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

Tentative Notice of Action

MEETING DATE	CONTACT/PHONE	APPLICANT	FILE NO.
December 16, 2011 LOCAL EFFECTIVE DATE December 16, 2011 APPROX FINAL EFFECTIVE DATE January 6, 2011	Ryan Hostetter, Coastal Planner (805) 788-2351	Cal Fire	DRC2011-00035

SUBJECT
Hearing to consider a request by Cal Fire for a Minor Use Permit/Coastal Development Permit to create a shaded fuel break along the southern, western, and portions of the eastern edges of the CT Ranch property (along the urban reserve lines). This project covers approximately 50 acres which includes a 100 foot wide buffer area where "ladder fuel" will be removed along the edge of the property. This "ladder fuel" includes down, dead and diseased trees as well as shrubs and some small trees, however large trees and the forest canopy will not be removed. Removal will occur through a combination of hand crews and mechanical equipment. The proposed project is within the Rural Lands land use category and is located at 5694 Bridge Street in the community of Cambria. The site is in the North Coast Rural Coastal planning area.

RECOMMENDED ACTION
Approve Minor Use Permit DRC2011-00035 based on the findings listed in Exhibit A and the conditions listed in Exhibit B.

ENVIRONMENTAL DETERMINATION
Consider and rely upon the adopted Mitigated Negative Declaration prepared by Cal Fire.

LAND USE CATEGORY	COMBINING DESIGNATION	ASSESSOR PARCEL NUMBER	SUPERVISOR DISTRICT(S)
Rural Lands	Terrestrial Habitat, Sensitive Resource Area, Geologic Study Area, & Local Coastal Plan	013-111-005	2

PLANNING AREA STANDARDS:
Monterey Pine Forest Sensitive Resource Area
Does the project meet applicable Planning Area Standards: Yes – see discussion

LAND USE ORDINANCE STANDARDS:
Appeals to the Coastal Commission (Coastal Appealable Zone), Local Coastal Program, Sensitive Resource Area, Environmentally Sensitive Habitats, Terrestrial Habitat, and Geologic Study Area
Does the project conform to the Land Use Ordinance Standards: Yes – see discussion

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: CT Ranch/open space	
SURROUNDING LAND USE CATEGORIES AND USES: *North:* Agriculture and Rural Lands/large lot residential/ranch *South:* Residential Single Family / residence	*East:* Agriculture/open space & agriculture *West:* Residential Single Family / residence
OTHER AGENCY / ADVISORY GROUP INVOLVEMENT: The project was referred to: North Coast Advisory Council, Public Works, Building Division, Cambria Community Services District (Water, Sewer, and Fire), Northern Chumash Council, Salinan Heritage Consultants, Native American Heritage Commission, and the California Coastal Commission	
TOPOGRAPHY: Nearly level	VEGETATION: Monterey Pines, Grasses, and ornamental landscaping
PROPOSED SERVICES: Water supply: On-site system Sewage Disposal: On-site system Fire Protection: Cambria Fire	ACCEPTANCE DATE: October 28, 2011

DISCUSSION

Project Description: Cal Fire is proposing a shaded fuel break within this area because of the high fire severity within the forest along the urban edge of Cambria. This project location includes approximately 50 acres around the northern urban edge of the community within the largest forested area adjacent to the urban reserve line (also known as CT Ranch). The shaded fuel break is proposed to be 100 feet wide which was chosen because it is the standard measurement for defensible space around developed areas. The fuel break however, is not a "clearing" but a shaded break which includes selective removal of plants and trees that are the highest threat for fire to spread uncontrollably toward the community. Down, dead, and diseased trees, along with some hazardous snags and some brush and weed material will be removed above grade (roots will remain). All trees/shrubs larger than 10 inches will remain, and some healthy plant specimens that are smaller than 10 inches will also remain. Cal Fire received a grant to complete this proposed project and will be required to complete the project under the rules of the Forest Practices Act.

The proposal includes a combination of hand crews and a masticator for the removal of the material. The masticator was chosen for several reasons on this specific project. The masticator is quiet when compared to hand crews with multiple chain saws and would accomplish a similar outcome. The masticator is the size of a small car (or bobcat type of tractor) with an approximately six foot "mower" type of attachment on the front which can both rotate and lift to capture material off of the ground. The mower does not disturb the soil and stays above grade. Left behind are small wood chips from the material being mulched by the machine. The masticator can remove up to 3 acres of ladder fuel (i.e. material above grade but below the canopy) in a day, thus limiting the amount of time residents will be disturbed by the project. Hand crews using chain saws can't clear half as much within the same amount of time and the chain saws have a much greater noise impact to residents in the area. The mulch left behind is proposed to also enhance the forest and soil health. Hand crews alone would take much longer and leave behind piles which would need to be burned and all the material would be removed.

PLANNING AREA STANDARD: The following applicable planning area standard is from the North Coast Area Plan (Rural area standards):

> ***Monterey Pine Forest (SRA), Tree Preservation*** *- Where development requires removal of Monterey pines greater than six inches in diameter, replacement of native stock will be required.*

The intent of this standard is to ensure that impacts to native Monterey pines from projects are mitigated, and that the forest is not negatively impacted with regards to proposed projects. This specific project, however, is a proposal to enhance the forest health while mitigating a potential fire threat to this area. The proposed project will remove "ladder fuel" which consists of low branches, dead material, hazardous snags, diseased and dying trees, and the "thicket" in the middle zone of the forest canopy in order to lessen the hazardous fire threat to the community of Cambria within this northern edge of the community. Some small trees will be removed, however it is anticipated that their removal will spur more healthy new growth as a natural fire event is somewhat simulated in this case. Additionally, the project is conditioned to comply with the Cambria Forest Management Plan which includes recommendations for spreading native seed stock through scattering cones and seeds (page 4-26 of the Cambria Forest Management Plan).

This project will not include a 100 foot "clearing" along the edge of the property, and the forest canopy will remain (thus this being a "shaded" fuel break). Removal of plants will occur selectively with the equipment proposed for this project. All trees and shrubs 10 inches and larger will remain and smaller healthy trees will also remain. This project is proposed to be conducted under the Forest Practices Act which requires a minimum of 150 healthy trees per acre to remain which are anticipated to help regenerate healthy new trees within this zone. By removing the thicket material (i.e. simulating a natural fire event) the forest is given the opportunity to regenerate in a healthy manner. Small trees are currently unable to grow into healthy trees and can become "stunted" as a result of this thicket which would normally be cleared by a fire. This proposed project will be simulating a fire while lessening the threat of a hazardous fire to the community by removing the prominent fuel material along the urban edge.

LAND USE ORDINANCE STANDARDS:

Section 23.05.060-064 Tree Removal Standards
Removal of trees are subject to specific requirements such as permit type, application content and tree removal standards. This project is a Minor Use Permit because the tree removal is proposed within a Sensitive Resource Area, a Coastal Appealable area, and is not accompanied with a land use permit for another type of development (as outlined in this section of the ordinance). Required application contents include a description of the project as to the size and species of each tree proposed for removal, the purpose for removal, and the size and species of trees required to replace the removed trees. This information has been provided minus the exact tagging of each piece of vegetation that will be removed. Because this project is not the typical tree removal project which generally includes hazardous trees on small lots which are easy to identify, staff has determined that the project description provided from Cal Fire has adequately outlined what is proposed for removal. In order to verify that not all of the trees will be removed, a county approved monitor is required to ensure that healthy trees remain as a condition of approval (and as required by the Cambria Forest Management Plan). Additionally, replacement of each removed tree is not proposed with this specific project because it was demonstrated that the project is anticipated to enhance forest health, and no trees will be permanently removed due to any development. However, scattering of cones and

or native seed stock as outlined in the Cambria Forest Management Plan will be required as mitigation.

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, according to official County maps.

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 Section23.05.034.c (Grading Standards.)

This project is located within a sensitive resource area (SRA) and Environmentally Sensitive Habitat Area (ESHA) due to the Cambria Monterey Pine forest, and complies with ESH development Standards 1-5 above as proposed. Specifically, the project will not inhibit the continuance of the forest as it is anticipated to enhance the habitat of the forest by simulating a natural fire within this area. There is no grading or development of any structures with this proposed project.

Section 23.07.174 Streams and Riparian Vegetation
Coastal streams and adjacent riparian areas are environmentally sensitive habitats. The provisions of this section are intended to preserve and protect the natural hydrological system and ecological functions of coastal streams. Development adjacent to a coastal stream shall be sited and designed to protect the habitat and shall be compatible with the continuance of such habitat.
This proposed project includes conditions of approval which state that all project activities remain outside riparian (or wetland) setback areas which complies with the requirements of this section. Required setbacks are 100 feet from the upland extent of the stream or wetland area.

Section 23.07.164-166 Sensitive Resource Area
This area within Cambria is classified as a mapped Sensitive Resource Area due to the Monterey Pine forest habitat. Projects within this area are required to include a description of measures proposed to protect the resource, applicable CEQA determination, required findings, and minimum development standards. Required findings are as follows (also listed in Exhibit A of this staff report):

> (1) The development will not create significant adverse effects on the natural features of the site or vicinity that were the basis for the Sensitive Resource Area designation, and will preserve and protect such features through the site design.
> (2) Natural features and topography have been considered in the design and siting of all proposed physical improvements.

(3) Any proposed clearing of topsoil, trees, or other features is the minimum necessary to achieve safe and convenient access and siting of proposed structures, and will not create significant adverse effects on the identified sensitive resource.
(4) The soil and subsoil conditions are suitable for any proposed excavation; site preparation and drainage improvements have been designed to prevent soil erosion, and sedimentation of streams through undue surface runoff.

This project complies with the above findings because it does not include development or siting of any structures or grading activities. Additionally, there is no soil disturbance proposed with this project. The project includes a shaded fuel break which will enhance the health of the forest while allowing for a safe barrier between this portion of the forest and the urban area. This barrier is anticipated to assist in mitigating the safety of residents within the community from a major fire event. The natural features and topography of the project area are the basis for the proposed project location as this area is a high fire hazard along the urban edge of the community. In order to additionally ensure that healthy plants will remain, a county approved monitor is required to be on site during project activities. A draft Mitigated Negative Declaration was prepared for the project by Cal Fire which is the applicable CEQA determination and includes mitigation measures for the project.

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. However, this specific project does not involve the construction of structures, and the purpose of the project is to protect the health and safety of the community of Cambria while enhancing the forest health within the project zone. It is anticipated that tree replacement will occur naturally within this shaded fuel break area. Small and large healthy plants/trees are required to remain with this proposed project. The County will require a monitor on site during project activities to ensure that healthy trees remain to the maximum amount feasible and that new seeds are scattered as recommended in the Cambria Forest Management Plan.

Geologic Study Area 23.07.080
A Geologic Study Area combining designation is applied by the Official Maps (Part III) of the Land Use Element, to areas where geologic and soil conditions could present new developments and their users with potential hazards to life and property. This project, however, does not include any soil disturbance nor does it involve the construction of structures, therefore the standards of this section are not applicable.

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, 27, 28, 33

Agriculture: N/A
Public Works: N/A
Coastal Watersheds: ☒ Policy No(s): 7, 8, and10
Visual and Scenic Resources: ☒ Policy No(s): 1 and 7
Hazards: ☒ Policy No(s): 1
Archeology: N/A
Air Quality: N/A

Coastal Watersheds:

Policy 7: Siting of new development*: The proposed project is consistent with this policy because there will be no grading or construction on slopes of 20% or more.* This project is anticipated to enhance erosion control by leaving mulched material that has been removed. There is no soil disturbance proposed with this project.

Policy 8: Timing of new construction: The proposed project is consistent with this policy because no grading will occur or be left unfinished between October 15 through April 15.

Policy 10: Drainage Provisions: The proposed project is consistent with this policy because the project is not proposed to modify natural drainage patterns as there will be no construction of hardscape or grading proposed.

Hazards:

Policy 1: New Development: *The proposed project is consistent with this policy because it is located and designed to minimize risks to human life and property.* The proposed project is anticipated to reduce fire hazards to the community of Cambria.

Environmentally Sensitive Habitats:

Policy 1: Land Uses Within or Adjacent to Environmentally Sensitive Habitats: *New development within or adjacent to locations of environmentally sensitive habitats (within 100 feet unless sites further removed would significantly disrupt the habitat) shall not significantly disrupt the resource. Within an existing resource, only those uses dependent on such resources shall be allowed within the area.* This proposed project complies with this policy because it is not introducing a new use within the sensitive habitat area, and the project is proposed to enhance the habitat area while providing health and safety measures which are proposed to reduce a threat of wildfire moving into the urban area.

Policy 2: Permit Requirement: *As a condition of permit approval, the applicant is required to demonstrate that there will be no significant impact on sensitive habitats and that proposed development or activities will be consistent with the biological continuance of the habitat. This shall include an evaluation of the site prepared by a qualified professional which provides: a) the maximum feasible mitigation measures (where appropriate), and b) a program for monitoring and evaluating the effectiveness of mitigation measures where appropriate.* Cal Fire registered professional foresters (as required under the Public Resources Code) are proposing and implementing the fuel break project. Additionally, a County monitor is required to ensure that healthy trees remain and that the continuance of the habitat is not negatively impacted.

Policy 3: Habitat Restoration: *The County or Coastal Commission should require the restoration of damaged habitats as a condition of approval when feasible.* This project will include

habitat enhancement as proposed. The project is also conditioned to include monitoring to ensure that healthy habitat will remain when the project is complete as well as scattering native seed as outlined in the Cambria Forest Management Plan.

Policy 27: Protection of Terrestrial Habitats: The proposed project is consistent with this policy because tree removal has been limited to the maximum amount feasible.

Policy 28: Protection of Native Vegetation: The proposed project is consistent with this policy because tree removal and impacts to the Monterey pine forest have been minimized through design. The project is also limited to a specific 100-foot buffer area as shown on the project maps.

Policy 33: Protection of Vegetation: The proposed project is consistent with this policy because site disturbance has been minimized through project design.

Visual and Scenic Resources:

Policy 1: Protection of Visual and Scenic Resources: Unique and attractive features of the landscape, including but not limited to unusual landforms, scenic vistas and sensitive habitats are to be preserved protected, and in visually degraded areas restored where feasible. This project will not remove forest canopy, and is expected to enhance a buffer area around the forest next to the urban reserve line. The project does not propose to include a clearing, but a thinning will occur. No new structures are proposed as a part of this project.

Policy 7: Preservation of Trees and Native Vegetation: The proposed project is consistent with this policy because disturbance has been minimized through project design.

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

COMMUNITY ADVISORY GROUP COMMENTS: The North Coast Advisory discussed the project at multiple meetings and on their November 16, 2011 meeting, the advisory group supported the proposed project.

AGENCY REVIEW:
California Coastal Commission (letter attached): Supportive of project that addresses fire hazards however the following issues will need to be addressed (summarized here):

1. A Development Plan will need to be approved (not a MUP) due to site disturbance
2. Should use only hand crews
3. Monitoring by a biologist should occur
4. Width of fuel break should be reduced (possibly 50-75 feet)
5. Clarification on portion of treated area along Bridge St. (Is it necessary?)
6. Mitigation or replacement planting for trees six inches or greater
7. Streams and wetland areas to be avoided as well as required setbacks from them.
8. Environmental Document lacks analysis of impacts to listed species
9. Reduced project will comply with conservation easement
10. Need alternatives analysis.

Staff Response (in the order listed above):

1. This project is being processed as a "tree removal project" under section 23.05.064 of the Coastal Zone Land Use Ordinance which states that a Minor Use Permit be processed when the tree removal occurs within a sensitive resource area (which this project is). This project does not include the development of any structures or grading activities.
2. The project description proposes a combination of hand crews and the use of a masticator due to the funding and timeline for the project.
3. Monitoring is required as a condition of approval.
4. Width of fuel break as proposed is the minimum width in order to be effective (according to Cal Fire) and is consistent with regulations for defensible space.
5. The area along Bridge Street is proposed to allow for a safe zone along the roadway.
6. Mitigation for seed scattering is a condition of approval as required by the Cambria Forest Management Plan (page 4-26 of the plan, simulate fire by seed removal from cone).
7. Avoidance from riparian areas is included as a condition of approval.
8. Cal Fire has completed the proposed environmental document as the lead agency and has included comments from other agencies such as Coastal Commission and Department of Fish and Game within their document.
9. The proposed project complies with the conservation easement as proposed. "Exhibit C" allows for vegetation removal (including native vegetation).
10. This project is based on the project description of Cal Fire, and based on the grant provided and environmental review completed by Cal Fire. No alternatives analysis has been submitted for the proposed project as none is required by ordinance.

Public Works: Fuel modification within the public right of way will require an encroachment permit from Public Works.

LEGAL LOT STATUS:
The single parcel was legally created by a recorded map at a time when that was a legal method of creating lots.

Staff report prepared by Ryan Hostetter and reviewed by Nancy Orton.

EXHIBIT A - FINDINGS

CEQA

A. The County is considering and relying upon the previously adopted Mitigated Negative Declaration proposed by Cal Fire for the project.

Minor Use Permit

B. The proposed project is consistent with the San Luis Obispo County General Plan because the shaded fuel break project as conditioned is consistent with all applicable General Plan policies, including policies for Environmentally Sensitive Habitats, Coastal Watersheds, Hazards, and Visual and Scenic Resources.

C. As conditioned, the proposed project or use satisfies all applicable provisions of Title 23 of the County Code.

D. The establishment and subsequent operation or conduct of the use will not, because of the circumstances and conditions applied in the particular case, be detrimental to the health, safety or welfare of the general public or persons residing or working in the neighborhood of the use, or be detrimental or injurious to property or improvements in the vicinity of the use because the proposed shaded fuel break project will not generate activity that presents a potential threat to the surrounding property and buildings. This project is subject to Ordinance and Building Code requirements designed to address health, safety and welfare concerns.

E. As stated in Coastal Plan Policies above, and incorporated herein by reference, the proposed project or use will not be inconsistent with the character of the immediate neighborhood or contrary to its orderly development because the project does not include any new structures or uses within this area, and will only include the 100 foot shaded fuel break as proposed in the attached maps and project description.

F. The proposed project or use will not generate a volume of traffic beyond the safe capacity of all roads providing access to the project, either existing or to be improved with the project because the project is located on Bridge St., a local road constructed to a level able to handle any additional traffic associated with the project.

Coastal Access

G. The proposed use is in conformity with the public access and recreation policies of Chapter 3 of the California Coastal Act, because the project site is not located within the area between the first public road and the ocean.

Sensitive Resource Area

H. The development will not create significant adverse effects on the natural features of the site or vicinity that were the basis for the Sensitive Resource Area designation, and will preserve and protect such features through the site design, because the proposed shaded fuel break is proposed to enhance the habitat area by leaving healthy plants at a minimum density of 150 trees per acre (as required in the Public Resource Code). A County approved monitor will be on site during project activities to ensure healthy habitat will remain when the project is complete.

I. As designed, natural features and topography have been considered in the design and siting of the proposed project.

J. The proposed clearing of material is the minimum necessary for the proposed project, and will not create significant adverse effects on the identified sensitive resource. There will be no disturbance or removal of top soil with this proposed project.

K. The soil and subsoil conditions are suitable for the proposed project, and there will be no disturbance or removal of native soils with this proposed project. All vegetation removal will occur above grade.

Environmentally Sensitive Habitat

L. There will be no significant negative impact on the identified sensitive habitat, and the proposed use will be consistent with the biological continuance of the habitat as the project has been designed to avoid impacts to the maximum extent feasible. To ensure this is the case, a County approved monitor shall be on site during project activities.

M. The proposed use will not significantly disrupt the habitat, as the project site is located along the edge of the urban developed neighborhood. The purpose of the project is to remove "ladder fuel" material which will include forest thinning; healthy trees and plants will remain.

EXHIBIT B - CONDITIONS OF APPROVAL

Authorized Use

1. This approval authorizes a Minor Use Permit/Coastal Development Permit to allow a shaded fuel break along the southern, western, and portions of the eastern edges of the CT Ranch property (along the urban reserve lines). This project covers approximately 50 acres which includes a 100 foot wide buffer area where "ladder fuel" will be removed along the edge of the property (as shown on the attached maps). This "ladder fuel" includes down, dead and diseased trees as well as shrubs and some small trees, however large trees and the forest canopy will not be removed. Removal will occur through a combination of hand crews and mechanical equipment (small bob cat size masticator only). The project shall specifically include the following:
    a. All trees and snags 10 inches or larger will remain.
    b. There shall be minimal soil disturbance (less than 3 acres) with this proposed project.
    c. The fuel break will be a maximum of 100 feet and will be considered "shaded" as the canopy shall remain within this area, the short length parallel to Bridge Street between the southernmost portion of the project along bridge street to the sharp curves in Bridge Street will be 150' (a.k.a. "hog back" area).
    d. Riparian and/or wetland areas shall be tagged and avoided with a minimum buffer of 100 feet from the upland extent of the riparian or wetland area. The county approved monitor shall inspect tagging and project activities to ensure riparian habitat is not impacted.

2. Prior to commencement of project activities, Cal Fire shall submit a monitoring plan to be reviewed and approved by the County which will demonstrate how the project will comply with the anticipated goals to ensure habitat health as outlined in the Mitigated Negative Declaration prepared by Cal Fire and as outlined in the Cambria Forest Management Plan of April 2002. Monitoring shall occur as outlined in section 6 (page 6-7) in numbers 1-4 of the Cambria Forest Management Plan (attached) and include the "Cambria Forest Site Condition Checklist" which is outlined in Chapter 3 of the Cambria Forest Management Plan. The results of the monitoring data shall be archived and analyzed as required by the Cambria Forest Management Plan (also outlined in section 6 titled "What to do with the Results: Archiving and Analyzing Monitoring Data").

3. Prior to commencement of project activities, the applicant shall submit a mitigation program for review and approval by the County which is consistent with the seed dispersal program outlined within the Cambria Forest Management Plan (attached page 4-26 regarding Scatter Cones and/or seeds). Seeds and/or scatter cones shall be disbursed on a site(s) that will allow for maximum regrowth with regards to site conditions and shall be spread across a minimum of 50 acres. Success of this mitigation shall be included within the monitoring plan results listed in condition of approval no. 2 above.

4. **Unanticipated Discovery Plan. Prior to project commencement,** the Applicant shall submit to the County an Unanticipated Discovery and Monitoring Plan for review and

approval. The plan shall be prepared by a qualified archaeologist and shall outline the processes of notification, evaluation, and actions to be taken should unanticipated cultural resources be found during construction. The plan shall explicitly state that if undiscovered cultural resources, such as lithic debitage or groundstone, shell midden, historic debris, building foundations or human remains are exposed during project activities, all ground-disturbing activities shall immediately be halted at the discovery site and within 100 feet of it. Work shall be stopped until the discovery has been evaluated by a professional archaeologist and appropriate agencies have been notified. If the discovery is recommended as eligible for listing in the California Register, impacts shall be mitigated per the actions specified in the plan, which may include archaeological excavations and/or monitoring.

Implementation of this mitigation measure would prevent destruction or loss of previously undiscovered cultural resources during construction activities that could inadvertently expose such resources.

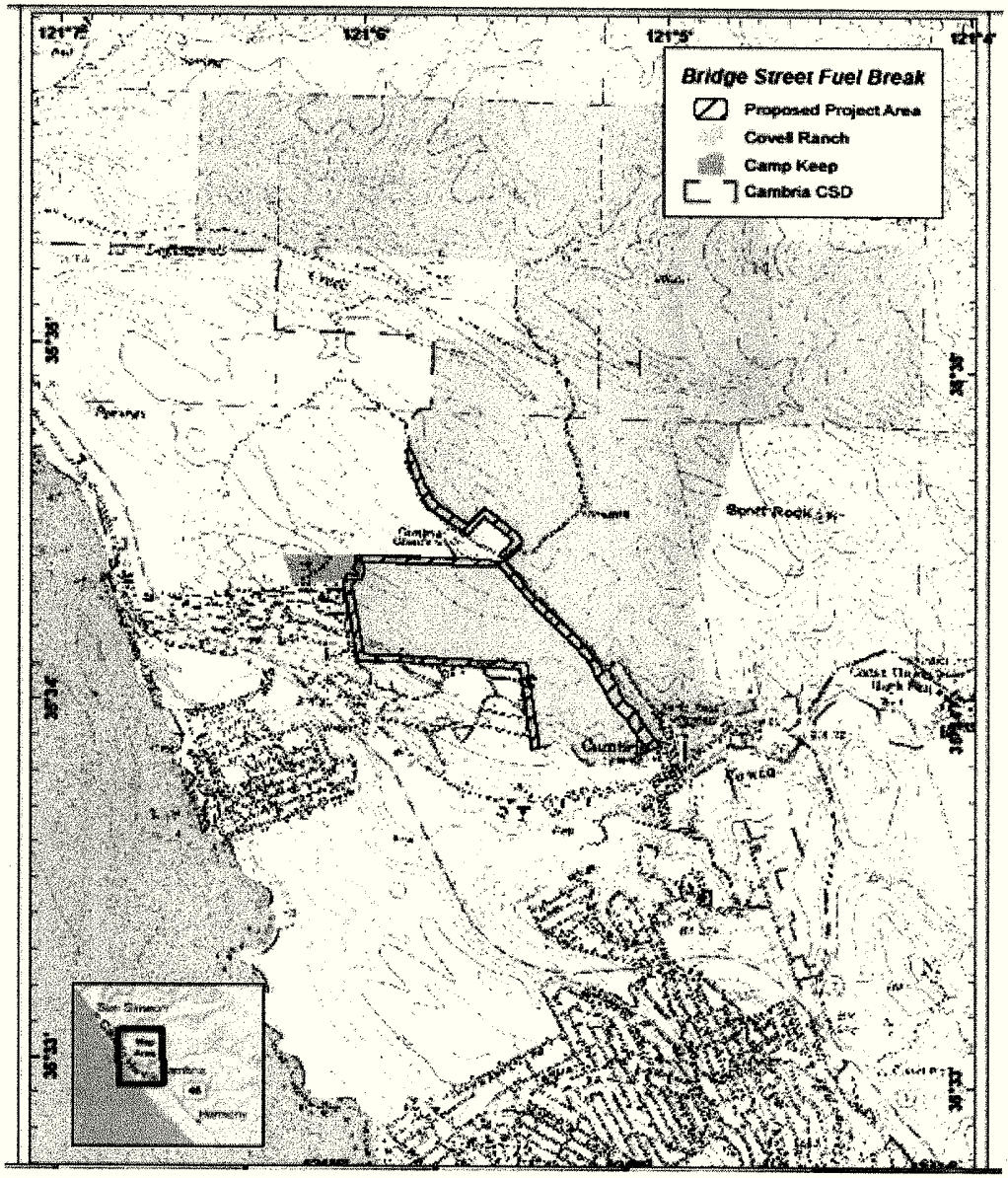
5. A masticator shall not be used within 100 feet of the upland extend of a stream or wetland area. Hand crews can conduct vegetation removal within the 100 foot setback up to 25 feet from the edge of riparian or wetland area.

6. Prior to commencement of project activities, the applicant shall obtain approval from the Air Pollution Control District (APCD) for the project prior to work commencing. Cal Fire shall comply with all APCD requirements for the project.

7. This permit is valid for a period of 24 months from its effective date unless time extensions are granted pursuant to Land Use Ordinance Section 23.02.050.

8. All conditions of this approval shall be strictly adhered to, within the time frames specified, and in an on-going manner for the life of the project. Failure to comply with these conditions of approval may result in an immediate enforcement action by the Department of Planning and Building. If it is determined that violation(s) of these conditions of approval have occurred or are occurring, this approval may be revoked pursuant to Section 23.10.160 of the Coastal Zone Land Use Ordinance.

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING



PROJECT

Covell Ranch Shaded Fuel Break Minor Use Permit
DRC2011-00035

EXHIBIT

Vicinity Map

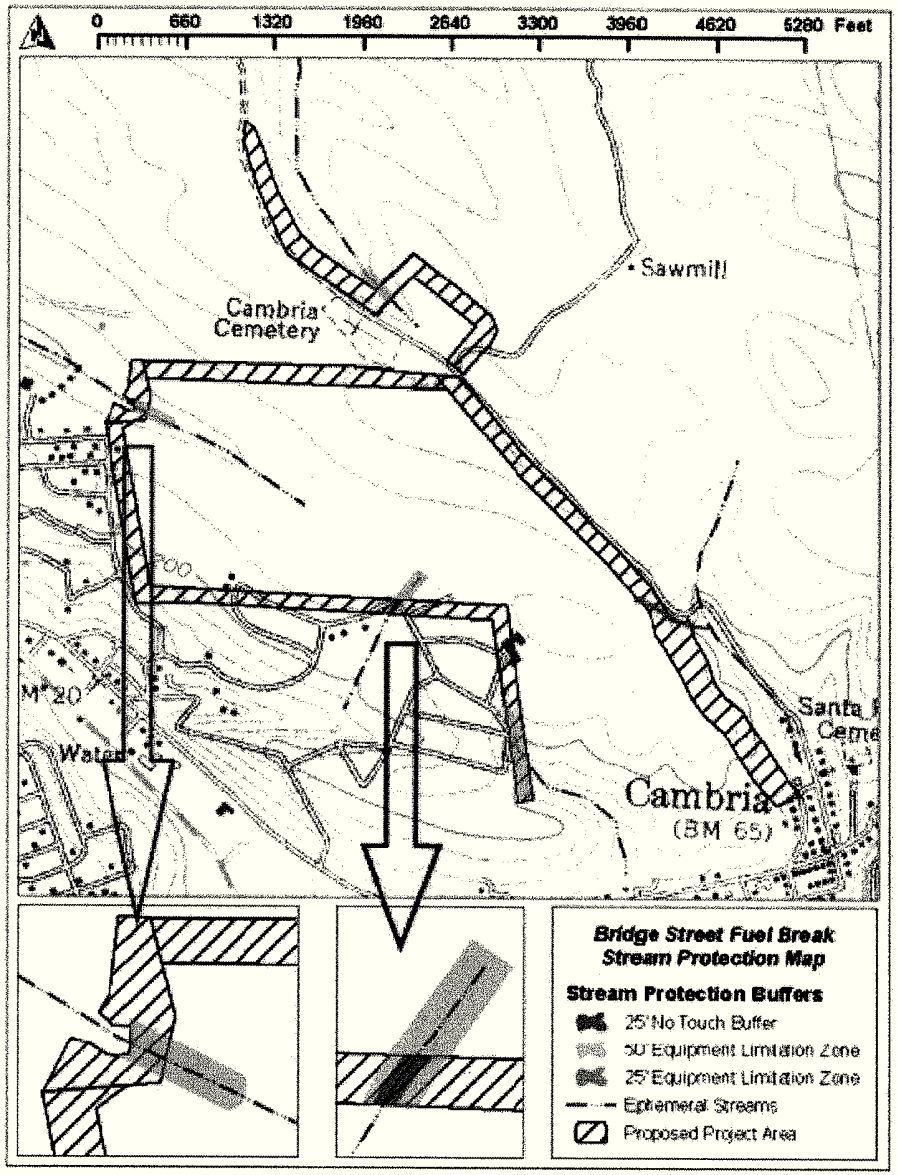
SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING

PROJECT

Covell Ranch Shaded Fuel Break Minor Use Permit
DRC2011-00035

EXHIBIT

Aerial Photo with project boundries



PROJECT

Covell Ranch Shaded Fuel Break Minor Use Permit
DRC2011-00035

EXHIBIT

Site Plan

PROJECT

Covell Ranch Shaded Fuel Break Minor Use Permit
DRC2011-00035

EXHIBIT

Photos of Area – tagged trees representative of what will NOT be removed

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING

PROJECT

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EXHIBIT

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PROJECT

Covell Ranch Shaded Fuel Break Minor Use Permit
DRC2011-00035

EXHIBIT

Photos of Area – tagged trees representative of what will NOT be removed

STATE OF CALIFORNIA – NATURAL RESOURCES AGENCY EDMUND G. BROWN JR., *Governor*

CALIFORNIA COASTAL COMMISSION

CENTRAL COAST DISTRICT OFFICE
725 FRONT STREET, SUITE 300
SANTA CRUZ, CA 95060
PHONE: (831) 427-4863
FAX: (831) 427-4877

November 14, 2011

Jason Giffen, Director
San Luis Obispo County Planning and Building Department
County Government Center, Room 207
San Luis Obispo, CA 93408

Subject: **CalFire's Proposed Shaded Fuel Break in Cambria (San Luis Obispo County Coastal Permit Application Number DRC2011-00034)**

Dear Mr. Giffen:

We appreciated the opportunity to participate with County staff, CalFire, and other stakeholders in the pre-application meeting for CalFire's proposed Cambria shaded fuel break project a few weeks ago. Following that meeting, we received the County's request for our comments on the above-referenced coastal development permit (CDP) application for the proposed project. We also previously received a copy of the Draft Mitigated Negative Declaration (DMND) for the proposed project. Please accept the following comments on both the project and the DMND, including comments that reinforce some of the input we have provided to date (including during the recent stakeholder meeting) as well as refinement based upon more recent review of the proposed project materials.

