

**CALIFORNIA COASTAL COMMISSION**

45 FREMONT, SUITE 2000  
 SAN FRANCISCO, CA 94105-2219  
 VOICE (415) 904-5200  
 FAX (415) 904-5400  
 TDD (415) 597-5885

**Th12b**

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**STAFF REPORT: REGULAR CALENDAR**

**Consistency Determination No.:** **CD-0201-13**

**Federal Agency:** **Bureau of Land Management**

**Location:** Prosper Ridge Prairie, King Range National Conservation Area, Humboldt County (**Exhibit 1**)

**Project Description:** Consistency Determination by Bureau of Land Management for Prosper Ridge Prairie Plan, south of Mattole River estuary in King Range National Conservation Area, Humboldt County

**Staff Recommendation:** Concurrence

**SUMMARY OF STAFF RECOMMENDATION**

The Bureau of Land Management (BLM) Arcata Field Office has submitted a consistency determination for the implementation of the Prosper Ridge Prairie Plan (PRPP), a project intended to restore approximately 800 acres of coastal prairie habitat in the northern part of the King Range National Conservation Area (NCA), Humboldt County, located just south of the Mattole River estuary. Over the past several decades, coastal prairie habitats at the site have experienced encroachment by trees and shrubs, and invasion by non-native species. The purpose of the project is to promote ecological processes that would recover and maintain both the characteristic flora and areal extent of the natural coastal prairie at this site. These objectives

would be achieved through a phased program of mechanical removal of encroaching brush and trees, pile burning, and controlled broadcast burning over much of the project site.

Mechanical treatments would include the pulling and mastication of brush and trees with heavy equipment, with the purpose of reducing woody vegetation to the point where broadcast burning could be performed safely and effectively. Mechanical treatments would be limited to areas with less than 35 percent slope, and excluded from riparian and drainage areas (Exhibits 2, 3). A portion of the removed woody material would then be piled and burned when conditions allowed. Broadcast burning would be prescribed under a burn plan that includes extensive fire behavior modeling, and would occur outside of the fire season under cool, damp, low-wind conditions. Both mechanical and burn treatments would be carried out within smaller sub-units of the project area (Exhibit 2). After the initial project is complete, the area would be maintained periodically through a combination of broadcast burning and limited mechanical removal.

Mechanical removal of vegetation and the reintroduction of fire to the project site would, by design, affect the plant species composition of the coastal prairie ecosystem, with secondary effects on wildlife habitat, grazing uses, visual resources and recreational use of the site. However, these effects on Coastal Act-protected resources would be largely positive.

Encroaching woody species and several invasive plants would become less common, while ground-clearing and nutrient release associated with fire would promote regrowth of the native flora and increased biodiversity. The restoration of the prairie habitat would improve the quality and quantity of habitat and forage for native wildlife, and for livestock that currently graze the site. Soil disturbance and erosion associated with the restoration efforts would be minimized by excluding mechanical treatment from sensitive areas, and by the rapid regrowth characteristic of disturbance-adapted grassland ecosystems. The landscape changes anticipated to result from the project are consistent with the terrestrial habitat restoration goals of the King Range NCA *Resource Management Plan* (RMP). The project as a whole is consistent with CCMP policies protecting land and agricultural resources, environmentally sensitive habitat areas, and water quality, and minimizing erosion (Coastal Act Sections 30231, 30240-30243, 30253).

Implementation of the PRPP may temporarily limit or affect recreational uses on or adjacent to the project site, including hiking, camping, wildlife viewing and hunting. However, over the longer-term, the removal of encroaching and non-native vegetation and restoration of the coastal prairie ecosystem will enhance coastal views, wildlife viewing, and the aesthetic experience of visiting the site. Restoration activities will utilize existing public access roads, but will not result in the closure or restriction of public access routes or recreational areas in or adjacent to the project site except for the immediate areas where mechanical treatments or controlled burns are occurring. Thus, the proposed restoration project will not adversely impact public access and recreation or scenic and visual qualities within the project area, and is consistent with the access, recreation, and visual resource policies of the CCMP (Coastal Act Sections 30210-12, 30214, 30221, 30223, and 30251)

## TABLE OF CONTENTS

<b>I. FEDERAL AGENCY’S CONSISTENCY DETERMINATION</b>	4
<b>II. MOTION AND RESOLUTION</b>	4
<b>III. FINDINGS AND DECLARATIONS</b>	4
A. PROJECT SETTING AND BACKGROUND	4
B. PROJECT DESCRIPTION	6
C. ESHA, WATER QUALITY, AND EROSION	8
D. AGRICULTURE	10
E. PUBLIC ACCESS, RECREATION AND VISUAL RESOURCES	11

### APPENDICES

Appendix A – Substantive File Documents	14
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### EXHIBITS

- Exhibit 1 – Project Location Map
- Exhibit 2 – Proposed Project
- Exhibit 3 – Excluded Drainage Areas
- Exhibit 4 – Historical Landscape Changes
- Exhibit 5 – Low-intensity Broadcast Burn
- Exhibit 6 – Grassland Regrowth

## I. FEDERAL AGENCY'S CONSISTENCY DETERMINATION

The Bureau of Land Management has determined the project consistent to the maximum extent practicable with the California Coastal Management Program (CCMP).

