

COASTAL CONSERVANCY

Staff Recommendation
November 21, 2024

GARLAND RANCH WILDFIRE RESILIENCE – AUGMENTATION

Project No. 22-059-01
Project Manager: Irvin Tang

RECOMMENDED ACTION: Authorization to disburse up to \$500,000 to the Monterey Peninsula Regional Park District to augment the Conservancy grant previously authorized on September 22, 2022, to implement the Garland Ranch Wildfire Resilience Project, consisting of thinning 12 acres of eucalyptus trees, creating a 6.2 acre shaded fuel break, maintaining previously treated areas, collecting data, and conducting community engagement at Garland Ranch in Monterey County; and adoption of findings under the California Environmental Quality Act.

LOCATION: Garland Ranch, Carmel Valley, Monterey County

EXHIBITS

- Exhibit 1: [Project Location Map](#)
- Exhibit 2: [September 22, 2022 Staff Recommendation](#)
- Exhibit 3: [California Vegetation Treatment Program \(CalVTP\) Statewide Programmatic Environmental Impact Report \(PEIR\)](#)
- Exhibit 4: [Project-Specific Analysis and Addendum for the Garland Ranch Regional Park Fuel Management Project \(CalVTP Project ID 2023-24\)](#)

RESOLUTION AND FINDINGS

Staff recommends that the State Coastal Conservancy adopt the following resolution and findings.

Resolution:

The State Coastal Conservancy hereby authorizes a disbursement of five hundred thousand dollars (\$500,000) to the Monterey Peninsula Regional Park District (“the grantee”) to augment the grant previously authorized by the Conservancy on September 22, 2022, for a total authorized amount of one million ninety-one thousand and seven hundred dollars (\$1,091,700) to implement the Garland Ranch Wildfire Resilience Project, consisting of thinning 12 acres of eucalyptus trees, creating a 6.2 acre shaded fuel break, maintaining previously treated areas,

collecting data, and conducting community engagement at Garland Ranch in Monterey County (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 5.5 of Division 21 of the Public Resources Code, regarding Integrated Coastal and Marine Resources Protection.
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 (CalVTP) Statewide Program Environmental Impact Report (PEIR), which was certified by the California Board of Forestry and Fire Protection in December 2019 pursuant to the California Environmental Quality Act (“CEQA”) (Exhibit 3) and the Project-Specific Analysis and Addendum for the Garland Ranch Regional Park Fuel Management Project (CalVTP Project ID 2023-24),(Exhibit 4). The PSA/Addendum addresses the Garland Ranch Regional Park Fuel Management Project (GRRP Project) which covers the component of this project involving the thinning of at least 12 acres of Eucalyptus trees in Garland Ranch Regional Park.

The Conservancy finds:

- a. The GRRP Project is within the scope of the CalVTP, and the PEIR adequately describes the GRRP Project for purposes of CEQA. As described in the PSA/Addendum, although portions of the GRRP Project are located outside the treatable landscape as identified in the CalVTP, those portions have landscape conditions that are similar to those of the treatable landscape, and the treatment types and activities are the same as those described in the CalVTP. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred.
- b. The PEIR and PSA/Addendum identify potentially significant impacts of the GRRP Project in the areas of Archeological, Historical, and Tribal Cultural Resources, Hazardous Materials, Public Health and Safety, and Transportation as identified in the accompanying staff recommendation. The Conservancy finds that the mitigation measures identified in CalVTP and the PSA-Addendum will avoid, reduce, or mitigate these possible significant environmental effects to less-than-significant levels and that these mitigation measures have been required or incorporated into the project.
- c. The PEIR and PSA/Addendum identifies significant and unavoidable impacts of the GRRP Project in the areas of Air Quality, Greenhouse Gas Emissions, and Utilities. The standard project requirements and mitigation measures will reduce these impacts but will not avoid them. The Conservancy finds it is infeasible to completely avoid, reduce, or mitigate the possible significant environmental effects of the GRRP Project in these areas but environmental and other benefits of

the GRRP Project as described in the accompanying staff recommendation outweigh or render acceptable these unavoidable adverse environmental effects to achieve the objectives of the GRRP Project.

- d. The Conservancy adopts the Findings regarding Significant Effects and Statement of Overriding Considerations set forth in the accompanying staff recommendation.