To be clear from the onset, we are generally supportive of a project to address fire hazards in and around Cambria that will also be a resource management project premised on protection of habitat values associated with the Cambria stand of native Monterey pine forest. The Cambria stand is one of only five such native stands in the world; three of which are in coastal central California. In this respect, this forest area is not like other forested areas that are not as rare or sensitive. As you know, this forest is designated a Sensitive Resource Area (SRA) and an Environmentally Sensitive Habitat Area (ESHA) by the San Luis Obispo County Local Coastal Program (LCP). These designations allow for only limited development that is dependent on the forest resource and that does not result in significant habitat disruption. Thus, it will be critical that any approvable project be a forest management project that takes into account the whole of the forest resource and the relationship of this proposed project to it, and that is designed and implemented to foster preservation and health of the forest resource overall. To meet project and LCP hazard avoidance objectives, such a project will obviously need to also afford a reduction in fire hazard, but those fire hazard objectives should be carefully balanced with the habitat protection policies of the LCP.

From the materials we have reviewed, it appears that such a project is both feasible and can be implemented consistent with LCP. At the same time, we have some specific recommendations and questions that we believe are necessary to address to achieve a project that is consistent with the certified LCP, and that we hope will assist the County and CalFire as you move toward that

goal. Please consider the following:

CDP Type

One of the first steps in the development review process is to determine the type of permit required under the LCP. This is important, as the permit type dictates the appropriate course and level of review based on core project details. In this case, the LCP appears to require a Development Plan CDP because the project will affect more than 3 acres of natural groundcover (per CZLUO Section 23.03.042). We note that the documents you forwarded for review indicate that a Minor Use Permit CDP will be processed rather than a Development Plan CDP. Unless it can be shown that less than 3 acres of natural groundcover will be affected, it appears that a Development Plan CDP is necessary under the LCP. In addition, please note that because the project is located in an LCP designated SRA and ESHA, is within 100 feet of a coastal stream/wetland, and is not development listed in the LCP as the principally permitted use, any County actions to approve a CDP for a project like this are appealable to the Coastal Commission.

Native Monterey Pine Forest and Other Habitats

As you know, the LCP's ESHA, coastal stream, wetland, and other habitat and biological resource protection policies (including ESHA LUP Policies, CZLUO Section 23.07.160 through 23.07.176, and North Coast Area Plan (NCAP) SRA/MPF SRA Standards 1 and 5) establish a multi-tiered process that starts with a determination of whether such habitat areas are present. If so, the LCP then dictates that proposed projects avoid adverse impacts to such habitats, including through a combined approach of limiting allowable uses in such areas and requiring that such projects be sited, designed, and implemented in a manner that protects such habitats (including through setbacks, construction procedures, mitigation/restoration requirements, long-term management and monitoring of habitats, etc.). In general, the LCP objective is to avoid impacts to such habitats, and to ensure that allowed development adequately safeguards habitat resources.

In this case, it is clear that the proposed project is located within the native Monterey pine forest SRA/ESHA. Due to this status and the sensitivity of this resource, we believe certain project modifications will be necessary to achieve LCP consistency, much of that premised around refining the project parameters so that it is clearly a forest management project that could reduce fuel loading at the same time as including components designed ultimately to help protect the forest over the long-term. Because the Monterey pine forest is a fire-dependent resource (i.e., it is typically regenerated and reinvigorated from the effects of heat and fire), it is important that the project be designed as a resource management effort to help foster some of the same types of outcomes that might typically occur after a natural fire of this habitat, such as some understory/thatch thinning. In any case, the forest benefits of the proposed project need to be clearly articulated and identified.

In relation to the proposed project, we believe that that means that several aspects of it would need to be appropriately modified and refined in relation to the native Monterey pine forest

SRA/ESHA, including:

- Perhaps most critically, we believe that the project should consider the use of hand crews and more limited support equipment as opposed to the proposed heavy equipment (i.e., masticators, large tractors, loaders, etc.) in the forest to avoid degradation of soils/forest floor resources, to avoid the possible introduction/spread of invasive materials and species, to avoid indiscriminate removal of understory and overstory based on limitations of heavy equipment maneuverability and use tolerances, and to ultimately avoid significantly disrupting the forest resource as required by the LCP.

- In addition, we also believe that the project should be overseen by a biologist experienced with native Monterey pine forest resource ecology who would be able to direct field crews with respect to what to remove/modify, what to leave alone, and the most resource protective ways of going about it. Again, the intent in this respect is to ensure that the project will result in a net positive in terms of long-term health and viability of the forest resource in addition to reducing fire hazards, including while keeping in mind the LCP requirement of retaining as much native vegetation as possible.

- Also and related, we recommend that the width of the disturbance area be evaluated for whether it can be reduced from the proposed 100 to 150 feet to something less (e.g., 50 to 75 feet) and still meet project objectives, and/or whether a range of management measures within the disturbance area (whether the width is reduced or not) could be applied to better protect the resource (e.g., more to less aggressive modification extending from the edge of the forest toward the interior).

- In addition, we would like clarification regarding whether the portion of the project extending through the heart on the forest along both sides of Bridge Street is necessary and appropriate. The project materials that we have reviewed are unclear on this point. Unlike the portion of the project along the edge of the forest to the west, this portion of the project would appear to potentially have a significant impact on forest connectivity, and could lead to unnecessary fragmentation.

- Finally, the project materials and the DMND are unclear with respect to proposed replacement planting. As you know, the LCP requires replacement for any native tree greater than six inches in diameter that is removed (NCAP SRA Standards 1 and 5). The DMND appears to base its counts on a ten-inch standard, and this must be corrected to six inches per the LCP. In addition, it is unclear from the project materials where such replanting and/or offsetting revegetation otherwise would occur. Consistent with the above discussion, we believe that the replanting/revegetation component of the project needs to be bolstered, including with respect to LCP required replacement ratios. We recommend that any such replanting/revegetation associated with the overall project be envisioned in light of the forest as a whole. Again, in our view, an approvable project must take into account the way the

project area work affects the larger forest as a whole, and thus replanting/revegetation could thus be undertaken where it makes most resource sense forestwide, whether that means in or near the project disturbance area or not.

With respect to other habitat resources associated with the native Monterey pine forest in Cambria (e.g., streams, wetlands, riparian corridors, listed species, etc.), the measures identified above for pine forest would also help to protect and enhance these associated resources. However, certain other resources present in the project area have their own set of issues that will also require additional analysis and potential modification, including as follows:

- The project materials indicate that 25 to 50 foot "protection buffers" would be applied in relation to identified coastal streams. This raises several concerns. First, four streams are identified in this respect, but the DMND materials indicate that the project area also includes other ephemeral streams and areas with seasonally wet soils, some of which have a mix of riparian type plant species growing alongside upland plant species. However, the location and related attributes of these resource areas are not clearly identified. All of these resources need to be clearly identified so that project parameters may be adjusted as necessary and appropriate to meet LCP requirements related to them. Second, the LCP requires that development be set back a minimum of 100 feet from identified streams and wetlands, and only allows a limited subset of development within this 100-foot area if specific LCP exception findings can be made. Although some amount of forest management as described above may be appropriate as a resource management/enhancement measure for forest (as discussed above), the way in which vegetation management within the setback area from these wet resources affects such wet resource values must also be countenanced. Third, it is not clear from the materials provided that the "protection buffers" designation, however wide such buffers are, will adequately protect such resources consistent with LCP requirements. We recommend that all such wet resources be identified and 100-foot buffers be applied to them where any work within 100 feet is only allowed provided it is designed to foster habitat values (including in the way in which wet resource habitat values interact and overlap with forest resource habitat values) and provided the LCP exception findings can be made.

- The DMND lacks identification or analysis of potential impacts to listed species. Again, all such species that may be present need to be documented, and the project adjusted to avoid impacts.

Finally, it will be important to monitor and document the effects of the project so that future forest management projects can benefit from and adapt to any lessons learned. In that respect, we recommend that the project include a monitoring and reporting component designed to ensure that it not only functions as envisioned (including 'on-the-fly' adaptation as needed to ensure same through the work of the aforementioned biological monitor), but also to ensure that forest managers can learn from the project, including in such a way as to inform future projects and forest management efforts.

Other

We believe that a project refined in the ways identified above can likely be found consistent with LCP policies, but we also believe it raises some other issues, including as follows:

- The project area is subject to a conservation easement currently held by the Nature Conservancy. From what we understand of that easement, only a project as refined and re-envisioned above can be found consistent with the terms and conditions of that easement. It will be important that the ways in which the conservation easement affects potential project parameters be made clear in the County's process, and that any easement inconsistencies are clearly identified and addressed.

- The project materials and the DMND lack discussion of potential alternatives to the proposed project. In addition to the recommendations above, we believe it would be useful to begin exploring alternatives that could be used to help manage and maintain the native pine forest, including in relation to fire hazards and recognizing that it is located at the interface with the town of Cambria and it residents, residences, and other development. It occurs to us that there may be a range of alternative measures that could be applied over time that could help to avoid or minimize the need for projects such as the one proposed, and would be interested in seeing an evaluation of same moving forward. For example, grazing, prescribed burns, and modified fuel loading standards have all been applied and/or proposed in this and other native Monterey pine forests in California, and an evaluation of same would provide some context for understanding this project and others like it that may follow in the future.

- It is clear that the Cambria native Monterey pine forest as a whole would benefit from a more comprehensive management and planning effort that takes into account potential development and other factors, like the proposed project, that can affect it. Such an approach would have been particularly useful in helping to shape and evaluate this proposed project from the beginning, particularly to the extent it were made a part of the LCP, including because it could make clear to all the parameters of what is appropriate under the LCP (such as the modifications suggested above and others). Such a tool could also form the basis for pursuing and attracting funding to help implement measures that benefit the forest over time. We strongly encourage the County to work with interested stakeholders on just such a Cambria native Monterey pine forest management tool, and are available for consultation should such an effort move forward.

Thank you for the opportunity to comment on the proposed project, DMND, and CDP application. We hope that these comments prove helpful. Clearly, there are some aspects of the project that raise questions regarding the various resource protection and fire hazard mandates and laws that intersect at the Cambria native Monterey pine forest stand. Fortunately, in our view, the LCP (including in the way it derives its authority from the State Coastal Act) provides

a way for these sometimes competing objectives to be reconciled in a way that reflects good planning and good public policy, and that recognizes and appropriately protects resource values of one of the last remaining native pine forest stands in the world. We look forward to reviewing revised project materials as they are developed, including in terms of the recommendations above, and are available for consultation as the project moves through your CDP process. If you or your staff have any questions regarding our comments or would like to discuss this matter further, please contact me or Jonathan Bishop of my staff at the address and phone number above.

Sincerely,

Dan Carl
District Manager - Central Coast District Office
California Coastal Commission

cc: Alan Peters, CalFire
Robert Lewin, CalFire
Bruce Gibson, 2nd District Supervisor
Ryan Hostetter, County Planning and Building Department

North Coast Advisory Council
Minutes of Regular Meeting
Wednesday, November 16, 2011
Rabobank Community Hall
Main Street, Cambria

I Meeting Called to order by Chair Joyce Renshaw at 6:30 PM

Roll Call: Present Bambi Fields, Stevan Rosenlind, Joyce Renshaw, Erwin Ohannesian, Clive Finchamp, Dawn Dunlap, Debby Mix, Marty Munoz-Main
Present but entered after roll taken:
Bob McLaughlin, Gary Gall, Gail Robinette, Ralph Covell, Amanda Rice, Laurel Stewart
Excused: Teri O'Rourke, Tom Gray, Matt VanWeerden Poelman, Mary Giacoletti
Absent: Marjorie Sewell, Sigrid Castaneda, Mac VanDuzer

II Public comment-limited to items not on Agenda
1. Harry Farmer-blessed in town of Cambria. Advocates end to all violence. Wishes respect for everyone.
2. Don Archer-points out goals of Occupy Movement in a letter read to those at the meeting. Against the power of global corporations. Shares book about history of corporations.
3. Jesse Arnold-Thanks members for serving on the NCAC.

III NCAC Members' Comments
1. Bambi Fields-trolley will be working on Hospitality Night.
2. Dawn Dunlap-re. Events Ordinance-wants Hearst Castle to be available for public use by non-profits. Never has there been complaints lodged against Hearst Castle because of non-profit events.
3. Steve Cole- recommends letter in support of Dawn's letter which supports Hearst Castle activities. Motion?
Kathe Tanner-this subject is not on tonight's agenda.
Dawn- rescinds the motion.

IV Motion to approve the consent agenda-passes unanimously.
Approval of Minutes of October 19, 2011
Treasurer's Report-current balance of $1700.40
Dropping subject of By-Laws-ok'd by Chair.

V Public Agency Reports
1. Public Safety: Todd Steeb/Jay Donovan
236 calls for service. narcotics, heroin, codeine cases. Also increase involving prescription drugs.
Robinette-substation locations in county? Los Osos, Templeton, Oceano
Thanks for monitoring of speed on Winsor.
Collision at Highway 1 and Main Street. Entrance sign to Cambria destroyed.

Note neighbor's concerns about construction activity; request that construction be monitored for impacts such as noise, congestion from parking of vehicles and storage of equipment, etc.

LAND USE COMMITTEE RECOMMENDATION: Approve, with conditions noted above.

Motion made to approve project with conditions noted.
Vote taken. Motion passes unanimously.

5) DRC2011-00036 MANDERS - Minor Use Permit for SFR with grading on slopes; 4.24-care site located off Cabrillo Highway in San Simeon (Ragged Point). APN: 011-021-016.

Link to application:
http://www.slocounty.ca.gov/Assets/PL/referrals/coastal/DRC2011-00036 MANDERS.pdf

SUMMARY: This MUP is for a 3423 sf single-story home with 600 sf guest house on a 4.24-acre parcel adjoining Highway One (landward side) about 0.8 mile south of the Ragged Point Inn. Total area of home, guesthouse and detached garage (1545 sf) would be 5028 sf. Project includes a new private water well and septic system. The proposed home is situated on a gently sloping bluff about 50 ft above the highway; the structure would not be visible from the highway except from a distance of about one mile to the south. Access to the building site is currently through an adjacent property owned by the applicant. A new driveway will be constructed to the highway, pending encroachment approval by Caltrans.

This is a well-designed project, with the proposed structures of appropriate size and profile for the size of the lot and its setting.

LAND USE COMMITTEE RECOMMENDATION: Approve

No discussion.
Motion to approve. Vote taken. Motion passes unanimously.

6) DRC2011-00034 COVELL-CAL FIRE - Minor Use Permit for shaded fuel break project; 50-acre site located off Bridge Street in Cambria. APN: 013-111-005.

Link to application:
http://www.slocounty.ca.gov/Assets/PL/referrals/coastal/DRC2011-00034 COVELL-CALFIRE.pdf

SUMMARY: This is a forest-thinning project covering approximately 50 acres in two elongated zones 100 feet wide. One zone would roughly follow Bridge Street from East Village to about a half-mile northwest of Cambria Cemetery. The other would extend from Cambria Cemetery west and then run south and eastward at the edge of the Happy Hill and Pine Knolls residential neighborhoods. Undergrowth and small trees would be removed for fire protection. The primary method would be mechanical

thinning with a "masticator" that removes and chips vegetation. Effects of the project and steps being taken to protect sensitive habitat and plant species are detailed in the Mitigated Negative Declaration received by the NCAC. Impacts, as mitigated, will not be significant. This fuel break project appropriately addresses the need to protect a substantial number of Cambria businesses and residences from potential wildfires.

Land Use Committee Comment: Proponents and opponents of this project agree that it is necessary for the safety of Cambria. They disagree over the means of implementation and some details of mitigation. The Committee urges all parties to work together to resolve their differences to the greatest extent possible, recognizing that neither side will prevail on all issues. The Committee then urges all parties to work together to achieve approval of this project at all levels of government review so that it can be completed in the shortest amount of time possible.

LAND USE COMMITTEE RECOMMENDATION: Approve

Discussion

S. Rosenlind-resolution already passes by NCAC last month approving the project.

Motion to approve the land use committee recommendation.

Mr. Covell thanks all, including fire agencies, public, etc. for support.

L. Stewart-how does this vote differ from last month's? Chair says it does not differ.

Fire deputies-smaller seedlings, a limited number , would be affected.

G. Robinette-CalFire has answered the citizens' questions and concerns.

L. Stewart-no further review of this project until 2016. Red'legged frog and other species may be harmed.

No consideration of grazing and herbicide use in the area at this time.

Lewin-residents of Cambria need to continue to stay involved and pay attention to areas of town that need attention.

Thinks this project is important for the needs of town and its citizens.

L. Stewart-future expansion of firebreak to 300 feet is planned. Asks Supervisor Gibson if further reviews would be required if firebreak is expanded.

environmentally sensitive habitat=firebreak, so Coastal Commission is involved.

any public comment should only be accepted by deadline. Hearing is Dec. 16 at 9 AM.

S. Cole-wants firebreak project to move ahead

A. Singwald-hearing to take place only if requested/otherwise, project moves forward.

Harry Farmer-what about the animals who reside in the area of the firebreak project?

Fire Chief-will protect flora/fauna and environment.

Robinette-wood rat nests to be avoided.

other habitats may be relocated.

Dawn Dunlap-bad choice of name for machine and for project.

Vote taken on Motion made. In favor-7. Against-1 Motion passes.

No report from Chair Joyce Renshaw.

X Adjournment of Meeting – by Chair at 8:30 PM.

Respectfully submitted, Marty Munoz-Main, Recording Secretary

Excerpts from the Cambria Forest Management Plan

removal and/or cone and seed scattering treatments (described below) in preparation for a controlled burn.

Ecological Benefits and Consequences

Of all understory treatments, a controlled burn is the least manipulative and most resembles natural processes. Monterey pines benefit from fires; heat or fire causes closed cones to open and release seeds, and prepares the soil for seed germination. Fires reduce understory vegetation, and partially or completely remove the layer of leaf litter on the soil surface (the duff layer), leaving an open site with nutrient-rich ash in which seeds can germinate and seedlings can thrive. In addition, fires remove pests and pathogens, including invasive exotic plant species, the pitch canker pathogen, and beetles that act as pitch canker vectors.

Scatter Cones and/or Seeds

Objective

Intensive overstory treatments such as Treatments 6 and 7 will leave few or no mature trees in the overstory to provide a source of cones and seeds for regeneration. If the number of cones on the ground after such treatments is insufficient, the Forest Manager may want to supplement the seed population by scattering cones or seeds. The objective of scattering cones and/or seeds is to ensure a large and diverse seed population for Monterey pine regeneration.

Description

Cones and seeds should be collected from many healthy trees within the management unit where they are to be scattered to ensure germination of stock that is adapted to local microclimates. Either cones or seeds may be scattered. Scattering open cones will likely be the most cost-effective method. Closed cones can be taken from healthy mature limbs by pruning small limbs or portions of large limbs and cutting the cones off the limbs by hand. The cones can then be artificially heated to open them or placed in the open on hot summer days, where they should open on their own. Cones should be scattered as evenly as possible in open areas to maximize the chance that seedlings will grow in suitable microsites. Care should be taken to insure that genetic differences between management units are considered when scattering seeds.

This treatment is appropriate for use where a delay between treatment and recruitment is acceptable. On sensitive sites where groundcover or regeneration is required immediately after treatment, planting trees (see below) is the desired understory treatment.

Ecological Benefits and Consequences

Scattering cones and seeds evenly over an entire management unit increases the chances of germination within that unit. If pitch canker is present within the management unit, some of the seeds scattered may be infected; these will produce infected seedlings if they germinate. Other seeds will be from healthy, perhaps genetically resistant, trees and are expected to germinate successfully. Because healthy trees may not be evenly spaced throughout the management unit, scattering their cones will increase the probability that these viable seeds will germinate in several places. Scattering cones and seeds would be especially helpful as an addition to an intensive overstory treatment, where regeneration of a healthy, even-aged cover of Monterey pines is important to protect soil and understory resources.

Plant Trees

Objective

Tree planting is an important supplement to overstory treatments in sensitive areas, such as management units with steep slopes. The objective of tree planting is to speed regeneration of Monterey pine cover in areas under treatment. Planted trees will replace trees removed from the overstory.

Description

Appendix B provides detailed information on recommended techniques for tree planting. At least 3 trees should be planted for each removed tree with a dbh >20 inches. Planted trees should be 5-gallon stock of disease-free Monterey pines native to the Cambria area, coast live oak, or other tree species approved by the CFC or Cambria Design Committee. All native tree species to be planted should be propagated from stock native to the Cambria forest. All Monterey pines should be derived from an approved propagation program intended to develop pitch canker–resistant stock from local trees.

Ecological Benefits and Consequences

Planting healthy stock free of pitch canker infection will help to increase the survival of young trees in management units within the Cambria forest. This will be especially beneficial in areas with sensitive resources, where it is important to regenerate healthy canopy cover as quickly as possible. In addition, tree planting, or tree planting used in conjunction with cone and seed scattering, will contribute to greater biodiversity, improved soil conditions, and better overall forest health compared to reliance on cone and seed scattering along, because the

3. Annual reports should be prepared for CFC, which include landscape-level and management unit–level evaluations and recommendations.

4. Management unit treatment plans should be evaluated according to the objectives, standards, and milestones provided in the forestwide priorities and goals and objectives of the CFMP, and should be modified or redirected as appropriate.

5. Anomalies detected by monitoring and/or research and determined to be relevant to the program should be further investigated with more detailed evaluations or changes in the treatment or site selection methods.

7. Long-term forestwide priorities and short-term management unit treatment plans should include contingency planning elements in order to contend with unforeseen circumstances.

8. If possible, funding should be dedicated to basic scientific research in support of adaptive management.

9. With some specific exceptions, information generated by adaptive management, monitoring, and research should be managed and archived so that it is accessible to program participants and the public and is available for future analysis.

10. The Forest Manager and the CFC should review the entire adaptive management process every 3–5 years; as part of the review process, independent scientific peer review should be solicited.

Monitoring

What to Monitor: Defining Success Criteria

The treatment prescriptions incorporated in the CFMP will have varying degrees of impact on the environment. Treatments such as complete removal (Treatment 7) are considered intensive because they commonly remove vegetative cover and expose the soil. Other treatments, such as individual tree removal (Treatment 2), require less manipulation within the management unit and result in less structural and environmental change.

Because different treatments or combinations of treatments leave a management unit in widely varying states, this document cannot prescribe monitoring techniques and success criteria that are both standardized and specific. Rather, the flexibility and variability of the CFMP lends itself to the development of individual monitoring parameters in conjunction with a specific treatment implementation plan. For example, if the checklist has identified removal of individual trees from an urban area as an appropriate treatment, the monitoring parameters may include assessing the resulting decrease in hazard to life and

property and the success of regeneration/recruitment of new trees to take the place of the removed tree or trees. By contrast, the monitoring parameters for a shelterwood cut (Treatment 3) on a high-erosion wildland management unit might include assessing the recruitment, growth, vigor, cover, density, and survival of Monterey pine and other species; the amount of erosion caused by construction/implementation techniques; and the degree of encroachment by invasive plant species.

Criteria for the evaluation of management success should be developed from the monitoring parameters. In general, the Forest Manager should monitor each site for general health, including:

- cover, density, and survivorship of healthy Monterey pines and coast live oaks;
- infection or reinfection of Monterey pines by pitch canker;
- understory composition and diversity;
- erosion caused by the treatment application or removal of vegetation; and
- infestation by invasive exotic species.

Monitoring variables should be realistic, clear, and quantitative, in light of the following.

- The natural communities in the management unit.
- Characteristics that reflect the growth and vigor of the community.
- The physical stability of the treated landscape.
- The condition of adjacent properties or management units.
- The life history of the Monterey pine.
- Special features within the management unit (e.g., cultural resources, streams, wetlands, etc.).

The success criteria should be used to create a checklist or other guide or form that will standardize the collection of data and facilitate the Forest Manager's collection of appropriate data for comparison. The checklist may also require the Forest Manager to collect information to fill data gaps that were identified for the research needs for the adaptive management plan.

When to Monitor: Developing a Monitoring Schedule

Like success criteria, monitoring schedules should reflect the severity of the treatment and the projected or anticipated future conditions on the treated site. Monitoring intervals should be appropriately spaced to permit the identification of any potential concerns and to track successional changes; the precise interval

will depend on the treatment and the success criteria. Following is a sample monitoring schedule for a high intensity treatment, such as seed tree retention.

1. **Immediately prior to implementation of the treatment.** The first monitoring visit should document existing site conditions, in order to provide a baseline for comparison with post-treatment conditions. This visit will also contribute to the development of success criteria for the management unit over the next 5–10 years and will help to identify potential issues that may affect the success or stability of the treated unit.
2. **Immediately after implementation of the treatment.** The second monitoring visit should document the immediate post-treatment conditions in the management unit; it will also allow the Forest Manager to ensure that the treatment prescription was executed properly and that the immediate goals for the treatment have been met. The "picture" established during this visit will help to refine the success criteria for the management unit's next 5–10 years and improve the identification of potential issues that may affect the ongoing success or stability of the treated unit.
3. **Every year for the first 5 years.** Monitoring efforts should continue every year for 5 years following treatment. The continuous collection of data will document successional changes and regrowth and health of Monterey pines within the treated management unit and help to identify potential problems. It will also contribute to evaluations of the Site Condition Checklist's model. By comparing data from neighboring management units, the Forest Manager will be able to track forest structure throughout the Cambria forest. Monitoring data should also be compared to the success criteria and baseline data to help identify any necessary changes in management practice or in the implementation of specific treatments.
4. **Every 3 years for the next 15 years (or indefinitely, budget permitting).** Long-term monitoring will allow further tracking of changes in forest structure and physical stability of the treated management unit, and should also be used to determine if and when the unit needs to be treated again. The Forest Manager should continue to document the successional changes within the treated management unit. Synthesis of data collected from a number of management units will help to manage the whole forest by tracking the forestwide patterns of disturbance and regeneration. Long-term monitoring will also permit the identification and control of reinfestations or other problems long before they affect the entire forest. Ongoing monitoring will also detect possible new infections in the managed area; this will provide an early warning system for the arrival of the potentially devastating sudden oak death syndrome, which has not yet been reported in the Cambria forest but is spreading rapidly on the central California coast.

What to Do with the Results: Archiving and Analyzing Monitoring Data

All monitoring data should be entered into a database. The database must be systematically organized so it provides a usable archive of historical information about the treated management units. It should also offer the means to make comparisons between pre- and post-treatment data, and between the monitoring results and the success criteria.

Any spatial data (e.g., locations of management unit boundaries, locations of wetlands, etc.) should be maintained in a geographic information system (GIS) database using software such as ArcView or ArcInfo. As the number of treated management units increases and as the monitoring data are characterized and tracked over time, this type of spatially organized database will help the Forest Manager analyze data and administer treatment to many management units within the CFMP quickly and easily. This type of analysis can also accommodate any spatial modeling needs for the Cambria forest.

The database should be used to compare the quantitative data and the spatial data. The comparisons will help assess how well the treated area is progressing relative to the success criteria for the management unit, and the goals and objectives of the CFMP as a whole.

Adaptive Management

When to Engage Adaptive Management

In general, Adaptive Management should be an integral part of the forest management process and should always be in process. However the extent of application should be keyed to ongoing assessment of forest conditions.

Response to Forest Conditions

For each performance metric and its associated success criteria, a threshold should be established that serves as the indicator, or "trigger," at which point the adaptive management process starts. Adaptive management triggers are derived from two sources:

- the performance and recovery expectations established during the development of the specific implementation plan for the treatment prescription; and
- the success criteria.

The triggers must be quantitative, in order to permit explicit (binary or "go/no go") comparison between the monitoring data and the trigger threshold.

Letters requesting hearing for Planning Department Hearing

SAN LUIS OBISPO COUNTY

DEPARTMENT OF PLANNING AND BUILDING

November 30, 2011

Ralph Covell
5694 Bridge St.
Cambria, CA 93428-2107

Re: **COVELL**
County File Number: DRC2011-00035

We have received a request for hearing on the above referenced project. The hearing will be held on, **Friday, December 16, 2011, at 9:00 a.m.** in the Board of Supervisors Chambers, County Government Center, 1055 Monterey Street Room D170 San Luis Obispo, California. At the hearing all interested persons may express their views for or against, or to change the proposed project. A copy of the hearing request(s) is enclosed.

This item has been continued from the December 2, 2011 Planning Department Hearing.

If you have any questions please contact **Ryan Hostetter, Project Manager,** in the San Luis Obispo County Department of Planning and Building, County Government Center, San Luis Obispo, California 93408. (805) 781-5600.

Sincerely,

Donna Hernandez

DONNA HERNANDEZ, SECRETARY PRO TEM
PLANNING DEPARTMENT HEARINGS

cc: Mary Webb
186 Hartford
Cambria, CA 93428

✓ Ryan Hostetter, Project Manager/File

November 19, 2011

SLO County Dept. of Planning & Building
976 Osos St.
San Luis Obispo, CA ~~93446~~ 93408

-Attn: Donna Hernandez.

Dear Donna,

This is the second letter I've sent to SLO county regarding this project. I and many others were given an incorrect zip code by your staff. Apparently you have not received many of the requests that were mailed to zip code 93446.

Project **#DRC2011-00035 Covell Ranch Fuel Break.**

TO REQUEST A PUBLIC HEARING: An applicant or an interested party may request a public hearing on this matter. To do so, send a letter to this office by Monday, November 28, 2011. We need an original signature, a fax will not be accepted, and the letter MUST include the language **"I would like to request a hearing on this matter."**

Dear Donna,

This property is under a conservation easement held by The Nature Conservancy and contains endangered Monterey Pines, Oaks and provides excellent forest habitat for wildlife and birds. I understand approximately 10,000 trees would be cut along with much of the understory bushes, using a masticator. Invasives such as Broom are invading the forest edges already and this project may exacerbate this problem. The Broom that has already invaded the property needs to be removed and perhaps the $48,000 grant could be used to solve this one major problem.