## II. MOTION AND RESOLUTION

### Motion:

*I move that the Commission **concur** with consistency determination CD-0201-13 that the project described therein is fully consistent, and thus is consistent to the maximum extent practicable, with the enforceable policies of the California Coastal Management Program.*

Staff recommends a **YES** vote on the motion. Passage of this motion will result in an agreement with the determination and adoption of the following resolution and findings. An affirmative vote of a majority of the Commissioners present is required to pass the motion.

### Resolution:

*The Commission hereby **concurs** with consistency determination CD-0201-13 by the Bureau of Land Management on the grounds that the project is fully consistent, and thus consistent to the maximum extent practicable, with the enforceable policies of the CCMP.*

## III. FINDINGS AND DECLARATIONS

### A. PROJECT SETTING AND BACKGROUND

The proposed project is located within the northern portion of the King Range National Conservation Area (NCA) in southern Humboldt County (Exhibit 1). The project site lies approximately five miles southwest of the town of Petrolia, and is bounded on the north by the Mattole River estuary. The project area encompasses approximately 800 acres of maritime-influenced vegetation communities, including coastal prairie, coyote brush scrub, and immature Douglas fir stands, with riparian vegetation in the several ephemeral water courses crossing the site.

Historically, the site was composed largely of coastal prairie, dominated by a mixture of native and non-native perennial grasses, along with native forbs and bulbs, and a relatively low abundance of shrubs.<sup>1</sup> Early descriptions of the site noted that the area was “destitute of timber” and well-suited “for agricultural or grazing purposes.”<sup>2</sup> Over the last several decades, however, the project site has been increasingly colonized by woody vegetation, including shrubs (e.g., coyote brush, blackberry, *Ceanothus*) and conifer trees (Douglas-fir) that was previously

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<sup>1</sup> A list of plant species occurring at the project site is provided in Appendix F of the *Prosper Ridge Prairie Plan Draft Environmental Assessment* (Draft EA), p. 94.

<sup>2</sup> Draft EA, p. 1.

distributed only sparsely. These successional changes in vegetation, and the decline in the extent of the coastal prairie, are evident in historical aerial photographs from the site (Exhibit 4). The persistence of prairie habitat at moist, deep-soiled coastal sites is typically dependent on periodic landscape disturbance, especially fire. Historically, the coastal prairie at the project site was maintained primarily through lightning fires (1- to 15-year return intervals) and intentional burning practiced first by Native Americans and later by ranchers. Fire suppression efforts and the abandonment of traditional range management practices during the 20<sup>th</sup> century allowed woody vegetation to begin encroaching on the coastal prairie. Encroachment accelerated during 1980s and 1990s, potentially exacerbated by reductions in livestock grazing intensity.<sup>3</sup>

The exclusion of fire has generally had negative impacts on the native flora of coastal prairies. Periodic, low-intensity wildfires play a key role in maintaining these communities by removing dead vegetation (“thatch”) and encroaching shrubs, which allows light and heat to penetrate to the soil surface and stimulate seed germination and regrowth of native grass, herb, forb and bulb species. The release of essential nutrients (e.g., nitrogen, phosphorus, potassium) from thatch and other standing vegetation also stimulates regrowth of perennial grasses. Heat from wildfire can also stimulate the growth of native nitrogen-fixing herbs, which fertilize the soil and improve the vigor and nutritional content grassland plants. Regular wildfire also reduces the abundance of non-native annual grasses by removing current seed crops. In the absence of fire, the build-up of thatch, increased competition from non-native grasses, and encroachment by woody species combine to reduce the productivity and diversity of the native coastal prairie flora.<sup>4</sup>

Fire suppression and the encroachment of woody vegetation into the project area are also changing the susceptibility of the ecosystem to future wildfires. Coastal grasslands burn readily under dry summer conditions, and though these fires can spread rapidly, the overall intensity of the fires is often limited by low fuel loads. As the project site transitions toward a mixed grassland-woodland, the chances of natural ignition may decrease, but the risk of larger, more intense and more dangerous fires during dry intervals may increase.<sup>5</sup>

The project area has been extensively invaded by non-native species, including annual and perennial grasses (e.g., velvet grass, sweet vernal grass, etc.), broom, tansy ragwort and Italian thistle. In many cases, these invasive species spread rapidly, out-compete native plants for resources, and are unpalatable or poisonous to livestock.<sup>6</sup>

The project area provides habitat for a variety of terrestrial wildlife species, including mammals, birds, reptiles, amphibians and insects, many of which utilize the coastal prairie during all or part of their life-cycles. There are currently no federally- or state-listed threatened or endangered species present in the project area.<sup>7</sup>

The coastal prairies of the Mattole Valley area have supported sheep and cattle grazing for more than one hundred years, and were considered a high-value location for this land use because of

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<sup>3</sup> Draft EA, p. 21-24, 28.

