

COASTAL CONSERVANCY

Staff Recommendation
September 22, 2022

REDWAY SHADED FUEL BREAK PROJECT

Project No.22-041-01
Project Manager: Michael Bowen

RECOMMENDED ACTION: Authorization to disburse up to \$175,200 to the Humboldt County Resource Conservation District to complete Phase 1 of the Redway Shaded Fuel Break Project, a forest health and wildlife risk reduction project located along the eastern edge of Redway in southern Humboldt County, and adoption of findings under the California Environmental Quality Act.

LOCATION: Redway, southern Humboldt County

EXHIBITS

- Exhibit 1: [Project Location Map](#)
- Exhibit 2: [California Vegetation Treatment Program Statewide Programmatic Environmental Impact Report](#)
- Exhibit 3: [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 and findings.

Resolution:

The State Coastal Conservancy hereby authorizes a grant of an amount not to exceed one hundred seventy-five thousand and two hundred dollars (\$175,200) to the Humboldt County Resource Conservation District (“the grantee”) to conduct Phase 1 of the Redway Shaded Fuel Break Project in Redway, CA.

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.
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 impacts and potential impacts of climate change on resources within the Conservancy's jurisdiction (Section 31113(a)).
2. The proposed project is consistent with the current Conservancy Project Selection Criteria.
3. The Conservancy has independently reviewed and considered the California Vegetation Treatment Program Statewide Programmatic 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 reviewed the project-specific checklist prepared by CAL FIRE Humboldt-Del Norte Unit (HUU) (attached to the accompanying staff recommendation as Exhibit 2), and the Conservancy finds:
 - a. The proposed project is within the scope of the PEIR.
 - b. The PEIR and the project-specific checklist identify impacts in the categories of Air Quality, Greenhouse Gas Emissions, Cultural Resources, and Biological Resources that are less than significant when mitigated, as discussed in the accompanying staff recommendation.
 - c. The PEIR and project-specific checklist identify a potentially significant but unavoidable impact (PSU) in the Transportation category. The impact is associated with additional vehicle miles travelled (VMT) by vehicles transporting work crews. The Conservancy finds that it is infeasible to avoid, reduce, or mitigate these impacts, but the benefits of the project described in the Statement of Overriding Considerations in the accompanying staff recommendation outweigh the impacts and render them acceptable.

STAFF RECOMMENDATION

PROJECT SUMMARY:

Staff recommends the Conservancy authorize a \$175,200 grant to the Humboldt County Resource Conservation District ("HCRCD") to complete Phase 1 ("the project") of the Redway Shaded Fuel Break Project in Redway, CA. The Redway Shaded Fuel Break Project is a 142--acre forest fuel reduction and thinning project in southern Humboldt County (Exhibit 1). Phase 1

consists of 66 acres of this work, principally vegetation removal with hand tools and mechanical grinders. Phase I excludes prescribed burning.

In the Humboldt County Community Wildfire Protection Plan (CWPP), the Southern Humboldt Fire Safe Council (SHFSC) identified the protection of Redway as a very high priority given its large and dispersed population, extensive wildland-urban interface (WUI), and vulnerability to wind-driven fires out of the northeast. To address this vulnerability, the CWPP calls for landscape-level fuels reduction efforts to aid in the protection of the community. This project is designed to meet this need by reducing wildfire risk to the community of Redway and nearby areas.

The project will also help restore ecological health and resilience to southern Humboldt County's forested landscape. Treatment will include the removal of brush, downed and dead debris, suppressed trees, and pruning of dominant and codominant trees to reduce ladder fuels. Tree spacing will be determined based on-site conditions with the goal of separating crowns and stems sufficiently to promote residual tree growth and provide shade to the forest floor, thereby limiting the regrowth of ladder fuels that contribute to catastrophic wildfires. These and other measures will reverse the current overcrowded condition of vegetation and increase resilience to drought and disease, thereby contributing to an improved ecological condition overall. The shaded fuel break prescription focuses on manual or mechanical forest thinning activities that treat understory trees and brush to reduce fire hazards, improve tree growth and carbon sequestration, and increase forest resilience. The thinning activities will result in a change to the stand structure within the fuel break to select for widely-spaced and larger trees that are more resilient to wildfire and drought. Furthermore, in the event of a wildfire, the shaded fuel break treatment will decrease the likelihood of a stand-replacing wildfire by 1) reducing the likelihood of a wildfire transitioning from the forest surface into the forest canopy and 2) serving as a strategic location from which to fight and contain the fire.