STAFF RECOMMENDATION

PROJECT SUMMARY:

Staff recommends the Conservancy authorize a \$500,000 augmentation to its existing grant to the Monterey Peninsula Regional Park District (Park District) to implement the Garland Ranch Wildfire Resilience Project at Garland Ranch in Monterey County, for a new total grant amount of up to \$1,091,700. The original grant amount was authorized by the Conservancy on September 22, 2022 (Exhibit 2) for the Park District to reduce the wildfire risk in Garland Ranch Regional Park and Carmel Valley through a combination of fuel reduction, data collection, and community outreach. This project consists of: 1) thinning of at least 12 acres of invasive flammable eucalyptus trees in Garland Ranch Regional Park; 2) creation of an approximately 6.2 acre shaded fuel break as a defensible space in Garland Ranch Regional Park less than one mile from Carmel Valley Road and Carmel Valley Village; 3) implementation of ongoing spot-treatment and grazing to maintain treated areas in the park; 4) hiring of a technical specialist, such as a GIS consultant, to collect data and execute GIS mapping recommendations for alternate evacuation routes, safer fire retardant drop zones, additional fuel reduction sites, and/or potential habitat restoration sites; and 5) facilitation of community outreach through in-person meetings, online updates, and educational signage.

The recommended augmentation is to address a significant unexpected increase in the estimated cost of tree thinning which was discovered when the project went out to bid and has delayed the start of the project. The thinning of eucalyptus is expected to begin in 2025 if the necessary funding is secured. Other than the increase in project costs and the adoption of CEQA findings, there are no other changes to the project as described in the September 22, 2022 staff recommendation.

Site Description: See Exhibit 2

Grant Applicant Qualifications: See Exhibit 2

CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA:

The proposed project remains consistent with the Conservancy's Project Selection Criteria, last updated on September 23, 2021, as described in the September 22, 2022 staff recommendation (Exhibit 2).

PROJECT FINANCING

Coastal Conservancy (proposed authorization)	\$500,000
Coastal Conservancy (previous authorization)	\$591,700
Firesafe Council of Monterey County	\$30,000
Monterey County Resource Conservation District	\$360,000
Project Total	\$1,481,700

The anticipated source of funding is the Fiscal Year 2023-24 appropriation from the General Fund to the Conservancy for the purpose of wildfire resilience project (The Budget Act of 2023, Chapter 12, Statutes of 2023 (SB 101)). The proposed project is consistent with this funding source because it will help increase the pace and scale of wildfire resilience work and ultimately reduce the risk of catastrophic wildfire in Carmel Valley. Monterey County Resource Conservation District secured a CALFIRE grant and is providing a cash match of \$360,000 for related fuel reduction work at Garland Ranch. The Firesafe Council of Monterey County is providing an additional \$30,000. Monterey Peninsula Regional Park District anticipates providing an estimated \$140,000 of in-kind staff time for the project.

Unless specifically identified as “Required Match,” the other sources of funding and in-kind contributions described above are estimates. The Conservancy does not typically require matching funds or in-kind services, nor does it require documentation of expenditures from other funders or of in-kind services. Typical grant conditions require grantees to provide any funds needed to complete a project.

CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:

The proposed project remains consistent with the Conservancy’s Enabling Legislation as described in the September 22, 2022 staff recommendation (Exhibit 2).

CONSISTENCY WITH CONSERVANCY’S [2023-2027 STRATEGIC PLAN](#):

Consistent with **Goal 4.2 Wildfire Resilience Projects**, the proposed project will reduce hazardous fuels across an estimated 12 acres and develop an approximately 6.2-acre shaded fuel break in Garland Ranch Regional Park.

CONSISTENCY WITH LOCAL WATERSHED MANAGEMENT PLAN/STATE WATER QUALITY CONTROL PLAN:

The proposed project remains consistent with local watershed management plans and Water Quality Control Plan for the Central Coast Basin, as described in the September 22, 2022 staff recommendation (Exhibit 2).

CEQA COMPLIANCE:

Garland Ranch Regional Park Fuel Management Project

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 to reduce wildfire risk, fire suppression efforts, and related costs, and to protect natural resources and other assets from wildfire. The thinning and removal of at least 12 acres of Eucalyptus trees is a component of Garland Ranch Regional Park Fuel Management Project ("GRRP Project"). The recommended CEQA findings address the GRRP Project as a whole. There are two applicable CEQA documents for the GRRP Project:

- A. The California Vegetation Treatment Program Final Program Environmental Impact Report (CalVTP PEIR), certified by CAL FIRE in December 2019.
- B. Project-Specific Analysis and Addendum for the Garland Ranch Regional Park Fuel Management Project (CalVTP Project ID 2023-24), dated June 2023, adopted by the Monterey Peninsula Regional Park District on October 10, 2023.

The PEIR evaluates the environmental impacts of the CalVTP. The PEIR was prepared by the California Board of Forestry and Fire Protection (Board), the lead agency, in accordance with the requirements of CEQA (Public Resources Code Section 21000 et seq.) and the CEQA Guidelines. The Board certified the PEIR and approved the CalVTP on December 30, 2019. Within the CalVTP PEIR, the State Responsibility Area is also referred to as the treatable landscape.

