Conservancy’s Statutory Authorities contained in the Conservancy’s enabling legislation, Strategic Plan and Project Selection Criteria.

Audubon Canyon Ranch will mobilize toward its Fire Forward program as part of the project completion effort during the project term. Fire Forward is funded in part by private foundation

grants including the Farley Family Foundation, and funding contributions from the Federated Indians of Graton Rancheria. The cost of the proposed project is reasonable, with ACR assuring major cost savings through the use of their Fire Forward staff team to complete the vegetation treatments.

Additionally, the grantee will provide an estimated \$30,000 of in-kind services over the grant period in the form of volunteer hours assisting with project field activities and data collection.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

The proposed project is consistent with the provisions of Chapter 4.5 of Division 21 of the Public Resource Code Sections 31160-31165, which authorizes the Conservancy to award grants in the nine-county San Francisco Bay Area to help achieve stated goals. Specifically, the proposed project, located in a coastal draining watershed in Marin County, supports the achievement of the goals as stated in more detail below.

Pursuant to Section 31162(b), the Conservancy may award grants to protect, restore, and enhance natural habitats and connecting corridors, watersheds, scenic areas and other open space resources of regional importance. The proposed project will protect natural habitat on an important regional open space preserve by conducting native upland grassland restoration, enhancing a natural coastal resource that is threatened by successional growth on a landscape historically altered by cattle grazing pressure.

Consistent with Section 31163(c), the project meets the five criteria for priority projects in the San Francisco Bay Area Program in that 1) the project is consistent with the Marin County Local Coastal Plan; 2) ACR works in partnership with other land management entities in the Mount Tamalpais watershed on fire risk reduction and habitat restoration, and the project will serve as a demonstration project for the region; 3) the project is ready to be implemented immediately; 4) if the project is not implemented in a timely way, fire risk and costs will increase; and 5) ACR has assembled funding from several other sources including private foundations and the Federated Indians of the Graton Rancheria to support its fire risk reduction program.

CONSISTENCY WITH CONSERVANCY'S [2018-2022 STRATEGIC PLAN](#) GOAL(S) & OBJECTIVE(S):

Consistent with **Goal 6, Objective B** of the Conservancy's 2018-2022 Strategic Plan, the proposed project will restore over 50 acres of coastal prairie habitat on the Martin Griffin Preserve in Marin County.

Consistent with **Goal 8, Objective C** of the Conservancy's 2018-2022 Strategic Plan, the proposed project will increase resilience to climate change impacts by restoring wildfire-resilient native habitat.

CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA & GUIDELINES:

The proposed project is consistent with the Conservancy's Project Selection Criteria and Guidelines, last updated on October 2, 2014, in the following respects:

Required Criteria

1. **Promotion of the Conservancy’s statutory programs and purposes:** See the “Consistency with Conservancy’s Enabling Legislation” section above.
2. **Consistency with purposes of the funding source:** See the “Project Financing” section above.

3. **Promotion and implementation of state plans and policies:**

The proposed project will help implement the California Forest Carbon Plan (CNRA, 2018) which calls for restoration of natural fire regime through a multitude of approaches including thinning, prescribed burns, and invasive vegetation management.

The proposed projects are consistent with the 2019 Community Wildfire Prevention & Mitigation Report 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.

The proposed projects are also consistent with the Forests and Rangelands Companion Plan, California State Wildlife Action Plan Update (CDFW 2015) in that projects will seek to create a healthier and more resilient ecosystem.

The 2015 Environmental Goals and Policy Report “A Strategy for California @ 50 Million, Supporting California’s Climate Change Goals”, Goal 6 of the Steward and Protect Natural and Working Landscapes section calls on the State to “Build resilience into natural systems and prioritize natural and green infrastructure solutions”. Consistent with this, the proposed authorization will increase resilience of coastal prairie.

4. **Support of the public:** ACR’s Fire Forward program partners with Marin County Fire, Golden Gate National Recreation Area Fire, local fire departments, and regional landowners to plan restoration work and prescribed burns. This project will serve as a demonstration site for community partners facing similar ecological challenges, increasing the scale of workable solutions across the region. See Exhibit 4: Project Letters.
5. **Location:** The proposed project is partially located within the coastal zone of Marin County. It benefits coastal resources by ensuring the resilience of native habitats and regional biodiversity, as coastal grasslands play an important role in the ecology of coastal California.
6. **Need:** If Conservancy funds were not available, the project would be delayed by at least a year and lose an important window of opportunity to reduce the property’s wildfire risk.
7. **Greater-than-local interest:** ACR’s Fire Forward program is a Bay Area leader on strategies for fuels management and ecological stewardship of open spaces. A founding member of and sitting on the boards of the Bay Area Prescribed Fire Council and the local Prescribed Burn Association, Fire Forward leads workshops, trainings, conferences, field demonstrations, and project site visits with partners across the Bay. Once completed this project will be featured as a demonstration site to educate land managers and owners across the Bay Area region.