<sup>4</sup> Ibid, p. 23-24, 45.

<sup>5</sup> Ibid, p. 30-36, 50.

<sup>6</sup> Ibid, p. 24-25.

<sup>7</sup> Ibid, p. 24, 29.

the high concentrations of perennial grasses providing green forage later in the summer season than range farther south.<sup>8</sup> At present, the BLM leases two cattle grazing allotments within the project area. The usable grazing area within these allotments has decreased over time due to encroachment by woody vegetation and/or non-native plant species, and in places, erosion related to overgrazing.<sup>9</sup> At present, both allotments are grazed at a relatively low intensity, supporting up to 104 cattle on approximately 470 acres of available grassland.

The BLM has initiated, but not fully implemented, two previous restoration projects within the subject area.<sup>10</sup> In 2006, a prairie restoration and fuels reduction project near Strawberry Rock in the northern part of the project area was abandoned prior to implementation. In 2010, another fuels reduction project was begun utilizing using mechanical treatments to reduce the cover of small trees and brush, but was discontinued due to concerns about resprouting coyote brush. In 2012, the BLM Arcata Field Office began planning and scoping for the present, more comprehensive prairie restoration project.

## **B. PROJECT DESCRIPTION**

The Bureau of Land Management (BLM) proposes to implement the Prosper Ridge Prairie Plan (PRPP) in order to restore a portion of coastal prairie habitat in the northern portion of the King Range National Conservation Area (NCA). The BLM reports in its consistency determination that the coastal prairie at the site is being progressively degraded due to encroachment by trees and shrubs and invasion by non-native species. These changes, which have accelerated over the last several decades, threaten the long-term existence of the rare, native grassland flora that persists at this site, along with the habitat, forage and grazing values, and recreational and scenic resources that the coastal prairie provides at this location. The goal of the project is to promote ecological processes that would restore and maintain the extent and characteristic flora of a healthy coastal prairie community within the project area. As outlined in the *Prosper Ridge Prairie Plan Draft Environmental Assessment* (Draft EA),<sup>11</sup> the specific purposes of the project are to:

- *Promote vigor and diversity of flora consistent with healthy coastal prairie communities*
- *Promote soil conditions that are able to maintain a diverse flora and fauna, while minimizing soil compaction*
- *Reduce the fuel load and increase the number of viable woodland fire suppression tactics available within and adjacent to the project area.*
- *Initiate reductions in Douglas-fir (*Pseudotsuga menziesii*) encroachment and other woody vegetation before the conditions require treatment methods that could have significant environmental impacts.*

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<sup>8</sup> Draft EA, p. 21.

<sup>9</sup> Ibid, p. 28-29.

<sup>10</sup> Ibid, p. 1.

<sup>11</sup> Ibid, p. 6.

The goals of the PRPP are consistent with the King Range NCA Regional Management Plan (RMP)<sup>12</sup>, and the project will help meet several specific objectives and management actions of the RMP:

- *Objective TEV 1.7: Maintain healthy, productive grasslands to encourage native species abundance and diversity . . .*
- *Management Action TEV 1.71: Use prescribed burns to mimic the pre-mechanization era fire regimes that helped to shape and maintain the distribution and extent of grasslands. Native grass enhancement will be pursued through an integrated approach including, but not limited to burning, grazing, reseeding, and transplanting with locally collected seed stock.*
- *Objective FIR 1: Develop a landscape resistant to damage associated with large scale, high intensity fires by allowing for the natural dynamic effects of fire to occur on the ecosystem.*
- *Management Action FIR 1.5.1: Utilize prescribed fire and mechanical fuel reduction methods in managing fuels to create conditions resulting in low intensity wildfires and to reduce fire-spread potential and damages associated with large, high-intensity fires.*

As described in the Draft EA, the proposed project is also intended to improve the quality and quantity of forage on the two grazing allotments leased by the BLM on the project site.<sup>13</sup>

The BLM will implement the PRPP over three phases, in eight smaller treatment units within the larger project area (Exhibit 2). During the first phase, all or portions of each unit would be subjected to mechanical vegetation removal treatment. Coyote brush and small trees would be pulled using a small excavator, followed by mechanical grinding (“mastication”) of the woody material, until fuels were reduced to a level to would allow for safe and effective broadcast burn treatment. Some of the woody material, in particular coyote brush and larger diameter Douglas-fir, would be piled and burned as a part of the second phase (see below). In order to limit the risk of excessive ground disturbance and soil erosion, heavy equipment use would be excluded from areas with greater than 35 percent slope. As a result, some portions of each unit, and large portions of the three most coastal treatment units, would not be subject to mechanical treatment (Exhibit 2). Mechanical treatments would also be excluded from the several ephemeral drainages and riparian corridors crossing the project site (Exhibit 3), and steps will be taken to avoid individuals or colonies of native bunchgrasses and other sensitive species.

