



**COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING AND BUILDING
STAFF REPORT**

Tentative Notice of Action

*Promoting the wise use of land
Helping build great communities*

MEETING DATE April 8, 2016 LOCAL EFFECTIVE DATE April 22, 2016 APPROX. FINAL EFFECTIVE DATE May 13, 2016	CONTACT/PHONE Airlin M. Singewald, Senior Planner (805) 781-5198 asingewald@co.slo.ca.us	APPLICANT Cambria Community Services District / Friends of Fiscalini Ranch	FILE NO. DRC2015-00016
SUBJECT A request by the CAMBRIA COMMUNITY SERVICES DISTRICT (CCSD) AND FRIENDS OF FISCALINI RANCH for a Minor Use Permit / Coastal Development Permit (DRC2015-00016) to allow for hazardous fuel reduction and forest restoration activities on approximately 50 acres of the Fiscalini Ranch Preserve in Cambria. These activities would include removal of dead and dying trees, ladder fuel, and woody debris; thinning stands of overcrowded small trees; and removal of invasive plants. The project description includes various measures to minimize or avoid environmental impacts. The work would occur first in three approximately 1-acre size test plots and then the most successful treatment will be applied to the balance of the project acreage. The proposed project will result in approximately 50 acres of temporary site disturbance, primarily by hand crews with chain saws, of a 378-acre parcel. The proposed project would also finalize ZON2014-00693 authorizing the removal of up to 300 hazardous trees on CCSD properties. No permanent site disturbance is proposed. The proposed project is within the Open Space land use category and is located on the Fiscalini Ranch, which is bounded by Warren Road to the south, Huntington Road to the North, the Pacific Ocean to the west, and Highway 1 and Trenton Avenue to the east, within the community of Cambria. The site is in the North Coast planning area.			
RECOMMENDED ACTION Approve Minor Use Permit/Coastal Development Permit DRC2015-00016 based on the findings listed in Exhibit A and the conditions listed in Exhibit B.			
ENVIRONMENTAL DETERMINATION The proposed project is consistent with the Final Environmental Impact Report for the Fiscalini Ranch Preserve Management Plan certified by the CCSD on November 16, 2009.			
LAND USE CATEGORY Open Space, Residential Single Family	COMBINING DESIGNATION Sensitive Resource Area, Terrestrial Habitat, Local Coastal Plan, Archaeologically Sensitive, Geologic Study Area	ASSESSOR PARCEL NUMBER 013-121-025, 013-121-026	SUPERVISOR DISTRICT(S) 2
PLANNING AREA STANDARDS: Archaeological Resource Protection, Monterey Pine Forest Habitat (TH), Fiscalini Ranch – Limitation on Use <i>Does the project meet applicable Planning Area Standards: Yes - see discussion</i>			
LAND USE ORDINANCE STANDARDS: Local Coastal Program, Terrestrial Habitat, Archaeologically Sensitive Area <i>Does the project conform to the Land Use Ordinance Standards: Yes - see discussion</i>			
FINAL ACTION This tentative decision will become the final action on the project, unless the tentative decision is changed as a result of information obtained at the administrative hearing or is appealed to the County Board of Supervisors pursuant Section 23.01.042 of the Coastal Zone Land Use Ordinance; effective on the 10th working day after the receipt of the final action by the California Coastal Commission. The tentative decision will be transferred to the Coastal Commission following the required 14-calendar day local appeal period after the administrative hearing. The applicant is encouraged to call the Central Coast District Office of the Coastal Commission in Santa Cruz at (831) 427-4863 to verify the date of final action. The County will not issue any construction permits prior to the end of the Coastal Commission process.			
ADDITIONAL INFORMATION MAY BE OBTAINED BY CONTACTING THE DEPARTMENT OF PLANNING & BUILDING AT: COUNTY GOVERNMENT CENTER γ SAN LUIS OBISPO γ CALIFORNIA 93408 γ (805) 781-5600 γ FAX: (805) 781-1242			