The multi-phased Redway Shaded Fuel Break Project is the first in the CAL FIRE Humboldt-Del Norte Unit (HUU) utilizing the California Vegetation Treatment Plan (CalVTP) PEIR and will treat a total of 142 acres to achieve the critical goal of restoring forest health to southern Humboldt County while reducing wildfire risk to the community of Redway. HCRCD, in coordination with the CAL FIRE HUU, will assist with implementation of Phase 1 of the Redway Shaded Fuel Break, which includes 21 acres treated with mechanical mastication (grinding) and 45 acres treated with hand tools on private property and in the Humboldt Redwoods State Parks Holbrook Grove.

Implementation began in April 2022 funded under an agreement between CAL FIRE and HCRCD. The funding requested here, if awarded, will supplement the funding allocated in the CAL FIRE agreement and will allow for the completion of the first phase of work. Phase 1 includes three distinct treatment areas as identified in Exhibit 1 and described below:

1. Ridgetop: A shaded ridgetop fuel break will be installed, primarily following an existing road. In the event of a future wildfire, this will serve as a strategic

feature for CAL FIRE from which to fight and contain the fire; it will also serve as a containment line for future broadcast burns in Phase 2 of the Redway Shaded Fuel Break project. Mechanical mastication will occur on slopes with gradients less than 40 percent while steep areas and areas within State Parks will be treated by hand. Treatment will include the removal of brush, downed and dead debris, suppressed trees as well as the pruning of dominant and codominant trees to reduce ladder fuels. Tree spacing will be determined based on-site conditions, with the goal of separating crowns and stems sufficiently to promote residual tree growth and provide shade to the forest floor, thereby limiting the regrowth of ladder fuels.

2. Redway WUI: A 100- to 200-foot band surrounding the eastern edge of Redway will be treated utilizing hand or mechanical methods with the goal of reducing wildfire risk in the Redway WUI. Trees less than 6 inches in diameter at breast height will be removed to achieve 10-15 feet of space between residual trees. Those in good health and vigor will be prioritized for retention, and pruning will be conducted to a minimum of 6 feet. Hand methods will include lop and scatter or pile and chip. Pile burning will be limited to areas inaccessible to the chipper.
3. Meadows Park WUI: The prescriptions applied in the Redway WUI will be applied here, with the goal of reducing wildfire risk to the Meadows Park WUI. However, due to steeper slopes, stream buffers, and the Highway 101 corridor, a series of narrower bands of treatment largely consisting of hand treatment will be completed.

Completion of this Phase I project will facilitate implementation of Phase 2. Phase 2 will include the application of low-intensity prescribed fire on 84 acres south of the Ridgetop treatment area to consume fuels generated by mechanical fuel treatments, provide treatment to the remaining hillside, and return prescribed fire to a landscape from which it has been absent for decades, enhancing ecological values. The implementation of the prescribed fire treatment will be led by the CAL FIRE HUU. SCC does not currently expect to provide grant funding to support that portion of the project.

Site Description: The community of Redway is one of two larger population centers in southern Humboldt County and is bounded to the north, east, and south by the South Fork of the Eel River and to the west by densely vegetated wildlands and Highway 101. Redway is located within a high wildfire risk zone, with parts within a very high zone, as identified in the CAL FIRE Fire Hazard Severity Zones map. The surrounding landscape contains high fuel loads and is densely vegetated with mix of brush, oak woodland, and mixed conifer forest habitats. The surrounding land use is mixed between residential with wildland urban interfaces, industrial and nonindustrial timberlands, ranching, and cannabis cultivation. The Redway Shaded Fuel Break project was designed by CAL FIRE HUU and has been developed to connect to and integrate with other landscape-level fuels reduction work in southern Humboldt County, including the East Garberville Shaded Fuel Break that was recently completed by HCRCD and

CAL FIRE HUU. The project area includes private and state-owned lands, including an area within Humboldt Redwoods State Parks Holbrook Grove.

Grant Applicant Qualifications: HCRCD will bring its considerable experience managing grants and natural resource projects to the task of administering this award. HCRCD has successfully planned and implemented multiple restoration and enhancement projects in forestland, wetland, and floodplain ecosystems. Since its formation in 1987, HCRCD has successfully managed more than 160 federal, state, and local agreements and contracts and has extensive experience with federal and state contracting and subcontracting, procurement, contract compliance, and grant management, as well as financial and project progress reporting and invoicing. HCRCD also has a history of positive financial and program audits, evidence of the HCRCD's ability to effectively manage public funds and adhere to the terms of contracts and agreements. Most recently, HCRCD completed the 43-acre East Garberville Shaded Fuel Break under a funding agreement with the CAL FIRE HUU. HCRCD is also administering a \$4.3 million dollar CAL FIRE Forest Health grant agreement to support forest health treatments, including a 130-acre shaded fuel break, in the Yurok Salmon Sanctuary and Community Forest.