The second phase of the proposed project would consist of pile burning to eliminate piles of removed vegetation created during the first phase. Pile burning would occur only in the units which received mechanical treatment during phase one. In order to minimize the risk of igniting an uncontrolled fire, pile burning would be conducted outside of the fire season when weather conditions are cool and damp, and winds are low.

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<sup>12</sup> Draft EA, p. 6-7.

<sup>13</sup> Ibid, p. 28, 46.

During the third phase, each project unit, including those excluded from mechanical treatment, would be subjected to controlled broadcast burning (Exhibit 5). As above, the risk of uncontrolled fires would be minimized by conducting the broadcast burns outside of the fire season under cool, damp, low-wind conditions, following prescribed burn plans that would incorporate extensive fire modeling and professional peer review. Riparian and drainage areas (Exhibit 3), as well as several areas that were historically vegetated with conifer forest, would not be targeted for broadcast burning, though they may experience some burning incidental to the broadcast burning occurring in the surrounding units. These impacts will be minimized by limiting broadcast burning to the wet season when riparian areas are naturally moist. Following phases two and/or three, certain areas (e.g., areas with previously acute invasions of non-native species) would be replanted with native grass seed and/or perennial bunchgrass plugs, as available.

All phases of the project would be conducted during periods of low visitor use, outside of holiday weekends and deer hunting season. The project could potentially be initiated as early as the fall of 2013, and would continue opportunistically as funding and weather conditions allowed. Access to the project site would occur via two public roads (Prosper Ridge Road and Windy Point Road). The roads would be closed temporarily during broadcast burn treatments, and possibly during mechanical and pile burn treatments as necessary to maintain public safety. Temporary access road closures would be in effect for several hours, up to four times per year. Project notices would be posted in visible locations at the nearby Mattole Campground and in the town of Petrolia.

After the initial treatments are complete, the area would be maintained through a combination of broadcast burning and limited mechanical treatment, as deemed necessary based on regular monitoring of grassland extent and woody species encroachment. The project area would also be monitored for species composition, using the California Native Plant Society rapid assessment protocol at existing plot sites, at ten-year intervals. Additional monitoring sites may be assigned in areas where coyote brush, Douglas-fir, or non-native species are abundant, or where post-burn native plant seeding or planting has been undertaken in order to facilitate plant community composition changes. In addition, the project area will be monitored for invasive, non-native species, and any infestations would be eradicated as warranted.

### **C. ESHA, WATER QUALITY AND EROSION**

Section 30231 of the Coastal Act states:

*The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*

Section 30240 states:

*(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas.*

*(b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

Section 30253 states in part:

*New development shall do all of the following:*

*(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard*

*(b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding are or in any way require protective devices that would substantially alter natural landforms along bluffs and cliffs.*

The purpose of the PRPP is to restore a portion of coastal prairie habitat in the King Range NCA through the mechanical removal of encroaching woody vegetation and the reintroduction of fire into the ecosystem. The project is likely to promote ecological processes that will benefit the native plant species that characterize coastal prairie habitats, restrict or reduce encroachment by woody vegetation and non-native invasive species, and benefit wildlife that utilizes coastal prairie. However, by design, the proposed project would disturb and change the existing environment over both the short- and long-term, and thus effects of the project on resources protected by the Coastal Act and CCMP must be evaluated.

If the proposed project were completed, the areal extent of coastal prairie habitat at the site would increase, at the expense of coyote brush shrublands and immature Douglas-fir forest. The combination of mechanical treatments followed by broadcast burning would slow or eliminate the colonization of grassland by trees and shrubs, and slow the recovery of established coyote brush. Mechanical treatments will reduce the abundance of non-native grasses and shrubs (such as broom) on the landscape, and broadcast burning will in some cases reduce the seed banks of these species, slowing their recovery. Broadcast burning is expected to stimulate growth of native annual species, including nitrogen fixers such as lotus, lupine and clover that will help fertilize the landscape. The removal of built-up thatch will release nutrients and allow light and heat to penetrate to the soil surface, stimulating seed germination and regrowth of fire-adapted native perennial grasses. Further, the proposed reseeding and plug planting of native perennials at key sites will facilitate the recovery of the native grassland. Overall, the initial treatments are expected to result in a greater distribution of grassland cover – in particular native perennial grasses – relative to woody vegetation, and improve the diversity, vigor and nutritional composition of herbaceous species. At a minimum, these changes would persist for several years following the

initial treatment, and could be maintained over the long-term where repeated mechanical and broadcast burn treatments are implemented. For the purposes of the Coastal Act, native perennial grasslands growing on coastal terraces are typically considered environmentally-sensitive habitat areas (ESHA), and thus are required to be protected against significant degradation or disruption of habitat values. The proposed project, while resulting in some short-term habitat disturbance, would over a longer time-frame restore the extent, diversity and ecological function of coastal prairie ecosystem at this site. The proposed project is thus compatible with the continuance of the ESHA at the site and is consistent with Section 30240 of the Coastal Act.