8. **Sea level rise vulnerability:** The proposed project area within the Martin Griffin Preserve is located along ridgelines, which are not vulnerable to sea level rise.

Additional Criteria

9. **Urgency:** Growing wildfire risk combined with the loss of fire-resilient native coastal prairie habitat to encroachment by higher intensity burn vegetation types makes this project urgent.
10. **Resolution of more than one issue:** The project addresses native habitat loss, by restoring a threatened coastal habitat type. It also addresses wildfire risk, shifting habitat composition from dense and fire-prone coyote brush and Douglas fir cover back to a native grassland assemblage that is naturally resilient to wildlife.
11. **Leverage:** See the “Project Financing” section above.
12. **Innovation:** The proposed project uses fuels management techniques to conserve a threatened ecological resource. Innovative techniques include determining treatment boundaries through detailed geospatial assessment of remnant coastal prairie stands on the project property.
13. **Readiness:** ACR is ready to proceed with the project upon securing Conservancy funds.
14. **Realization of prior Conservancy goals:** See “Project History” above.
15. **Vulnerability from climate change impacts other than sea level rise:** The proposed project is designed specifically to reduce vulnerability to climate change-exacerbated wildfire risk. By restoring vegetation toward a more open, grass dominated structure on two coastal ridges, the proposed project will reestablish a more fire resilient ecosystem within the project area.
16. **Minimization of greenhouse gas emissions:** While pile and patch burning activities to be conducted by the project create limited emissions, the plant material being cut and burned are susceptible to high-severity wildfire. By contrast, native bunch grasses that will be restored by the proposed project are characterized by deep, long-lived root systems and ability to thrive in a fire-prone environment. By reopening native coastal prairie stand structure and increasing native bunchgrass cover, the project will result in a more stable carbon-sink environment that is resilient in the face of wildfire.

CEQA COMPLIANCE:

The California Vegetation Treatment Program (CalVTP) directs implementation of vegetation treatments within the California Department of Forestry and Fire Protection’s (CAL FIRE’s) State Responsibility Area (SRA) to serve as one component of the state’s range of actions to reduce wildfire risk, reduce fire suppression efforts and costs, and protect natural resources as well as other assets from wildfire. The California Vegetation Treatment Program Final Program Environmental Impact Report (PEIR) evaluates the environmental impacts of the CalVTP. The PEIR has been prepared under the direction of CEQA lead agency, California Board of Forestry and Fire Protection (Board), in accordance with the requirements of the California

Environmental Quality Act (CEQA) (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines. The Board certified the PEIR and approved the CalVTP on December 30, 2019.

Using the Project-specific Analysis (PSA) in reliance on the PEIR, CAL FIRE or other project proponents evaluate each vegetation treatment project intended to implement the CalVTP as a later activity addressed by the PEIR to determine whether the later activity qualifies as within the scope of this PEIR or requires additional environmental documentation or its own independent environmental review.

Pursuant to the Conservancy's obligation as a responsible agency under CEQA, Conservancy staff have reviewed the PSA prepared by Audubon Canyon Ranch under the PEIR and find that the proposed project is within the scope of the PEIR. Specifically, staff has determined that:

- The proposed treatment methods are consistent with the treatment types and activities described in Chapter 2, "Program Description" of the PEIR, consisting of ecological restoration via prescribed burning (broadcast and pile burning) and manual treatments.
- The proposed treatment site is within the geographic limits of the CalVTP's treatable landscape, with all treatment areas within the State Responsibility Area covered by the CalVTP.
- The environmental effects of the proposed treatment have been covered in the PEIR and none of the criteria for preparation of subsequent CEQA documentation are met (State CEQA Guidelines Sections 15168(c)(2), 15162)

Based on analysis of the PSA, Conservancy staff recommend that the Conservancy find that the impacts of the proposed project are within the scope of the PEIR and its associated Mitigation Measures.

Air Quality

Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed California or National Air Quality Standards. Feasible mitigation measures aimed at reducing emissions within MM AQ-1 for the proposed treatments include encouraging carpooling to site and using best available control technology for reducing NO_x and PM emissions on equipment. Equipment meeting Tier 4 emission standards and use of renewable fuel will be used if available. Although this significant impact will be mitigated it is not unavoidable.