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

1. 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.

2. Project is a good investment of state resources.

- a. Established Priority - As discussed, above, Redway is identified In the Humboldt County Community Wildfire Protection Plan (CWPP) by the Southern Humboldt Fire Safe Council as a very high priority area. This project is designed to meet this need by reducing wildfire risk to the community of Redway and nearby areas and restoring both immediate and long-term health and resilience to southern Humboldt County's forested landscape. Moreover, the project is the first in the CAL FIRE HUU utilizing the CalVTP PEIR, thereby setting an important precedent for the region.
- b. Risk Reduction - Completion of the Redway Shaded Fuel Break will reduce the risks associated with wildfire by decreasing the amount of combustible material throughout the WUI near Redway, protecting nearby communities from wildland fires, and reducing the risk of ignitions spreading into wildlands. Well-managed vegetation will also decrease wildfire intensity, making it less likely to ignite structures, minimizing the destructive impacts of embers, and increasing the capacity of the forest to regenerate after a fire. Additionally, strategic ridgetop treatments outside of the WUI will provide firefighters with effective anchor and

control points from which to deploy their resources to protect the area's communities in the event of wildfire.

- c. Quantitative Benefits - Quantitative project outcomes are anticipated to include the following: 1) Phase 1 implementation includes installation of a shaded fuel break to treat a combined 66 acres in the following vegetation types: Forest: 61.4 acres, Shrub/Chaparral: 3.3 acres and Woodland: 1.2 acres; and 2) Phase 2 implementation includes prescribed burn treatments over 84 acres in the following vegetation types: Forest: 78.1 acres, Shrub/Chaparral: 4.2 acres and Woodland: 1.7 acres.

Cost Effectiveness - HCRCD and CAL FIRE HUU developed this project in partnership, and it is a feasible extension of the work that is currently being executed under CAL FIRE and HCRCD's active CAL FIRE agreement. Associated costs were derived from costs of similar projects, including the East Garberville Shaded Fuel Break, and the budget is reasonable based on local contractor rates and costs per acre. The project advances statewide goals for wildfire resilience and habitat enhancement and is consistent with state plans as discussed below.

- **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.
- **Safeguarding California Plan: 2018 Update** (California Natural Resources Agency, 2018): The project will help meet Objective F-18 of the Plan: "Expand grants and cost share agreements to Tribes, public agencies, nonprofit organizations, and landowners for selectively removing hazardous wildfire fuels."

3. Extent to which the project helps the Conservancy accomplishes the objectives in the Strategic Plan.

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

4. 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.

In preparation for the Project, CalFire sent notice of the Project to all tribal contacts extending from Loleta to the Mendocino County line. One response was received, but no specific cultural resource concerns were identified within the Project area, nor were there objections to the proposed treatments. The project includes extensive avoidance and inadvertent discovery elements intended to protect archaeological and cultural resources in and near the project area.

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

As outlined in the Long-term management and maintenance section, this project will be resilient over the long-term. Treatments will be designed with attention to the potential for ladder fuel regrowth, ensuring that residual tree growth provides necessary shade to the

forest floor and treated areas age well with minimal maintenance needs. Phase 1 activities funded under this agreement will also set the stage for Phase 2 implementation, which includes the completion of 84-acres of prescribed burn treatments and will further enhance the ecological outcomes and contribute to the long-term resilience of this project.

The minimization of future maintenance is central to the design of the proposed project; by leaving enough overstory to inhibit the regrowth of brush and trees, future maintenance needs will be lessened. However, some maintenance will inevitably be required, and the three areas receiving treatments under this grant will be revisited at an interval sufficient to maintain the effectiveness of the installed fuels reduction features. Maintenance of treated areas will be accomplished using manual processes; herbicide is an alternate maintenance option and would be limited to ground-based methods such as using a backpack sprayer. The project team anticipates that the County-wide and Southern Humboldt CWPPs as well as the SHFSC and the CAL FIRE Eel River Camp and Garberville Engine crews will leverage support for maintaining the project's benefits. The project team intends to continue to seek funding, partnerships, and support to incentivize and assist with wildfire mitigation priorities, which include maintenance of landscape-level fuels reduction projects.