To use the PEIR for any particular project, CAL FIRE or other project proponents must prepare a project specific analysis to evaluate the particular project and determine whether it qualifies as within the scope of this PEIR or requires additional environmental documentation or its own independent environmental review.

The recommended CEQA findings address the GRRP Project as a whole. The GRRP Project will be accomplished using several treatment types identified in the CalVTP including WUI fuel reduction and shaded fuel breaks treatments and is part of the Park District's regional approach to wildfire prevention. All the GRRP Project's treatment activities and treatment types are evaluated in the PEIR. Treatment activities include manual treatments, mechanical treatments, prescribed burning (comprising broadcast burning, pile burning, and/or air curtain burning), prescribed herbivory, and herbicide application. Future maintenance treatment projects are included in the PSA/Addendum and would involve the same treatment type and activities used in the initial treatment project.

Pursuant to the Conservancy's obligation as a responsible agency under CEQA, Conservancy staff has reviewed the PEIR and the PSA/Addendum. Most of the GRRP Project area is within the CalVTP treatable landscape. However, 3.2 acres of the project area are outside the CalVTP treatable landscape. An Addendum to an EIR is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts, consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168. In

this case, the proposed revision or change in the GRRP Project, compared to the PEIR, is the inclusion of areas outside of the CalVTP treatable landscape. As described in the PSA/Addendum, although portions of the GRRP Project are located outside the treatable landscape as identified in the CalVTP, those portions have landscape conditions that are similar to those of the treatable landscape, and the treatment types and activities are the same as those described in the CalVTP. None of the conditions described in State CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR have occurred. Since preparation of the PEIR, no new circumstances have occurred, nor has any new information been identified requiring new analysis or verification. Thus, the GRRP Project does not require additional CEQA documentation beyond the PSA/Addendum.

The PSA/Addendum identifies standard project requirements (SPRs), which are similar to best management practices and are incorporated into the project activities, and mitigation measures. While the Conservancy has reviewed the SPRs, the Conservancy's analysis focuses on the mitigation measures.

Implementation of SPRs and mitigation measures will reduce potentially significant environmental effects in the areas of Archeological, Historical, and Tribal Cultural Resources, Hazardous Materials, Public Health and Safety, and Transportation, to less than significant levels. Each mitigation measure applicable to each impact is described below.

Archaeological, Historical, and Tribal Cultural Resources

Impact CUL-2: Cause a Substantial Adverse Change in the Significance of Unique Archaeological Resources or Subsurface Historical Resources. Initial and maintenance vegetation treatment activities could include mechanical treatments that use heavy equipment. The heavy equipment use may result in ground disturbance as vegetation is removed. Prescribed burning could damage above ground archaeological features, such as bedrock mortars, lithic scatters, historic-era foundations, and historic-era trash scatters. As a result, these treatments activities have the potential to damage unique archaeological resources or subsurface historical resources, if they are present within a treatment area. Mitigation Measure CUL-2 requires halting ground-disturbing activities within 100 feet of cultural sites and consulting with a qualified archaeologist if archaeological or historic resources are inadvertently discovered. If an archaeologist finds that the discovery is significant, the integrity of the resource will be protected. While the SPRs and mitigation measure would reduce potential impacts, the potential for significant impacts remains unavoidable. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PEIR.

Hazardous Materials, Public Health and Safety

Impact HAZ-3: Identify and Avoid Known Hazardous Waste Sites. Initial and maintenance treatments would include soil disturbance and prescribed burning, which could expose workers or the environment to hazardous materials if a contaminated site is present within the project area. Mitigation Measure HAZ-3 requires a database search for hazardous materials sites within the project area. A database search was conducted as part of the PSA/Addendum. As directed by Mitigation Measure HAZ-3, database searches for hazardous materials sites within the

project area have been conducted, and no hazardous materials sites were identified within 0.25 mile of the treatment areas. Therefore, this impact is less than significant. No SPRs are applicable to this impact, and no additional mitigation is required.

Transportation

Impact TRAN-3: Result in a Net Increase in VMT for the proposed CalVTP. Treatments could temporarily increase vehicle miles traveled (VMT) above baseline conditions because the proposed project would require vehicle trips to transport crew members and equipment to the treatment areas, and some material may be off-hauled. This impact was identified as potentially significant and unavoidable in the PEIR because implementation of the CalVTP would result in a net increase in VMT.