EXISTING USES: Open space, passive recreation	
SURROUNDING LAND USE CATEGORIES AND USES: <i>North:</i> Residential Single Family/ Residences <i>East:</i> Open Space, Residential Single Family/ residences, Highway 1 <i>South:</i> Residential Single Family/ Residences <i>West:</i> Pacific Ocean	
OTHER AGENCY / ADVISORY GROUP INVOLVEMENT: The project was referred to: Public Works, Building Division, Cambria Community Services District (Water/ Sewer/ Fire), Coastal Commission, and North Coast Advisory Council.	
TOPOGRAPHY: Nearly level to steeply sloping	VEGETATION: Monterey pine trees, coast live oaks, grasses
PROPOSED SERVICES: Water supply: N/A Sewage Disposal: N/A Fire Protection: Cambria Fire Department (Cambria CSD)	ACCEPTANCE DATE: January 15, 2016

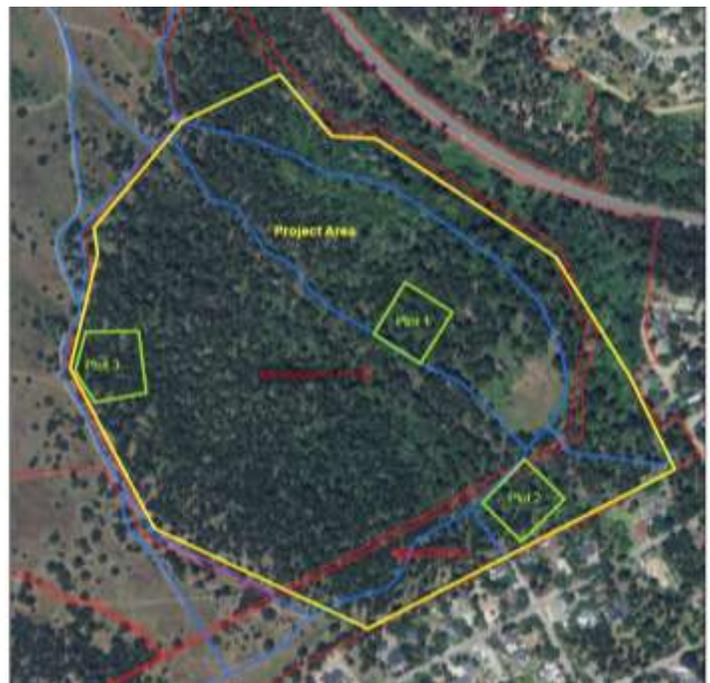
DISCUSSION

Project Site

The primary focus of this project is the Fiscalini Ranch Preserve (the Ranch), with an adjacent parcel owned by the CCSD included in one phase only (Hazardous tree removal). Highway 1 divides the Ranch into two sections – one to the west and one to the east. This project will take place entirely in the forested area on the western section of the preserve. This section is bounded by Warren Road to the south, Huntington Road to the North, the Pacific Ocean to the west and Highway 1 and Trenton Avenue to the east. The adjacent CCSD parcel is also located to the west of Highway 1, with the CCSD wastewater treatment plant to the north, Fiscalini Ranch to the south and Huntington Road to the east.

The project area encompasses approximately 50 acres of the 378-acre parcel. The 2014 Fiscalini Ranch Forest Analysis, prepared by consulting arborist James Allen, divides the project area into two management units: A and B (see Figure 1). The majority of the acreage is located in Management B. A small portion of the project spills over into Management Unit A. The project encompasses most of the forest surrounding the Forest Loop Trail.

Figure 1: Forest Restoration Plan Project Area



As recommended by the arborist, the first phase of the project would be implemented in three approximately one-acre test plots. The purpose of the test plots is to determine which treatment method is the most cost effective and yields the best results.

Background

The proposed project would authorize hazardous fuel reduction and forest restoration activities on approximately 50 acres of the Ranch. The Ranch contains about 70 acres of mixed Monterey pine forest, of which an estimated 20-40% of the trees are dead or dying due to the recent drought and pine bark beetles. These dead and dying trees, combined with accumulated woody debris on the forest floor, contribute to extreme fire hazards in Cambria.