I am asking that the project be reduced in scope using hand crews, cutting fewer trees, and not cutting a 100 ' wide pathway around the forest edges. State Parks uses hand crews on the adjacent lands and the fuel break recently cut in Washburn Campgrounds is a wonderful example of a project I could support.

I understand that the Covell Ranch Fuel Break project would be approved without a hearing (as a consent item) unless a member of the public writes a letter requesting a hearing. Therefore I would like to request a hearing on this matter.

Thank you,

Mary Webb
1186 Hartford
Cambria, CA 93428

November 19, 2011

SLO County Dept. of Planning & Building
976 Osos St.
San Luis Obispo, CA ~~93446~~ 93408

-Attn: Donna Hernandez.

Dear Donna,

This is the second letter I've sent to SLO county regarding this project. I and many others were given an incorrect zip code by your staff. Apparently you have not received many of the requests that were mailed to zip code 93446.

Project #DRC2011-00035 Covell Ranch Fuel Break.

TO REQUEST A PUBLIC HEARING: An applicant or an interested party may request a public hearing on this matter. To do so, send a letter to this office by Monday, November 28, 2011. We need an original signature, a fax will not be accepted, and the letter MUST include the language **"I would like to request a hearing on this matter."**

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I understand that the Covell Ranch Fuel Break project would be approved without a hearing (as a consent item) unless a member of the public writes a letter requesting a hearing. Therefore I would like to request a hearing on this matter.

Thank you,

Mary Webb

[redacted]

GREENSPACE
THE CAMBRIA LAND TRUST

SLO County Dept. of Planning & Building
976 Osos St
County Government Center.
San Luis Obispo, CA 93408

RE: Project **#DRC2011-00035 Covell Ranch Fuel Break.**

November 23, 2011

Dear MUP Hearing Coordinator;

I request a hearing on the matter of DRC2011-00035 – the Covell Ranch Fuel Break proposal. It is my understanding that the MUP hearing is on December 16, 2011. Please advise as to the time and location of this hearing.

Thank you and kind regards,

RICHARD HAWLEY
EXECUTIVE DIRECTOR

PO Box 1505
Cambria, CA 93428
805. 927.2866 [v]
805. 927.2866 [f]
rick@greenspacecambria.org
www.greenspacecambria.org

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Deborah Parker, Emeritus Director

SAN LUIS OBISPO COUNTY

DEPARTMENT OF PLANNING AND BUILDING

November 22, 2011

Ralph Covell
5694 Bridge St.
Cambria, CA 93428-2107

Re: **COVELL**
County File Number: DRC2011-00035

We have received a request for hearing on the above referenced project. The hearing will be held on, **December 16, 2011, at 9:00 a.m.** in the Board of Supervisors Chambers, County Government Center, 1055 Monterey Street Room D170 San Luis Obispo, California. At the hearing all interested persons may express their views for or against, or to change the proposed project. A copy of the hearing request(s) is enclosed.

This item has been continued from the December 2, 2011 Planning Department Hearing.

If you have any questions please contact **Ryan Hostetter, Project Manager,** in the San Luis Obispo County Department of Planning and Building, County Government Center, San Luis Obispo, California 93408. (805) 781-5600.

Sincerely,

Donna Hernandez

DONNA HERNANDEZ, SECRETARY PRO TEM
PLANNING DEPARTMENT HEARINGS

cc: Richard Hawley
c/o Greenspace
P.O. Box 1505
Cambria, CA 93428

✓Ryan Hostetter, Project Manager/File

GREENSPACE
THE CAMBRIA LAND TRUST

RECEIVED
NOV 16 20
SLO CO PLANNING DEPT.

Ryan Hostetter, Coastal Planner
SLO County Planning
County Government Center
San Luis Obispo, CA 93408

November 15, 2011

RE: DRC2011-00035

Dear Ryan Hostetter;

I would like to request a hearing on this matter. Thank you for this opportunity to have a voice in how our community can protect our resources while providing defensible space at the same time. As proposed, the project falls short on resource protection and mitigation and places harm on the environment.

Kind regards,

Richard Hawley

RICHARD HAWLEY
EXECUTIVE DIRECTOR

PO Box 1505
Cambria, CA 93428
805. 927.2866 [v]
805. 927.2866 [f]
rick@greenspacecambria.org
www.greenspacecambria.org

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Valerie Bentz
Vance Hyde

SAN LUIS OBISPO COUNTY

DEPARTMENT OF PLANNING AND BUILDING

November 30, 2011

Ralph Covell
5694 Bridge St.
Cambria, CA 93428-2107

Re: **COVELL**
County File Number: DRC2011-00035

We have received a request for hearing on the above referenced project. The hearing will be held on, **Friday, December 16, 2011, at 9:00 a.m.** in the Board of Supervisors Chambers, County Government Center, 1055 Monterey Street Room D170 San Luis Obispo, California. At the hearing all interested persons may express their views for or against, or to change the proposed project. A copy of the hearing request(s) is enclosed.

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If you have any questions please contact **Ryan Hostetter, Project Manager,** in the San Luis Obispo County Department of Planning and Building, County Government Center, San Luis Obispo, California 93408. (805) 781-5600.

Sincerely,

Donna Hernandez

DONNA HERNANDEZ, SECRETARY PRO TEM
PLANNING DEPARTMENT HEARINGS

cc: Harry Farmer
P.O. Box 534
Cambria, CA 93428

✓Ryan Hostetter, Project Manager/File

November 21, 2011

San Luis Obispo County
Dept. of Planning and Building
976 Osos St.
San Luis Obispo CA 93406

would like to make PDF

attn: Donna Hernandez
re: Project #DRC2011-00035

Ms Hernandez;

As a 25 year resident of Cambria, I have some concerns regarding the use of the Masticator in the Covell Ranch Fuel Break, and would like to request a public hearing on this matter.

Thank you very much.

Respectfully,

Harry Farmer

[redacted]

GREENSPACE

THE CAMBRIA LAND TRUST

Ryan Hostetter, Planner
SLO County Department of Planning
County Government Center
San Luis Obispo, CA 93408

November 29, 2011 (Email – no letterhead – USPS letterhead)

Dear Ryan,

CalFire, a representative from the North Coast Advisory Council and two Greenspace representatives meant at the Greenspace office to discuss the Covell Ranch Fuel Break proposed plan. The objective of the meeting as, I viewed it, was to attempt to find a resolution on the manor in which the proposed fuel reduction plan could move forward without continued friction on methodology. The meeting was cordial and CalFire explained to us the rationale for the MUP and how it fits into the tree removal aspect of the Coastal Zone Land Use Ordinance.

We also made a site visit to an area already flagged for tree removal and walked a small section of the area. We learned that there were mistakes in the flagging – that is to say, healthy trees were on the chopping block, the entire understory was to be removed and invasive plants – in the case pampas plants where to be masticated without removal of the seed heads.

Greenspace offered to make some significant concessions on the use of masticators. We could see a limited use in certain areas but were still uncertain what kind of constraints might apply and none were offered by CalFire. We talked about CEQA and decided not to discuss that at this meeting because we had not had the opportunity to read any staff analysis from comments on the MND. We suggested that Bridge Street and both road shoulders be included in the width of the fuel break thereby reducing the impact on the forest but it was rejected. We suggested an overall reduction in width – 50 – to 75 feet depending on conditions and this was rejected. We where very interested in seeing what CalFire could do that would ease the assault on the forest with their project but to our dismay CalFire refused to budge from their steadfast position. Perhaps the most striking aspect of this project is that it was developed through the eyes of persons looking at his stand of trees from a timber harvest point of view and not from the point of view of habitat land set aside for conservation. Two completely separate objectives. Lastly, we learned that this project was in the making for ten years which makes one wonder why none of the community groups had any say in the process other then commenting on the already completed MND.

RICHARD HAWLEY
EXECUTIVE DIRECTOR

PO Box 1505
Cambria, CA 93428
805. 927.2866 [v]
805. 927.2866 [f]
rick@greenspacecambria.org
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Katherine Cochrun
Deborah Parker, Emeritus Director

After thinking about what we learned from the meeting I consulted a number of people who are versed on land use issues and offer the following analysis to be included with my prior letter sent to you a few weeks ago for your consideration at the Minor Use Permit Hearing (MUP).

Greenspace is concerned that the Covell fuel break project is being processed as a minor use permit instead of a development plan. Section 23.03.042 of our CZLUO requires a development plan for removal of over three acres of natural ground cover. It is my understanding that the project is being processed a minor use permit on the idea that it is a tree removal permit under CZLUO section 23.05.060.

The problem is that those sections don't apply to a project of this magnitude where specific trees will not be assessed for compliance with the ordinance requirements or individually tagged for removal.

I am sure you are aware that this project is development as defined by the coastal act and county ordinance which includes "grading, *removing*, dredging, mining, *or extraction of any materials*" and "the *removal* or harvesting of *major vegetation*". Development requiring a CDP does not have to be construction. Again, the understory removal issue arises.

When you read sections 23.05.060 – 064 you can see that those sections very clearly apply to removal of specifically identified individual trees. Not for the removal of 10,000 trees or even 100 trees that aren't individually assessed.

If this section applied (and if were being carried out), the application would have to describe the "size, species, and condition (e.g. diseased, healthy, etc.) of *each tree* proposed for removal." That is in 062(3) (A). The applicant would have to show why each tree should be removed based on specified criteria. Each tree to be cut would have to be tagged or marked. (We clearly saw errors with what trees where to be kept and which ones were to be removed while on our site visit).

For the tree removal permit process to apply, each tree would have to be replaced – one to one. This is subsection .064(3). Is there a one-to-one replacement element to this project?

In addition, the ordinance makes it clear that it doesn't apply where the tree cutting removes more than 6,000 square feet of vegetation. Where there is over 6,000 square feet of vegetation to be removed, the project is subject to minor use approval instead of a tree removal permit. This is .062(1) (E). Section (1) (D) likewise requires a minor use

permit where the trees to be cut are the identified sensitive resource in a sensitive resource area as they are here. The tree removal ordinance tells you that it does not apply to this project.

Yes, you are providing a minor use permit process – but not under sections 23.05.060 – 064. The project doesn't fit into these sections and it is not being processed by the requirements of these sections. These sections require a plot plan and where these sections *do not apply*, a minor use permit is required.

Also permit requirements in the coastal zone are governed by section 23.03.042 and table 3-A under that section makes it very clear that removal of over three acres of natural ground cover (which is what this project is) requires a development plan which is supposed to go directly to the Planning Commission.

The difference is not only that the Planning Commission is authorized to take action on a development plan and that it is supposed to go directly to the commission. The processing of this project as minor use permit related to a tree removal permit is that it is not being properly reviewed as a coastal sensitive resource area and an environmentally sensitive habitat area – both of which require additional information on the application, additional land use permit processing requirements, and applications of specific standards under the CZLUO.

For these reasons I ask staff to reconsider the idea that this project falls under a tree removal permit and to process this project as a development plan under section 23.03.042 with full application of coastal zone LCP requirements.

Best regards,

Richard Hawley

CC: Jonathon Bishop, Coastal Commission Staff

Additional Correspondence received by November 28, 2011

Ryan Hostetter, Planner
SLO County Department of Planning
County Government Center
San Luis Obispo, CA 93408

November 29, 2011 (Email – no letterhead – USPS letterhead)

Dear Ryan,

CalFire, a representative from the North Coast Advisory Council and two Greenspace representatives meant at the Greenspace office to discuss the Covell Ranch Fuel Break proposed plan. The objective of the meeting as, I viewed it, was to attempt to find a resolution on the manor in which the proposed fuel reduction plan could move forward without continued friction on methodology. The meeting was cordial and CalFire explained to us the rationale for the MUP and how it fits into the tree removal aspect of the Coastal Zone Land Use Ordinance.

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Best regards,

Richard Hawley

CC: Jonathon Bishop, Coastal Commission Staff

Donald G. Sather
Lee Ann Oliphant
889 Northampton Street
Cambria, CA 93428

22 November 2011

Mr. Ryan Hostetter
County of San Luis Obispo
Planning and Building Department
976 Osos Street – Room 300
San Luis Obispo, CA 93408

Re: DRC2011-00035 – Cambria Shaded Fire Break

Dear Mr. Hostetter,

As residents and owners of a 276 foot common property line with the Covell's Cambria Pines by the Sea (CT) Ranch, we have a keen interest in the fire break project currently under consideration.

Twenty years ago we watched, from across the bay, the Oakland Hills fire. It started in an unpopulated area very similar to the Ranch. It worked its way westward over the crest and down into the Oakland Hills, fanned by offshore (Santa Ana) winds. The loss of life and property was staggering. The same devastation is a very real threat here in Cambria. Our hills, roads, vegetation, and structure proximity are very similar to the once lovely Oakland Hills.

Citizens and environmental activists seem to agree that a fire break is truly necessary. The one hundred foot width is appropriate given the related research and actual experience with rural/urban interface wildfires. It seems to us that the only stumbling block to consensus on the execution of the fire break plan is the use of a masticator.

The dust and noise generated from a masticator cannot be significantly different than a chipper on wheels. The small tractor could remain in place while the chipper on the arm could reach small trees and brush within a sixty foot circle. More invasive would be trucks, trailers, and chippers with more workmen and chainsaws. Masticators have been used in environmentally sensitive areas including Monterey, Lake Tahoe and Twaine Harte, and are part of the forest management plans for Santa Cruz and San Mateo Counties, among others. The University of California has published a study in 'California Agriculture Online' funded by the California Tahoe Conservancy. This research study is entitled "Mechanical mastication thins Lake Tahoe forest with few adverse impacts." The title summarizes the conclusions of this research.

The Nature Conservancy has been the grantee of an environmental easement over this property since 2000, funded by CalTrans. The Nature Conservancy has specific rights "in order to further the Conservation Purposes, where necessary or desirable ***in the judgment of the grantee***". These rights include "the right to plant, maintain, preserve, protect and/or remove native vegetation" (page 47). The Nature Conservancy has been working with CalFire, Cambria Fire and the Covells for years to insure Cambria has a healthy, fire safe forest boundary. In the judgment of the Nature Conservancy, and the forest and wildfire fighting professionals, we have a viable, funded plan that includes a masticator. We believe the Nature Conservancy and CalFire have carefully considered all feasible alternatives and have produced a functional, cost effective solution to successfully complete this much needed project.

The argument over the masticator and its environmental impact becomes insignificant in comparison to the environmental and cultural devastation that could occur without a firebreak to stop or slow a wildfire. Just 3% of Covell Ranch acreage is affected by this forest health and fire safety project.

The environmental easement agreement severely restricts any recreational use of this land. Most Cambrians will never see, hear, or feel this project. They will, however, feel the results if this project is abandoned. Without this fire break, firefighters will be forced to use very large bulldozers and other heavy equipment to clear cut and uproot everything in a wildfire path to protect the residents of Cambria, with no regard for preserving anything on this land. Let's hope they can respond in time to make a difference.

We urge you to rely upon the existing environmental determination prepared by CalFire, grant a Minor Use Permit and Coastal Development Permit, and allow the Covell / CalFire Fire Break Plan to proceed immediately. Thank you for your consideration of this important project.

Sincerely,

Don Sather and Lee Oliphant

Don Sather and Lee Oliphant
805-927-1819

cy: The Honorable Bruce Gibson
County Supervisor – 2nd District
Room D-430 County Government Center
San Luis Opisbo, CA 93408

County File Number DRC2011-00035

Bill Schassberger to: Ryan Hostetter 11/26/2011 08:55 AM

1 attachment

Foster fuel comments DRAFT4 10 OCT 2011.rtf

Ryan,

I talked with you on the phone and you told me it was ok to send you an email with my comments for the Planning Dept. to read before the hearing on December 16. I am a past chairman and current member of the Cambria Forest Committee. We drafted a letter with our comments on this project. We voted to approve it and then sent it to Dan Foster, Senior Environmental Planner at the California Department of Forestry and Fire Protection Program.

I want to make sure that the Planning Department has a copy of this letter from the Cambria Forest Committee. Please see attached.

Thank You for you time.

Dan Foster, Senior Environmental Planner
California Department of Forestry and Fire Protection
Program – Environmental Protection
P.O. Box 944246
Sacramento, CA 94244-2460

October 10, 2011 by e-mail

RE: Mitigated Negative Declaration (MND) Bridge Street Fuel Break Project SCH# 2011081093

Dear Mr. Foster:

This letter is a revised replacement version of our earlier dated letter. It incorporates additional suggestions and deletions from Cambria Forest Committee directors not included in the earlier letter. Our Committee generally supports the creation of shaded fuel breaks along the urban interface. Please consider the following comments on the Mitigated Negative Declaration for the Bridge Street Fuel Break Project in Cambria, compiled by and approved by the Cambria Forest Committee. In summary, we believe that certain potential adverse impacts have not been fully identified and that additional mitigation measures are needed.

The currently named project does not adequately describe the area that is under review. It is misleading and clearly confuses the public. Nearly the entire proposed project is on the Covell Ranch and it would be more appropriate to identify the project as the "Covell Ranch Fuel Break Project", or a similarly more accurate name.

In the project description, it is stated that trees less than 10 inches DBH beneath the canopy of overstory trees will be removed. We recommend that in areas where the larger trees are unhealthy, widely spaced or near the end of their lifespan, healthy trees less than 10 inches DBH be retained to promote the re-establishment of larger trees as quickly as possible in all areas. This policy should apply to future maintenance clearing as well. In the future, replanting of trees in areas with no existing healthy trees should be considered.

The use of a masticator or other heavy equipment in a Monterey pine forest can have an adverse impact on the health of the trees. Compaction of the soil and tree roots as well as direct machine impacts can injure or kill the trees. We recommend a mitigation measure that requires all heavy equipment to remain at least 15 feet away from retained trees and brush.

The statements in the current project description about monitoring the fuel break in the future for the invasion of exotic plants into the disturbed habitat are lacking adequate information. More detailed and specific information is required on how exotics will be

effectively controlled or eliminated so that the fuel break does not contribute to the degradation of the forest.

Closely related to the issue of monitoring invasive vegetation, is what monitoring will be done to ensure that native trees indeed regenerate and grow to maturity in the fuel break, as the proposed MND claims will happen. Additional description of the planned monitoring activities should be added to the project description.

The claim that the fuel break will increase biodiversity is questionable. The likely increase in diversity will be in exotic weed species, not the few natives that are characteristic of the forest in Cambria.

There seems to be an inconsistency in the project documentation regarding the treatment of snags. This should be clarified. In one part of the document they are to remain standing, whereas in another section they are to be removed. While the discussion of the importance of snags for bats is accurate, we think that snags are important as granaries for acorn woodpeckers and especially as a source of nesting cavities for a large number of birds.

During the public meeting on March 10, 2011, it was stated that existing invasive plants would be treated or removed in the affected area before the main project begins. The plan does not mention herbicides even though at the March 10th meeting it was clearly stated that herbicides would be used. The plan states that French broom will be removed by hand only when feasible. Does this mean herbicides will be used in other areas? The CFC thinks this statement points to a pervasive problem in this plan, which is a lack of an effective clear and specific plan of action to address the removal of current and future invasive exotic plants. In addition, using a masticator to remove existing invasive plants like brooms will almost certainly spread the seeds of this plant, which must be avoided. To remove the existing brooms by cutting them at ground level is not a solution because these plants will regrow from the remaining root. They must be either completely removed including roots, or killed with a herbicide. The CFC would like to know how many gallons of herbicide will be used and what the half-life is of the specific herbicide.

One of the justifications for the project is the high level of public use based on the number and condition of trails in the area, which increases the chance of an accidental fire started by people in the forest. A fuel break, without an effective method of controlling access, could expand the probabilityof public access and the potential for starting a fire.

At the CFC public meeting held on March 10, 2011 there was a discussion of cattle grazing and fencing, and the need for monitoring of regeneration of both native and exotic plants. This issue was not included in the MND. The CFC thinks the document must clearly state what the plan is for grazing. If grazing is to be used, it should be clearly defined in this document as part of maintenance of the fuel break. The use of cattle is an important issue (and it need not be negative), and a clear plan of exactly how the cattle will be managed must be addressed, including stocking rate, season, and short-term as well as long-term monitoring.

The CFC is concerned that the proposed project is not in compliance with the Conservation Easement (CE) that was placed on the property. Public funds were used to augment the purchase of this land for the public benefit. The CE prohibits cattle grazing and motorized vehicles and allows public access on certain weekends with docent led hikes. We question if the proposed plan actually is legal from a CE point of view and why the California Department of Forest and Fire Protection or The Nature Conservancy has not addressed this problem.

The CFC is aware of three fuel breaks in the Cambria pine forest. The one at the Top of the World was implemented in 1996 by CalFire. Based on discussions with residents adjacent to the fuel break, it was poorly executed and never included any monitoring or maintenance. It has and continues to contain large amounts of fuel, including invasive plant material that probably resulted from the creation of the fuel break. A limited fuel break was completed in Strawberry Canyon and is partially maintained by the land owner. The fuel break on the East West Ranch is maintained by the Cambria Community Services District on a limited level. In order to avoid past problems with poorly maintained firebreaks, the CFC believes that the project documentation should include specific information about what agency or organization is responsible for maintaining the proposed fuel break in the Cambria Monterey Pine forest. Otherwise, the effort is a waste of effort and current funding that results in a potentially major impact on the forest with little long-term benefit for fire prevention.

In conclusion, the Cambria Forest Committee supports the creation of fuel breaks along the urban interface and agrees that protecting residents and community resources from wildfire is an important part of community planning. The Monterey Pine forest with its associated habitats in Cambria is a rare and important asset to the area. The CFC Directors feel that the proposed plan lacks adequate mitigation measures for the adverse impacts caused by the use of heavy equipment and masticators and does not adequately define future monitoring and maintenance responsibilities to ensure that the forest resource is protected and public funds are spent wisely.

Sincerely,

Co-Chairman
Co-Chairman
The Cambria Forest Committee
The Cambria Forest Committee

Re: Covell Fire Break Proposal

Brad Seek to: rhostetter 11/24/2011 12:37 PM

As a member of the Cambria Forest Committee I would like to see the proposal be modified to include a Follow up Plan to evaluate the project and take corrective action where it is necessary. This the first time that a Masticator will be used in a Monterey Pine Forest. I am concerned that the forest understory will be replaced with exotic annual grasses and French Broom. The exotics in my view can be ignited and burn faster than the native evergreen understory. This can result in a greater fire hazard and a waste of public funds.

I am not an expert in this area but even the Cal Fire Representative(Alan Peters) has admitted that he doesn't know how the project is going to turn out. There should be a specific follow up plan and a firm commitment from Cal Fire, Nature Conservancy, and the property owner to maintain a native forest in this shaded fuel break.

Fitzhugh Ranch

Walter & Judith Fitzhugh
2650 Eton Rd.
Cambria CA. 93428-4102

Phone 805-927-8353
Fax 805-927-3090
Email fitzhughranch@aol.com

11/19/20011

San Luis Obispo County Planning Dept
Ryan Hostetter

Subject: Cambria Fuel Break

I am appealing to the SLO County Building and Planning Dept. to issue all permits necessary to get the fuel break constructed in Cambria. This fuel break is a safety issue, to life, property and the preservation of the forest in Cambria. I know first hand what fuel break can defiantly be way to help control a wild land fire ,especially when the fire is crowning in the trees. I am a retired Heavy Fire Equipment Operator with Cal Fire and have fought fires in areas simpler to the Cambria forest and have first hand knowledge of what fuel break can do in controlling a wild fire. A fuel break can make the difference in stopping the fire. Cal Fire has the money to do this fuel break now but if it is bogged down in paper work and hearings this money could get lost. Greenspace and others advocates the use of hand crews to cut, chip and burn the cleared material this would cost several hundred thousand of dollars verses forty thousand dollars which is committed to the project to be done using a masticator which is cheaper and also safer. I see these appeals as a way to totally stop any fuel break projects not only in Cambria but other coastal areas. I would hope that we never see a fire in Cambria like the ones in Santa Barbara or Oakland, if this proposed fuel break is stopped we are running a greater risk of seeing this happen here and I hope those that are instrumental in stopping the project can live with the knowledge that they could cause the potential lose of lives, property and damage to our forest to those of us that live in Cambria.

Please put this project on a fast track so that this fuel break can be completed before we loose the funding that we may never see again and possibly save lives and property.

Sincerely,
Walter Fitzhugh

GREENSPACE
THE CAMBRIA LAND TRUST

Ryan Hostetter, Environmental Planner
San Luis Obispo County Depart of Bldg. and Planning.
County Government Center
San Luis Obispo, CA 93408

November 14, 2011

RE: Bridge Street Fuel Break - DRC2011-00035

Dear Commissioners and Ryan Hostetter:

Thank you for the opportunity to comment on the above mentioned fuel reduction project. Greenspace is a founding board member of the San Luis Obispo County Community FireSafe Council and have just recently retired from nearly10 years of service.

I want to make it clear that Greenspace supports a shaded fuel reduction project along the Urban Wildland Interface (WUI) in our community but the proposed project is flawed and is not consistent with the CZLOU/LCP and the California Coastal Act.

There seems to be some confusion as whether this proposed project is a minor use permit or a coastal development permit. We think the project is clearly a Coastal Development. The

With that said, please consider the below comments based on a Mitigated Neg-dec from CalFire and from inconsistencies in the Local Coastal Plan and the California Coastal Act and PRC as it pertains to conservation lands held in the public trust. We will certainly be interested in reading the staff report on this project and will make further comments on this issue at that time.

- The first issue is the name of the project. It is misleading and gives many in the community a false sense of where the project is located. If you have ever been in our community and driven on Bridge Street you would be confused. Perhaps 10% of the project is located adjacent to Bridge Street. The entire project is located on the Covell Ranch. Consider calling it by a name that accurately describes the project location. A suggestion is the 'Covell Ranch Fuel Break'.

- We are aware that the entire proposed project is under a public financed Conservation Easement (CE) held in the public trust by The Nature Conservancy (TNC). We obtained a copy of this document and discovered that much of the work proposed by this MND is not allowed in the declarations of the CE. We also noticed that public access to the

RICHARD HASSLER
EXECUTIVE DIRECTOR

PO Box 1505
Cambria, CA 93428
805. 927.2866 [v]
805. 927.2866 [f]
rick@greenspacecambria.org
www.greenspacecambria.org

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property is required but under docent supervision one month per year. Please explain these discrepancies. This is a very important issue that the MND fails to consider and we believe it is not consistent with California Environmental Quality Act (CEQA). We also think that the document is not consistent with the Local Coastal Plan nor is consistent with the California Coastal Act. The MND lacks essential findings that support the plans lack of mitigation and the plans lack of identifying and securing funds to monitor and maintain this disturbance from becoming an exotic plant and weed-infested fire trap.

- Based on the fact that the native Monterey pine forests are considered a forest habitat that is under severe threat due to habitat loss, fragmentation, and development we question the need for a 100 foot to 150 foot wide fuel break when a 50 - 75 foot graduated shaded fuel break would result in defensible space appropriate for the climate and forest type. The plan fails to consider the distance between existing structures and the CE. The onus of fuel modification is clearly placed on the Covell Ranch and the Cambria side of the equation appears not included in the total fuel reduction area We think that this project is creating a classic "edge effect" and as proposed will require a level of mitigation that has not been remotely analyzed or even considered in this document. As a matter of fact, the edge effect has two sides on part of the proposed project as new fragmentation occurs as the proposed project leaves the Bridge Street area and a fuel break swath of 150 feet occurs that has two sides. Consequently, the effected area could easily double. Again, poorly thought through and no mitigation for the loss of habitat.

- Based on tree loss in California by fragmentation, habitat loss, and disease we think the carbon sequestration issue in our state is vastly underestimated and the loss of carbon sequestration with 50 acres of vegetation removals PLUS the edge effect must be included in the discussion and adequate mitigation developed.

- Masticators create fear and angst for residents. There are studies that prove the use of masticators to reduce fuel loads actually worsen the problem of wild fires. This type of equipment is not appropriate for the soil types and for the species of pine in this project. It is also not appropriate to use because of the proximity of people. The Masticator aerates poison oak into fine particles that can be inhaled or settle on skin, furniture, pets and other things that humans frequently come in contact with. No mitigation was offered for this condition. The Masticator appears to be used as a cost saving application only and little thought has gone into the health issues raised by this equipment. We think our forest and residents are more important then saving a few dollars for expediency sake. We think employing people to conduct this work is the correct method of removing fuel ladders and trimming vegetation not pulverizing and

grinding and then broadcasting matter into the surrounding habitat. To be blunt, the project appears to be underfunded.

- The Bridge Street asphalt surface must be used as part of the fuel break width thereby reducing the encouragement into the forest along this reach of the project. It will also reduce the cost.

- The monitoring impacts for wood rats are an important part of this project. The monitoring plan is not adequate and will NOT give any science based information on the impacts to these mammals caused by habitat loss from this proposed project.

- The tree removal regime as described in the MND is not clear and makes little sense. It appears to be based on a timber harvest plan and not from the perspective of a forest ecologist. The forest is now protected using state funds. The state of California has a financial investment in this property and owns certain rights held in the public benefit. We see no facts that support the removal of a certain class of trees over another age class of trees. The point of the CE is to protect the forest unit and promote regeneration. We believe that fuel management is part of conservation and public safety goals but the MND has not demonstrated this balance.

- The protocol on monitoring the fuel break over time for invasive plants and for forest regeneration is basically worthless. We would like to see a plan developed for this monitoring and see a secure funding source to do this work. The plan needs to address fixing problems of no regeneration and invasive plant removal plus show a secure funding source to do the work. The results of this monitoring and remediation must be accessible to the public and reported to the Cambria Forest Committee by CalFire and TNC. This is an essential part of mitigation for the proposed project.

- The fuel break will not increase biodiversity unless you mean the introduction of weedy and invasive material. This fiction needs to be taken out of this document unless you have specific examples that prove otherwise.

- We have concerns that there are parts of this fuel break regime that are not fully disclosed to the public. At a meeting with CalFire, TNC, and the Cambria Fire Department it was said that grazing would be part of the invasive weed control after the understory removal occurs. There is no mention of grazing. That is not to say that grazing is necessarily bad or good but it now appears it is not part of the program. Is this true or not? The MND also mentions potential road building but it is not part of this plan – what does this mean? Will the community need to review other

parts to this fuel reduction program? It appears that this plan is a piece of a larger plan and therefore not in compliance with CEQA.

- The existing cemetery is a shaded fuel break and another fuel break surrounding the cemetery is redundant and a needless encroachment on ESHA and a property held in the public trust by TNC.

- The permit application states that 10,000 trees will be removed but we see no mitigation for this loss of canopy. The LCP clearly states that tree replacement is needed when oak trees and Monterey pines trees are removed.

- This project is larger then 3 acres and requires a Coastal Development Plan (SLO code §23.03.042).

- Fuel reduction in Cambria is currently being piecemealed – that is to say that the Cambria Fire Department and CalFire project are clearly linked and should both be analyzed as one project impacting a small forest.

- Lastly, Greenspace supports proper and appropriate fuel management but the proposed plan fails to address many issues of concern and does not adequately support claims in the MND document.

Again, we appreciate the opportunity to comment on this potentially beneficial plan and look forward to reading a revised fuel management plan that demands a broader approach to managing a rare forest ecosystem.