6. Project delivers multiple benefits and significant positive impact.

The project seeks to reduce wildfire risk and enhance forest health in a low income, frontline community at high fire risk. Development of the project has involved extensive community education and community engagement. The project also leverages similar efforts in nearby Garberville, thereby providing a more regional and systematic approach to fire risk management. CAL FIRE HUU has engaged to provide training opportunities (technical skills and group development); first year firefighter hand crews from High Rock and the California Conservation Corps (CCCs) have already participated during early season training in May / June 2022. Additionally, the prescribed burn component will include coordination with local volunteer fire departments to training opportunities.

7. Project planned with meaningful community engagement and broad community support.

This project is identified in the Humboldt County CWPP and has long been championed by the SHFSC. This project is also identified in CAL FIRE HUU's 2021 Strategic Fire Plan and builds upon the efforts of CAL FIRE HUU, the County of Humboldt (on behalf of the Humboldt County FSC), SHFSC, and HCRCDC to implement the CWPP in coordination and to layer wildfire mitigation actions. These coordinated partnerships, the investment of the SHFSC, and the mix of treatment methods contribute to a project with multiple benefits, including increased community resilience and improved ecological conditions. Support Letters are attached as Exhibit 4.

PROJECT FINANCING

Coastal Conservancy

\$175,200

CAL FIRE Fire Prevention Grant	\$95,500
Project Total	\$270,700

The proposed source of funding is an appropriation from the General Fund to the Conservancy for the purpose of wildfire resilience (the Budget Act of 2022 as amended by AB 178 (2022)). The proposed project is consistent with the anticipated funding source because it will increase wildfire resilience. Matching funding comes from a CAL FIRE Fire Prevention Grant secured earlier by HCRCD.

CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:

The recommended project will be undertaken pursuant to Section 31113 of Chapter 3 of Division 21 of the Public Resources Code, which authorizes the Conservancy to address the impacts and potential impacts of climate change on resources within the Conservancy’s jurisdiction (Section 31113(a)).

Pursuant to Section 31113(b), the Conservancy is authorized to award grants to nonprofit organizations and public agencies to undertake projects that include reducing greenhouse gas emissions, and addressing extreme weather events, sea level rise, flooding, and other coastal hazards that threaten coastal communities, infrastructure, and natural resources.

Pursuant to Section 31113(c), the Conservancy must prioritize grants for projects that maximize public benefits and have one of several purposes, including reducing emissions of greenhouse gases.

Consistent with these sections, the proposed project will restore the health and resilience of California forests, grasslands, or natural lands and reduce fire risk to communities. The project will help California’s natural lands to be more resilient to catastrophic wildfires which may ultimately reduce greenhouse gas emissions released from increased wildfires due to climate change.

The proposed project addresses resources within the Conservancy’s jurisdiction by improving forests, grasslands, or natural lands and reducing the risks of wildfire that would adversely impact water quality and habitat in a coastal watershed (Chapter 5.5 of Division 21 of the Public Resources Code).

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

Consistent with **Goal 8, Objective C** of the Conservancy’s 2018-2022 Strategic Plan, the proposed project will implement a project to restore the health and resilience of California forests, grasslands, and natural lands in a manner that reduces fire risk to communities. The project will help California’s natural lands to be more resilient to catastrophic wildfires.

Consistent with **Goal 16, Objective A**, the proposed project benefits a disadvantaged community.

CEQA COMPLIANCE:

Conservancy staff 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 (Public Resources Code Section 21000 et seq.; "CEQA") (Exhibit 2). Staff then reviewed the project-specific checklist prepared by HCRCD (attached to the accompanying staff recommendation as Exhibit 3), the Notice of Determination for which was filed in December 2021.

Staff concurs that there is no substantial evidence that the project, as mitigated, will have a significant effect on the environment. Staff also concurs that the proposed project is within the scope of the EIR. Staff therefore recommends that the Conservancy find that the project as mitigated avoids, reduces, or mitigates the possible significant environmental effects to a level of less-than-significant and that there is no substantial evidence that the project will have a significant effect on the environment as that term is defined by 14 Cal. Code Regs. §15382.

Air Quality

The PEIR and project-specific checklist identify less than significant as mitigated impacts in the area of Air Quality. Those impacts related to air quality impacts due to vehicles, gas powered tools, are mitigated to a less than significant level under this project through the use of gasoline powered equipment, encouraging carpooling to the project site, and using Best Available Control Technology for emission reductions of NO_x and particulate matter on equipment. Equipment meeting Tier 4 emission standards and the use of renewable fuel would be implemented to the extent feasible. Impacts due to prescribed burns discussed in the PEIR and project-specific checklist are inapplicable to this project; this phase of the project does not include any burning.