On October 22, 2015, the Department of Planning and Building issued an emergency permit (ZON2014-00693) authorizing the removal of up to 300 hazardous trees on CCSD properties. Hazardous trees were defined as dead trees that posed an immediate threat of falling on utility lines, homes or other structures, as well as trails and benches used by visitors on the Ranch. The Ranch manager and Cal Fire teams identified and flagged 190 trees, of which 156 trees were located on the Ranch and 34 on the adjacent CCSD property behind the wastewater treatment plant. The trees were all felled in late October and early November using hand crews.

Coastal Zone Land Use Ordinance 23.03.045(B)(6) requires applicants to apply for a regular "follow-up" coastal development permit within 30 days of receiving an emergency permit. Phase 1 of this minor use permit satisfies this requirement since it covers hazardous tree removal on the Ranch and the adjacent CCSD parcel.

Project Goals and Objectives

The overall goal of the proposed project is to mitigate fire hazards in Cambria and improve the overall health of the Monterey pine forest. The project's specific goals and objectives include:

1. Reduce hazards to life and property within and around the forest

- a. Selectively remove dead and dying trees and accumulated woody debris on the forest floor to reduce the risk of catastrophic wildfire
- b. Remove trees and limbs that present a hazard to people using Ranch amenities, such as trails and benches

2. Improve overall forest health

- a. Strive to mimic the outcomes that would result from the low intensity, periodic fires to which the Monterey pine forest is adapted using mechanical means
- b. Maintain an uneven-aged stand, by retaining a representative mix of seedlings, saplings, pole-sized and mature trees
- c. Selectively thin crowded stands of saplings and pole sized trees in order to provide sufficient resources (e.g. light, moisture, nutrients) for continued healthy growth of most vigorous specimens
- d. Remove diseased / infested branches (e.g. Western gall rust, Dwarf mistletoe) on otherwise vigorous young trees to promote their recovery

3. Encourage the regeneration and expansion of the forest

- a. Protect existing seedlings by flagging them and instructing workers to practice avoidance to the extent practicable during project activities
- b. Scatter cones and plant pine seedlings in areas with extensive tree, debris and / or invasive removal
- c. Scatter cones and plant pine seedlings on the forest edge to replace forest acreage lost years ago to logging and development

4. Maintain/enhance habitat for native plants and wildlife

- a. Protect existing wildlife habitat by reducing the threat of stand replacing wildfire which could potentially destroy it
- b. Safeguard wildlife by conducting habitation surveys before project activities begin and retain non-hazardous trees providing habitat for wildlife
- c. Eradicate invasive plant species that are displacing native plants and the wildlife they support
- d. Plant a variety of native shrubs, forbs and grasses in areas with extensive tree, debris and / or invasive removal to accelerate natural regeneration of an understory with high structural and species diversity
- e. Enhance biological diversity by propagating rare plants to increase populations on site (e.g. Cambria morning glory) and expanding range by introducing rare species suited to site conditions (e.g. Hickman's onion)
- f. Retain large snags and logs for wildlife habitat and nutrient cycling

5. Maintain and enhance aesthetic values of the forest

- a. Remove trees, ladder fuels and woody debris only to the extent necessary to insure public safety and forest health in an environmentally sensitive manner
- b. Factor aesthetics into project decisions, such as plant palettes, revegetation plans, snag retention, etc.

6. Improve understanding of the ecology, restoration, and stewardship needs of the Monterey pine forest among Cambrians and the broader public

- a. Increase knowledge of the historical role of in Monterey pine ecosystems and demonstrate how periodic thinning can benefit forest health
- b. Improve understanding of the Monterey pine plant community and the ecosystem services they provide
- c. Increase familiarity with invasive plants found locally, their impacts, how they spread and how the public can help control them
- d. Cultivate a stewardship ethic by encouraging more people to participate in forest restoration and monitoring activities

Project Description

The proposed project would treat approximately 50 acres of pine forest in five phases:

1. **Conduct pre-project / environmental monitoring** – this would involve documenting the baseline forest conditions to evaluate the project's success. This phase includes conducting surveys and establishing appropriate buffers to avoid disruption to wildlife (including woodrats, nesting birds, and overwintering monarch butterflies).
2. **Remove hazardous trees** – this includes the removal of 190 hazardous trees which have already been flagged by Cal Fire and removed under emergency permit ZON2014-00693. This minor use permit would finalize the emergency permit.
3. **Reduce test plot fuel loads** – this involves removing dead and dying trees, ladder fuel, and woody debris, and thinning stands of overcrowded small trees in the three one-acre test plots. All work will be done by hand crews with chainsaws. The only heavy equipment used would be a chipper. The three techniques that will be used are as follows:
 - a. Cut / Lop / Scatter: This approach involves cutting trees and branches into 3 to 6 foot lengths and scattering them evenly over an area. The pieces should lie relatively flat on the ground and

only be 1-2 feet in height. This insures that they decompose readily and contribute nutrients to the soil.

- b. Cut / Pile / Burn: This technique involves creating piles of woody debris approximately 8-10 feet in diameter and 4 feet high consisting of small trees, branches, tops, brush, etc. Piles are typically located in meadows or openings in the forest at least 10 feet away from trees / shrubs and several hundred feet from any structures. The piles are ignited during the winter and monitored during the burn. The piles are thoroughly extinguished when they have finished burning. All pile burns will be conducted only on permissive burn days, permitted through the San Luis Obispo Air Pollution Control District (SLOAPCD) and supervised by Cal Fire.
 - c. Cut / chip: Chipping is another effective way of dealing with woody debris up to 12 inches in diameter. Chipping reduces materials into chips approximately one inch square by one-quarter inch thick. Some chips will be spread on trails to protect tree roots and reduce dust. Others will be used to build water basins for new vegetation and aid in plant development.
4. **Reduce remaining fuel loads** – after fuel reduction activities in the test plots are completed, the success of each treatment will be assessed. The treatment deemed most effective will be applied to the balance of the project area.
 5. **Remove invasive plants** – this phase involves removal of invasive plants, particularly French broom, which is found in two locations within the project site: near the Trenton entrance and at the northeast corner of Management Unit B.
 6. **Replant native vegetation** – this will be limited in scope as it is anticipated that natural regeneration will be sufficient to replace trees in most areas. The project will rely on assisted regeneration by scattering seeds and cones for regeneration of pines trees in the forest. In large areas where aggressive invasives such as French broom have been removed, the project will plant 1-gallon containers of understory plants to give the natives a competitive advantage.
 7. **Post-project monitoring** – the project proposes to monitor treated areas immediately following forest treatments and at six-month intervals thereafter.

Environmental Determination

The proposed project is consistent with the Final Environmental Impact Report (EIR) for the Fiscalini Ranch Preserve Management Plan, adopted by the Cambria CSD on November 16, 2009. The management plan consisted of additions to the existing trail system, on-going management and restoration of resources, and development of a community park on the eastern part (across Highway 1) of the Ranch. On September 13, 2012, the County Planning Commission approved Development Plan / Coastal Development Permit DRC2010-00026, which authorized the activities described in the management plan.

The proposed project would help to implement Mitigation Measure PSU-6 of the FEIR, which states: “The Cambria CSD Fire Department shall continue to engage in annual fuel reduction activities, especially in the urban/wildland interface areas on the north and south boundaries of the West Ranch, as outlined in the Public Access and Resource Management Plan.”

The proposed project is subject to applicable mitigation measures of the FEIR. The most relevant mitigation measures are included in Exhibit B – Conditions of Approval.

PLANNING AREA STANDARDS:

As described below, the project complies with applicable planning area standards of the North Coast Area Plan.

Fiscalini Ranch

The following standards apply to the West Fiscalini Ranch:

Limitation on Use (Open Space Land Use Category) - Uses shall be limited to Passive Recreation, Crop Production & Grazing (grazing only), Coastal Accessways, Temporary Events, existing Water Wells, & Impoundments, existing Public Utility Facilities, and existing Pipelines & Transmission Lines.