Sincerely,

Richard Hawley

Ryan Hostetter, Environmental Planner
San Luis Obispo County Depart of Bldg. and Planning.
County Government Center
San Luis Obispo, CA 93408

November 14, 2011

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Sincerely,

Richard Hawley

Dan Foster, Senior Environmental Planner
California Department of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460

October 4, 2011

RE: Mitigated Negative Declaration Bridge Street Fuel Break Project SCH# 2011081093

Dear Mr. Foster,

Thank you for the opportunity to comment on the above mentioned Mitigated Negative Declaration (MND). Greenspace is a founding board member of the San Luis Obispo County Community FireSafe Council and have just recently retired from nearly10 years of service.

I want to make it clear that Greenspace supports a shaded fuel reduction project along the Urban Wildland Interface (WUI) in our community but the proposed project is flawed and will not have our blessing until some significant changes occur.

With that said, I offer the below comments:

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Again, we appreciate the opportunity to comment on this potentially beneficial plan and look forward to reading a revised fuel management plan that demands a broader approach to managing a rare forest ecosystem.

Sincerely,

Richard Hawley

Mahala Burton

6425 Cambria Pines Rd Cambria, CA 93428
(805) 927-1802 *mahala1@charter.net*

Planning Department

Attention Ryan Hostetter

County file # DRC2011-0035 apn013-111-005

As a concerned resident, I am writing in order to promote the quality of life for all residents of Cambria and for environmental protection of the Cambria Monterey Pine forest habitat and species.

After a careful review and analysis of the fire break project I conclude that the proposed project raises substantial issues, as to its conformance with the California Environmental Quality Act and the applicable policies of the San Luis Obispo Local Coastal Program, and to California Coastal Act provisions. Even after mitigation measures described in the MND are implemented the proposed project MAY have significant effects and impacts on the environment that will require additional mitigation.

Please enter the following comments into the formal record of this proposed action.

The fire plan goal of providing fire protection to the town and residents of Cambria must not be in conflict with the existing Conservation Easement held by The Nature Conservancy (TNC) in order to uphold the conservation values enumerated in the easement.

This writer does not argue with the necessity for fuel load reduction and for providing a 100 ft. defensible space for residents –only with the means of achieving this goal and the lack of mitigation measures.

In December of 2000 The Nature Conservancy acquired a Conversation Easement on approx. 1450 acres of the Covell Ranch also known as the Cambria Coast Ranch formerly named CT Ranch, paid for with TEA-21 Funds $4,000,000 (in two grants). Matching Funds: $500,000 in EEMP funds by the California Resources Agency.

In part the Conservation Easement agreement states:

> *This Grant Deed of Conservation Easement (this "Deed"), dated for reference purposes as of December JT, 2000, is entered into by and between A.L. Central Coast Estates, Inc., a California Corporation, as the grantor ("Grantor") and The Nature Conservancy, a District of Columbia non-profit corporation ("Grantee"), on the basis of the following facts and circumstances:*

A. Grantor owns that certain real property, consisting of approximately 1,454 acres of land in San Luis Obispo County, California, commonly known as the "Cambria Coast Ranch." This Deed covers all of the Cambria Coast Ranch except up to five and one-half (5 1/2) acres in the aggregate (the land covered by this Deed is hereinafter referred to as the "Land" and the portion of the Cambria Coast Ranch excluded from this Deed is hereinafter collectively referred to as the "Excluded Land"). The property description of the Land is attached hereto as Exhibit A. The Land, together with all rights, title, and interests appurtenant to the Land, is sometimes hereinafter referred to as the "Property".

B. The Property possesses significant natural, ecological, aesthetic and scenic values for conservation purposes (collectively, the "Conservation Values") which are of great importance to Grantor and Grantee, to the people of San Luis Obispo County, and to the people of the State of California, and which include, but are not necessarily limited to natural resources, ecological, and scientific values, including the Monterey pine forest and riparian habitat referred to in Recital C below, as well as scenic, open space and recreational values.

C. In particular, the Property contains one of only three remaining indigenous stands of Monterey Pine forest, as well as a creek ecosystem and its riparian corridors, providing significant habitat for a variety of important wildlife, and plants.

Inconsistent Uses of the Property.

Any activity on or use of the Property which is inconsistent with the Conservation Purposes of the Easement is prohibited. Grantor and Grantee acknowledge and agree that the uses of the Property which are described in Exhibit E which is attached hereto, though not an exhaustive recital of inconsistent uses and practices, are inconsistent with the Conservation Purposes of the Easement and shall be prohibited at the Property, except to the limited extent (if any) permitted pursuant to the terms of that exhibit.

Before implementation of the fire plan a careful reading of the Conservation Easement is crucial. Is the fire plan consistent with the Conservation Easement? Is the use of a masticator— the primary means of carrying out the fire plan an allowable use on the ranch? Is a masticator a motor vehicle and prohibited under the easement? Would the use of hand crews only acting with precision to implement the fire plan be a more effective means of protecting the forest flora and fauna and not degrade the wildlife habitat including the forest understory necessary for the survival of the many creatures that inhabit the forest.

The use of a masticator rather than manual hand crews can greatly enhance forest vulnerability. The environmental impacts that are potentially resulting from mastication treatments have been placed into three categories: sedimentation, soil damage and stand damage. Add to this the potential to severely degrade bird and mammal habitats due to the masticator's lack of precision targeting and deficiency of operator skills.

A list of species dependent on the forest within the fire plan includes but is not limited to:

Hawks, owls, bats, quail, wild turkeys, deer, foxes, bob cats, mountain lions, possums, raccoons, rats of all types, salamanders, red legged frogs' pond turtles, garter snakes, rattle snakes, gopher

snakes, and numerous birds. Is the fire plan taking into consideration the wildlife that may not have a government designation as protected but are still a part of the inter-related eco system?

Conservation Easement Exhibit E

#5 Vehicles

There shall be no use of any motorized vehicles off of existing roadways in the Forest Area as shown on the Map. There shall be no use of any motorized vehicles in the Riparian Area, except to cross at the crossing sites referred to and subject to compliance with provisions set forth in Paragraph 8(d) of Exhibit P.

MOTOR VEHICLE 18 USC

Includes an automobile, automobile truck, automobile wagon, motorcycle, or any other self-propelled vehicle designed for running on land but not on rails.

#7 Vegetation

There shall be no removal, cutting or destruction of native vegetation (unless harmful to horses or humans) or introduction of exotic plant or animal species which may in Grantee's determination threaten the Conservation Values of the Property. Grantor shall give Grantor a Proposed Activity Notice pursuant to paragraph 7 of this Easement prior to removing, cutting or destroying native vegetation deemed by Grantor to be harmful to horses or humans and prior to introducing any exotic or animal species Without placing any limitation on the foregoing provisions, none of the plant species which are listed in Exhibit E-l which is attached to this Deed shall be planted anywhere at the Property.

Broom Removal

Ironically broom— that shares equally with dead fall fuel load as a fire risk factor is given a mere one paragraph discussion in the MND. The fire plan fails to detail precisely how broom removal will not promote imminent explosive repopulation of this highly flammable noxious weed. Walking along Bridge Street and from the cemetery one can see numerous large areas of broom. Along Sunbury where the Covell Ranch shares a boundary with private homes are more huge amounts of broom. And adjacent to Camp Yeager even more enormous amounts of broom.

Not included in the fire plan is Cambria Pines Road; lined with broom for about 1/3 mile. In fact in the Cambria Pines neighborhood in private yards are broom hedges and large healthy looking broom bushes. None of this broom is within the fire plan and slated for eradication.

Page 9 of the MND

"Hand crews will also be used to remove French broom (Genista monspessulana) in the project area. Broom is present, particularly along roadsides and trails. Broom may be pulled from the ground if feasible, provided soil disturbance is minimized. When soil conditions are too dry for hand pulling, or soil disturbance is too great, broom will be cut just above ground level. All of the removed broom having seed heads will either be

disposed of properly off site, or piled and burned to minimized seed dispersal. Subsequent efforts to control the spread of broom will be made prior to fuel break maintenance activities as well."

The following excerpt on Broom is from California Invasive Plant Council
California Invasive Plant Council:

Native to countries surrounding the Mediterranean and in the Azores, French broom is thought to have been introduced to the San Francisco Bay Area In the mid-1800s as an ornamental. It spreads via prodigious seed production. A medium-sized shrub can produce over 8,000 seeds a year (Bossard unpubl. data). After pods open explosively, flinging seeds up to 4 m, the seeds are further dispersed by ants, birds, and animals and in river water and rain wash (McClintock, pers. observation), in mud, and on road grading or maintenance machinery (Parsons 1992). It resprouts readily from the root crown after ***cutting, freezing, and sometimes after fire*** *(Bossard et al. 1995).French broom currently occupies approximately 100,000 acres in California (D.Barbe, pers. comm.). It displaces native plant and forage species, and makes reforestation difficult. It is a strong competitor and can dominate a plant community, forming dense monospeclfic stands. In an experiment in New Zealand French broom had a higher growth rate than any other broom species found in California, reaching an average height of more than 4.5 feet (141 cm) in two growing seasons. Since it can grow more rapidly than most trees used in forestry, it shades out tree seedlings in areas that are re-vegetated after harvest.*

French broom foliage and seeds are toxic, containing a variety of quinolizldine alkaloids, especially in young leaves (Montlor et al. 1990). In some livestock, ingestion of plant parts can cause staggering followed by paralysis (McClintock 1985). Foliage can cause digestive disorders in horses (Parsons 1992). Infestations of broom degrade the quality of habitat for wildlife by displacing native forage species and changing microclimate conditions at soil levels. French broom is believed to be responsible for reducing arthropod populations by one-third in Golden Gate National Recreation Area (Lanford and Nelson 1992). It burns readily and carries fire to the tree canopy layer, increasing both the frequency and intensity of fires. French broom along roadside obstructs views, requiring expensive ongoing road maintenance. This species establishes a dense, long-lived seed bank, making it difficult to eradicate.

Fuel Break Maintenance

An inherent challenge with fuel break systems is the need for periodic maintenance to retard the growth of flammable shrubs and saplings, grasses, weeds and other non-native undesirable plants that can thrive in the increased sunlight and disturbed soils of cleared sites.
Fuel breaks without proper maintenance, become ineffective because the combined effects of vegetation and soil disturbance created during fuel break construction, and the increased exposure to sunlight in thinned areas, can lead to prolific growth of grasses, brush, weeds and particularly broom. Lack of maintenance on a regular basis will quickly negate functionality of the fuel break as a defensible space.

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"future periodic treatments may be conducted where necessary to maintain the integrity of the fuel break. Future maintenance activities will likely be conducted primarily with hand crews and will occur every several years as conditions and **funding warrant**. *Fuel loads will be less with future activities so durations of maintenance activities will typically be less than those of the initial treatment; again however, durations will vary based on the number and type of resources or treatment methods used."*

Apparently if funding is not available there will be no maintenance. Therefore prior to this fire plan implementation of a detailed environmentally sound plan for future maintenance should be mandatory— preferably manual cutting that can precisely target specific trees or vegetation for maintenance thinning and utmost a method of broom control. It is reasonable to hold The Nature Conservancy as holder of the conservation easement as the financially responsible party.

In Summary:

To comply with the procedural requirements of CEQA and to avoid and minimize wildlife impacts and harm to ESHA and to listed and sensitive plants, wildlife, and habitat that are likely to be adversely affected,

- Actual on ground surveys by a botanist and wildlife biologist for plant and animal species that inhabit and utilize the forest and that surveys be conducted during the time when sensitive resources could be detected. An attempt to predict what species may be present cannot reliably demonstrate the "absence" of a species on the project site.

- A qualified on-site biologist should be on hand to review proposed clearing areas for the presence of imperiled species, and for avoiding clearing along streams, wetlands, wet meadows, and during nesting or breeding seasons. No trees as large as 10in dbh removed.

- A detailed plan explaining the measures in the fire plan to prevent the spread of such diseases as pitch canker and sudden oak death in the forest.

- A precise maintenance plan with known funding to prevent the forest from becoming re-re-populated with invasive plants that will displace the natives necessary for the species that inhabit the forest.

- Consistency with the TNC conservation easement

Respectively Yours,

Mahala Burton

October 7, 2011

Ryan Hostetter

SLO County Planning
County File # DRC 2011-00035

rhostetter@co.slo.ca.us
RE: Covell Ranch Fire Break in Cambria

My husband and I live in Pine Knolls in Cambria, near the sight of the proposed 100 foot fire break project. We've been lucky enough to participate in Cambria's springtime "Walk in the Woods" several times on the Covell Ranch in Cambria over the years, at no cost, and are quite familiar with the Ranch. This popular walk was led annually by an enthusiastic, qualified, and informed biologist provided by Greenspace-the Cambria Land Trust. It was an educational and inspiring day for everyone who participated, and people looked forward to opening the ranch each year for this purpose.

The conservation easement for the property requires that it be managed and maintained in a manner that is, to the maximum extent possible, consistent with the preservation and protection of the significant conservation values of the property. Along with protection and restoration of riparian habitat associated with Cambria Meadows Creek and the extensive grasslands in the northern part of the property, a primary value and function of the easement is protection, management, and enhancement of the rare and indigenous Monterey pine forest.

Almost $5 million in public monies were used to protect this 1500 Acre property (900 acres of it in Monterey Pines). According to the Staub 2002 report, this is the largest contiguous area of native Monterey pine forest in the Region! Cal Fire's project would affect 50 Acres of this forest, nearly 6% of the conserved Forest, not 2% as erroneously reported.

Consistent with the conservation easement regarding 'enhancement', this Monterey Pine Forest should and could be expanded, rather than reduced. From Staub's report "As noted in the report by Langford (2000) and confirmed by our fieldwork, the forested area of the property appears to be stable, and in some areas is expanding into associated grasslands on the favorable sandy loam soils of the San Simeon series as grazing and fire activity has declined or been eliminated. In the absence of significant clearing and management for grazing or fairly regular ground fires, potential habitat for Monterey pine is probably close to the 1036 acres mapped as a Sensitive Resource Area (SRA) in the County's Local Coastal Plan (LCP)."

Instead this project proposed cattle grazing (a proposal that is now missing from documents), tree removal that more closely resembles the Collins Pine Logging operation in Northern California than lands being managed under a conservation agreement, 100 foot wide clearance areas encircling the forest area and masticating 50 acres of forest, activities that would negatively affect and reduce the forest and wildlife rather than enhance it.

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COLLINS PINE LOGGING OPERATION

COVELL FUEL BREAK proposal, Cal/Fire Photo

Because of the limited funds being sought for this project ($50,000) a machine called a masticator is being considered to remove trees, shrubs, bushes and vegetation. A masticator is a piece of heavy machinery consisting of a backhoe-type vehicle with an articulating arm. On the end of the arm is a device that chops or flails woody vegetation. The machines come in various sizes for different needs and land characteristics. Several attachments can be used i.e. masticator, mower, bucket, and thumb.

This piece of equipment is designed to mow and shred brush, such as blackberries, Manzanita, scrub trees and Toyon, as well as tall grasses. It is a cost-effective way to process large expanses of land and is suited to flat and gently sloping conditions. It cannot operate in steeper conditions or rocky soil. The processed material left by the masticator is larger and shredded in appearance versus a finer-chipped mulch product. A concern of leaving this material behind is that it could dry and become more fuel for a fire than the existing material, which is basically rotting.

In addition, the masticator leaves more of a footprint on the soil than hand methods. It can induce a source of erosion of soils into the riparian habitat. It can unintentionally scar and cut healthy trees and brush thereby providing an opening for beetle and fungus infection on otherwise healthy trees. In the hands of a careless operator, or one who is more concerned about Fire Abatement as opposed to Resource Conservation, the damage could be significant. Be clear about what you want left in place; once it's gone it's too late.

Fire Risk?
Quotes from the recent study of Potential Wildfire Behavior for the Covell Ranch by David Schmidt (May, 2010) include:

1. There have been no recorded wildland fires for the last 100 years.
2. No detailed data or fire history information for the ranch has been found.
3. Lack of significant fire history on the property can probably be attributed to the generally cool, moist, climate of the area and good ignition management over the years.
4. Results of the study showed relatively low rates of spread and flame length for the vast majority of the forested area.
5. These are relatively moderate conditions for fire behavior when coupled with the low average slopes on the property.

6. The study also predicted no crown fire behavior.
7. Schmidt points out that forested areas were originally mapped as model TU1 and were later changed to model TU5 based on field observation of fuel loading and model TU1 may be a better match for the lighter fuel component within the Monterey pine fuel types and has significantly less heavy fuels.
8. Spread rates and flame lengths are relatively moderate for the vast majority of the forested area
9. There is no predicted transition to crown fire for the weather scenarios used for the forested area.
10. Ignition probability for firebrands resulting from torching is relatively low over most of the area.

Again, from Schmidt's report "However, in areas of increased slope and lower canopy base height, these (fire) factors are expected to increase dramatically. Difficulty of control, as reflected by flame length and intensity, would be expected to increase drastically in areas where canopy is reduced and grass/fuel ladder & shrub/deadwood jackpots are the primary fire carriers (particularly in the vicinity of lower Bridge Street and the upper ranchland area)." The lower Bridge Street area is where the most French Broom (highly flammable) is located. The few areas where fire is of most concern focus on steep slopes of 30-50%, and those should be hand cleared. The mechanical masticator is not supposed to operate on steep slopes due to erosion and danger of operating a machine on a steep hillside. Industry experts explain "there are a variety of tasks which should be done by hand because larger equipment is not an appropriate match, is not agile enough to work around specific conditions or is simply "overkill." Hand-held equipment, like chainsaws and weed-eaters, allows us the precision and control we need to address these types of tasks, which include eliminating tall weeds on a hillside, falling trees, trimming tree branches, removing vegetation around the base of trees and among boulders and removing brush overgrown in wet areas."

The Schmidt report states that there is a need to "provide safe entry and containment points for fire control operations." Creating a 100 foot wide fuel break in the Forest Area of Covell Ranch does not take into account the current residential roads which currently surround the Ranch. By reviewing the Cambria Street map one can see that Covell Ranch is already accessible to Fire Equipment thru Hillcrest Road, Pinewood, Manor Way, Greystone Way, Iva Court, Northampton, Sunbury, Ashby, Warwick, Weymouth, Dover, Buckley, Cambria Pines Road, Charing Lane, Tamson, Grove, Wall Street, Bridge Street, and Cemetery Road. In addition, according to the Conservation agreement, many ranch roads exist inside the Covell Ranch and are accessible to Fire personnel and equipment.

According to CalFire's 5 year average fire cause statistics, "a further risk for fire is the increased level of human activity in the forest" and "the vast majority of fires are human caused. This may be associated with vehicle or equipment use, campfire, playing with fire, arson, or other activities. Managing access is therefore an important means of controlling potential unwanted fires. This includes installation of fences, gates and signage as appropriate. Attention should also be given to controlling the use of vehicles and fire on the property in the course of management. Care should be given to establish designated smoking areas for employees, limiting off road vehicle use and equipment use during high fire danger periods, and following all open burning requirements carefully." Common sense would suggest that creating a 100 foot wide expansion of the forest edge, with newly created open areas next to already existing residential roads, will only expand human activity in the forest, not reduce it. This plan encourages more human access, including vehicle access, to the Ranch thereby increasing the fire danger rather than reducing it.

Additional major impacts with no mitigation include:
1. Air quality hazards from the masticator grinding up resinous plants including Poison Oak.

2. Noise from Masticator on wildlife and residents.
3. Lack of detailed archeological investigation. Significant archeological sites (and human remains) could be pulverized beyond all recognition using the masticator. This is completely unacceptable.
4. Removing trees that capture water from the fog can further dry out the edge of the forest making it more susceptible to fire .
5. Clearing and creating a new open area 100 feet wide allows more sunlight and encourages non natives such as pampas grass and French broom – a highly flammable invasive. According to Staub's report "Occurrence of invasive plants, particularly French broom (*Genista monspessulana*), is not widespread but can be locally dense. Examples include the area and trails nearest homes toward the upper end of Sunbury and west of the Cemetery and portions of the steep slopes east of the southernmost portion of Bridge Street." And "Since broom is principally associated with areas of disturbance near homes and along roads and trails, access to most of the worst areas for control treatments is not difficult." We should not be creating new areas for broom to grow.
6. Machine Masticating could spread Pitch Canker and Sudden Oak Death Fungus.
7. Erosion could be significant due to brush and tree removal, and machine mastication rather than hand removal. Small stream headcuts are a result of soil compaction and mostly occur on people pathways. Using motorized equipment on 50 acres of sensitive forest land could compact the soil and increase stream headcuts.
8. Project is less than one mile from Leffingwell Creek and Santa Rosa Creeks. If erosion and water is increased into these flatter drainage areas there could be impacts on species in the creeks.
9. On the ground surveys were not performed therefore impacts to wildlife and species may not be mitigated.
10. Referring to the Cambria Forest Management Plan as if it is in place and being enforced is misleading. The Cambria Forest Management Plan has not been funded therefore has not been enacted or enforced. The Cambria Forest Management Plan (2002) provides an extensive list of management alternatives designed to address specific overstory and understory conditions in Monterey pine forest in order to enhance forest health and public safety.
11. Of potential botanical interest is the fact that mature Douglas fir trees (*Psuedotsuga menziesii*) occur in a small patch within the Monterey pine stand immediately west of the Leffingwell Creek channel in the west central part of the property. These trees are actively reproducing and appear as if they could be naturally occurring. If so, this would be noteworthy because this location is not recorded in the definitive work The Distribution of Forest Trees in California (Griffin and Critchfield, 1972) and would be the second southernmost known natural occurrence of the species. I wondered what was being done to protect and enhance these Douglas firs?
12. Development of water supply raises concerns about possible impacts to future growth and development. Assurances need to be made that an additional water supply is not growth inducing.
13. View shed affects from nearby hillsides could be significant. This property and its tall Monterey Pines is a main feature on the Eastern side of Highway One in Cambria and is part of the viewshed from areas of Highway One. The area is in view from Burton Drive as it descends into Main Street, can be seen from the upper levels of businesses in downtown West Village (I watched a Mountain Lion roaming around on Covell Ranch from Seekers Gallery while working one evening), it can be seen from a distance from homes on Park Hill, from across the ravines on Bridge Street, Sunbury, and Hillcrest Streets, and from neighborhood areas of Lodge Hill.

Recommendations:

1. Use hand crews instead of mechanical shredding, which has the added benefit of employing people and reduces and lessens all other impacts to the forest caused by mastication and vehicle use.

2. Detailed Archeological Investigation should be performed if mastication is used.
3. Complete on the ground surveys to identify wildlife and sensitive species before mastication is used.
4. Join with Cambrians to fully fund the Cambria Forest Management Plan in order to protect, preserve and actively manage what is left of our rare Monterey Pine forest. The "treatments may be costly due to various combinations of the expertise, equipment, labor, and/or materials involved" but I think Cambrians and tourists would agree - it is well worth it. As holders of the Conservation Easement one expects The Nature Conservancy to be optimistic rather than pessimistic in this regard.
5. Reduce the size of the project in scope to 20-50 foot selective fuel clearance in the most dangerous areas, using the work of hand crews rather than machine mastication.
6. Control of the currently relatively limited infestations of French broom should be a priority. Help establish a landscape ordinance for Cambria that prevents and eliminates the use of Pampas Grass and French Broom in town!
7. No trees over 8" should be cut

I am attaching several pages from the Cambria Coast Ranch Conservation agreement as I believe some of Cal Fire proposal is in violation of that conservation document. The entire 81 page Cambria Coast Ranch conservation agreement should be consulted before proceeding with any fuel break on the property.
Thank you for the opportunity to comment,

Jim and Mary Webb
1186 Hartford
Cambria, CA 93428

Cc: Scott Butterfield, Ph.D.
scott_butterfield@tnc.org
Chief Mark Miller, Cambria Fire
Cambria Forest Committee

Possible conflicts with the Cambria Coast Ranch conservation easement and the Coastal Commission designation of a Special Treatment Area 14 CCR 895.1 which reads:

An identifiable and geographically bounded forest area designated within the Coastal Zone that constitutes a significant wildlife and/or plant habitat area, area of special scenic significance, and any land where timber operations could adversely affect public recreation areas or the biological productivity of any wetland, estuary, or stream especially valuable because of its role in the coastal ecosystem. Special treatment areas were adopted by the Coastal Commission on July 5, 1977.

Coastal Commission Special Treatment Areas have been designated according to the following criteria:

A. Scenic View Corridors
B. Sites of Significant Scenic Value
C. Wetlands, Lagoons, Streams, Estuaries, and Marine Environments
D. Significant Animal and Plant Habitat Areas
E. Recreation Areas

The Coastal Commission has also set forth in its designations special management objectives considered essential by the Coastal Commission for the protection of public values within the Coastal Zone.

The following is a listing of the Coastal Commission Special Treatment Areas. In parentheses following the name of each area are capital letters indicating the specific criteria as listed above.

> (c) Publicly Owned Preserves and Recreation Areas. Coastal Commission Special Treatment Areas include those forested areas within the Coastal Zone within 200 ft. (60.96 m) of an publicly owned preserved and recreation areas including national, state, regional, county, and municipal parks.

Excerpts from Cambria Coast Ranch Conservation Easement:

The document is too large to include but I think all 81 pages should be checked for inconsistencies. These are just a few excerpts from the larger document:

A. Grantor owns that certain real property, consisting of approximately 1,454 acres of land in San Luis Obispo County, California, commonly known as the "Cambria Coast Ranch." This Deed covers all of the Cambria Coast Ranch except up to five and one-half (5 1/2) acres in the aggregate (the land covered by this Deed is hereinafter referred to as the "Land" and the portion of the Cambria Coast Ranch excluded from this Deed is hereinafter collectively referred to as the "Excluded Land"). The property description of the Land is attached hereto as Exhibit A. The Land, together with all rights, title, and interests appurtenant to the Land, is sometimes hereinafter referred to as the "Property".

B. The Property possesses significant natural, ecological, aesthetic and scenic values for conservation purposes (collectively, the "Conservation Values") which are of great importance to Grantor and Grantee, to the people of San Luis Obispo County, and to the people of the State of California, and which include, but are not necessarily limited to natural resources, ecological, and scientific values, including the Monterey pine forest and riparian habitat referred to in Recital C below, as well as scenic, open space and recreational values.

C. In particular, the Property contains one of only three remaining indigenous stands of Monterey Pine forest, as well as a creek ecosystem and its riparian corridors, providing significant habitat for a variety of important wildlife, and plants.

D. Grantor, as the owner in fee of the Property, owns the rights to identify, to

preserve and protect in perpetuity, and to enhance the restoration of the ecosystem, the natural systems and processes, and the scenic and aesthetic values of the Properly. Grantor intends that the Conservation Values of the Property be preserved, protected, and maintained in perpetuity by the continuation of existing land use patterns that will not interfere with or disrupt, impair, or interfere with the Conservation Values of the Property, all subject to the terms and conditions of this Deed. In order to accomplish such purposes (the "Conservation Purposes"), Grantor intends to convey to Grantee, and Grantee intends to obtain, a conservation easement restricting the use which may be made of the Property, in order to preserve and protect in perpetuity the Conservation Values of the Property.

E. The State of California recognizes the public importance and validity of conservation easements by enactment of Section 815 *el seq.* of the California Civil Code.

F. Grantee is a non-profit corporation incorporated under the laws of the District of Columbia and, as a tax-exempt public charity described in Section 815.3 of the California Civil Code and Sections 501(c)(3) and 509(a)(l) of the Internal Revenue Code, is organized to protect and conserve natural areas and ecologically significant land for scientific, ecological, scenic, aesthetic, charitable, recreational, and educational purposes, and is a "qualified organization" within the meaning of that term in Section 170(h) of the Internal Revenue Code of 1986 (as amended), qualified to acquire and hold conservation easements.

G. Grantee is concurrently being granted, under the terms of a separate document which is being recorded with this Deed in the official public records of the county in which the Property is located (the "Official Records"), a right of first refusal to purchase the Property (the "Right of First Refusal").

H. Grantee is acquiring a conservation easement, using funds allocated pursuant to section 133(d)(2) of the United States Code Annotated Title 23 for the public purpose of utilizing the Property, other than the Improvement Area, hereinafter defined, as a Transportation Enhancement Activities (TEA) project which is directly related to the protection and enhancement of scenic values and views from State Highway One owned by the State of California in the vicinity of the Property, hereinafter referred to as the "Transportation Facilities."

NOW, THEREFORE, in consideration of the foregoing recitals, the respective agreements of the parties which are hereinafter set forth, and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, and pursuant to Section 815 *el seq.* of the California Civil Code, Grantor hereby grants to Grantee in perpetuity, and the successors and assigns of Grantee, and Grantee hereby accepts, a conservation casement in, on, over, and across the Property (the "Easement"), granting lo Grantee the rights which are provided for herein and restricting in perpetuity the uses which may be made of the Property, all on the following terms and conditions:

I. Purpose. It is the purpose of the Easement and this Deed that the Property will be managed and maintained in a manner that is consistent with the preservation and protection of the Conservation Values of the Property, in order to preserve, protect, enhance, and restore in perpetuity the Conservation Values of the Property, including (but not limited to) the significant habitat of plants and wildlife on the Property, and Grantor and Grantee intend that this Deed will confine the use of the Property to such activities and facilities as are consistent with the Conservation Purposes of the Easement. For purposes of this Easement, the Property consists of three areas, referred to, respectively as the "Forest Area", the "Riparian Area" and the "Range Area", and the Excluded Land consists of four areas, referred to , respectively as the "Cambria Cemetery Exception," the "Main Street Commercial Exception," the "Bridge Street Commercial Exception" and the " Santa Rosa Cemetery Exception." All of said areas are depicted or referred to on the map attached hereto as Exhibit B together with attachments I through 8 thereto (collectively, the "Map") and further defined as follows:

(a) "Forest Area" is defined as that portion of the Property shown and labeled on the Map as "Forest Area", and includes (i) all of the areas labeled on the Map as parcels E (except n portion of the Excluded Land consisting of approximately two acres adjacent to the Cambria Cemetery, as shown on the Map and further described in attachment 3 thereto (the "Cambria Cemetery Exception"), which, subject to the provisions of Paragraph 13 of Exhibit D below, is reserved from this Easement to accommodate a possible expansion by said cemetery), F, 29 and 32; (ii) portions of areas labeled on the Map as parcels 30 and 31 which are southerly of the boundary line between the Forest Area and the Range Area as shown on the Map (said boundary line between the Forest Area and the Range Area is further described in Attachment 1 thereto); and (iii) all of the area labeled on the Map as Parcel G except for the following Excluded Land: (A) an area of approximately two and one-half (2.5) acres at the southeasterly corner of Parcel G, which is zoned commercial, is Excluded Land hereunder, and is identified on the Map and further described in Attachment 4 thereto and referred to herein as the "Main Street Commercial Exception," (B) an area of not to exceed one acre at the southwesterly corner of Parcel G at its intersection with Bridge Street as shown on the Map and further described in Attachment 5 thereto and referred to herein as the "Bridge Street Commercial Exception"), and (C) an area of not to exceed one-half acre defined and defined in Subparagraph l(d) below as the "Santa Rosa Cemetery Exception." A legal description of the Forest Area is attached as Exhibit F hereto. The Forest Area predominantly consists of indigenous Monterey Pine forest, the protection, management and enhancement of which is a major objective of this Easement. The size and configuration of (the Forest Area and the rights of Grantee under this Easement with respect to the Forest Area shall not be affected by any future change in the population or coverage area of Monterey Pines within the Forest Area as depicted on the Map.