Biological Resources Impacts

Impact BIO-1: The potential for the proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) to result in direct and indirect impacts on special-status plant species is analyzed in the PEIR. Treatment activity and intensity are consistent with the PEIR evaluation as are the resulting potential impacts. CalVTP PEIR Standard Project Requirements (SPRs) related to biological resources that are relevant for this project include; SPR BIO-1-3, SPR BIO-6-9, SPR GEO-1, and SPR GEO 3-7.

Per SPR BIO-7, protocol-level surveys will not be required for four of the eight target taxa because they are geophytes or annuals (Table 1). They include bent-flowered fiddleneck (*Amsinckia lunaris*), Marin checker lily (*Fritillaria lanceolata* var. *tristulis*), congested-headed hayfield tarplant (*Hemizonia congesta* subsp. *congesta*) and bristly leptosiphon (*Leptosiphon acicularis*). Treatment activities, intensity and work plan are consistent with SPR BIO-7 in that: treatments will not result in ground disturbance and will be implemented during the dormant season of relevant species after they have completed their life-cycle, and that treatment activities do not alter the environment so that special-status taxa have the ability reestablish after the treatment.

Of the eight target species that may occur, three are woody perennials and one an herbaceous perennial, and thus cannot be avoided using the SPR guidelines for annual herbaceous species. The woody perennials include western leatherwood (*Dirca occidentalis*), Tamalpais oak (*Quercus parvula* var. *tamalpaisensis*) and Victor's gooseberry (*Ribes victoris*). The herbaceous perennial is California bottle-brush grass (*Elymus californicus*). Based on ranges of the three woody perennial taxa and quality of habitat, presence of these taxa is unlikely. Further, a thorough plant list already exists for MGP that does not include these woody perennial special status species. However, marginal habitat is present and previous botanical surveys do not have documented methodology and thus no way to assess the level of effort. California bottle-brush grass is known from the property from numerous locations. This species prefers heavily forested habitat which is not the focus of planned treatments, however forest edge habitat will be subject to treatment. Though marginal, habitat is present for all four special status perennial species. Given these factors and in compliance with SPR BIO-7, focused surveys are required for these species before implementation of treatments. If any special-status taxa are observed during these focused surveys, Mitigation Measure BIO-1b will be implemented. It has been determined by biologist Brian Peterson that based on taxonomic features of the above woody perennial species, surveys may be done in the spring, summer or fall. The California bottle-brush grass becomes cryptic in the late summer and fall and therefore requires a spring or early summer survey. Given the SPRs listed above, these impacts are less than significant.

Impact BIO-2: The potential for the proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) to result in direct and indirect impacts on special-status wildlife species was evaluated in the PEIR. Treatment activity and intensity are consistent with the PEIR evaluation as are the resulting potential impacts. SPRs related to wildlife biological resources that are relevant for this project include; SPR BIO-1-3, SPR BIO -9 and SPR BIO-10-12.

Hoary Bat

Habitat suitable for hoary bat is present on site in the patches of Douglas fir forest. Douglas fir forest within the Project Area is young early successional and thus does not contain the preferred hoary bat habitat of larger trees or snags, making habitat marginal. Further, treatment design specifically avoids removal of large Douglas fir trees (20+ inches in diameter), snags or hardwoods. Though the habitat is marginal and treatment design retains high value habitat, hoary bat uses a wide range of habitat and

preferred habitat is not considered a strong correlate for potential presence. Hoary bat roost in tree foliage, which could include the smaller trees that will be removed. Given this potential impact, the project proponent will comply with SPR Bio-10 and focused surveys for hoary bat roost within the treatment area will be conducted before treatments are implemented. If roosts are identified, Mitigation Measure BIO-2b will be implemented, where a no-disturbance buffer of 250 feet will be established within which no work will be performed around the observed roost. Hoary bat habitat function will remain intact and potentially improved after treatments are implemented. A majority of Douglas fir trees will be left standing and no tree greater than 20 inches in diameter will be removed. Thinning of the dense Douglas fir stands will improve aerial access for Hoary bats. Given the SPRs listed above, this impact is less than significant.

American Badger

Suitable American badger habitat is present within the project area in the form of grassland and early successional shrubland. Though vegetation treatments would not negatively impact American Badger habitat, work activity may disturb and negatively impact an individual. In compliance with SPR Bio-10, focused surveys for signs of American badger (predominately burrows) within the treatment area will be conducted before treatments are implemented. If American badger signs of any kind including burrows are identified, Mitigation Measure BIO-2b will be implemented and a no-disturbance buffer of 100 feet around the sign will be established within which no work will be performed.