Staff comments: The proposed project is consistent with this standard because it would not establish a new use; rather, it would help to protect and restore the pine forest, which is a natural element of the property that contributes to its passive recreation value.

Combining Designations

Monterey Pine Forest Terrestrial Habitat (TH)

The following standards apply to new development proposed within the Monterey Pine Forest Terrestrial Habitat (TH) combining designation:

1. **Establishment of a 'project limit area'**. A project limit area shall be established in a manner that avoids Monterey pine forest impacts to the maximum extent feasible, is located on the least sensitive portion of the site, and safeguards the biological continuance of the habitat.
2. **New Development siting**. Applications for new development within the Monterey pine forest shall demonstrate that no native vegetation outside the project limit area shall be removed, except for trees identified as hazardous by a qualified professional.
3. **Plan Requirements**. Plans shall identify all Monterey pine trees and their size when they are six inches or more in diameter at 4.5 feet above ground, and oak trees four inches or more in diameter at 4.5 feet above ground. The plans shall indicate which trees are to be retained and which trees are proposed for removal.
4. **Construction Practices**. Construction practices to protect Monterey pines, oak trees and significant understory vegetation shall be implemented.
5. **Replacement of Vegetation**. Any Monterey pine trees that are six inches or more in diameter 4.5 feet above the ground shall be replaced at a 4:1 ratio for each tree removed, and at a 2:1 ratio for each tree impacted but not removed. Any oak trees that are four inches in diameter 4.5 feet above ground shall be replaced at a 6:1 ratio for each tree removed, and at a ratio of 3:1 ratio for each tree impacted but not removed. All open areas of the site disturbed by project construction are to be seeded with native, drought and fire resistant species that are compatible with the habitat value of the surrounding forest.
6. **Understory Vegetation Removal**. No understory vegetation shall be removed until a permit has been issued or unless an immediate hazardous condition exists. Understory vegetation removal to create,

improve, or maintain adequate defensible space and Fire Hazard Fuel Reduction shall be the minimum necessary.

Staff comments: The proposed project involves hazardous fuel reduction and forest restoration activities on approximately 50 acres of the 430-acre Fiscalini Ranch Preserve in Cambria. The goal of the project is to improve the overall health of the pine forest and reduce the potential for a catastrophic wild fire which could destroy the entire stand. The project does not involve any construction or permanent site disturbance, all work would be conducted by ground crews using chainsaws, and the only heavy equipment to be used would be a chipper.

The proposed project would remove dead and dying trees and would thin overcrowded stands of small pine trees. The applicant estimates that the project could remove up to 2,352 live trees over 6" in diameter, but emphasizes that this is a high estimate and the actual number could be considerably smaller. Staff does not propose applying a 4:1 replacement requirement to this project, since the purpose of the project is to thin overcrowded stands of trees and facilitate natural regeneration by scattering pine cones and seeds in areas with extensive tree, debris, and/or invasive removal. Although the 4:1 replanting requirement is an appropriate means to offset the tree removal impacts of a development project, according to the experts who prepared the proposed restoration plan, facilitating natural regeneration (not replanting) is the most effective method for ensuring the biological continuance of the Monterey pine forest on the Ranch. Therefore, the proposed project is consistent with these provisions of the area plan.

Site Review – Biological Assessment

Based on the results of a site review, all projects determined to have the potential to adversely impact a sensitive resource shall require a biologic assessment report prepared in accordance with Coastal Zone Land Use Ordinance Section 23.07.170.

Staff comments: The proposed project is consistent with this standard because a biological survey was conducted on the site by SWCA for previous studies. The findings of the survey, including a list of special status plants and wildlife potentially present on the site, are summarized in the applicant's project description. As described above, the proposed project was developed based on the recommendations of professional foresters and arborists as the most effective means for protecting the long-term health of the Monterey pine forest. The project would also be subject to relevant mitigation measures from the Final EIR for the Fiscalini Ranch Management Plan to ensure protection of biological resources. This includes, but is not limited to, biological surveys to be conducted prior to initiation of site disturbing activities and avoidance of sensitive areas.