(b) "Riparian Area" is defined as that portion of the Property, consisting of a seasonal creek through areas shown on the Map as Parcels C-l, C-2 and C-3, the configuration of which, including the creek bed and protected riparian zone, is shown on the Map and further described in Attachment 2 thereto; the Conservation Purposes of the Riparian Area are the protection, maintenance and restoration of riparian habitat.

(c) "Range Area" is defined as that portion of the Properly labeled on the Map as "Range Area", and includes (i) areas labeled on the Map as parcels C-l, C-2 and C-3 (excluding however, (he Riparian Area"), (ii) all of parcel 28, and (iii) all of parcels 30 and 31 northerly of the boundary of the Forest Area, as shown on the Map. A legal description of the Range Area is attached hereto as Exhibit G. The Range Area predominantly consists of range lands, interspersed with trees and other native vegetation. Grantee has reserved certain ranching and development rights with respect to portions of the Range Area, which are more fully set forth in Paragraph 4 below.

(d) "Excluded Land" is collectively defined to consist of (i) the Cambria Cemetery Exception (provided, however, that the Cambria Cemetery Exception may be removed from the Excluded Land and shall become subject to this Easement, under the circumstances as set forth in Subparagraph 13(vi) of Exhibit D hereof), (ii) the Main Street Commercial Exception, (iii) the Bridge Street Commercial Exception, all as shown on the Map, and (iv) the Santa Rosa Cemetery Exception defined below in this subparagraph 1 (d). The parties acknowledge that, as of the date hereof, there exists an encroachment of gravesites on Parcel G by the Old Santa Rosa Cemetery presently owned by the Catholic Church, Diocese of Monterey (A.P.N. 013-241-022). Part of such encroachment is located on the Commercial Area and thus already excluded from this Easement; however, the balance of such encroachment, consisting of lands of not to exceed one-half acre within the present fence-line of the Old Santa Rosa Cemetery as of the date hereof and located within Parcel G outside of the Main Street Commercial Exception, is defined as the "Santa Rosa Cemetery Exception;" a legal description of the Santa Rosa Cemetery Exception is attached to the Map as Attachment 6 thereto.

2. Easement Documentation Report; Map. The parties acknowledge that the specific Conservation Values of the Property, including those pertaining to the Property as a whole and those pertaining, respectively, to the Forest Area, the Riparian Area and the Range Area are

further documented in an inventory of the relevant features of the Property, which is referred to hereinafter as the "Easement Documentation Report", and which has been prepared by a competent biologist familiar with the environs and approved by Grantor and Grantee in writing. Grantor and Grantee each have a copy of the Easement Documentation Report, executed by both parties. The parties agree that the Easement Documentation Report contains an accurate representation of the biological and physical condition of the Property at the time that this Deed is recorded and is intended to serve as an objective, though non-exclusive, information baseline for monitoring compliance with the terms of the Easement. The foregoing notwithstanding, if a dispute arises with respect to the nature and extent of the physical or biological condition of the Property, the parties shall not be foreclosed from utilizing any and all other relevant documents, surveys, or other evidence or information to assist in the resolution of the dispute. The parties further acknowledge that the Map is a reduced copy of that certain unrecorded 30" by 42" map, the original of which is in the possession of Grantee and which Map includes and depicts all of the following:
(a) the Forest Area, and the Range Area including the configuration of constituent areas of the Land and the Excluded Land;
(b) the location and exterior boundaries of the Riparian Area;
(c) the location of the boundaries referred to in Paragraph 24 hereof where fences are to be built by Grantor;
(d) the location of the boundaries of the Forest Area, where Grantee has the right to build fences pursuant to Paragraph 7 of Exhibit C hereto;
(e) the location of all existing roads within the Forest Area, which Grantor may maintain and improve to the extent permitted in Paragraph 5 of Exhibit P hereof; and
(i) the location of existing wells on the Property.
3. Rights Conveyed to Grantee. The rights conveyed to Grantee by this Deed and pursuant to the Easement include, but are not limited to, the following:
(a) the right to identify, preserve, and protect in perpetuity, as well as the right to enhance and restore, to the extent permitted under this Deed, the natural, ecological, scenic, and aesthetic features, processes and values of the Property, including (but not limited to) the water resources of the Property and the natural flora and fauna on the Property, all in the manner set forth in this Deed; subject, however, to any reserved rights of Grantor specified in this Deed;
(b) the right to conduct wildlife, plant, and habitat studies, research and monitoring at times permitted by the Easement, and at any additional times permitted by Grantor;
(c) the right of access to and entry upon the Property at all reasonable times, subject to the terms of this Deed, using any and all easements and rights of way appurtenant to the Property, if any, in order to inspect the Property, to enforce the rights which are granted to Grantee herein, to study and make scientific observations of the Property's natural elements and ecosystems, to determine whether the activities of Grantor are in compliance with the terms of this Deed, and to enforce the restoration of such areas or features of the Property as may have been damaged; it being understood that such access and entry will be made: (i) in a manner that will not interfere unreasonably with the permitted use(s) or enjoyment of the Property by Grantor, its successors in interest, or any legally recognized occupant(s) or user(s) of the Property; (ii) with a minimum of seventy-two (72) hours prior written notice to Grantor; (iii) unless otherwise specifically provided for herein, access shall be for the reasonable period of lime required by Grantee to carry out the of the purpose of the access; and (iv) subject to any additional provisions and limitations set forth in Exhibit C attached hereto;
(d) the right of immediate entry upon Properly if", in the reasonable judgment of Grantee, such entry is needed to prevent damage to or the destruction of any of tree Conservation Values, or a violation of the terms of this Deed; and
(e) the right to enjoin any activity on the Property or other use of the Property which, in the judgment of Grantee, exercising its reasonable discretion, is inconsistent with the

5. Roads and Trails. The maintenance and repair of existing roads as shown on the

9 Webb comments
| Bridge St./Covell Ranch Firebreak

Map shall be permitted. Grantor shall have the right, within the Improvement Area, to construct, maintain and improve existing as well as new roads and trails, but only as reasonably necessary for the permitted uses of the Improvement Area under this Deed, and further provided that they do not substantially diminish or impair the Conservation Values of the Properly and are consistent with the purposes of the Easement. Existing roads in the Forest Area as shown on Attachment 7 to the Map are of three categories, as follows (i) Bridge Road and the existing road which intersects Bridge Road in the vicinity of the Cambria Cemetery and leads to The Historic Residence and the road subject to the easement referred to in paragraph 25 of this Easement are identified on Attachment 7 to the Map and are hereby collectively referred to as the "Connector Roads," (ii) all other roads in the Forest Area as shown on Attachment 7 to the Map except the Emergency Service Road, defined below, arc hereby collectively referred to as the "Service Roads," and (iii) the "Emergency Service Road," as shown on Attachment 7 to the Map which shall be used solely by emergency service vehicles for emergency ingress and egress in the event of a forest fire or other emergency. No new road or trail shall be constructed in the Forest Area; provided, however, that, subject to the prior review and written approval by Grantee of all relevant plans therefore, Grantor shall have the right to improve in their present location and with their present grades and elevations, existing Connector Roads as private roads with a paved surface not wider than the minimum width required by any relevant governmental agency as said when needed to provide access to uses of the Improvement Area otherwise permitted herein Grantor shall have the right to maintain all existing Service Roads and The Emergency Service: Road to a maximum width of eight (8) feet, provided that the width of the Service Road and the Emergency Service Road may be not to exceed ten (10) feet in road sections where, because of sharp curves or other terrain features, the Service Road or the Emergency Service Road would otherwise be impassable to service vehicles reasonably needing access to the Service Roads or the Emergency Service Road. The Service Roads and the Emergency Service Road shall not be paved or extended; provided that gravel may be selectively applied in areas which would otherwise become impassable in inclement weather. Grantor shall, within 120 days of the date hereof, install and maintain a gate at the point of ingress and egress to the Property of such Emergency Service Road; said gate shall at all times remain locked with a "Knox Box" or equivalent electronic or pass-key device with access codes or keys limited to the Property owners and governmental emergency vehicles, such as fire engines. All roads and trails on the Property shall remain private, and Grantor shall not grant, dedicate or otherwise allow or create any public or private road or any public or private trail easement over any portion of the Property without Grantee's prior written consent, which may be withheld in its sole discretion.

(f) The location and construction of any new road and driveway in The Improvement Area shall be subject to the following requirements: (i) the roads and driveways shall be located to the extent possible so as to preserve all native trees and natural site features and to avoid entering root zones of existing oaks (which lie in the drip line of The tree canopy); (ii) the roads and driveways shall not follow any natural drainage swale, but shall follow existing grade whenever possible; (iii) only road and driveway materials which improve water infiltration shall be allowed, such as natural materials (such as decomposed granite in a natural color) or porous paving solutions (porous asphalt and/or modular pavement allowing for vegetation); and (4) The width of any road or driveway in the Improvement Area shall not exceed the minimum width required by the applicable governmental entity lo obtain n building permit for the Improvements otherwise permitted herein.

Inconsistent Uses of the Property
The following are set forth both to list specific prohibited activities, and to provide Grantor and Grantee with guidance in determining whether other activities are not consistent with the conservation purposes of the Easement:

1. Inconsistent or Adverse Actions. There shall be no change, disturbance, alteration or impairment of this Conservation Values of the Property, including (but not limited

to) the significant habitat of wildlife and plants on the Property, except as may occur pursuant 10 (and then only to the extent permitted as a part of) the other activities which are explicitly permitted under this Deed.

2. Improvements. Except as explicitly permitted by the terms of this Deed, the exercise of any development rights associated with the Properly is prohibited, including (but not limited to) the construction or placement of any structures or improvements on the Property, including (but not limited to) residential or other buildings, camping accommodations, boat ramps, bridges, mobile homes, house-trailers, permanent tent facilities, Quonset huts or similar structures, underground or aboveground tanks, billboards, signs, or other advertising facilities, street lights, utility structures or lines, and sewer systems or lines.

3. No Use or Transfer of Development Rights. Except as explicitly permitted by the terms of this Deed, all development rights that are now or hereafter allocated to, implied, reserved, or inherent in or to the Property are terminated and extinguished, and may not be used on or transferred to any portion of the Property as it now or hereafter may be bounded or described, or to any other properly (whether adjacent or otherwise)

4. No Subdivision. Other than the lot line adjustments provided for in Exhibit D. Paragraph 13, there shall be no other lot line adjustments nor any legal or *de facto* division, subdivision, or partitioning of the Property, except that ownership of the legal parcels constituting the Property may be held in the form of undivided interests, provided, however, that (i) no owner of an undivided interest in the Property shall have the right of exclusive occupancy or exclusive use of any separate portion of the Property nor any right to have the Property partitioned in kind, whether pursuant to California Code of Civil Procedure Section 872.210 el seq., or otherwise, and (ii) undivided interests in the Forest Area shall be permitted only with respect to holders of undivided interests in the Master Parcel, hereinafter defined. Notwithstanding anything to the contrary herein, fee title to the Forest Area shall at oil limes be owned by the owner of one of the Compounds to be designated by Grantor in an instrument to be recorded not later than the issuance of a building permit for the first New Residence (the parcel of the Property which is to remain the owner in fee of the Forest Area is herein referred to as the "Master Parcel"), and if no such designation is made, then the Master Parcel shall be deemed to be the easternmost parcel in the Range Area, Grantor shall not partition, subdivide or transfer undivided interests or in the Forest Area; but said prohibition shall not preclude Grantor from carrying out the lot line adjustments pertaining to the Excluded Land as expressly provided in Exhibit P. paragraph 13.

5. Vehicles. There shall be no use of any motorized vehicles off of existing roadways in the Forest Area as shown on the Map. There shall be no use of any motorized vehicles in the Riparian Area, except to cross at the crossing sites referred to and subject to compliance with provisions set forth in Paragraph 8(d) of Exhibit P.

6. Pumping and Salvage. There shall be no dumping, storage, or other disposal of soil, trash, garbage (other than compostable refuse generated on the Property, and then only in areas agreed to by Grantee), ashes, waste, sludge, Hazardous Materials (as defined in this Deed), or other unsightly or dangerous materials, and there shall be no storage or disassembly of inoperable automobiles, trucks, or other vehicles or equipment for purposes of sale, or rental of space for that purpose;

7. Vegetation. There shall be no removal, cutting or destruction of native vegetation (unless harmful to horses or humans) or introduction of exotic plant or animal species which may in Grantee's determination threaten the Conservation Values of the Property. Grantor shall give Grantor a Proposed Activity Notice pursuant to paragraph 7 of this Easement prior to removing, cutting or destroying native vegetation deemed by Grantor to be harmful to horses or humans and

prior to introducing any exotic or animal species Without placing any limitation on the foregoing provisions, none of the plant species which are listed in Exhibit E-l which is attached to this Deed shall be planted anywhere at the Property.

8. Timber Harvesting and Firewood. There shall be no taking or harvesting of timber, standing or downed, on the Property, except for: (i) disease or insect control or to prevent property damage or personal injury, after prior consultation with Grantee and with the approval of Grantee (which shall not be withheld unreasonably); (ii) collection of downed timber or branches as fencing or for firewood for personal (but not any commercial) use, or (iii) pursuant to the Forest Management Plan.

9. Biocides. There shall be no storage or use of fertilizers, pesticides, biocides, herbicides, or other agricultural chemicals, except as reasonably needed to be used in the Range Area in the operation of the Horse Ranch or the Equestrian Facility or as explicitly permitted under this Deed. All such chemicals shall be stored and used in compliance with all applicable laws, and no such chemicals shall be used by Grantor in such a fashion as to damage or degrade the Forest Area or the Riparian Area.

10. Paths. Roads. Grading. Except as permitted in The Improvement Area in accordance with Exhibit P hereto, there shall be no construction, reconstruction, or replacement of any paths or roadways, nor any other change in the general topography or grading of the Property, except with the prior written approval of Grantee, and no permitted roads or roadways shall interfere with movement, nesting, forage, etc. of wildlife at the site.

11. Fences. Except in a Compound and except as permitted under the terms of Exhibit P hereto, there shall be no fences or walls built, except with the prior written approval of Grantee, which approval shall not be unreasonably be withheld, and any fence built with such approval shall meet the following criteria (in addition to any others set by Grantee in its approval): (I) the fence shall be built solely within two (2) feel of the Property boundary line or the nearest roadway edge; and (2) the fence shall not interfere with movement, nesting, or forage of wildlife at the site.

12. Commercial Uses. There shall be no commercial or industrial use of the Properly, other than the grazing activities, Horse Ranch and Equestrian Facility which are explicitly permitted under this Deed. Permitted commercial activities of the Horse Ranch and Equestrian Facility shall be limited to (i) keeping, breeding, raising and selling horses in the Range Area; (ii) boarding of horses at the Equestrian Facility; horse and wagon riding in the Range Area; (iii) horse riding and wagon riding on existing roads in the Forest Area (to the extent permitted under Paragraph 2 of Exhibit D of this Easement); and (iv) "Horse Shows," as defined below, in the Equestrian Facility Compound at intervals of not to exceed four (4) per calendar year. For purposes of this Easement, a "Horse Show" is defined as a gathering of 40 or more people in the Equestrian Facility Compound at which horses or teams of horses are displayed. Grantor shall not permit any Horse Show outside of the Equestrian Facility Compound, and betting and horseracing at any Horse Show shall be prohibited. Examples of prohibited commercial or industrial uses include, but are not limited to: (a) commercial orchards or vineyards; (b) commercial campgrounds; (c) commercial picnic areas; (d) commercial feedlots, which are defined as any open or enclosed area, within which the land is not grazed or cropped at least annually, and where domestic livestock owned by other than Grantor are grouped together for intensive feeding purposes; (e) circuses, carnivals, rodeos, horse or dog racing; (f) snack shops, restaurants, hotels, convention centers, retreats, bed and breakfasts; (g) mechanized amusement rides, and (h) gift shops or other retail shops. Notwithstanding the foregoing, the owner of the Equestrian Facility Compound may permit temporary stalls for the sale of snacks and gifts to be set up and operated within the Equestrian Facility Compound during the Horse Shows otherwise permitted hereunder.

13. Natural Resource Development. Except as reasonably needed incident to the operation of the Horse Ranch and the limited permitted, construction activities referred to in Exhibit D hereto, there shall be no filling or excavating of the Properly. Under no circumstances shall there be any mining, drilling (other than drilling for water in the Range Area and where otherwise specifically permitted herein), removing, or exploring for or extracting of minerals, oil, gas, coal, or other hydrocarbons, soils, sands, gravel, loam, rocks or any other material on or below the surface of the Property. Grantor shall obtain any required sand, gravel, loam or other material used in connection with the construction activities permitted under Exhibit P from sources other than the Property; provided, however that the owner of the Equestrian Facility may designate a site not to exceed one-half acre within the Equestrian Facility Compound as a site for the extraction of sand for use on the Property in connection with the operation by Grantor of the Equestrian Facility or the Horse Ranch. Grantor shall develop, maintain and, as needed, restore such sand extraction site according to a conservation plan prepared by Grantor and reviewed and approved by Grantee prior to the commencement of any sand extraction by Grantee.

14. Recreational Facilities. There shall be no recreational facilities (such as picnic tables, sports fields, etc.) erected or placed in the Forest Area. Any recreational facilities in the Range Area proposed by Grantor in connection with the Equestrian Facility or the Horse Ranch shall be consistent with the Conservation Values and must be approved in advance by Grantee.

15. Agriculture and Grazing. There shall be no: (a)agricultural activities or operations of any kind anywhere on the Property, including (but not limited to) row crops, forage, timber, orchards, vineyards, or any other activities that involve tillage of soil, removal of vegetation, planting of crops that would be harvested, or irrigation of such agricultural activities; or (b) except to the extent otherwise specifically permitted herein, grazing of livestock (whether for commercial purposes or otherwise), including (but not limited to) the breeding, raising, pasturing, and grazing of livestock of every kind, nature, and description.

16. Hunting. Trapping and Fishing. Except to the extent explicitly permitted under this Deed (and then, only to the extent permitted), there shall be no use of the Properly for any hunting, trapping, or fishing of any kind.

17. Water Resources. There shall be no development of any waters on the Property for hydroelectric power, fish farming, or any other commercial purpose. All presently existing water wells may continue to be used by Grantor; and, except as provided in Subparagraph 9(e) of Exhibit D. any new water wells shall be located in the Range Area. Grantor may construct water troughs and water delivery systems to bring water from such wells to supply water to horses and cattle in pastures in the Range Area. Water extraction and usage shall be as reasonably necessary for the personal use of Grantor and the grazing activities which are permitted under this Deed, but only provided that such use is kept to the minimum necessary to exercise such rights and does not endanger the Conservation Values of the Property. There shall be no activities, action, or uses detrimental to water conservation, erosion control, soil conservation, or fish and wildlife habitat preservation, and no irrigation, including irrigation of pastures, manipulation or alteration of natural water courses, wetland, stream bank, shorelines, or bodies of water, or activities or uses detrimental to water quality, including but not limited to:
(a) degradation, pollution of any surface or subsurface waters, or rip-rapping;
(b) bank protection or any other manipulation, diversion or other alteration of natural water courses, wetlands, or other bodies of water, except for natural stream bed remediation not involving the damming or impounding of water in the Riparian Area or in upstream reaches thereof; natural stream bed remediation permitted hereunder may include planting native riparian vegetation and in-stream log structures and as may be required in connection with the restoration activities permitted pursuant to this Deed. Notwithstanding anything to the contrary above in this subparagraph (b), within the Improvement Area only, where natural stream bed remediation

is insufficient to provide reasonable protection of Improvements, including roads, from damage from flooding or bank erosion, Grantor may, subject to the prior written consent of Grantee, which approval shall not be unreasonably withheld or delayed, reinforce existing stream banks with natural materials approved by the County of San Luis Obispo in a manner which does not impede the flow of waters to the Riparian Area; or
(c) any other activity which may destabilize the banks of any course or body of water;
and any uses or activities which would pollute, degrade, or drain the surface or sub-surface waters.

There shall also be no severance, conveyance, impairment, or encumbrance of wafer or water rights appurtenant to the Property, separately from the underlying title to the Property, or other action which diminishes or extinguishes such water rights, including, without limitation, any export or conveyance of water from the Property for use on any other real property, whether or not such other real property may now or in the future be owned by Grantor or Grantor's successors in interest, and the Easement shall not sever or impair any riparian water or other water rights appurtenant to the Property or result in any loss or diminution of Grantor's water rights appurtenant to the Property except as the same may be affected as the result of compliance by Grantor with the terms of this Easement.

18. **Pets.** Unleashed pets, including (by way of example and not limitation) dogs shall not be allowed on the Property, outside of the Range Area; provided, however, that if Ralph Covell and Tracy Covell shall purchase the Property, they shall have the personal, nontransferable right, during their lifetimes, and provided that they continue to own the Forest Area, to have their dogs accompany them, unleashed, when they are in the Forest Area. Vegetation Restrictions
None of the following plant, tree, or weed species shall be planted on the Property:
African daisy
Artichoke thistle
Castor bean
Eucalyptus
Eurasian mustard
Fountain grass
Giant reed (Arundo)
Italian - Mediterranean olive
Milk thistle
Pampas grass
Russian olive
Salt cedar (Tamarisk)
Tree tobacco
Yellow star thistle
Vinca

Dan Foster, Senior Environmental Planner
California Department of Forestry and Fire Protection
Program – Environmental Protection
P.O. Box 944246
Sacramento, CA 94244-2460

October 10, 2011 by e-mail

RE: Mitigated Negative Declaration (MND) Bridge Street Fuel Break Project
SCH# 2011081093

Dear Mr. Foster:

This letter is a revised replacement version of our earlier dated letter. It incorporates additional suggestions and deletions from Cambria Forest Committee directors not included in the earlier letter. Our Committee generally supports the creation of shaded fuel breaks along the urban interface. Please consider the following comments on the Mitigated Negative Declaration for the Bridge Street Fuel Break Project in Cambria, compiled by and approved by the Cambria Forest Committee. In summary, we believe that certain potential adverse impacts have not been fully identified and that additional mitigation measures are needed.

The currently named project does not adequately describe the area that is under review. It is misleading and clearly confuses the public. Nearly the entire proposed project is on the Covell Ranch and it would be more appropriate to identify the project as the "Covell Ranch Fuel Break Project", or a similarly more accurate name.

In the project description, it is stated that trees less than 10 inches DBH beneath the canopy of overstory trees will be removed. We recommend that in areas where the larger trees are unhealthy, widely spaced or near the end of their lifespan, healthy trees less than 10 inches DBH be retained to promote the re-establishment of larger trees as quickly as possible in all areas. This policy should apply to future maintenance clearing as well. In the future, replanting of trees in areas with no existing healthy trees should be considered.

The use of a masticator or other heavy equipment in a Monterey pine forest can have an adverse impact on the health of the trees. Compaction of the soil and tree roots as well as direct machine impacts can injure or kill the trees. We recommend a mitigation measure that requires all heavy equipment to remain at least 15 feet away from retained trees and brush.

The statements in the current project description about monitoring the fuel break in the future for the invasion of exotic plants into the disturbed habitat are lacking adequate

information. More detailed and specific information is required on how exotics will be effectively controlled or eliminated so that the fuel break does not contribute to the degradation of the forest.

Closely related to the issue of monitoring invasive vegetation, is what monitoring will be done to ensure that native trees indeed regenerate and grow to maturity in the fuel break, as the proposed MND claims will happen. Additional description of the planned monitoring activities should be added to the project description.

The claim that the fuel break will increase biodiversity is questionable. The likely increase in diversity will be in exotic weed species, not the few natives that are characteristic of the forest in Cambria.

There seems to be an inconsistency in the project documentation regarding the treatment of snags. This should be clarified. In one part of the document they are to remain standing, whereas in another section they are to be removed. While the discussion of the importance of snags for bats is accurate, we think that snags are important as granaries for acorn woodpeckers and especially as a source of nesting cavities for a large number of birds.

During the public meeting on March 10, 2011, it was stated that existing invasive plants would be treated or removed in the affected area before the main project begins. The plan does not mention herbicides even though at the March 10th meeting it was clearly stated that herbicides would be used. The plan states that French broom will be removed by hand only when feasible. Does this mean herbicides will be used in other areas? The CFC thinks this statement points to a pervasive problem in this plan, which is a lack of an effective clear and specific plan of action to address the removal of current and future invasive exotic plants. In addition, using a masticator to remove existing invasive plants like brooms will almost certainly spread the seeds of this plant, which must be avoided. To remove the existing brooms by cutting them at ground level is not a solution because these plants will regrow from the remaining root. They must be either completely removed including roots, or killed with a herbicide. The CFC would like to know how many gallons of herbicide will be used and what the half-life is of the specific herbicide.

One of the justifications for the project is the high level of public use based on the number and condition of trails in the area, which increases the chance of an accidental fire started by people in the forest. A fuel break, without an effective method of controlling access, could expand the probabilityof public access and the potential for starting a fire.

At the CFC public meeting held on March 10, 2011 there was a discussion of cattle grazing and fencing, and the need for monitoring of regeneration of both native and exotic plants. This issue was not included in the MND. The CFC thinks the document must clearly state what the plan is for grazing. If grazing is to be used, it should be clearly defined in this document as part of maintenance of the fuel break. The use of cattle is an important issue (and it need not be negative), and a clear plan of exactly how the cattle will be managed

must be addressed, including stocking rate, season, and short-term as well as long-term monitoring.

The CFC is concerned that the proposed project is not in compliance with the Conservation Easement (CE) that was placed on the property. Public funds were used to augment the purchase of this land for the public benefit. The CE prohibits cattle grazing and motorized vehicles and allows public access on certain weekends with docent led hikes. We question if the proposed plan actually is legal from a CE point of view and why the California Department of Forest and Fire Protection or The Nature Conservancy has not addressed this problem.

The CFC is aware of three fuel breaks in the Cambria pine forest. The one at the Top of the World was implemented in 1996 by CalFire. Based on discussions with residents adjacent to the fuel break, it was poorly executed and never included any monitoring or maintenance. It has and continues to contain large amounts of fuel, including invasive plant material that probably resulted from the creation of the fuel break. A limited fuel break was completed in Strawberry Canyon and is partially maintained by the land owner. The fuel break on the East West Ranch is maintained by the Cambria Community Services District on a limited level. In order to avoid past problems with poorly maintained firebreaks, the CFC believes that the project documentation should include specific information about what agency or organization is responsible for maintaining the proposed fuel break in the Cambria Monterey Pine forest. Otherwise, the effort is a waste of effort and current funding that results in a potentially major impact on the forest with little long-term benefit for fire prevention.

In conclusion, the Cambria Forest Committee supports the creation of fuel breaks along the urban interface and agrees that protecting residents and community resources from wildfire is an important part of community planning. The Monterey Pine forest with its associated habitats in Cambria is a rare and important asset to the area. The CFC Directors feel that the proposed plan lacks adequate mitigation measures for the adverse impacts caused by the use of heavy equipment and masticators and does not adequately define future monitoring and maintenance responsibilities to ensure that the forest resource is protected and public funds are spent wisely.

Sincerely,

J. Crosby Swartz
Co-Chairman
The Cambria Forest Committee

Brad Self
Secretary
The Cambria Forest Committee

Thursday, Nov 10, 2011
Posted on Thu, Nov. 03, 2011

Viewpoint: Fire break plan could be improved

Mary Webb

Greenspace— The Cambria Land Trust has uploaded the Conservation Easement for Covell Ranch (held by The Nature Conservancy), which is what must be followed under restrictions placed on the property in exchange for Mr. Covell receiving $4.5 million dollars from taxpayers. The grant money was provided by the state as part of a grant program with TEA-21 (federal Transportation Equity Act for the 21st Century, enacted in 1998, including funds to mitigate impacts to the environment from road projects) and EEM (Environmental Enhancement Mitigation) grant money. The Nature Conservancy would not provide this conservation agreement to citizens when asked. Citizens researched it, found it and citizens paid to obtain it.

This project should not "set a precedent" or have a "chilling effect" on future fire breaks. This project is different than usual "fire breaks" in the coastal zone because the project is in an environmental sensitive habitat area (ESHA), it is removing hundreds of Monterey pines, it uses the masticator machine when no motorized vehicles are allowed in the "forest area" of the Covell Ranch, the land is under a conservation easement, it creates a new pathway through the forest that is five times the size of the road in front of the average home in Cambria, the masticator can ruin habitat for wildlife, dry out the forest edge, pulverize non-natives and spread seeds and disease throughout the rest of the conserved property.

The Cambria Forest Committee has simple recommendations that would make the project smaller and use hand crews. If our Forest Management Plan were funded this project would have been different from the start.

At least 30 letters (which have not been made public yet) were written by individuals opposing the project and a petition against the project was apparently circulated and over 250 responses in opposition were registered. The petition can be found at:

http://www.change.org/petitions/protect-cambriasmonterey-pine-forest . I (and others) added our signatures to the 250 existing signatures after we learned about the petition from the newspaper last week.

The Cambria Forest Committee has had ongoing issues with the project, and many citizens attending Cambria Forest Committee and North Coast Advisory Council meetings last summer expressed their concerns at that time. Concerns and issues were clearly stated verbally and in writing in previous meetings. It is no surprise to those who understand we are lucky to live in a pine forest, in a very special place on the coast, that this project requires a Coastal Development Permit

The easement is hard to read in places but it is important to have the facts; sometimes a difficult task to obtain in Cambria. A page entitled "Inconsistent uses of the property" begins on Page 58.

The Covell Conservation Easement can be found at the Greenspace website at www.Greenspacecambria.org under "Critical Issues," or at this link:
http://www.greenspacecambria.org/news_menu.htm

Mary Webb is vice-president of Greenspace — The Cambria Land Trust.

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http://www.sanluisobispo.com

Elizabeth Bettenhausen, Ph.D.
345 Plymouth Street
Cambria, CA 93428

9 October 2011

Dan Foster, Senior Environmental Planner
California Department of Forestry and Fire Protection
Resource Management – Environmental Protection Program
P.O. Box 944246
Sacramento, CA 94244-2460
Email: sacramentopubliccomment2@fire.ca.gov

Dear Mr. Foster:

Thank you for the opportunity to make comments on the "Initial Study/Mitigated Negative Declaration for the proposed Bridge Street Fuel Break Project, San Luis Obispo County, California" (State Clearinghouse Number 2011081093).

I agree that establishing fire breaks and fuel reduction zones could be protective of the future of the forest and community well-being. However, I am concerned about the ambiguity of the Project description. Were I to make a dress, the means to the end would affect the process and outcome in significantly different ways. Whether to use a high speed electric sewing machine or needle and thread would be a major decision.

In the Project description two significant means are referenced without any clarity on the criteria that will actually be used to choose between them: masticator or hand crews for establishing the initial primary shaded fuel break and defensible space fuel reduction zones. An additional variable—pile burning—also has unspecified criteria for when it would be used.

On p. 8 it reads, "It is anticipated a majority of the initial treatment will be conducted with mastication equipment." But the reasons or criteria for the choice are not given. The questionability entailed in the choice is addressed in "Masticators for fuel reduction treatment: equipment options, effectiveness, costs, and environmental impact" by Brian Vitorelo, *et al.* In the Introduction they say, "Negative impacts on soils and residual trees may occur and vary based on equipment choices, intensity, and introduction of fire (Windell and Bradshaw

2000). It is difficult to predict burn intensities in masticated areas using fire modeling programs such as Behave Plus and FOFEM (Glitzenstein et al. 2006, Knapp et al. 2006, Kreye 2008)." The Bridge Street Project is to address "the need for fuel reduction treatments in order to reduce the fire hazard and improve the fire resiliency of the forest" (p. 6). But since "[i]t is difficult to predict burn intensities in masticated areas using fire modeling programs," how have you judged the reasonableness of the choosing the masticator?