Greenhouse Gas Emissions (GHGs)

The PEIR and project-specific checklist identified less than significant as mitigated impacts in the Greenhouse Gas Emissions category. Use of vehicles and mechanical equipment during initial and maintenance treatments would result in GHG emissions. Project-specific emissions were calculated and methods from mitigation measure GHG-2 have been integrated into the treatment design. Generation of GHG emissions from the project treatments are within the scope of the PEIR analysis and site-specific analysis.

Cultural Resources

The PEIR and project-specific checklist identified less than significant as mitigated impacts in the area of Cultural Resources largely due to use of heavy equipment. The checklist found the impacts applicable to the project, because "...vegetation treatment would include mechanical treatments using heavy equipment." The checklist goes on to state that "...(t)he potential for these treatment activities to result in inadvertent discovery of unique archaeological resources or subsurface historical resources was examined in the PEIR. Treatment activities and extent of ground disturbance of the treatment project are consistent with those analyzed in the PEIR and

Mitigation Measures CUL-2 would apply to this treatment.” CUL-2 requires “contacting geographically affiliated native American tribes, which the project proponent did. In conclusion, the project-specific checklist determined that the potential impact is rendered less than significant as mitigated due to the application of CUL-2 and the receipt of a response which did not identify any cultural resources within the project area, a finding confirmed by CUL-4, and archeological survey conducted by CalFire.

Biological Resources

The PEIR and project-specific checklist identify potential impacts to biological resources that when mitigated are deemed less than significant. These include impacts to special status plant species, none of which were identified during field surveys. In that case, a 50’ buffer will be established around any special status plant species identified during operations. Similarly, protections for Marbled Murrelet and Spotted Owl include implementation of buffers around roosts and through seasonal limitations for treatments (i.e. work outside of sensitive breeding season). Potential impacts to sensitive habitats are acknowledged but avoided through initial survey work, mapping, and then project design around sensitive habitat areas such as riparian zones. An abundance of team training on topics ranging from invasive species management to sensitive habitat identification and avoidance is included in the project to ensure compliance with avoidance measures identified in the PEIR.

Transportation

The PEIR and project-specific checklist identify a potentially significant but unavoidable impact (PSU) which it fails to address through Standard Project Requirements. This PSU is in the topic of Transportation.

Initial and maintenance treatments could temporarily increase vehicle miles traveled (VMT) because the project site is in a rural area, which may require farther travel for contractors and CAL FIRE crews. The potential for net increase in VMT to occur was analyzed in the PEIR and was identified as potentially significant and unavoidable (CalVTP Final Program EIR Volume II Section 3.15.3, page 11-13).

By PEIR standards, this individual project is expected to require only a small number (fewer than the 110 trips threshold per the project-specific checklist) of trips per day, as discussed in the PEIR and the Technical Advisory on Evaluating Transportation Impacts (OPR, 2018). The most VMT would occur at the beginning, end, and prescribed fire portions of the project. Daily VMT would consist of crew transportation to and from the site. Hiring local contractors is encouraged to reduce the amount of VMT. However, no mitigation measures apply to this impact.

The project proponent will implement Mitigation Measure AQ-1 to encourage crew members to carpool and further reduce VMT. Based on the implementation of Mitigation Measure AQ-1, measures to reduce VMT, and short-term duration of this project, the potential for this individual project to result in a net increase in VMT would remain potentially significant and unavoidable, as stated in the PEIR (CalVTP Final Program EIR Volume II Section 3.15.3, page 13).

Staff has concluded that a foreseeable reduction in VMT could be reasonably expected to occur in the long term with the intended reduction in wildfire occurrence and severity, and that individual vegetation treatments would likely be less than significant pursuant to the thresholds identified in OPR's Technical Advisory on Evaluating Transportation Impacts. This, in combination with an overall improvement to forest health and prospective reductions in emissions resulting from less catastrophic wildfires, lead staff to conclude that the benefits of the project outweigh the potential localized and temporary impacts of additional VMTs resulting from the project.

Statement of Overriding Considerations

As set forth in this staff recommendation, as in the PEIR and project-specific checklist, the Conservancy's approval of this project will result in significant adverse environmental effects in the Transportation category that cannot be avoided even with the adoption of all feasible mitigation measures, and there are no feasible project alternatives that would mitigate or substantially lessen the impacts. However, the project will result in increased wildfire risk reduction benefitting life, property, environmental, and other resources, and these benefits significantly outweigh the adverse environmental impacts. Therefore, staff recommends that the Conservancy concur with the Board of Forestry's finding on the PEIR, and approve the project.

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.