LAND USE ORDINANCE STANDARDS:

Section 23.01.043c.(3)(i): Appeals to the Coastal Commission (Coastal Appealable Zone)

The project is appealable to the Coastal Commission because the subject parcel is located in an Environmentally Sensitive Habitat Area (Terrestrial Habitat).

Section 23.07.120: Local Coastal Program

The project site is located within the California Coastal Zone as established by the California Coastal Act of 1976, and is subject to the provisions of the Local Coastal Program.

Section 23.07.170.e(1-5) Environmentally Sensitive Habitat (ESH) Development Standards

- 1) New development within or adjacent to the habitat shall not significantly disrupt the resource.
- 2) New development within the habitat shall be limited to those uses that are dependent upon the resource.
- 3) Where feasible, damaged habitats shall be restored as a condition of development approval.
- 4) Development shall be consistent with the biological continuance of the habitat.
- 5) Grading adjacent to Environmentally Sensitive Habitats shall conform to the provisions of Section 23.05.034.c (Grading Standards).

Section 23.07.176 Terrestrial Habitat Protection

The subject parcel supports a mapped Terrestrial Habitat (TH) combining designation, and is subject to Section 23.07.176 Terrestrial Habitat Protection. This section implements development standards for protection of Terrestrial Habitat. Specifically, that revegetation with native plants occurs where vegetation is removed, and that “readily-identifiable barriers that will protect the surrounding native habitat areas” be used to ensure protection during grading and construction.

Staff comments: The proposed project involves hazardous fuel reduction and forest restoration activities on approximately 50 acres of the 430-acre Fiscalini Ranch Preserve in Cambria. The goal of the project is to improve the overall health of the pine forest and reduce the potential for a catastrophic wild fire which could destroy the entire stand. The project does not involve any construction or permanent site disturbance, all work would be conducted by ground crews using chainsaws, and the only heavy equipment to be used would be a chipper.

The proposed project would remove dead and dying trees and would thin overcrowded stands of small pine trees. The applicant estimates that the project could remove up to 2,352 live trees over 6” in diameter, but emphasizes that this is a high estimate and the actual number could be considerably smaller. Staff does not propose applying a 4:1 replacement requirement to this project, since the purpose of the project is to thin overcrowded stands of trees and facilitate natural regeneration by scattering pine cones and seeds in areas with extensive tree, debris, and/or invasive removal. Although the 4:1 replanting requirement is an appropriate means to offset the tree removal impacts of a development project, according to the experts who prepared the proposed restoration plan, facilitating natural regeneration (not replanting) is the most effective method for ensuring the long-term health of the Monterey pine forest on the Ranch. Therefore, the proposed project is consistent with these provisions of the area plan.

Section 23.07.104 – Archaeologically Sensitive Areas

This section requires development applications within the Archaeologically Sensitive combining designation area to include a preliminary archaeological site survey. The survey shall be conducted by a qualified archaeologist knowledgeable in local Native American culture and approved by the Environmental Coordinator. If the preliminary site survey determines that proposed development may have significant effects on existing, known or suspected archaeological resources, a plan for mitigation shall be prepared by a qualified archaeologist.

Staff comments: A cultural resources assessment (Singer; 1995) was prepared for the project. One archaeological site is present within the project area (CA-SLO-367) and three sites are located in close proximity to the project area (CA-SLO-1655, CA-SLO-1656, CA-SLO-369). The proposed fuel reduction and forest restoration activities would avoid these archaeological sites. In addition, these areas have been excluded from revegetation plans to avoid soil disturbance.