Wide dispersal of seeds and fungi through masticator clearing might make the ecological condition of the cleared area even worse than before. The Project description states, "The reduction in understory vegetation will create conditions resulting in less competition among residual vegetation for improved health and vigor. Overall forest health in the treated areas is expected to improve as a result of this project" (p.40). But if seed dispersal does create new hazards, and no funding is available for subsequent cleaning and maintenance, the initial establishment of the fuel breaks would be a mistake indeed.

Since we are moving into the rain season and well into autumn, the work would have to be done in 2012, not this year. Then 100 days needed for hand crews to do the establishing work would be available in the appropriate season. I have every confidence that the California Conservation Corps, under the leadership of Cal Fire and forest ecologists, would welcome the experience of maintaining the Monterey pine Forest in a healthier state. They have done excellent work here in Cambria on several projects.

New research into the ecology of forests and the effects of human actions on it has begun a healthy exercise in humility and caution. That gives me hope. I volunteer with the 1st graders in the Cambria Grammar School and work to inspire them to think deeply and carefully about Monterey pine, phytoplankton, oxygen, and carbon dioxide. Telling about ecological connections among the forest, the sea, and all plants and animals—including us humans—is a privilege.

Thank you for your work with the amazing array of forests in California.

Sincerely,
Elizabeth Bettenhausen
elizabethbettenhausen@gmail.com

Mahala Burton

6425 Cambria Pines Rd Cambria, CA 93428
(805) 927-1802 mahala1@charter.net

September 29th, 2011

Dan Foster, Senior Environmental Planner
California Department of Forestry and Fire Protection (CAL FIRE) Resource Management Program – Environmental Protection
P.O. Box 944246, Sacramento, CA 94244-2460

Comments on Mitigated Negative Declaration Bridge Street Fuel Break Project SCH# 2011081093

Dear Mr. Foster,

The following comments are submitted in response to the California Department of Forestry and Fire Protection proposal to adopt a Mitigated Negative Declaration for the project titled Bridge Street Fuel Break Project SCH# 2011081093.

As a concerned resident, I am writing in order to promote the quality of life for all residents of Cambria and for environmental protection of the Cambria Monterey Pine forest habitat and species.

After a careful review and analysis of the MND I conclude that the proposed project raises substantial issues, as to its conformance with the California Environmental Quality Act and the applicable policies of the San Luis Obispo Local Coastal Program, and to California Coastal Act provisions. Even after mitigation measures described in the MND are implemented the proposed project MAY have significant effects and impacts on the environment that will require additional mitigation.

Please enter the following comments into the formal record of this proposed action.

The fire plan goal of providing fire protection to the town and residents of Cambria must not be in conflict with the existing Conservation Easement held by The Nature Conservancy (TNC) in order to uphold the conservation values enumerated in the easement.

This writer does not argue with the necessity for fuel load reduction and for providing a 100 ft. defensible space for residents –only with the means of achieving this goal and the lack of mitigation measures.

In December of 2000 The Nature Conservancy acquired a Conversation Easement on approx. 1450 acres of the Covell Ranch also known as the Cambria Coast Ranch formerly named CT Ranch, paid for with TEA-21 Funds $4,000,000 (in two grants). Matching Funds: $500,000 in EEMP funds by the California Resources Agency.

In part the Conservation Easement agreement states:

> *This Grant Deed of Conservation Easement (this "Deed"), dated for reference purposes as of December JT, 2000, is entered into by and between A.L. Central Coast Estates, Inc., a California Corporation, as the grantor ("Grantor") and The Nature Conservancy, a District of Columbia non-profit corporation ("Grantee"), on the basis of the following facts and circumstances:*
>
> *A. Grantor owns that certain real property, consisting of approximately 1,454 acres of land in San Luis Obispo County, California, commonly known as the "Cambria Coast Ranch." This Deed covers all of the Cambria Coast Ranch except up to five and one-half (5 1/2) acres in the aggregate (the land covered by this Deed is hereinafter referred to as the "Land" and the portion of the Cambria Coast Ranch excluded from this Deed is hereinafter collectively referred to as the "Excluded Land"). The property description of the Land is attached hereto as Exhibit A. The Land, together with all rights, title, and interests appurtenant to the Land, is sometimes hereinafter referred to as the "Property".*
>
> *B. The Property possesses significant natural, ecological, aesthetic and scenic values for conservation purposes (collectively, the "Conservation Values") which are of great importance to Grantor and Grantee, to the people of San Luis Obispo County, and to the people of the State of California, and which include, but are not necessarily limited to natural resources, ecological, and scientific values, including the Monterey pine forest and riparian habitat referred to in Recital C below, as well as scenic, open space and recreational values.*
>
> *C. In particular, the Property contains one of only three remaining indigenous stands of Monterey Pine forest, as well as a creek ecosystem and its riparian corridors, providing significant habitat for a variety of important wildlife, and plants.*

Inconsistent Uses of the Property.

> *Any activity on or use of the Property which is inconsistent with the Conservation Purposes of the Easement is prohibited. Grantor and Grantee acknowledge and agree that the uses of the Property which are described in Exhibit E which is attached hereto, though not an exhaustive recital of inconsistent uses and practices, are inconsistent with the Conservation Purposes of the Easement and shall be prohibited at the Property, except to the limited extent (if any) permitted pursuant to the terms of that exhibit.*

Before implementation of the fire plan a careful reading of the Conservation Easement is crucial. Is the fire plan consistent with the Conservation Easement? Is the use of a masticator— the primary means of carrying out the fire plan an allowable use on the ranch? Is a masticator a motor vehicle and prohibited under the easement? Would the use of hand crews only acting with precision to implement the fire plan be a more effective means of protecting the forest flora and fauna and not degrade the wildlife habitat including the forest understory necessary for the survival of the many creatures that inhabit the forest.

The use of a masticator rather than manual hand crews can greatly enhance forest vulnerability. The environmental impacts that are potentially resulting from mastication treatments have been

placed into three categories: sedimentation, soil damage and stand damage. Add to this the potential to severely degrade bird and mammal habitats due to the masticator's lack of precision targeting and deficiency of operator skills.

A list of species dependent on the forest within the fire plan includes but is not limited to:

Hawks, owls, bats, quail, wild turkeys, deer, foxes, bob cats, mountain lions, possums, raccoons, rats of all types, salamanders, red legged frogs' pond turtles, garter snakes, rattle snakes, gopher snakes, and numerous birds. Is the fire plan taking into consideration the wildlife that may not have a government designation as protected but are still a part of the inter-related eco system?

Conservation Easement Exhibit E

#5 Vehicles

There shall be no use of any motorized vehicles off of existing roadways in the Forest Area as shown on the Map. There shall be no use of any motorized vehicles in the Riparian Area, except to cross at the crossing sites referred to and subject to compliance with provisions set forth in Paragraph 8(d) of Exhibit P.

MOTOR VEHICLE 18 USC

Includes an automobile, automobile truck, automobile wagon, motorcycle, or any other self-propelled vehicle designed for running on land but not on rails.

#7 Vegetation

There shall be no removal, cutting or destruction of native vegetation (unless harmful to horses or humans) or introduction of exotic plant or animal species which may in Grantee's determination threaten the Conservation Values of the Property. Grantor shall give Grantor a Proposed Activity Notice pursuant to paragraph 7 of this Easement prior to removing, cutting or destroying native vegetation deemed by Grantor to be harmful to horses or humans and prior to introducing any exotic or animal species Without placing any limitation on the foregoing provisions, none of the plant species which are listed in Exhibit E-l which is attached to this Deed shall be planted anywhere at the Property.

Broom Removal

Ironically broom— that shares equally with dead fall fuel load as a fire risk factor is given a mere one paragraph discussion in the MND. The fire plan fails to detail precisely how broom removal will not promote imminent explosive repopulation of this highly flammable noxious weed. Walking along Bridge Street and from the cemetery one can see numerous large areas of broom. Along Sunbury where the Covell Ranch shares a boundary with private homes are more huge amounts of broom. And adjacent to Camp Yeager even more enormous amounts of broom.

Not included in the fire plan is Cambria Pines Road; lined with broom for about 1/3 mile. In fact in the Cambria Pines neighborhood in private yards are broom hedges and large healthy looking broom bushes. None of this broom is within the fire plan and slated for eradication.

Page 9 of the MND

> "Hand crews will also be used to remove French broom (Genista monspessulana) in the project area. Broom is present, particularly along roadsides and trails. Broom may be pulled from the ground if feasible, provided soil disturbance is minimized. When soil conditions are too dry for hand pulling, or soil disturbance is too great, broom will be cut just above ground level. All of the removed broom having seed heads will either be disposed of properly off site, or piled and burned to minimized seed dispersal. Subsequent efforts to control the spread of broom will be made prior to fuel break maintenance activities as well."

The following excerpt on Broom is from California Invasive Plant Council California Invasive Plant Council:

> *Native to countries surrounding the Mediterranean and in the Azores, French broom is thought to have been introduced to the San Francisco Bay Area In the mid-1800s as an ornamental. It spreads via prodigious seed production. A medium-sized shrub can produce over 8,000 seeds a year (Bossard unpubl. data). After pods open explosively, flinging seeds up to 4 m, the seeds are further dispersed by ants, birds, and animals and in river water and rain wash (McClintock, pers. observation), in mud, and on road grading or maintenance machinery (Parsons 1992). It resprouts readily from the root crown after* ***cutting, freezing, and sometimes after fire*** *(Bossard et al. 1995).French broom currently occupies approximately 100,000 acres in California (D.Barbe, pers. comm.). It displaces native plant and forage species, and makes reforestation difficult. It is a strong competitor and can dominate a plant community, forming dense monospeclfic stands. In an experiment in New Zealand French broom had a higher growth rate than any other broom species found in California, reaching an average height of more than 4.5 feet (141 cm) in two growing seasons. Since it can grow more rapidly than most trees used in forestry, it shades out tree seedlings in areas that are re-vegetated after harvest.*
>
> *French broom foliage and seeds are toxic, containing a variety of quinolizldine alkaloids, especially in young leaves (Montlor et al. 1990). In some livestock, ingestion of plant parts can cause staggering followed by paralysis (McClintock 1985). Foliage can cause digestive disorders in horses (Parsons 1992). Infestations of broom degrade the quality of habitat for wildlife by displacing native forage species and changing microclimate conditions at soil levels. French broom is believed to be responsible for reducing arthropod populations by one-third in Golden Gate National Recreation Area (Lanford and Nelson 1992). It burns readily and carries fire to the tree canopy layer, increasing both the frequency and intensity of fires. French broom along roadside obstructs views, requiring expensive ongoing road maintenance. This species establishes a dense, long-lived seed bank, making it difficult to eradicate.*

Fuel Break Maintenance

An inherent challenge with fuel break systems is the need for periodic maintenance to retard the growth of flammable shrubs and saplings, grasses, weeds and other non-native undesirable plants that can thrive in the increased sunlight and disturbed soils of cleared sites.

Fuel breaks without proper maintenance, become ineffective because the combined effects of vegetation and soil disturbance created during fuel break construction, and the increased exposure to sunlight in thinned areas, can lead to prolific growth of grasses, brush, weeds and particularly broom. Lack of maintenance on a regular basis will quickly negate functionality of the fuel break as a defensible space.

Page 8 of the MND

> *"future periodic treatments may be conducted where necessary to maintain the integrity of the fuel break. Future maintenance activities will likely be conducted primarily with hand crews and will occur every several years as conditions and* **funding warrant**. *Fuel loads will be less with future activities so durations of maintenance activities will typically be less than those of the initial treatment; again however, durations will vary based on the number and type of resources or treatment methods used."*

Apparently if funding is not available there will be no maintenance. Therefore prior to this fire plan implementation of a detailed environmentally sound plan for future maintenance should be mandatory— preferably manual cutting that can precisely target specific trees or vegetation for maintenance thinning and utmost a method of broom control. It is reasonable to hold The Nature Conservancy as holder of the conservation easement as the financially responsible party.

In Summary:

To comply with the procedural requirements of CEQA and to avoid and minimize wildlife impacts and harm to ESHA and to listed and sensitive plants, wildlife, and habitat that are likely to be adversely affected,

- Actual on ground surveys by a botanist and wildlife biologist for plant and animal species that inhabit and utilize the forest and that surveys be conducted during the time when sensitive resources could be detected. An attempt to predict what species may be present cannot reliably demonstrate the "absence" of a species on the project site.

- A qualified on-site biologist should be on hand to review proposed clearing areas for the presence of imperiled species, and for avoiding clearing along streams, wetlands, wet meadows, and during nesting or breeding seasons.

- A detailed plan explaining the measures in the fire plan to prevent the spread of such diseases as pitch canker and sudden oak death in the forest.

- A precise maintenance plan with known funding to prevent the forest from becoming re-re-populated with invasive plants that will displace the natives necessary for the species that inhabit the forest.

- Consistency with the TNC conservation easement

Respectively Yours,

Melinda Burton

Source: California Invasive Plant Council

URL of this page: **http://www.cal-ipc.org/ip/management/ipcw/pages/detailreport.cfm@usernumber=52&surveynumber=182.php**

Invasive Plants of California's Wildland

Genista monspessulana

Scientific name ***Genista monspessulana***

Additional name information: (L.) L. Johnson

Common name French broom, soft broom, canary broom, Montpellier broom

Synonymous scientific names *Cytisus monspessulanus, C. racemosus, C. canariensis, Genista monspessulanus, Teline monspessulana*

Closely related California natives 0

Closely related California non-natives: 4

Listed CalEPPC List A-1,CDFA C

By: Carla D'Antonio

Distribution

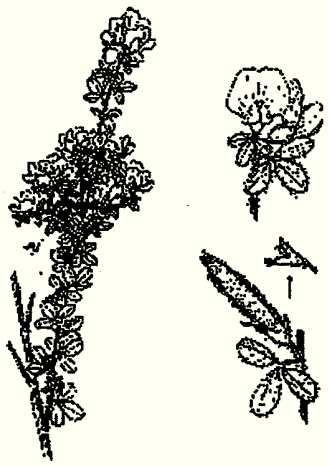
HOW DO I RECOGNIZE IT?

Distinctive features: French broom (*Genista monspessulana*) is an upright, evergreen shrub, commonly to ten feet tall. The round stems are covered with silvery, silky hair, and the small leaves are ususally arranged in groups of three. About eighty-five percent of the photosynthetic tissue of French broom is in leaf tissue. The small (less than half-inch) yellow flowers are pea-like and clustered in groups of four to ten. The mostly inch-long pods are covered with hairs.

This species sometimes is confused with Scotch broom (Cytisus scoparius), which has pods with hairs only at the seam, green stems that are five-angled and ridged, flowers that are golden yellow and larger than half an inch, and only about fifty-five percent of total green tissue as leaves (Bossard and RejmÃinek 1994).

Fabaceae. Shrub, usually <10 ft (3

Description: m), but occasionally to 16 ft (5 m). Stems: twigs silvery silky-hairy. Leaves: alternate; stipules <0.1 in (2 mm); deciduous; leaflets of trifoliate leaves 0.3-0.5 in (10-15mm), oblanceolate to obovate with length about twice width, upper surface glabrous, lower surface with appressed or spreading hairs hairiness; petioles <2 in. (5 mm). Inflorescence: 4-10 flowers in subcapitate racemes (on axillary short shoots); terminal or central flower usually opening last; pedicels <0.1 in. (1-3 mm).



Flowers: shaped like pea flowers; calyx silky-hairy, 0.2-0.3 in (5-7 mm); banner 0.3-0.5 in (10-15 mm), corolla yellow to light yellow. Fruit: a pod, 0.5-1 in (15-25 mm), covered in dense silky hairs, dark brown or black at maturity. Empty seed pods curled. Seeds: 3-8 seeds per pod, brown to black, shiny, round to oval, with a cream to yellow eliaosome (description from Hickman 1993 and pers. observation).

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WHERE WOULD I FIND IT?

French broom is found primarily in central coastal counties from Monterey County north to Mendocino County and inland in Lake, Solano, and Contra Costa counties. It is also known from Del Norte County, northern Sierra Nevada foothill counties to 800 meters, and in Kern, San Bernardino, and San Diego counties.

This broom is common on coastal plains, mountain slopes, and in disturbed places such as river banks, road cuts, and forest clearcuts, but it can colonize grassland and open canopy forest. It is found growing in varied soil moisture conditions, but prefers siliceous soils. Unlike other broom species in California, it grows reasonably well on alkaline soils with pH 8. It is competitive in low-fertility soils because of mutualistic relationships with nitrogen-fixing bacteria found in small nodules on roots. While Scotch broom is a problem species in many parts of the world, French broom is especially problematic in California and Australia (Partridge 1989, Parsons 1992). French broom seedlings are less tolerant of frost than are those of Scotch broom and consequently are less often found at higher elevations.

Â

WHERE DID IT COME FROM AND HOW IS IT SPREAD?

Native to countries surrounding the Mediterranean and in the Azores, French broom is thought to have been introduced to the San Francisco Bay Area in the mid-1800s as an ornamental. It spreads via prodigious seed production. A medium-sized shrub can produce over 8,000 seeds a year (Bossard unpubl. data). After pods open explosively, flinging seeds up to 4 m, the seeds are further dispersed by ants, birds, and animals and in river water and rain wash (McClintock, pers. observation), in mud, and on road grading or maintenance machinery (Parsons 1992). It resprouts readily from the root crown after

cutting, freezing, and sometimes after fire (Bossard et al. 1995).

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WHAT PROBLEMS DOES IT CAUSE?

French broom currently occupies approximately 100,000 acres in California (D. Barbe, pers. comm.). It displaces native plant and forage species, and makes reforestation difficult. It is a strong competitor and can dominate a plant community, forming dense monospecific stands. In an experiment in New Zealand French broom had a higher growth rate than any other broom species found in California, reaching an average height of more than 4.5 feet (141 cm) in two growing seasons. Since it can grow more rapidly than most trees used in forestry, it shades out tree seedlings in areas that are revegetated after harvest.

French broom foliage and seeds are toxic, containing a variety of quinolizidine alkaloids, especially in young leaves (Montior et al. 1990). In some livestock, ingestion of plant parts can cause staggering followed by paralysis (McClintock 1985). Foliage can cause digestive disorders in horses (Parsons 1992). Infestations of broom degrade the quality of habitat for wildlife by displacing native forage species and changing microclimate conditions at soil levels. French broom is believed to be responsible for reducing arthropod populations by one-third in Golden Gate National Recreation Area (Lanford and Nelson 1992). It burns readily and carries fire to the tree canopy layer, increasing both the frequency and intensity of fires. French broom along roadsides obstructs views, requiring expensive ongoing road maintenance. This species establishes a dense, long-lived seedbank, making it difficult to eradicate.

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HOW DOES IT GROW AND REPRODUCE?

French broom becomes reproductive at two to three years of age, on reaching a height of one and a half to two feet (45-60 cm). It flowers in late March-May inland, March-July on the coast. Flowers appear just prior to new leaves. Long-lived seeds are copiously produced (Hoshovsky 1995) and mature in June-July. Seeds are known to survive at least five years in soil (Bossard unpubl. data). French broom seedbanks have been found to contain 465 to 6,733 seeds per square meter (Hoskings 1994, Parker and Kershner 1989). Seeds germinate December-July (Bossard unpubl. data). Cheng (in press) reports that heat treating seeds with temperatures of 65 degrees C improved germination of seed in some populations but not in others. Seedlings can tolerate up to 80 percent shade (Bossard unpubl. data). Plants can resprout from the root crown after cutting. Once seedlings are taller than approximately eight inches (20 cm), their rate of resprouting after cutting can be over 90 percent, particularly if cut in the rainy season (Bossard unpubl. data).

The period of most rapid vegetative growth is April-July. As in other brooms, most photosynthate is moving up in the shrub toward branch tips during flowering, bud break, and seed set. Photosynthate starts moving down toward roots of this broom after seeds are well grown but before seed release (Bossard et al. 1995). French broom retains much of its foliage in coastal areas, and is more deciduous in inland areas. Its life span is typically ten to fifteen years (Waloff, pers. comm.).

(click on photos to view larger image)

HOW CAN I GET RID OF IT?

As with other broom species, the best method for removal of a French broom infestation depends on climate and topography, age and size of the infestation, importance of impact to non-target species, and type, quantity, and duration of resources available to remove and control broom at the site. All methods require appropriate timing and follow-up monitoring. Because of the seedbank, monitoring removal sites to locate and kill new seedlings is essential. Location and retreatment of resprouts is also necessary. Sites should be examined once a year, when the seed germination period ends in late spring, for five to ten years and every two years thereafter.

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Physical control:

Manual/mechanical removal: In general, when using hand removal or mechanical methods it is best to start in areas with small infestations and many desirable species that will reseed naturally. Desirable species should be given some assistance by hand weeding of French broom. Next work on areas with an intermediate degree of infestation (Fuller and Barbe 1985). Finally, tackle larger areas and dense concentrations of French broom using other techniques (fire, chemicals) to augment or replace hand pulling.

Pulling with weed wrenches is effective for broom removal in small infestations or where an inexpensive, long-duration labor source is dedicated to broom removal. The weed wrench removes the entire mature shrub, eliminating

resprouting. However, the resultant soil disturbance tends to increase depth of the seedbank and prolong the need for monitoring. Wrench removal is labor-intensive, but can be used on slopes. It also allows targeting of broom plants while minimizing impact on neighboring species. Golden Gate National Recreation Area has had success in using volunteers to remove broom with weed wrenches and closely monitoring and removing broom seedlings for five to ten subsequent years.

Brush hogs, which twist off above-ground plant material, can be used for broom removal. Although less labor-intensive than weed wrenches, they damage neighboring species and cannot be used on steep slopes. The twisting action is more destructive to tissues that initiate resprouting than is clean cutting. However, depending on the season of brush hog removal, resprouting can still be a problem. Brush hog removal has been used with limited success in Redwood National Park (Popenoe, pers. comm.).

Saw cutting: Archbald (1996) reported success with saw and/or brush cutter following four steps: (1) cut shrubs at or below ground level in late July or August, after broom has gone to seed and soil moisture is at a seasonal low; (2) move cut broom plants to sites appropriate for disposal or burn in spring after plants dry (use tarps to avoid spreading mature seed to uninfested areas while moving sawed broom); (3) the following summer, after grasses are dry and have dispersed their seed, destroy new French broom seedlings by mowing as low to the ground as possible with a heavy-duty brush cutter with a four-pointed metal blade; and (4) repeat for the next five or six seasons or until the seedbank is exhausted. Timing and height of cutting are critical in using this technique. Cutting French broom in June in Mendocino County at 5-8 cm above soil surface resulted in extensive resprouting (Bossard et al. 1995).

Mulching: A 10 cm deep wood bark mulch significantly decreased seedling emergence of French broom in experiments conducted by Cheng (in press) in the San Francisco Bay Area. This suggests that mulching could be used to suppress regrowth from the seedbank after removal of mature shrubs.

Prescribed burning: Using fire to remove uncut French broom in late spring or early summer has had some success at Mt. Tamalpais State Park in Marin County (Boyd 1994). Reburning of the removal site is usually necessary two and four years after the initial burn (Boyd, pers. comm.). Reburnings are most effective in killing resprouts and seedlings if there are either naturally occurring or reseeded grasses to carry the fire.
Ken Moore (pers. comm. 1999) reports that California State Parks has been very successful (100 percent mortality) using a propane torch to remove French broom seedlings up to 20 cm in height that emerge from the seedbank after removal of adult brooms. The torch is set so it is hot but not flaming and it is passed over the French broom seedlings. The heat does not cause the seedling to burn but within a day the seedling is wilted and dead. This is done at the end of the rainy season when seedlings are up but there is no fire danger. Flame throwers have been used to spot-treat road edges or small areas with seedlings emerged from the seedbank after removal of mature brooms in Redwood National Park and in New Zealand (Popenoe, pers. comm., Johnson 1982). For prescribed burning of pretreated or cut broom see below under integrated methods.

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Biological control:

There are no USDA approved biocontrol agents for French broom. The distribution and effects of the native pyralid moth, *Uresiphita reversalis*, on French broom were investigated by Montllor et al. (1990). While this insect may defoliate some French broom shrubs, plants grow new leaves after the larval stages undergo metamorphosis. Other insect biocontrol agents are being tested in England and France for use on Scotch broom in Australia and New Zealand (Paynter 1997). Some of these agents may use French broom as a host as well. However, the insects known to feed on and impact mature Scotch and French brooms (some *Sitona* sp.) are likely to feed on *Lupinus* species as well and consequently would not be appropriate for release in California (Paynter 1997).

Grazing: Heavy grazing by goats for four or five years during the growing season has been reported as effective in New Zealand and has been tried at a few sites in Marin County in California (Archbald, pers. comm.). The disadvantage is that goats are not selective, and native species that may start to revegetate the area are also eaten.

Â

Chemical control:

A solution of 3 percent glyphosate sprayed on foliage until wet has been used to treat mature French broom shrubs. Adding surfactant improved effectiveness (Parsons 1992). However, the foliar spray impacts non-target species, and resprouting often occurs. Triclopyr ester (25 percent), in HastenÂ® or PenevatorÂ® oil (75 percent) in one spot, low-volume basal bark application with a wick has proved effective in killing French broom (Bossard et al. 1995). Dye should be added to the herbicide solution to help avoid missing stems. It was necessary to spot only the main stem with 2 or 3 drops of herbicide, within 8 cm of the ground surface, to obtain a 99 percent kill of the eight-year-old French broom plants in this experiment conducted in Mendocino County. Soil analyses showed no contamination by the triclopyr, even in plots that were later burned. However, killing the mature shrubs was not sufficient to remove the infestation of French broom because of its well developed seedbank (Bossard et al. 1995). This application technique does not impact non-target species, but it is time-consuming if the site is large. Both of these chemical methods should be used during periods of active growth after flower formation and seed set but before seed dehisces.

The herbicide 2,4-D, alone or with additives such as diquat, picloram, dicamba, and sodium chlorate, has been used to control French broom. Not all of these herbicides are registered for use in California. French broom seedlings are least resistant to auxin-minimizing herbicides such as 2,4-D at the four- to six-inch (10-15 cm) size. Chemical removal alone results in standing dead biomass, which makes monitoring for and treatment of broom seedlings difficult. Standing dead biomass also presents a fire hazard.

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An integrated approach

The most effective removal treatments in a project in Jackson State Demonstration Forest conducted by the CalEPPC broom committee (Bossard et al. 1995) was a combination of treatments that began in early July with low-

volume basal bark application of triclopyr ester (as GarlonÂ®) (25 percent) in Hasten or Penevator oil (75 percent) and a purple dye in a low-volume basal bark application (2-3 drops in one spot <8 cm from the soil surface) with a squirt bottle on mature dense stands of French broom. After four weeks all broom shrubs were dead and were cut down, left on site, and burned. This flushed the seed from the seedbank by increasing germination rate with the next rains. French broom seedbanks in burned plots were reduced to less than 5 percent of their original size three years after prescribed burns. Seedbanks of unburned plots otherwise treated the same were reduced to 15.5 percent of their original size, and control plots exhibited no significant decrease in seedbank size. For the next two years, in July, seedlings in plots were treated with either 2 percent glyphosate (as RoundupÂ®, label-recommended strength) or cut with a four-blade gasoline powered brush cutter. Glyphosate was applied with a backpack sprayer, and non-target vegetation was avoided. Brush-cut plots had 1.6 resprouts per square meter, whereas plots in which glyphosate was applied to seedlings had 0.2 resprouts per square meter. Mean percent cover by French broom was reduced from 87 percent to less than 0.2 percent in plots treated with basal bark triclopyr, cut, burned, and seedlings treated with glyphosate.

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Federal Funding Programs

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Success Stories in Transportation Enhancements

Wide variety of examples of how federal transportation funding has been used for trails, conservation, historic preservation, and other projects.

From The Nature Conservancy
Revised November 2000

- Mitigation Projects
- Trails
- Special cases
- Natural Heritage Programs
- Funding Totals by Category
- Do's and Don'ts
- For More Information
- The Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA)
- The Transportation Equity Act for the 21st Century (TEA21)
- California's Environmental Enhancement and Mitigation Program (EEMP)

Cambria Coast Ranch

Description: Funds will be used to acquire an easement on the approximately 1,500-acre Cambria Coast Ranch in San Luis Obispo County in coastal California. The property is adjacent to State Highway 1 and features the largest remaining contiguous stand of Monterey pines in the region.

Sponsors: California Parks and Recreation Department, The Nature Conservancy

TEA-21 Funds: $4,000,000 (in two grants)

Matching Funds: $500,000 in EEMP funds by the California Resources Agency

Contact: Emily Tibbott, California Office, 415/ 281-0442

WHAT IS TEA-21?

The Transportation Equity Act for the 21st Century, TEA-21, is the name given to the Federal legislation (Public Law 105-178) which authorizes Federal highway, highway safety, transit and other surface transportation programs. The bill was signed into law on June 9, 1998, and covers the period October 1, 1997 through September 30, 2003. TEA-21 is the successor legislation to the Intermodal Surface Transportation Efficiency Act (ISTEA, Public Law 102-240), a landmark piece of transportation legislation that expired on September 30, 1997. TEA-21 builds on the initiatives established in ISTEA. It continues most of ISTEA's programs and policies and maintains ISTEA's emphasis on local involvement in transportation decisionmaking. TEA-21 is historic in a number of ways:

- **TEA-21 is the largest public works bill in history.**

  TEA-21 authorizes (makes available) nearly $218 billion in Federal funding for highway, highway safety and transit programs over six years.

- **TEA-21 provides significant increases in Highway and Transit funds.**

  TEA-21 authorizes (makes available) a 42 percent increase in Highway authorizations from ISTEA levels, and a 31 percent increase in Transit authorizations from ISTEA levels.

- **TEA-21 changes the Federal budget rules to "guarantee" minimum funding levels for Federal highway, highway safety and transit programs.**

  TEA-21 created another funding category within the Federal budget, a "firewall", which guarantees minimum funding levels of about $198 billion for Federal highway, highway safety and transit programs. Prior to TEA-21, funding for surface transportation programs was one priority among many competing for Federal budget dollars. Under the new budget rules, guaranteed funding amounts for highway and highway safety programs are tied to actual Highway Trust Fund (HTF) Highway Account receipts, to be used for projects eligible for funding under the highway and highway safety portions of TEA-21. Transit funding is guaranteed at a selected fixed amount over the six years, to be used for projects eligible to receive transit funding. (Note: The Highway Trust Fund (HTF) was established in 1956 as a means of financing highway projects. While it has changed over time, this fund continues to be supported by fees levied on highway users -- including fuel, tire, truck and use taxes, and is used to fund highway and transit programs.)

  Funding for surface transportation programs is a two step process. Authorizing legislation (such as TEA-21) lays out the program structure and the maximum levels of funding available over a period of several years (recently, six). However, before funds are actually available, they must be appropriated (made available for expenditure) by Congress in the annual appropriations process. Because not all the funding which is authorized (made available) is actually appropriated (provided to the states for expenditure), guaranteed funding is significant. Under ISTEA, while nearly all of the authorized highway funding was actually distributed to the states, only about three quarters of the transit funding authorized was distributed. Looking at guaranteed funding levels only, TEA-21 provides a 37 percent increase in highway guaranteed funding over ISTEA distributions, and a 51 percent increase in transit funding over ISTEA distributions.