The proposed project includes mechanical vegetation removal using heavy equipment, followed by broadcast burning, with the intent of removing the existing vegetation cover in order to facilitate regrowth of the coastal prairie. These treatments, however, have the potential to result in incidental effects such as soil disturbance and erosion, which could result in excess sediment in the seasonal streams draining the project site and ultimately in the coastal ocean. The proposed project includes several measures to minimize the risk of significant erosion and impacts to riparian areas and water quality. First, mechanical treatments and the use of heavy equipment will be excluded from all areas with slopes in excess of 35 percent, which are typically those for which the risk of erosion is greatest. For example, no mechanical treatments will be attempted in much of the steep western portion of the project area near the coast (Exhibit 2). Mechanical treatments will also be excluded from the ephemeral drainages crossing the site in order to preserve riparian vegetation and minimize erosion (Exhibit 3). Further minimizing the risk of erosion and impacts to water quality is the rapid regrowth and recovery time characteristic of the coastal grasslands at this site (Exhibit 6).

Taken together, these features of the proposed project will maintain the quality of coastal waters and streams and prevent substantial interference with surface water flow, and will not result in significant erosion, geologic instability or destruction of the project site. The Commission therefore finds that the project is consistent with Sections 30231 and 30253(b) of the Coastal Act.

The removal of woody vegetation and reintroduction of a periodic, low-intensity fire regime to the grassland ecosystem will reduce fuel loads and decrease the danger of higher intensity, dangerous wildfires on the project site, and thus contributes directly to minimizing the fire hazard in the larger area, consistent with Section 30253(a) of the Coastal Act.

#### **D. AGRICULTURE**

Section 30241 of the Coastal Act states in part:

*The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas' agricultural economy. . . .*

Section 30242 states:

*All other lands suitable for agricultural uses shall not be converted to nonagricultural uses unless (1) continued or renewed agricultural use is not*

*feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands.*

Section 30243 states:

*The long-term productivity of soils and timberlands shall be protected, and conversions of coastal commercial timberlands in units of commercial size to other uses or their division into units of noncommercial size shall be limited to providing for necessary timber processing and related facilities.*

Cattle and sheep grazing is a long-standing use of the Prosper Ridge Prairie that continues at present on two BLM grazing allotments. While inappropriate grazing practices and intensities have at times contributed to management problems at the site (e.g., soil erosion, invasive species),<sup>14</sup> grazing that is calibrated to the capacity of the site can help maintain a healthy prairie ecosystem. Over the past several decades, this land use has suffered as woody vegetation encroached on the coastal prairie, and as non-native species invasions degraded the quality of the forage at the site. Through the use of mechanical vegetation removal and broadcast burning, the proposed project would increase the area of coastal prairie usable for grazing, by reducing the abundance of woody and/or non-native species, improve the quality of the existing forage. Moreover, ecological and biogeochemical processes associated with periodic, low-intensity fire have the potential to preserve the long-term productivity of the soils and grasslands at the site, and improve the nutritional quality of the forage. In summary, the proposed project would halt the ongoing loss of suitable grazing land at the site, and maintain the long-term viability and productivity of this land use, consistent with the policies of Coastal Act Sections 30241, 30242 and 30243.

#### **E. PUBLIC ACCESS, RECREATION, AND VISUAL RESOURCES**

Section 30210 of the Coastal Act states:

*In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*

Section 30211 states:

*Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*

Section 30212 states in part:

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<sup>14</sup> Draft EA, p. 28.

*(a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: (1) It is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, (2) Adequate access exists nearby, or, (3) agriculture would be adversely affected.*

Section 30214 states in part:

*(a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to . . .*

*(1) Topographic and geologic site characteristics.*

*(2) The capacity of the site to sustain use and at what level of intensity.*

*(3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area . . .*

Section 30221 states:

*Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.*

Section 30223 states:

*Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.*

Section 30251 states:

*The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.*

Recreation uses in the vicinity of the project area include day-use and overnight camping, hiking along the river and beach, boating, and to a lesser extent, hunting, sightseeing and wildlife viewing.<sup>15</sup> Mattole Campground, located near the Mattole River mouth at adjacent to the

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<sup>15</sup> Draft EA, p. 42.

northern end of the project area, provides 14 tent/trailer campsites, picnic tables, and fire rings.<sup>16</sup> The campground lies near the northern terminus of the Lost Coast Trail, which runs along the beach adjacent to the seaward edge of the project area. Access to the inland areas of the project site is provided from Prosper Ridge Road and Windy Point Road, though the area contains only a handful of informal trails. Most sightseeing within the project area occurs from the roads themselves. BLM estimates that Mattole Campground receives approximately 12,000 visitors per year, while the beach area south of the campground receives an estimated 10,000 visitors per year. An additional 1000 visits per year may occur for the purposes of hunting or sightseeing in the project area itself. The Draft EA describes the project area as possessing “moderate to high scenic qualities”,<sup>17</sup> which include spectacular views of the ocean and coast and opportunities to view wildlife and rare native flora. Under the King Range NCA RMP, the project area should be managed so as to “generally retain the landscape’s existing character”, though moderate changes may be acceptable.<sup>18</sup>