American badger habitat function will remain intact and potentially improved after treatments are implemented. Improvement of grassland habitat will favor American badger preferred habitat by opening up shrub and tree canopies. Given the SPRs listed above, this impact is less than significant.

Impact BIO-3: The potential for the proposed initial and maintenance treatments (i.e., manual treatment, prescribed [broadcast] burning, pile burning and prescribed herbivory) to result in direct and indirect impacts on sensitive habitats including sensitive natural communities (CDFW 2019) was evaluated in the PEIR. Treatment activity and intensity are consistent with those evaluated in the PEIR, as are the resulting potential impacts.

Review of available and relevant literature and databases and a field reconnaissance survey of project-specific biological resources were performed according to SPR BIO-1. Based on the database search, communities in Table 3.6-16, and reconnaissance survey, Coastal Terrace Prairie (California Oat Grass Prairie alliance) and Redwood Forest have the potential to occur on site. During the reconnaissance survey species indicative of California Oat Grass Prairie were observed including California oatgrass (*Danthonia californica*), California brome (*Bromus carinatus* var. *carinatus*), blue wild rye (*Elymus glaucus*) and purple needlegrass (*Stipa pulchra*). However, patches were small and often under the threshold cover of 25% absolute cover or 50% relative cover of California oatgrass required to be categorized as Coastal Terrace Prairie. Under requirements stated in SPR BIO-3, if sensitive natural communities have the potential to exist, a protocol-level survey and mapping is required. Mapping native bunchgrass stands is an integral part of the project and will cover this requirement. All redwood forest found within the

project area will be avoided. Proposed treatment activities are focused on restoration of the Coastal Terrace Prairie community. Proposed thinning treatments are targeting the removal of coyote brush and Douglas fir trees encroaching on Coastal Terrace Prairie. This active management approach will shift fuel and species structure promoting the restoration of the natural fire regime (or surrogate fire regime) for Coastal Terrace Prairie. Thus Mitigation Measure BIO-3a would apply where treatment activities restore a natural fire regime. With implementation of Mitigation Measure BIO-3a, habitat function will be maintained or improved by treatments resulting in a determination as less than significant under CEQA.

Greenhouse Gas Emissions

Impact GHG-2: Use of vehicles, gas powered tools and prescribed burning associated with the initial and maintenance treatments would result in GHG emissions. The proposed treatments and their intensity are consistent with those evaluated in the PEIR. Relevant SPR's include GHG-1 and AQ-3. Mitigation Measure GHG-2 will be implemented to reduce emission impacts associated with prescribed burning. Although the mitigation measure will reduce this impact, it remains significant and unavoidable.

Transportation

TRAN-3: vehicle traffic associated with the proposed treatments could increase vehicle miles traveled (VMT) in the short term because the site is relatively remote. Increase in vehicle miles traveled associated with treatments was evaluated in the PEIR and determined to be a potentially significant and unavoidable impact. However, transportation associated with this project is going to be far lower than the fewer than 110 trips a day considered less than significant in the Technical Advisory on evaluating Transportation Impacts (OPR 2018). Mitigation Measure AQ-1 aimed at reducing VMT is relevant for this impact. Given the SPRs listed above, this impact is less than significant.

Statement of Overriding Considerations

The project's wildfire risk reduction benefits significantly outweigh and render acceptable the unavoidable greenhouse gas emissions and air quality impacts that will occur during project implementation. The immediate benefit of the project will be to reduce wildfire risk by reducing existing fuel load on the project site through planned and targeted vegetation removal treatments. The longer-term benefit of the project will be the increased wildfire resilience and ecological benefits provided by the restoration of native coastal prairie, which is a naturally fire resilient vegetation community type.

By conducting targeted vegetation treatments on a strategically selected subset of ridgeline acres within the landscape, the project will dramatically lower the risk of wildfire events that could ignite and spread up and over ridgetops, causing uncontrolled damaging impacts at the landscape scale. The greenhouse gas emissions and air quality impacts that would result from such wildfire events are many orders of magnitude larger than the greenhouse gas emission that will occur from vehicle miles travelled for project implementation, use of hand power tools for vegetation removal activities, and the greenhouse gas and air quality impacts of conducting coordinated burns of slash piles.

Upon approval of the project, Conservancy staff will file a Notice of Determination and file project information with CalFire, as required under the CalVTP program.