- **TEA-21 assures that each state receives a minimum return on the amount of gas taxes it contributes to the Highway Trust Fund.**

Within TEA-21, most of the highway funds are distributed based on statutory formulae. One funding provision, known as the "minimum guarantee" provision, provides that each still state will receive at least 90.5 percent of its percentage share of contributions to the Highway Account of the Highway Trust Fund (HTF). This provision in TEA-21 **essentially consolidates the several categories of equity adjustments in ISTEA. There is no minimum guarantee provision for the distribution of transit funds.**

TEA 21

East West Ranch Acquisition	**$ 101,000**
Bianchini House Acq & Restoration	**$ 150,000**
Cambria Cross Town Trail	**$ 292,000**

EEMP :Natural Resources Agency –
2010-11 Environmental Enhancement and Mitigation Program
1. INTRODUCTION

1-1. Purpose and Authority

These procedures and criteria guide the evaluation and selection of projects under the Environmental Enhancement and Mitigation Program (EEMP). This program, as provided by Streets and Highways Code Section 164.56, authorizes the allocation of up to $10 million each year for grants to mitigate the environmental impacts of modified or new public transportation facilities.

The Natural Resources Agency (Agency) prescribes procedures and criteria to evaluate grant proposals and submits a list of proposals recommended for funding to the California Transportation Commission (CTC). The CTC annually awards reimbursement grants to fund proposals from the Agency's list. The Department of Transportation (Caltrans) administers the Grant Agreement.

1-2. Eligible Applicants

Any State, local, federal or 501(c)(3) non-profit entity may apply for and receive grants. The agency or entity is not required to be a transportation or highway related organization, but must be able to demonstrate adequate charter or enabling authority to carry out the type of project proposed. Two or more entities may participate in a project with one designated as the lead agency.

APPLICATION FORM Application Form - page 3

D. ASSURANCES

Applicant possesses legal authority to apply for the grant and to finance, acquire, and construct the proposed project; and by formal action (i.e., a resolution) the Applicant's governing body authorized the filing of the Application, including all understandings and assurances contained therein, and authorized the person identified as the official representative of the Applicant to act in connection with the Application and to provide such additional information as may be required.

Applicant will manage and maintain into the future any property acquired, developed, rehabilitated, or restored with grant funds provided through this program. For property acquisition or conservation easement, Applicant will accept, sign, notarize, and record an Agreement Declaring Restrictive Covenant (ADRC) developed by the California Department of Transportation. With the granting agency's prior approval, the Applicant or its successors in interest may transfer the management and maintenance responsibilities in the property. If the property is not managed and maintained for the purposes stated in the Agreement, the state shall be reimbursed an amount at least equal to the amount of the grant award

or, for real property, the pro rata fair market value of the property, including improvements, at the time of sale, whichever is higher.
Applicant will give the State's authorized representative access to and the right to examine all records, books, papers, or documents related to the grant.
Applicant will cause work on the project to be commenced within a reasonable time after receipt of notification from the State that funds have been approved and that the project will be carried to completion with reasonable diligence. If Applicant cannot submit its first invoice for reimbursement to Caltrans by one year from the date of the execution of the Applicant-State agreement, Applicant will submit a statement of project progress appropriate to the project that provides real assurances that the project will be completed prior to **April 30, 2013**, including but not limited to: project advertisement or firm advertisement schedule, entry into escrow for acquisitions, date project plans will be completed, anticipated date of receipt of other needed funds from specified entity, etc.

Applicant will comply where applicable with provisions of the California Environmental Quality Act and the California Relocation Assistance Act and any other state, and/or local laws, rules and/or regulations and certifies the project is consistent with all applicable local, State and/or federal plans.

Periodic Review of the San Luis Obispo County LCP
Preliminary Report
February 2, 2001
(As revised to incorporate errata/clarifications of the July 12, 2001 action)
25

The development pressures north of Cambria and on the CT Ranch have created strong incentives among the environmental community to pursue more permanent protections of these rural lands. Most significantly, the Nature Conservancy acquired an 800 acre conservation easement on the CT (now Cambria Coast) Ranch in December of 2000. This conservation agreement has been reported as reducing the development potential of the ranch from 23 to 5 residential sites, and has been designed to protect the most significant forest resources on the ranch. Most important, this easement attenuates a significant development pressure for residential sprawl, and may mark the more permanent maintenance of the urban boundary of north Cambria. The lands adjacent to the rural lands are owned by State Parks. Coupled with the buildout of a few remaining lots west of Highway One, there now may be a much less concern for sprawling urban development in this area of the County's coastal zone.

10 Cambria Pines Road was approved as part of a previous subdivision – Tract 543 – approved without conditions by the Coastal Commission in CDP 4-85-297
11 See 3-SLO-97-041/A-3-SLO-97-023 (Wesnousky); and DEIR for CT Ranch General Plan Amendment (SCH 89051021).

When I asked TNC for it they said they would have to ask Covell for permission and they thought it would be better to go to the county and request it. The official name of the easement is Cambria Coast Ranch.

I asked what some of the allowable uses are and Scott Butterfield said the proposed emergency access road from Bridge to Cambria Pines is an allowable use in the easement however any allowable use is still subject to a CDP and CEQA . Scott said the grazing allowable use is really for temporary fire prevention very short term and probably would need a manager to oversee and fencing .

I'm not sure when if ever I'll go to the County to get the Easement. I guess I'm just lazy. I wonder if there are courier services that do that?

Hi

Fire Management Alternatives

Fuel Breaks

A fuel break is defined as "a strategically located wide block, or strip, on which a cover of dense, heavy, or flammable vegetation has been permanently changed to one of lower fuel volume or flammability" (Green, 1977). A shaded fuel break is one in which surface fuels have been reduced and the crown cover of remaining trees has been raised and/or opened to reduce the risk of crown ignition. There are no standard prescriptions for fuel break width, overstory removal, and ground treatment, as it is understood that fuel breaks will be designed to fit local landscape and fuel conditions. Shaded fuel breaks to enhance access for initial attack and safety of fire personnel and equipment can range from as little as 20 feet on each side of a road to more than 150 feet on one side. A width of 300 feet has been historically specified for primary fuel breaks (Green, 1977). A fuel break is typically not designed to stop a fire but to give suppression forces "a higher probability of successfully attacking a wildland fire" (Agee, et al, 2000). Fuel breaks may provide an area from which to safely attack a fire as well as an anchor from which to start an indirect attack. When associated with a road they may be used to enhance safe ingress and egress to potential fire prone areas.

Fire Breaks

By contrast a fire break is defined as a "...fireline wider than 10 feet, frequently 20 to 30 feet wide...." (Green,1977). These are by necessity devoid of all vegetation and are frequently constructed by bulldozer or other mechanical equipment. Firebreaks are often designed to be used as roads by fire equipment as both a primary and secondary fireline.

Thanks for the files on the fuel break. I had a telephone appointment with The Nature Conservancy yesterday. They paid for the enclosed report. We discussed my concerns and particularly about the machine the "masticator". There are 2 types of masticators and the boom type in the wrong hands can destroy a forest. I basically said they had to have oversight of the operator . In the hands of some gung ho person could be disaster for the forest.Do a Google search on "masticator". You tube has some good videos.
There are competing interests with this fuel reduction plan,. Cal fire and CCSD fire department want to cut/remove as much as possible. Covell would like to open up the forest for cattle grazing and TNC must protect the conservation values while allowing some fuel reduction.An interesting dance no doubt.

There will be a Neg declaration or Mit dec under CEQA so many concerns will be addressed then.There is an already an emergency road through the cemetery out onto Cambria Pines RD so another emergency road 12 ft wide cut in the forest is redundant.
I'm not sure if the plan I enclosed is for public consumption so I did not send to everyone and you might already have it.

I will be at the meeting and many people living on the forest boundary will be there as well and many are jumping for joy to have as much as possible cut.. I tried to get a copy of the conservation easement from TNC but they said I had to get it from public records but I'll bet Greenspace has it. That document will be useful in analyzing the CEQA document. I got the impression that the TNC man in charge of this project is a little timid. Talking to him on the phone was difficult as he has a pronounced stutter..poor thing.

Begin forwarded message:
From: Eandhhoffer@aol.comDate: February 25, 2011 3:53:00 PM PSTTo: JCollins@ceip.org, becivileng@gmail.com, ncollins99@aol.com, jfcollins@aol.com, potterplumbing@gmail.com, Eandhhoffer@aol.comSubject:
Fwd: Covell Ranch forest management planning

Jim, et al: Here is the response I received from the Nature Conservancy:
In a message dated 2/24/2011 10:56:06 A.M. Pacific Standard Time,
scott butterfield@tnc.org writes:
Holly,

Thank you for your email inquiry. I am the lead for The Nature Conservancy at the Covell Ranch.

Over the past year and a half The Nature Conservancy has been working in close collaboration with Ralph Covell, Steve Staub (Staub Forestry and Environmental Consulting – one of the foremost Monterey pine experts in the world), CalFire, Mark Miller (Cambria CSD), and California St. Parks on the development of a forest management plan for the Covell Ranch. This management plan will be an important supporting document for CalFire as they move through the California Environmental Quality Act (CEQA) process. We have briefed the Fire Safe Council and the Cambria Forest Committee throughout this planning process and will continue to do so as CalFire moves through the CEQA process.

We are nearly finished with the Covell Ranch Forest Management Plan. As soon as it is finished I will be happy to provide you a copy and would welcome any comments or questions that you may have.

The Nature Conservancy has held a conservation easement on the Covell Ranch (owned by Ralph Covell) since 2000. This property is one of five native Monterey pine stands in the world and is a truly special resource. Monterey pines are adapted to fire and actually need it, however this easement property sits right up against the community of Cambria and an unexpected natural fire poses a safety risk. We felt that given that this is a truly urban forest management options needed to be evaluated to both protect the health of the forest and safety of the residents of Cambria.

We appreciate your close attention to this forest management planning process and welcome any feedback you may have.

If you have any additional questions or concerns please feel free to give me a call at 805-550-3133.

Thank you.

Scott

Please consider the environment before printing this email

H. Scott Butterfield, Ph.D.
Ecoregional Ecologist

scott_butterfield@tnc.org
(805) 550-3133 (Phone)

nature.org

The Nature Conservancy
California Field Office
201 Mission Street, 4th Floor
San Francisco, CA 94105

Cal Fire prepared Mitigated Negative Declaration with Notice of Determination

Notice of Determination

To: ☒ Office of Planning and Research
1400 Tenth Street, Room 121
Sacramento, CA 95814

From: California Department of Forestry
and Fire Protection
P.O. Box 944246
Sacramento, CA 944246-2460

☐ County Clerk
County of _____

Subject: Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code.

Bridge Street Fuel Break Project
Project Title

SCH #2011081093	Daniel G. Foster	(916) 653-0839
State Clearinghouse Number (If submitted to Clearinghouse)	*Lead Agency Contact Person*	*Telephone*

Cambria, San Luis Obispo County, California, within Township 27S, Range 8E, Section 15 & Rancho Santa Rosa (Estrada) MDBM.
Project Location (include county)

Project Description: Fuel Reduction – Create a shaded fuel break by reducing understory fuels through mechanical shredding and hand crew work on approximately 50 acres of land in the Cambria area of San Luis Obispo County.

This is to advise that the Department of Forestry and Fire Protection has approved the above described project on
☒ Lead Agency ☐ Responsible Agency
Dec. 8, 2011 and has made the following determinations regarding the above described project:
(Date)

1. The project (☐ will ☒ will not) have a significant effect on the environment.
2. ☐ An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.
   ☒ A Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures (☒ were ☐ were not) made a condition of the approval of the project.
4. A statement of Overriding Considerations (☐ was ☒ was not) adopted for this project.
5. Findings (☐ were ☒ were not) made pursuant to the provisions of CEQA.

This is to certify that the record of project approval is available to the General Public at:

(walk-in requests)
California Department of Forestry and Fire Protection
Resource Management – Environmental Protection
1416 Ninth Street, 15th Floor, Room #1516-37
Sacramento, CA 95814

(mail-in requests)
California Department of Forestry and Fire Protection
Resource Management – Environmental Protection
P.O. Box 944246
Sacramento, CA 94244-2460

Daniel G Foster — December 8, 2011
Daniel G Foster — *Date*
Senior Environmental Planner

RECEIVED
DEC - 8 2011
STATE CLEARING HOUSE

Date received for filing and posting at OPR:

<u>Final</u> Initial Study/Mitigated Negative Declaration
for the proposed
Bridge Street Fuel Break Project
San Luis Obispo County, California
State Clearinghouse Number 2011081093

prepared by:

The California Department of Forestry and Fire Protection (CAL FIRE)
The Lead Agency Pursuant to Section 21082.1 of the
California Environmental Quality Act (CEQA)

CAL FIRE's Resource Management Program – Room #1516-37
P.O. Box 944246
Sacramento, CA 94244-2460
(916) 653-0839

~~**August 29, 2011**~~
<u>December 5, 2011</u>

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MITIGATED NEGATIVE DECLARATION

Introduction and Regulatory Context

Stage of CEQA Document Development

☐ **Administrative Draft.** This CEQA document is in preparation by California Department of Forestry and Fire Protection (CAL FIRE) staff.

☐ **Public Document.** This completed CEQA document has been filed by CAL FIRE at the State Clearinghouse on August 29, 2011 and is being circulated for an agency and public review period. This review period began on August 29, 2011 and closes at 5:00pm on October 10, 2011. An electronic version of the Notice of Intent (NOI) and the complete CEQA document are available for review on CAL FIRE's Internet Web Pages at:
http://www.fire.ca.gov/resource_mgt/resource_mgt_EPRP_PublicNotice.php
Addition methods of viewing the NOI, along with instructions for submitting written comments are provided on Pages 5-6 of this document.

☒ **Final CEQA Document.** This Final CEQA document contains the changes made by the Department following consideration of comments received during the public and agency review period. The changes are displayed in strike-out text for deletions and underlined text for insertions. The CEQA administrative record supporting this document is on file, and available for review, at CAL FIRE's Sacramento Headquarters which is located in the Natural Resources Building, 1416 Ninth Street, Room #1516-37 on the 15th Floor, Sacramento, California.

Introduction

This Initial Study/Mitigated Negative Declaration (IS/MND[1]) describes the environmental impact analysis conducted for the proposed project. This document was prepared by California Department of Forestry and Fire Protection (CAL FIRE) staff utilizing information gathered from a number of sources including research and field review of the proposed project area and consultation with environmental planners and other experts on staff at other public agencies. Pursuant to Section 21082.1 of the California Environmental Quality Act (CEQA), the Lead Agency, CAL FIRE, has prepared, reviewed, and analyzed the IS/MND and declares that the statements made in this document reflect CAL FIRE's independent judgment as Lead Agency pursuant to CEQA. CAL FIRE further finds that the proposed project, which includes revised activities and mitigation measures designed to minimize environmental impacts, will not result in significant adverse effects on the environment.

Regulatory Guidance

This IS/MND has been prepared by CAL FIRE to evaluate potential environmental effects which could result following approval and implementation of the proposed project. This document has been prepared in accordance with current CEQA Statutes (Public Resources Code [PRC] §21000 *et seq.*) and current CEQA Guidelines (California Code of Regulations [CCR] §15000 *et seq.*).

An Initial Study (IS) is prepared by a lead agency to determine if a project may have a significant effect on the environment (14 CCR § 15063[a]), and thus, to determine the appropriate environmental document. In

[1] A list and definition of the acronyms and symbols used in this CEQA document is presented on pages 69-70.

accordance with CEQA Guidelines §15070, a "public agency shall prepare ... a proposed negative declaration or mitigated negative declaration ... when: (a) The Initial Study shows that there is no substantial evidence ... that the project may have a significant impact upon the environment, or (b) The Initial Study identifies potentially significant effects but revisions to the project plans or proposal are agreed to by the applicant and such revisions will reduce potentially significant effects to a less-than-significant level." In this circumstance, the lead agency prepares a written statement describing its reasons for concluding that the proposed project will not have a significant effect on the environment and, therefore, does not require the preparation of an Environmental Impact Report (EIR). This IS/MND conforms to these requirements and to the content requirements of CEQA Guidelines Section 15071.

Purpose of the Initial Study

CAL FIRE has primary authority for carrying out the proposed project and is the lead agency under CEQA. The purpose of this IS/MND is to present to the public and reviewing agencies the environmental consequences of implementing the proposed project and describe the adjustments made to the project to avoid significant environmental effects or reduce them to a less-than-significant level. This disclosure document is being made available to the public, and reviewing agencies, for review and comment. The IS/MND is being circulated for public and agency review and comment for a review period of 30 days as indicated on the ***Notice of Intent to Adopt a Mitigated Negative Declaration*** (NOI). Refer to the NOI for dates of the 30-day public review period for this project. The information below discusses the publication and posting of the NOI for this project.

The requirements for providing an NOI are found in CEQA Guidelines §15072. These guidelines require CAL FIRE to notify the general public by utilizing at least one of the following three procedures:

- Publication in a newspaper of general circulation in the area affected by the proposed project,
- Posting the NOI on and off site in the area where the project is to be located, or
- Direct mailing to the owners and occupants of property contiguous to the project.

CAL FIRE has elected to utilize the first two of the three notification options. An electronic version of the NOI was published in ***San Luis Obispo Tribune*** (newspaper) on September 9, 2011. It appeared in the Legal Notices Section within the Classified Section and is also available on the on-line version of this newspaper at: http://www.sanluisobispo.com/classified-ads/ad/1543006 The NOI was posted at four prominent locations on and off site in the area where the project is located for the entire public review period. The four locations where the NOI was posted during the public review period are:

1. At Cambria Public Library, 900 Main Street, Cambria, CA 93428.

2. At Cambria Fire Station #10, 6126 Coventry Lane, Cambria, CA 93428.

3. At the public information counter of the CAL FIRE/County Fire Unit Headquarters, 635 North Santa Rosa Street, San Luis Obispo, CA 93405.

4. At the San Luis Obispo County Clerk/Recorder's Office in San Luis Obispo.

A complete copy of this CEQA document was made available for review by any member of the public requesting to see it at Locations #1, #2 and #3 above. An electronic version of the NOI and the CEQA

document were made available for review for the entire public review period through their posting on CAL FIRE's Internet Web Pages at:
http://www.fire.ca.gov/resource_mgt/resource_mgt_EPRP_PublicNotice.php

If submitted prior to the close of public comment, views and comments are welcomed from reviewing agencies or any member of the public on how the proposed project may affect the environment. Written comments must be postmarked or submitted on or prior to the date the public review period will close (as indicated on the NOI) for CAL FIRE's consideration. Written comments may also be submitted via email (using the email address which appears below) but comments sent via email must also be received on or prior to the close of the 30-day public comment period. Comments should be addressed to:

Dan Foster, Senior Environmental Planner
California Department of Forestry and Fire Protection
Resource Management – Environmental Protection Program
P.O. Box 944246
Sacramento, CA 94244-2460
Phone: (916) 653-0839
Email: sacramentopubliccomment2@fire.ca.gov

After comments are received from the public and reviewing agencies, CAL FIRE will consider those comments and may (1) adopt the Mitigated Negative Declaration and approve the proposed project; (2) undertake additional environmental studies; or (3) abandon the project.

Project Description and Environmental Setting

Project Location

The proposed project is located in San Luis Obispo County within the community of Cambria along the central coast, just east of Highway 1 and approximately 30 miles south of the Monterey County line. The majority of the project area is located on the 1,465 acre Covell Ranch. One additional landowner, Coalinga-Huron Parks & Recreation Dept. – Camp KEEP (Camp Yeager), makes up the remaining portion (approx 1-2 acres) of the project area. The legal description of the proposed project area is portions of T27S, R8E, Section 15, & Rancho Santa Rosa (Estrada) MDBM (Figure 1). The proposed project falls on two county assessor's parcels: 013-111-005 (Covell), and 013-111-004 (Camp KEEP).

Background and Need for the Project

The proposed project lies within one of the world's five native Monterey pine stands. A number of factors have influenced the pine stand within the project area including selection logging, grazing, alteration of fire regimes, pathogens and non-native species. The result is a dense understory throughout most of the project area that has created competition resulting in a generally poor, overstocked condition for much of the pine stand. The forest is in a senescent condition and will likely continue to decline in health and vigor except where sound forest management techniques are used. Significant mortality of pine overstories has occurred in portions of the project area over the last twenty or more years, leading to areas with high concentrations of snags and downed material (Staub 2011).

Local fire officials, including CAL FIRE, and stakeholders in the Covell Ranch have recognized the need for fuel reduction treatments in order to reduce the fire hazard and improve the fire resiliency of the forest. The Nature Conservancy (TNC) has entered into a partnership with the owner of the Covell Ranch through the

implementation of a conservation easement. As a result of this partnership, TNC has completed the *Forest Management Plan for Covell Ranch* (Staub 2011) to provide recommendations that address future activities on the ranch, focusing largely on fuel reduction treatments and fire protection improvements. The plan incorporated fire behavior predictions produced from *Potential Wildfire Behavior* (Schmidt 2010), which modeled fire behavior for the Covell Ranch area. Six forest management priorities for fire control treatments and implementation are listed in Staub's plan:

1. Establish a primary shaded fuel break from the southern property line up the hogback ridge to the S turn on Bridge Street and thence along the west side of Bridge Street to the Cemetery.

2. Establish defensible space fuel reduction zones adjacent to residences along the western boundary from Sunbury south toward downtown and to residences on either side of the Cemetery in Cambria Pines.

3. Investigate the feasibility of establishing gated emergency access for authorized personnel over the ranch road from the top of Bridge Street to Cambria Pines.

4. Improve internal fire road access for prevention and suppression activities on the ranch east of Bridge Street.

5. Install an emergency water supply tank for fire control purposes on the ranch near the Cemetery.

6. Establish a defensible space fuel reduction zone adjacent to the Cemetery itself.

The proposed project is generally consistent with and will accomplish the objectives of recommendations 1, 2 and 6 of the plan.

The intent of the *Cambria Forest Management Plan* (Jones and Stokes 2002), funded by the State and developed under the guidance of the Cambria Forest Committee, is to provide a framework for the management of Monterey pine and coast live oak forest in the Cambria community. This plan identifies hazard reduction in the forests of the Cambria area, in particular the control of fire-hazard materials, as one of its three primary goals and objectives. The treatment methods of the proposed project are generally consistent with the recommendations of this plan as well.

Project Objectives

Ultimately the intent of the proposed fuel break is to reduce the threat of a catastrophic wildfire in the Cambria area; in terms of both fires moving from wildland areas into developed areas, or from developed areas into sensitive habitats, such as the Monterey pine forest. A closely associated secondary objective is to accomplish the fire hazard reduction work while maintaining or improving forest health and vigor. The proposed project will create areas of defensible space in portions of the wildland-urban interface (WUI) of Cambria and create a shaded fuel break along an existing roadway (Figure 1a). The creation of the roadway fuel break will serve two important functions. First, it provides critical emergency egress and ingress, and second, it creates more favorable conditions for fire officials during fire suppression activities. These needs are specified in the aforementioned forest management plans and are also recommended by local fire officials.

Project Start Date

CAL FIRE anticipates the project will begin ~~in~~ after the ~~summer or~~ fall of 2011.

Project Description

The proposed project would treat approximately 50 acres by reducing the fuel loading throughout the understory of the project area resulting in a shaded fuel break. Along Bridge Street, the fuel break provides a strategic area to stop an advancing wildfire. Along the cemetery and the residences bordering the Covell Ranch the fuel break provides additional defensible space. The fuel break will be constructed through a variety of treatment methods that could include mechanical shredding (mastication) and/or the use of hand crews (chainsaw use with material either: chipped, lopped and scattered, or piled and burned). The fuel reduction methods will treat a majority of the smaller diameter live and dead woody vegetation in the understory, creating a shaded fuel break. Most dead and down material, including both trees and shrubs, less than 10 inches in diameter will be treated. To reduce ladder fuels, most live brush and trees less than 10 inches in diameter at breast height (dbh) will be removed when beneath the canopy of overstory trees. When not beneath the canopy of overstory trees, live brush and trees less than 10 inches dbh will be retained to achieve an average horizontal spacing of 10-15 feet between crowns. In some cases, retained trees will be limbed (pruned) with hand crews to reduce the chances of fire moving from the ground up into tree crowns.

A fully intact forest will be retained with a modified stand structure including trees of all sizes. Pines and oaks of all sizes including seedlings, saplings, and pole-size trees will be retained with the objective of retaining the healthiest, best formed trees at an average stem spacing of 10-15 feet. Mature shrubs, primarily toyon and manzanita, will be retained where suitable trees are lacking and where they are not likely to create ladder fuels. Important habitat components including wildlife snags, large down logs and woodrat houses will be retained. All trees and shrubs less than 10" DBH to be retained will be flagged with ribbons by a Registered Professional Forester or supervised designee prior to operations.

The proposed fuel reduction activities will extend 100 feet on the west side and about 10 feet (road shoulder) on the east side of Bridge Street for a length of ¾ mile, 100 feet on one side (east or south) of property lines adjacent to homes for a length of 2.5 miles, and 150 feet along a ridgeline west of Bridge Street for a length of ¼ mile (distances are approximate). Refer to Figure 1. Fuel break widths were determined based on input from local fire officials, foresters, a fire ecology study, and expected fire behavior. A generally rule for discouraging fire spread between fuels in wildland settings is a separation or reduction in fuels of at least 1 ½ times the height of the fuel. Fuel heights vary in the project area, but a 100-150 foot wide fuel break is considered the minimum width needed for proper functionality.

Mechanically shredded (masticated) material will remain on site and be distributed fairly uniformly with an average depth not to exceed 4 inches. Fuels that are treated by hand crews will be left on site and disposed of through any or all of the following methods: chipping, lop and scatter or pile and burn.

It is anticipated the initial establishment of the fuel break will take approximately 20 to 100 working days, based on the number and type of resources and treatment methods used. For example, hand crew work will typically be longer in duration than mechanical work due to difference in production rates. It is anticipated a majority of the initial treatment will be conducted with mastication equipment.

Future periodic treatments may be conducted where necessary to maintain the integrity of the fuel break. Future maintenance activities will likely be conducted primarily with hand crews and will occur every

several years as conditions and funding warrant. Mastication was chosen as the primary treatment method because the mulched material is incorporated with the litter/duff layer and helps retard the growth of plants, including invasive species, thereby reducing maintenance needs. Future maintenance needs will be assessed over time depending on the conditions that develop. It is expected that French broom will be the most difficult species to control and will require the most work. CAL FIRE, The Nature Conservancy, and the landowner plan to address this need using the best available means at the time. This could include prescribed herbivory, herbicide use, prescribed fire, harrowing, and re-cutting using various tools or equipment. The scope of the maintenance need will be determined over time and appropriate measures will be developed. A detailed maintenance plan is not possible since the exact scope of this need will only develop over time as plants grow. In general, fuelbreaks in conifer forests require less maintenance and at greater intervals than fuelbreaks in oak woodland or shrub dominated areas. Fuel loads will be less with future activities so durations of maintenance activities will typically be less than those of the initial treatment; again however, durations will vary based on the number and type of resources or treatment methods used.

Note regarding future fuel break maintenance: Additional CEQA documentation will be required for any future treatment methods, including but not limited to the methods listed above (prescribed herbivory, herbicide use, prescribed fire, harrowing, and re-cutting using various tools or equipment) including any future treatment methods CAL FIRE may propose that were not discussed in this document, including maintenance options that currently may not be available to the Department or are not appropriate to use with the current stand conditions. Furthermore prior to any future maintenance activities that are discussed in this document (beyond the initial establishment of the fuel break), a CNDDB query and DFG consultation will reoccur to address potential changes to any sensitive species occurrence and status. ~~Furthermore additional CEQA documentation will~~ Additional CEQA documentation will also occur for any ~~maintenance~~ project activity conducted beyond a five year period from the filing date of the ~~NOI~~ NOD associated with this document.

Prior to constructing the fuel break, hand crews will be utilized to conduct preparation work. Large accumulations of downed woody debris too large for mechanized equipment to process will be arranged so that equipment can access needed areas of the fuel break without pushing this material into, and without causing damage to, residual vegetation that is intended to remain in the fuel break. Hand crews will also be used to remove French broom (*Genista monspessulana*) in the project area. Broom is present, particularly along roadsides and trails. Broom may be pulled from the ground if feasible, provided soil disturbance is minimized. When soil conditions are too dry for hand pulling, or soil disturbance is too great, broom will be cut just above ground level. All of the removed broom having seed heads will either be disposed of properly off site, or piled and burned to minimized seed dispersal. Additionally a substantial layer of mulch material generated from mastication will reduce the ability of broom and other invasive plants to germinate in many areas. Subsequent efforts to control the spread of broom will be made prior to fuel break maintenance activities as well.

Project design components have been incorporated to avoid and lessen anticipated potential impacts. A number of treatment options exist, some of which were considered, to reduce the threat of catastrophic wildfire in the area, including wider fuel breaks, non shaded fuel breaks such as bull dozer lines, large acreage prescribed (broadcast) burning and large acreage understory fuel reduction. By choosing the proposed type of fuel reduction work and locating the fuel break in strategic areas, project acreage is minimized relative to alternatives; as a result, overall potential impacts are reduced proportionally, yet project objectives are still met. ~~The implementation of most~~ Restricting project activities ~~in the summer and early fall~~ during the spring months reduces potential impacts to wildlife, while potential impacts to soils and water quality are reduced by operating heavy equipment when soil conditions are dry, limiting or excluding

heavy equipment use on steep slopes and near watercourses, or in some cases by excluding such areas from the project altogether.

Environmental Setting of the Project Region

The proposed project is located along the central California coast, an area characterized by cool dry summers and mild wet winters. Average yearly precipitation is near 18 inches. Topography is gentle along the immediate coast. Coastal bluffs and terraces line the shore, vegetated with grasses and coastal sage. Further inland, foothills of the Coast Range are a mix of grasses, coastal sage, chaparral communities, and oak woodlands. The proposed project is located within the only stand of Monterey pine in the region.

Major drainages are absent in the region. Small to mid-sized watercourses tributary to the Pacific Ocean drain the foothills and Coast Range generally from east to west. San Simeon and Santa Rosa Creeks are two examples of such; located to the north and south of the proposed project area respectively.

The proposed project area is within the Coastal Zone (CZ) established by the California Coastal Act of 1976. Regulations known as the Coastal Zone Land Use Ordinance (CZLUO) of the county of San Luis Obispo, Title 23 of the San Luis Obispo County Code have been established and adopted to ensure protection of important coastal resources. SLO County is a certified Local Coastal Program (LCP) with the responsibility of enforcing the provisions of the California Coastal Act.

The following information was produced by the USFS as part of the federal ecoregion mapping program. This program provides a good general description of the ecosystem geography of the area and is available from http://www.fs.fed.us/r5/projects/ecoregions/261ak.htm.

SUBSECTION 261AK

SOUTH COASTAL SANTA LUCIA RANGE

This subsection is the southern part of the Santa Lucia Range that is near the coast, between the Nacimiento fault and the Pacific Ocean. The climate is hot and subhumid; it is modified greatly by marine influence. MLRAs 14c, 14d, and 15d.