Manual and mechanical treatments under the proposed project would, combined, require approximately 20 personnel and prescribed burning is expected to require crew sizes less than the average size (45 workers) identified in the PEIR due to the small size of the project and expected use of an air curtain burner or carbonator. Further, the project site is limited to approximately 12 acres, which will require limited equipment and off-hauling of only a portion of the removed material when on-site biomass processing is not feasible. Therefore, the crew sizes and project site are sufficiently small such that the total increase in VMT would not exceed 110 trips per day. In addition, the increase in vehicle trips would be temporary. A temporary increase in VMT is within the scope of the activities and impacts addressed in the PEIR because the number and duration of increased vehicle trips are consistent with that analyzed in the PEIR. No SPRs are applicable to this impact. Mitigation Measure AQ-1 would encourage workers to carpool to work sites, and/or use public transportation for their commutes which could result in the reduction of vehicular trips associated with vegetation treatments; and thus, could potentially reduce VMT. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

Implementation of SPRs and mitigation measures will reduce potentially significant environmental effects in the areas of Air Quality, Greenhouse Gas Emissions, and Utilities, but these impacts remain potentially significant and unavoidable. A Statement of Overriding Considerations (see below) is being adopted to address these potentially significant and unavoidable impacts.

Air Quality

Impact AQ-1: Generate Emissions of Criteria Air Pollutants and Precursors During Treatment Activities that would exceed California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS). Mitigation Measure AQ -1 requires, where feasible, the use of an air curtain burner or carbonator (pyrolysis) to process biomass in place of pile burning. Implementation of relevant SPRs and Mitigation Measure AQ-1 would reduce impacts, but impacts remain significant and unavoidable. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PEIR.

Impact AQ-4: Expose People to Toxic Air Contaminants Emitted by Prescribed Burns and Related Health Risk. SPRs applicable to prescribed burning are designed to reduce risk of

exposing people to smoke, but prescribed burning could result in short term exposure to toxic air contaminants. No feasible mitigation measures exist, other than what is listed in the SPRs. Impacts remain significant and unavoidable. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PEIR.

Impact AQ-6: Expose People to Objectionable Odors from Smoke During Prescribed Burning. Implementation of SPRs applicable to burning are designed to reduce risk of exposing people to smoke, including odor, but exposure to objectionable odor may still exist during prescribed fire. No additional mitigation measures are feasible, and this impact would remain significant and unavoidable because there is no guarantee that smoke would behave as predicted, as explained in the PEIR.

Greenhouse Gas (GHG) Emissions

Impact GHG-2: Generate GHG Emissions through Treatment Activities due to the use of equipment and prescribed burning, including pile burning. Mitigation Measure GHG-2 requires feasible implementation of measures to reduce GHG emissions from prescribed burning, such as the use of air curtain burners, carbonators, and gasifiers. These alternative reduction techniques may not be feasible due to cost or parameters of the given project. Even with the implementation of SPRs and Mitigation Measure GHG-2 impacts remain significant and unavoidable. This determination is consistent with the PEIR and would not constitute a substantially more severe impact than what was covered in the PEIR.

Utilities

Impact UTIL-2: Generate Solid Waste in Excess of State Standards or Exceed Local Infrastructure Capacity. Initial and maintenance treatments would generate biomass within the project area. Biomass generated by mechanical and manual treatments would be disposed of by several means. Vegetative biomass would be retained on-site (e.g., chipped, lopped and scattered), processed on-site (e.g., air-curtain burner or carbonator), or hauled off-site to a biomass processing facility or processing area. The type and relative amounts of biomass disposal would be dependent on vegetation type. This impact was identified as potentially significant and unavoidable because biomass hauled offsite could exceed the capacity of existing infrastructure to handle biomass. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact that what was covered in the PEIR.

Statement of Overriding Considerations

In the event a project has unavoidable significant environmental effects, the CEQA Guidelines require the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project (Title 14 California Code of Regulations Section 15093). If the specific project benefits outweigh the unavoidable significant environmental effects of the project, a Statement of Overriding Considerations may be adopted and the project approved, despite its significant environmental effects. The overall environmental benefits of the project, as detailed in the Project Summary section of this staff recommendation warrant the Conservancy's decision to approve the project.

The GRRP Project's benefits significantly outweigh and render acceptable the potentially significant and unavoidable Air Quality, Archaeological, Historical, Tribal Cultural Resources, Greenhouse Gas Emission, Transportation, and Utility impacts that may occur during project implementation.

The GRRP Project's benefits include removing invasive plant species and lowering the risk of catastrophic wildfire that could damage property, endanger wildlife, threaten human life, and significantly contribute to greenhouse gas emissions. The potentially significant and unavoidable air quality, archeological, historical, and tribal cultural resources, transportation, utility, and greenhouse gas emission impacts that may occur during project implementation are many order of magnitude less than the potential impacts associated with wildfire events that the GRRP Project seeks to prevent.

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