Project impacts on public access and recreational use of the site are likely to be minor, and where they occur, temporary. Project treatments would not occur in the campground, estuary or beach areas which receive the vast majority of visitors to the area, and thus these recreational uses would not be curtailed or limited. Temporary noise and air quality impacts may occur in the camp-ground and beach areas on days when mechanical and fire treatments are occurring. Access to portions of the Lost Coast Trail and the project area itself, both from vehicles along the access roads and on foot, would be temporarily restricted on days when treatments occur. These restrictions would be in place three or four hours per day, one to three days per year. However, these impacts to public access at the site would be minimized by the project work plan, which would substantially avoid the periods of highest visitation by restricting treatments to the wet season and excluding holiday weekends and the hunting season. BLM also states that over the long-term, the project would enhance hunting opportunities and success because of the increased visibility associated with the removal of brush and trees.<sup>19</sup> The removal of trees along the access roads could potentially induce increased vehicle use off the roadway, but this potential impact would be minimized by posting additional signage and/or installing post and cable barriers along the roads.<sup>20</sup>

Over the short-term, the piling of removed vegetation and blackening associated with broadcast burning would negatively affect visual resources in and adjacent to the project area. At any given time, however, these impacts would occur over relatively small areas due to the planned unit-by-unit approach to project implementation. Moreover, these impacts would be short-lived: Pile-burning would remove the vegetation piles, and the rapid natural regrowth of coastal prairie vegetation would begin to restore groundcover almost immediately. Over the longer-term, the proposed project would enhance views of the coastal landscape by removing trees and shrubs, creating more numerous and expansive vistas of the coastal prairie, shoreline and ocean. Restoration of the native coastal prairie flora may also enhance the visual experience for sightseers, especially during the spring bloom, and may improve opportunities for wildlife

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<sup>16</sup> BLM King Range NCA website, <http://www.blm.gov/ca/st/en/fo/arcata/kingrange/campground.html>

<sup>17</sup> Draft EA, p. 42.

<sup>18</sup> Ibid.

<sup>19</sup> Ibid, p. 54.

<sup>20</sup> Ibid.

viewing. The beneficial effects of these long-term changes would more than offset the temporary impacts of the project on visual resources.

Based on these considerations, the Commission finds that the proposed project will have no lasting adverse impacts on public access and recreation, and that the anticipated landscape changes associated with the restoration of the coastal prairie ecosystem would enhance scenic and visual resources and visitor enjoyment of the project area. The project is thus consistent with Sections 30210, 30211, 30212, 30214, 30221, 30223 and 30253 of the Coastal Act.

## **APPENDIX A**

### **SUBSTANTIVE FILE DOCUMENTS**

1. Coastal Consistency Determination for the Prosper Ridge Prairie Project, Bureau of Land Management Arcata Field Office, June 17, 2013.
2. Prosper Ridge Prairie Plan Environmental Assessment (#DOI-BLM-CA-N030-2013-0002).
3. Resource Management Plan and Final Environmental Impact Statement, King Range National Conservation Area, Bureau of Land Management – Arcata Field Office, 2005.