COASTAL PLAN POLICIES:

Following is a brief list of the Coastal Plan Policies (discussion of specific applicable policies following):

Shoreline Access: N/A
Recreation and Visitor Serving: N/A
Energy and Industrial Development: N/A
Commercial Fishing, Recreational Boating and Port Facilities: N/A
Environmentally Sensitive Habitats: Policy No(s): 1, 2, 3, 29 and 30
Agriculture: N/A
Public Works: N/A
Coastal Watersheds: N/A
Visual and Scenic Resources: N/A
Hazards: Policy No(s): 1
Archeology: Policy No(s): 4
Air Quality: N/A

Hazards:

Policy 1: New Development: *The proposed project is consistent with this policy because one of its key goals is to reduce the potential for a catastrophic fire in Cambria and to protect life and property in the surrounding residential neighborhoods.*

Archaeology:

Policy 4: Preliminary Site Survey for Development within Archaeologically Sensitive Areas: *The proposed project is consistent with this policy. A cultural resources assessment (Singer; 1995) was prepared for the project. One archaeological site is present within the project area (CA-SLO-367) and three sites are located in close proximity to the project area (CA-SLO-1655, CA-SLO-1656, CA-SLO-369). The proposed fuel reduction and forest restoration activities would avoid these archaeological sites. In addition, these areas have been excluded from revegetation plans to avoid soil disturbance.*

Environmentally Sensitive Habitats:

Policy 1: Land Uses Within or Adjacent to Environmentally Sensitive Habitats: *The proposed project is consistent with this policy because the goal of the project is to improve the overall health of the pine forest and reduce the potential for a catastrophic wild fire which could significantly destroy the Monterey pine forest. The proposed project would remove dead or dying trees, thin overcrowded stands of small trees, facilitate natural regeneration of the forest, and remove invasive plants, such as French broom.*

Policy 2: Permit Requirement: *The project is consistent with this policy because it will not significantly impact sensitive habitats, and proposed development will be consistent with the biological continuance of the habitat.*

Policy 3: Habitat Restoration: *The proposed project is consistent with this policy because its purpose is to reduce fuel loads and restore the Monterey pine forest on the Fiscalini Ranch. Although 4:1 tree replacement is not proposed, the project would stimulate natural regeneration of the forest. According to the experts who prepared the restoration plan, natural regeneration is the preferred method for ensuring the biological continuance of the habitat.*

Policy 29: Protection of Terrestrial Habitats: *The proposed project is consistent with this policy because its purpose is to reduce fuel loads and restore the Monterey pine forest on the Fiscalini Ranch. Although 4:1 tree replacement is not proposed, the project would stimulate natural regeneration of the forest. According to the experts who prepared the restoration plan, natural regeneration is the preferred method for ensuring the biological continuance of the habitat.*

Policy 30: Protection of Native Vegetation: *The proposed project is consistent with this policy because its purpose is to reduce fuel loads and restore the Monterey pine forest on the Fiscalini Ranch. Although 4:1 tree replacement is not proposed, the project would stimulate natural regeneration of the forest. According to the experts who prepared the restoration plan, natural regeneration is the preferred method for ensuring the biological continuance of the habitat. The proposed project also includes measure to avoid areas with special-status plan species.*

Does the project meet applicable Coastal Plan Policies: Yes, as conditioned.

COMMUNITY ADVISORY GROUP COMMENTS:

On January 20, 2016, the North Coast Advisory Council (NCAC) recommended approval of the proposed project with recommendations. NCAC's recommendations and staff's responses are listed below.

- Health concerns regarding the proposal to burn some felled trees on site.

As conditioned, all pile burns will be conducted only on permissive burn days, permitted through the San Luis Obispo Air Pollution Control District and Supervised by Cal Fire.

- Concern of damage to the Ranch from heavy vehicle access and road building.

As conditioned, no new roads shall be graded for the project. The only heavy equipment used would be a chipper, which will be delivered by a truck on an existing service road and staged on the road.

- Concern of damage to health trees from the process of removal of dead and unhealthy trees, non-native plants, and small trees.

As conditioned, large trees that could damage adjacent healthy trees shall be brought down in sections.

- Reminder to use best management practices established per the North Coast Area Plan and Title 23.

The proposed project complies with applicable provisions of the North Coast Area Plan and Title 23.

AGENCY REVIEW:

Cambria Community Services District (Water/Sewer) – No Response

Cal Fire – No response.

California Coastal Commission – No response.

LEGAL LOT STATUS:

The two parcels were legally created by a subdivision or deed at a time when that was a legal method for creating lots.

Staff report prepared by Airlin M. Singewald and reviewed by Karen Nall.