# Prosper Ridge Prairies Vicinity Map



**Humboldt County**  
Arcata Field Office  
Property



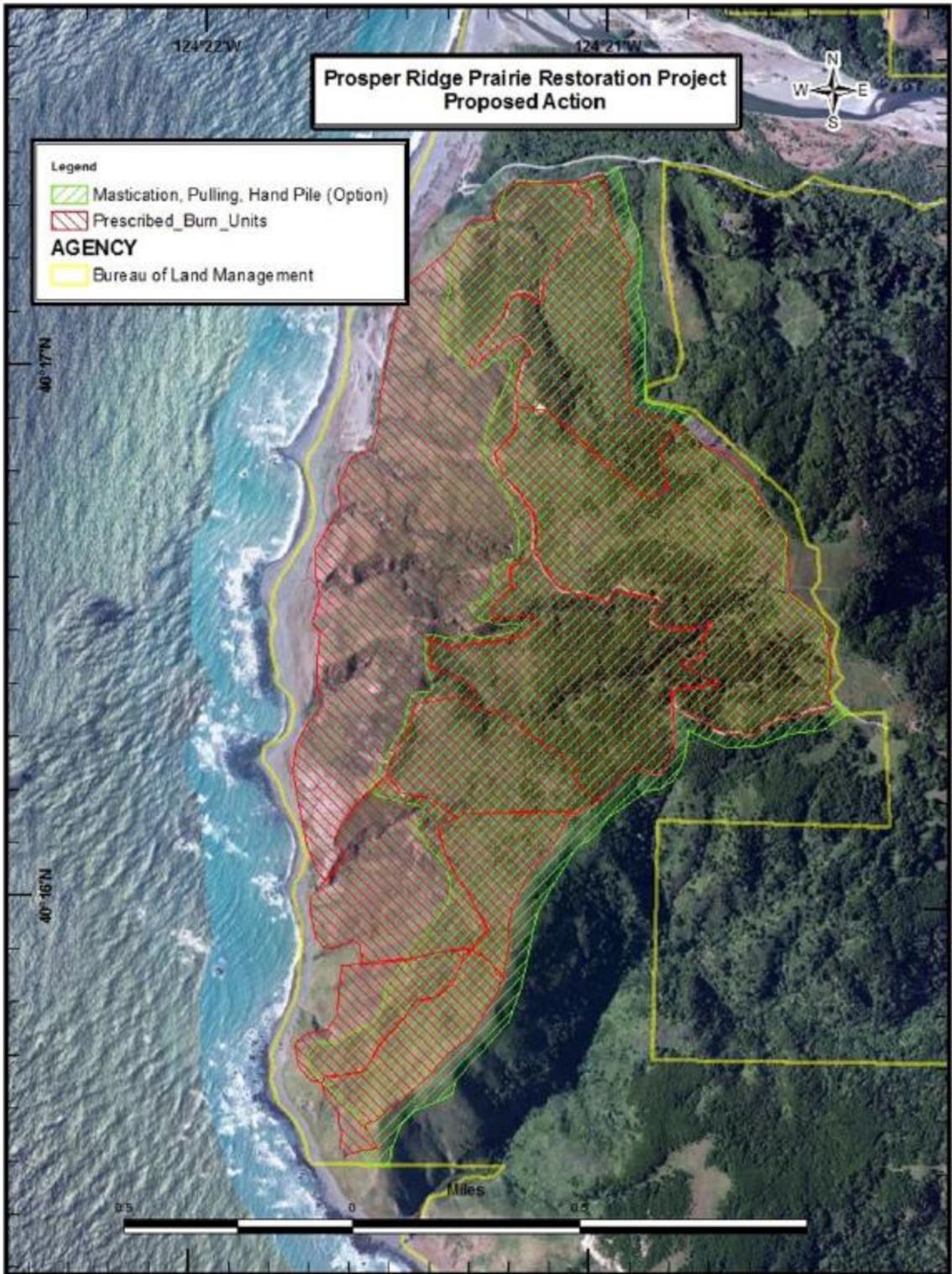
**King Range**  
National Conservation Area  
and surrounding BLM land



**Project Area**

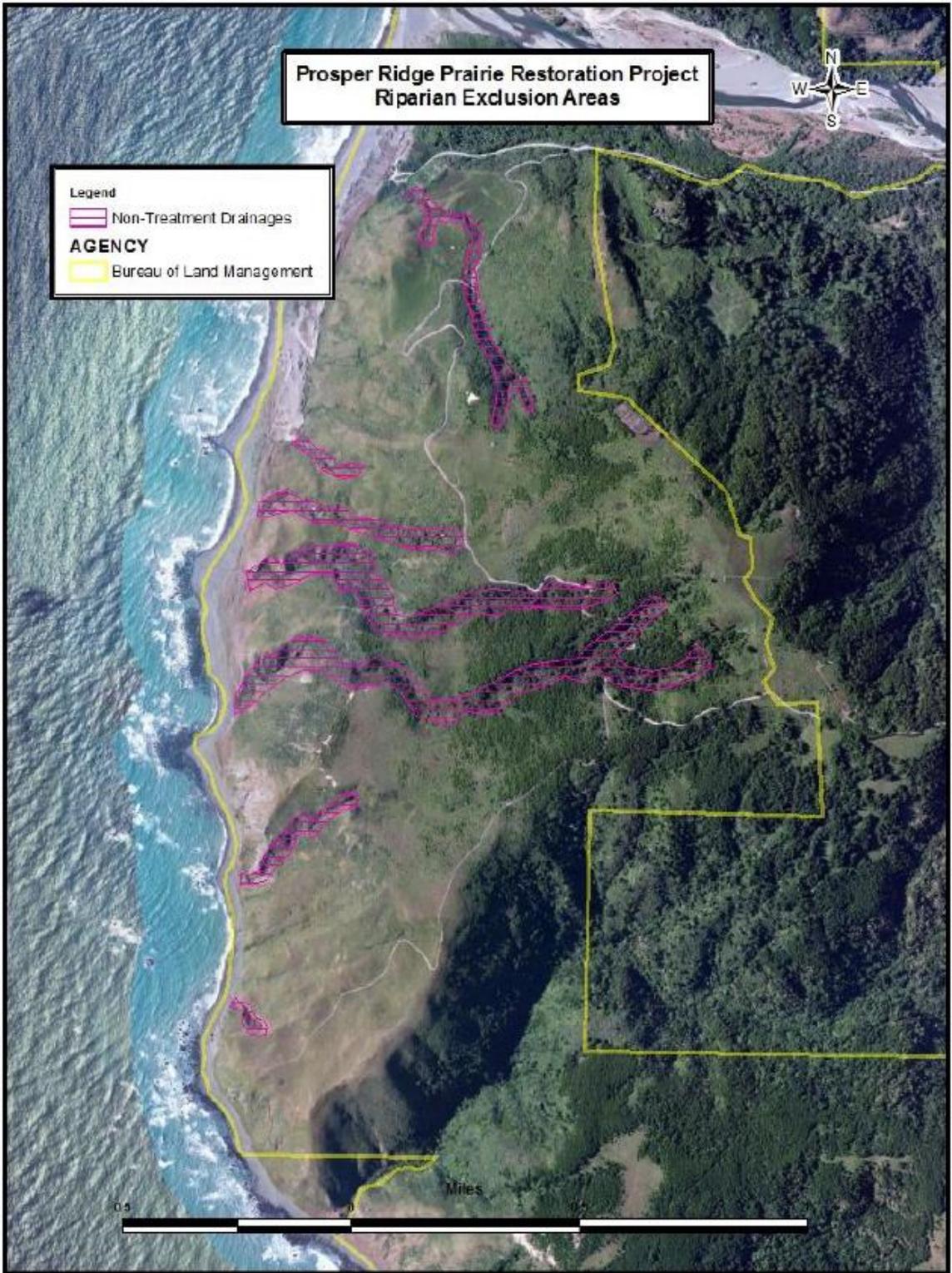
## Exhibit 1: Location of the Prosper Ridge Prairie Project

(Source: Prairie Ridge Prairie Project Draft EA, p. 2)

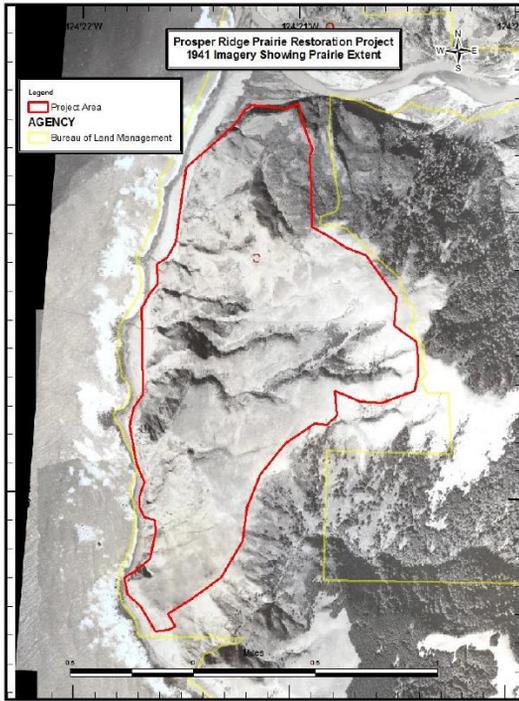


**Exhibit 2:** Project area and proposed treatments

(Source: Prairie Ridge Prairie Project Draft EA, p. 12)



**Exhibit 3:** Excluded drainage areas  
 (Source: Prairie Ridge Prairie Project Draft EA, p. 85)



**Project Area in 1941**



**Project Area in 2009**

**Exhibit 4:** Aerial photographs showing successional vegetation change on the project site between 1941 and 2009.

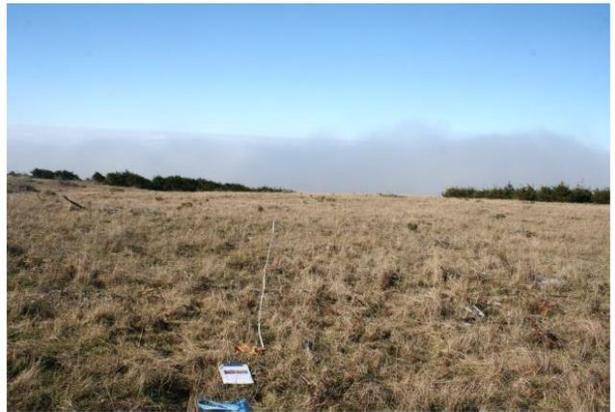
(Source: Prairie Ridge Prairie Project Draft EA, p. 2, 12)



**Exhibit 5:** Low-intensity grassland broadcast burn implemented by BLM Arcata staff in 2011.  
(Source: Prairie Ridge Prairie Project Draft EA, p. 49)



Plot 1 January 2011 – following mastication



Plot 1 January 2013 – two years post mastication

**Exhibit 6: Prairie Ridge grassland recovery, post-mechanical treatment, 2011-2013.**

(Source: Prairie Ridge Prairie Project Draft EA, p. 44)