Lithology and Stratigraphy. This subsection consists of mostly folded, faulted, and generally metamorphosed sedimentary and volcanic rocks of the Franciscan Complex and much less extensive Cretaceous sediments of the great valley sequence. Some ultramafic rock occurs in this subsection. Miocene marine sediments dominate the southeast end of the subsection, from San Luis Obispo to the Santa Maria or Sisquoc River. Late Quaternary alluvium occurs in Los Osos Valley and some Quaternary marine sediments are along the coast.

Geomorphology. This is a subsection of northwest trending mountains and hills with rounded ridges, steep sides, and mostly narrow canyons. Los Osos Valley is a broad one with substantial areas of floodplain, alluvial fans, and terraces. Remnants of marine terraces are present on narrow benches along the coast. Sand dunes are common along the coast, both adjacent to the beach and on marine terraces. The subsection elevation range is from sea-level up to 3408 feet on Pine Mountain and 3744 feet on Alder Peak at the northwest edge of the subsection. Mass wasting and fluvial erosion are the main geomorphic processes. Sedimentation is an important process in Los Osos Valley. Wind is an important geomorphic agent along the coast.

Soils. The soils are mostly Lithic Xerorthents, Lithic and Pachic Ultic Haploxerolls, serpentinitic Lithic Argixerolls, and Chromic Pelloxererts. Most of these soils are present on Miocene rocks, also, plus shallow Pachic Haploxerolls and Calcic Pachic Haploxerolls at the relatively dry southeast end of the subsection. Pachic Haploxerolls and Chromic Pelloxererts are common on alluvium and marine terraces. Typic and Alfic Xeropsamments prevail in eolian sand behind beaches and on some marine terraces. The soils are well drained, and most are leached free of carbonates, except those on Miocene rocks at the southwest end of the subsection. The soil temperature regimes are thermic. Soil moisture regimes are xeric.

Vegetation. The predominant natural plant communities are Coast live oak series, Chamise series, Manzanita shrublands, and Needlegrass grasslands. Some edaphic associations are Chamise series on shallow soils, Leather oak series on shallow serpentinitic soils, Needlegrass grasslands on Vertisols, and Manzanita shrublands on silicic sandstones. California sagebrush - black sage series is common near the coast and Coast live oak series and Valley oak series are common in Los Osos Valley. The dunes support a succession of plant communities, from bare dune through herbaceous communities and Coyote brush series to California sagebrush - black sage series on stabilized dunes.

Characteristic series by lifeform include:
Dune vegetation: Dune lupine-goldenbrush series, Sand-verbena - beach bursage series, Yellow bush lupine series.
Saltmarsh vegetation: Cordgrass series, Ditchgrass series, Pickleweed series, Saltgrass series, Sedge series.
Grasslands: California annual grassland series, Purple needlegrass series.
Shrublands: Black sage series, Blue blossom series, California encelia series, California sagebrush series, California sagebrush - black sage series, Chamise series, Chamise - bigberry manzanita series, Chamise - black sage series, Chamise - wedgeleaf ceanothus series, Coyote brush series, Deer brush series, Eastwood manzanita series, Leather oak series, Scrub oak series, Wedgeleaf ceanothus series, Woollyleaf manzanita series.
Forests and woodlands: Bishop pine series, California bay series, California sycamore series, Coast live oak series, Knobcone pine series, Mixed oak series, Sargent cypress series, Tanoak series, Valley oak series, White alder series.

Climate. The mean annual precipitation is about 20 to 40 inches. It is practically all rain, except for some snow on at higher elevations. Mean annual temperature is about 50° to 60° F. The mean freeze-free period is about 250 to 300 days.

Surface Water. Runoff is rapid and all but the larger streams are generally dry during the summer. Streams on the seaward side of the mountains in the northwestern part of the subsection may be perennial. There are no lakes, other than temporary ponding behind dunes.

Description of the Local Environment

The proposed project is located within one of only five native Monterey pine forests in the world (Jones & Stokes 1994). The stand is unevenaged, consisting of a mix of Monterey pine (*Pinus radiata*) and coast live oak (*Quercus agrifolia*) with an understory of pine and oak regeneration, and various shrub, grass and forb species. Common understory shrub species include poison oak (*Toxicodendron diversilobum*), toyon (*Heteromeles arbutifolia*), coffeeberry (*Rhamnus cailfornica*), blackberry (*Rubus spp.*) and monkey flower (*Mimulus aurantiacus*). Several photos depict the conditions commonly present in the proposed project area (Figures 2-5).

Shallow swales and the upper reaches of several small watercourses are present or adjacent to the proposed project area (Figure 1b). Each of these ephemeral watercourses is seasonal and typically flow water for short durations following large precipitation events. In most cases, actual channels are subtle and difficult to detect, especially when grasses and herbaceous vegetation are mature. Figures 6 and 7 are photos showing a small watercourse representative of those in the project area.

Slopes are gentle and generally range between 0-30 percent; with exceptions in the south portions of the project areas where pitches of 30-60 percent occur. Much of the project area can be described as flat, and where slopes do occur aspects are variable. The elevation is just over 200 feet throughout most of the proposed project area.

Current Land Use and Previous Impacts

Current Uses

Approximately 48 of the proposed project's 50 acres are on the Covell Ranch. A small portion of the ranch, outside of the proposed project area, is used to raise livestock. The majority (over 1,400 acres) of the ranch is managed by TNC through a conservation easement. The easement requires the ranch be managed and maintained in a manner that is, to the maximum extent possible, consistent with the preservation and

protection of the conservation values of the property and specifically, with regard to the protection and enhancement of native Monterey pine.

Although the Covell Ranch is private property and permission to pass is required, an extensive number of well travelled hiking trails are found throughout the project area. This increased level of human activity is further indication of the significant fire risk in the area which is the main focus of this project.

Coalinga-Huron Recreation & Parks District owns the other parcel within the project area. Approximately 2 acres of Camp Yeager, a camp operated by the Kern Environmental Education Program (KEEP), lies within the proposed project area. The camp is used for educational purposes for children from Kern County.

Previous Impacts

Past impacts that have influenced vegetation in the Cambria area include logging, grazing, pathogens (both native and introduced), fires and fire suppression. However, evidence of fires for agricultural clearance is not apparent within the project area. It is known that most of the Covell Ranch had been used for raising cattle grazing from the mid 1800s into the late 1990s. Fire suppression has occurred in the area since settlement began around the mid 1800s. Evidence of a low intensity surface fire is apparent in the project area north of the Cambria Cemetery, with charring present at the base of pines and fence posts. The date of this fire is not known at this time, nor have any of its effects been in vegetation been analyzed. Based on observation only, little long term effects on vegetation densities or fuel loading occurred as a result of this fire, suggesting it was a low intensity surface fire.

Within the project area, selective logging, grazing, and fire suppression have had an influence on vegetation (Staub 2011). These factors have lead to a generally overstocked, unhealthy understory with high fuel loading. Likely, these factors, combined with insect and pathogen effects (including the recently introduced pitch canker), and the relatively short lived nature of Monterey pine have created significant mortality of overstory pine in some areas in recent years.

No significant fuel reduction activities are known to have previously taken place within the proposed project area. Several home owners have thinned vegetation, removed or piled dead trees, or limbed trees within the project area adjacent to their property. The effects of these small projects are mostly consistent with the expected outcome of the proposed project and in these areas less work and in some cases, no additional work will occur.

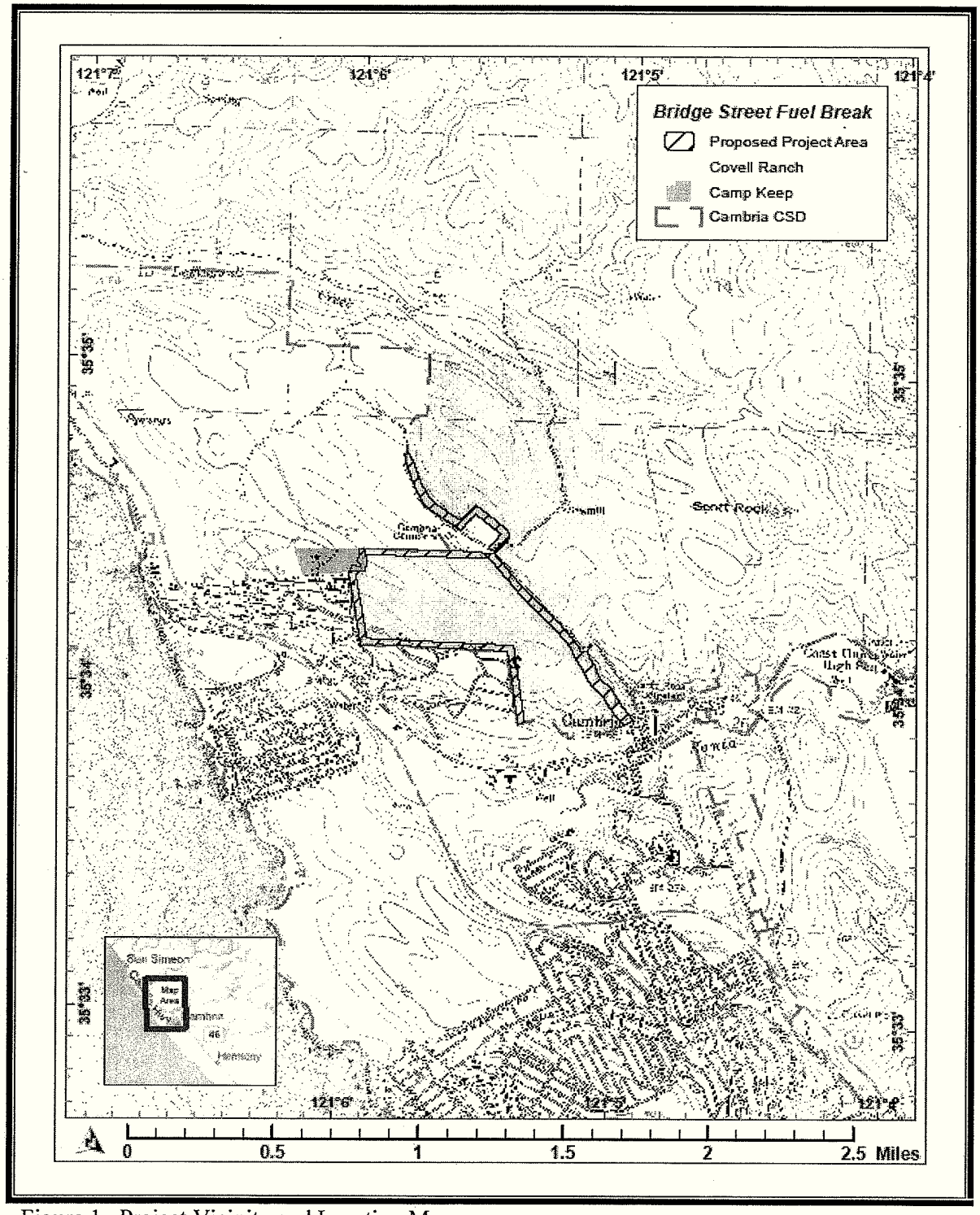

Figure 1. Project Vicinity and Location Map.

Figure 1a. Aerial photo illustrating the WUI and project location.

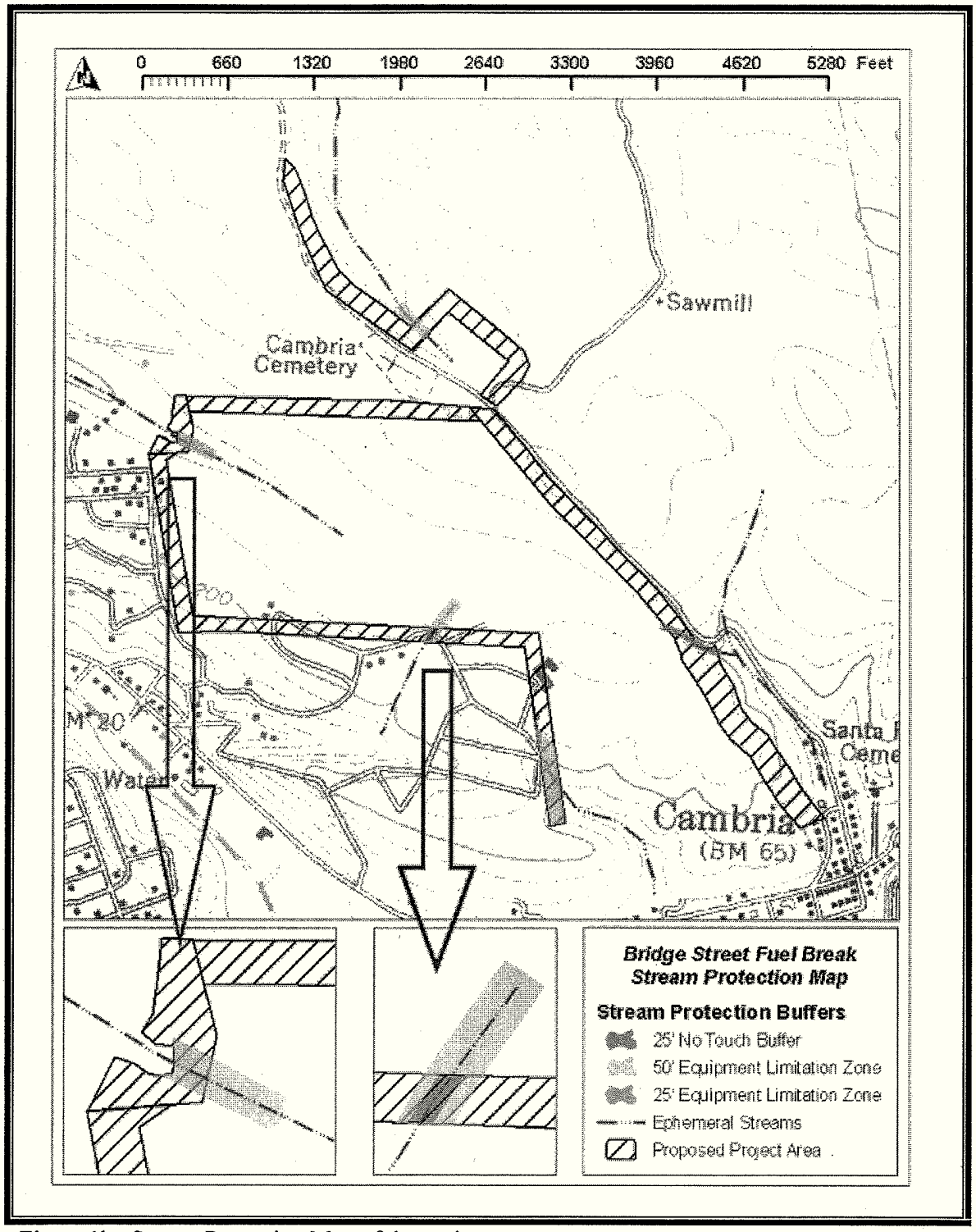

Figure 1b. Stream Protection Map of the project area.

Figure 2. Example of current stand conditions.

Figure 3. Example of current stand conditions.

Figure 4. Example of current stand conditions.

Figure 5. Example of current stand conditions.

Figure 6. Small stream typical of those found in the project area.

Figure 7. Small stream typical of those found in the project area.

Figure 8. Active headcut and a pool in one of the ephemeral streams in the project area.

Figure 9. Incised area downstream of the active headcut.

Figure 10. Seasonal pool below headcut in ephemeral stream.

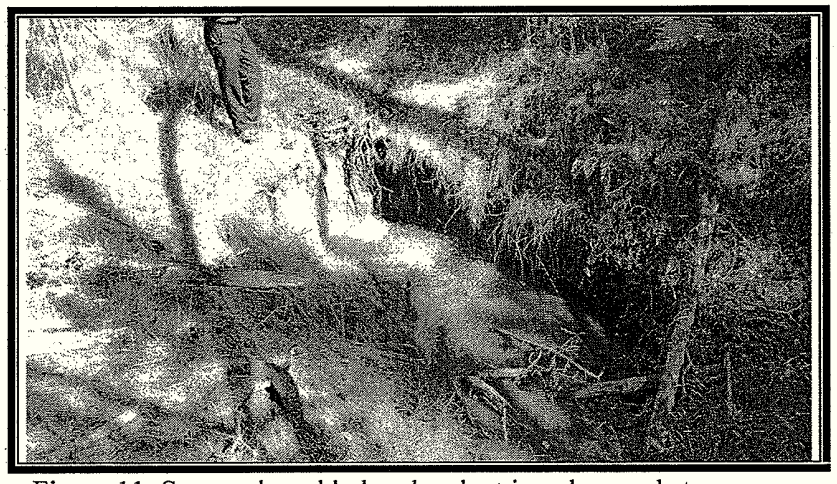

Figure 11. Seasonal pool below headcut in ephemeral stream.

Figure 12. Photo of the Cambria morning glory.

Conclusion of the Mitigated Negative Declaration

Environmental Permits

The proposed project may require the following environmental permits and CAL FIRE may be required to comply with the following State regulations:

Coastal Development or Minor Use Permit – issued by the SLO County Coastal Planning Department.
Road Closure/Restriction of Use Permit – issued by SLO County Department of Public Works
Smoke Management Plan – approved by SLO County Air Pollution Control District

Measures

The following five (5) mitigation measures will be implemented by CAL FIRE to avoid or minimize environmental impacts. Implementation of these mitigation measures will reduce the environmental impacts of the proposed project to a less than significant level.

Mitigation Measure #1: Measures to Protect the Monterey dusky-footed woodrat Houses.
Prior to fuel reduction activities woodrat houses, including the feature(s) the house is constructed around (shrub, tree, stump, log, etc), within the project area will be located and flagged for avoidance prior to project activities.

Mitigation Measure #2: Watercourse Protection Zone near the Cemetery Area
No equipment use will be allowed within 50 feet of the ephemeral stream and associated seasonal wet area near the cemetery, except to facilitate crossing in a designated area when conditions are dry (See Figure 1b).

Mitigation Measure #3: Watercourse Protection Zone near the Ballfield Area
No equipment use will be allowed within 50 feet of the ephemeral stream and associated seasonal wet area near the ballfield, except to facilitate crossing in a designated area when conditions are dry (See Figure 1b).

Mitigation Measure #4: Watercourse Protection Zone near the Headcut Area
No equipment use will be allowed within 50 feet of the ephemeral stream near the headcut delineated by blue flagging and no vegetation removal will be allowed within 25 feet of the banks above this stream (refer to Figure 1b).

Mitigation Measure #5: Procedures for Inadvertent Discovery of Human Remains
In accordance with the California Health and Safety Code, if human remains are discovered during ground-disturbing activities, CAL FIRE and/or the project contractor(s) shall immediately halt potentially damaging activities in the area of the burial and notify the SLO County Coroner and a qualified professional archaeologist to determine the nature and significance of the remains. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050[c]). Following the coroner's findings, the archaeologist and the Most Likely Descendent (designated by the Native American Heritage Commission) shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities of SLO County and CAL FIRE to act upon notification of a discovery of Native American human remains are identified in PRC § 5097.

Summary of Findings

This IS/MND has been prepared to assess the project's potential effects on the environment and an appraisal of the significance of those effects. Based on this IS/MND, it has been determined that the proposed project will not have any significant effects on the environment after implementation of mitigation measures. This conclusion is supported by the following findings:

1. The proposed project will have no effect related to Agricultural and Forest Resources, Mineral Resources, Population and Housing, Public Services, Recreation, and Utilities and Service Systems.

2. The proposed project will have a less than significant impact on Aesthetics, Air Quality, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use and Planning, Noise, and Transportation and Traffic.

3. Mitigation is required to reduce potentially significant impacts related to Biological Resources, Cultural Resources, Geology and Soils, and Hydrology, Water Quality, and Mandatory Findings of Significance.

The Initial Study/Environmental Checklist included in this document discusses the results of resource-specific environmental impact analyses which were conducted by the Department. This Initial Study revealed that potentially significant environmental effects could result from the proposed project; however, CAL FIRE revised its project plans and has developed mitigation measures which will eliminate impact or reduce environmental impacts to a less than significant level. CAL FIRE has found, in consideration of the entire record, that there is no substantial evidence that the proposed project as currently revised and mitigated would result in a significant effect upon the environment. The IS/MND is therefore the appropriate document for CEQA compliance.

INITIAL STUDY/ENVIRONMENTAL CHECKLIST

PROJECT INFORMATION	
1. Project Title:	Bridge Street Fuel Break Project
2. Lead Agency Name and Address:	California Department of Forestry and Fire Protection P.O. 944246 Sacramento, CA 94244-2460
3. Contact Person and Phone Number:	Dan Foster (916) 653-0839
4. Project Location:	Cambria, San Luis Obispo County
5. Project Sponsor's Name and Address:	CAL FIRE, 635 N. Santa Rosa, San Luis Obispo, CA 93405
6. General Plan Designation:	North Coast Planning Area
7. Zoning:	Rural, Recreation
8. Description of Project: See Pages 8-9 of this document	
9. Surrounding Land Uses and Setting:	Refer to pages 9-11 of this document
10: Other public agencies whose approval may be required:	See page 21 of this document

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below are the ones which would potentially be affected by this proposed project and were more rigorously analyzed than the factors which were not checked. The results of this analysis are presented in the detailed Environmental Checklist which follows.

☒	Aesthetics	☒	Agriculture and Forestry Resources	☒	Air Quality
☒	Biological Resources	☒	Cultural Resources	☒	Geology / Soils
☒	Greenhouse Gas Emissions	☒	Hazards & Hazardous Materials	☒	Hydrology / Water Quality
☒	Land Use / Planning	☐	Mineral Resources	☒	Noise
☐	Population / Housing	☐	Public Services	☐	Recreation
☐	Transportation / Traffic	☐	Utilities / Service Systems	☒	Mandatory Findings of Significance

DETERMINATION

On the basis of this initial evaluation:

I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared. ☐

I find that although the proposed project **COULD** have a significant effect on the environment, there **WILL NOT** be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared. ☒

I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☐

I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed. ☐

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required. ☐

Original signed by Daniel G. Foster — August 29, 2011

Dan Foster, Senior Environmental Planner
Environmental Protection Program, Room #1516-37
Department of Forestry and Fire Protection
P.O. Box 944246
Sacramento, CA 94244-2460
(916) 653-0839

Date Signed

ANALYSIS OF POTENTIAL ENVIRONMENTAL IMPACTS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. Aesthetics. Will the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which will adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Discussion

a) Will the project have a substantial adverse effect on a scenic vista?

No Impact: The project is located entirely on private property where public entry is not authorized. Portions of the project area are visible from public roadways and from adjacent private lands. Most of the project is visible only to neighboring residents; and the areas adjacent to Bridge Street are visible only to the relatively small number of people who travel the road to access the Cambria Cemetery. A small portion of the project area may also be visible from portions of Wall Street and the higher areas of Burton Drive. Where the project is visible, scenic vistas will not be adversely impacted due to the retention of overstory trees and scattered understory vegetation which will produce a managed forest condition. In most cases, views may improve as the visual results of this work are most commonly characterized as "looking park-like." The reduction in understory vegetation will allow for increased visibility into the forestland and will allow for the viewing of deer and other common wildlife.

The project area is not within view of the public travelling on Scenic Highway 1 or recreating along the coast near Cambria or at nearby San Simeon State Park. The project is visible from the air but the retention of the entire overstory will not noticeably alter this perspective.

b) Will the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact: No significant damage is anticipated to scenic resources. While all overstory trees will be retained, some minor damage to residual trees in the form of scuffs to trunks or broken limbs is expected following the reduction in understory vegetation. Damage to residual trees and vegetation will be minimized to the greatest extent feasible and will only be visible from neighboring residences or from Bridge Street and the Cambria Cemetery.

Highway 1 is classified by DOT as a State Scenic Highway. The coastline and nearby San Simeon State Park are heavily used by the recreating public. The project area is not within this viewshed due to the topography of the area. No rock outcroppings, historic buildings or other unique scenic resources are located within the project area.

c) Will the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less than Significant Impact: Residual overstory trees, saplings and pole-sized trees and scattered understory vegetation will retain the existing visual character and quality of the site. Minor damage to residual vegetation that may result is not expected to be widespread or apparent and will not result in significant degradation to the existing visual character or quality of the site.

The current condition over most of the project area is a dense, overstocked, unhealthy pine forest with visibility in most areas of less than 100 feet. Trees, brush and downed logs form continuous horizontal and vertical fuel ladders. Pines have extensive insect and disease problems caused by pitch canker, dwarf mistletoe, western gall rust and various bark beetles and other insects. These forest health issues have created extensive amounts of dead, dying and deformed trees with poorly formed, off-colored (yellowing) crowns. The project objective is to thin the forest in such a manner that all overstory trees as well as many of the healthy, well-formed trees and shrubs in the understory will be retained. Unhealthy, deformed understory trees and excess trees and vegetation are targeted for removal. The end result visually will be a thinned pine forest with well-spaced (approximately 12-15 feet between trees) stand made up of the largest, healthiest, best formed trees and shrubs available.

The greatest risk to the visual character of this Monterey pine forest is from a catastrophic fire that would sweep through the area and kill all or most of the pines in the forest. The stated objective of this project is to treat the fire hazard in a way that will greatly reduce the likelihood of such a stand replacing event.

d) Will the project create a new source of substantial light or glare which will adversely affect day or nighttime views in the area?

No Impact: The retention of overstory trees will preclude a substantial increase in light and glare. Views into the project area will be extended with the removal of understory vegetation; however, the orientation of the project area in relation to nearby residences will not make for increased visibility between homes. For example, a neighbor's nighttime flood light would not become visible as a result of this project. No negative impact to day or nighttime views in the area is anticipated.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. Agriculture and Forest Resources.				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact: Maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency indicates the lands within the project area are classified as "Other Land." No change in land use is proposed.

b) Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

No Impact: According to San Luis Obispo County records, none of the parcels within the proposed project area are zoned agricultural nor are under a Williamson Act contract. No change in land use is proposed. Project activities are consistent with the conservation easement for the Covell ranch held by The Nature Conservancy.

c) Would the project conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code §12220(g)), timberland (as defined by Public Resources Code §4526), or timberland zoned Timberland Production (as defined by Government Code §51104(g))

No Impact: The proposed project is located on lands defined as forest land and timberland, however, no conflict nor rezoning will occur. Project parcels are not currently zoned as Timberland Production Zone (TPZ). At all times during and after project implementation and pursuant to PRC 4526, land within the project area will exceed 10-percent native tree cover and allow for management of forest resources; and will remain capable of and available for growing a crop of commercial trees. The number and composition of native overstory tree species will remain constant with pre-project conditions.

The Cambria Monterey Pines meet the definition of Coastal Commission Special Treatment Areas so all of 14 CCR § 961 does apply to timber operations in the area. However, this proposed project does not constitute commercial timber operations per 14 CCR 4527 as no commercialization of any forest products is proposed.

14 CCR 895.1 defines the Costal Commission Special Treatment Area for the Southern Forest District as:

Coastal Commission Special Treatment Area: (For the Southern Forest District:) An identifiable and geographically bounded forest area designated within the Coastal Zone that constitutes a significant wildlife and/or plant habitat area, area of special scenic significance, and any land where timber operations could adversely affect

public recreation areas or the biological productivity of any wetland, estuary, or stream especially valuable because of its role in the coastal ecosystem. Special treatment areas were adopted by the Coastal Commission on July 5, 1977. Maps or designations of "Coastal Commission Special Treatment Areas" are on file in the Department offices within the Southern Forest District. (Ref. Sec. 31118.5, PRC).

Coastal Commission Special Treatment Areas have been designated according to the following criteria:
A. Scenic View Corridors
B. Sites of Significant Scenic Value
C. Wetlands, Lagoons, Streams, Estuaries, and Marine Environments
D. Significant Animal and Plant Habitat Areas
E. Recreation Areas

The Coastal Commission has also set forth in its designations special management objectives considered essential by the Coastal Commission for the protection of public values within the Coastal Zone.

The following is a listing of the Coastal Commission Special Treatment Areas. In parentheses following the name of each area are capital letters indicating the specific criteria as listed above. The letters referencing the criteria are listed in order of priority of the significance of the various criteria applicable to the area.

(a) Monterey County. Del Monte Forest (A,B,D,E), Pt. Lobos Uplands (A,B,D), Malpaso Creek (B), Doud Creek (B), False Sur (B), Little Sur (A,B,C,E), Molera Uplands (A,B,C,E), Big Sur Valley (A,B,C,E), Sycamore Canyon (A), Post Creek (A,B,C,E), Grimes Canyon (A), Toree Canyon (B), Partington Canyon (B,E) McWay Canyon (B), Anderson Canyon (A,B), Burns Creek (A), Hot Springs Canyon (B,E), Lucia Area Canyonmouths (B,E), Mill Creek (B,E).

(b) San Luis Obispo County. Cambria Monterey Pines (A,B).

(c) Publicly Owned Preserves and Recreation Areas. Coastal Commission Special Treatment Areas include those forested areas within the Coastal Zone within 200 ft. (60.96 m) of an publicly owned preserved and recreation areas including national, state, regional, county, and municipal parks.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact: At all times during and after project implementation and pursuant to PRC 4526, land within the project area will exceed 10-percent native tree cover and allow for management of forest resources. No conversion of forest land to non-forest use will occur as a result of this project. The number and composition of native overstory tree species will remain constant with pre-project conditions.

Stand replacing wildfire poses a significant threat to this Monterey pine forest. Were such a fire to occur, at a high enough intensity, much of the area would be vulnerable to natural conversion to brush or grass covered vegetation types. Project is planned and designed to reduce this important threat which will help maintain and possibly increase the area occupied by pine forest.

e) Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact: The proposed project is not located on land classified as Farmland. No changes to the existing environment as a result of this project will convert forest land to non-forest use. The number and composition of native overstory tree species will remain constant with pre-project conditions.

According to numerous sources including the CFMP, the Cambria Monterey pine forest is one of the most threatened forests in the world (Jones and Stokes, 2002). This threat is primarily due to changes in the environment, lack of forest management, the significant risk of wildfire, and insect and disease problems. The project is planned and designed to both reduce the fire hazard and improve forest health and resiliency in the areas treated. The fire threat will be reduced by the creation of a shaded fuel break. The forest health will be improved through the use of sound forestry techniques including thinning to reduce competition for water and nutrients, and the retention of the largest healthiest, best formed trees.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. Air Quality.				
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied on to make the following determinations. Will the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

Information about Air Quality

Discussion

Significant adverse impacts on many resources including air quality are common from catastrophic wildfire. These impacts occur annually in California. The risk of such an event in the Cambria area is considered high and has the potential to seriously degrade the air quality in large areas of the County as well as the Central Valley region as wildfire smoke is likely to travel inland. This project has been carefully planned to strategically reduce the threat of a large catastrophic wildfire and its associated impacts.

a) Will the project conflict with or obstruct implementation of the applicable air quality plan?

No Impact: Pursuant to the 2001 Clean Air Plan San Luis Obispo County, a consistency analysis is generally required for a Program Level Environmental Impact Report (EIR), and may be necessary for a Project Level EIR. Because the CEQA analysis for this project is not being conducted through a Program or Project Level EIR, a consistency analysis was not performed; however it is presumed the proposed project is consistent with the County's Clean Air Plan (CAP) based on the following rationale:

1) The project will not cause an increase in population.

2) Because population will not increase as a result of this project, no increase to the rate of vehicle trips and mileage will occur as a result of population growth itself. Only a temporary insignificant increase to the rate of vehicle trips and mileage will occur while personnel and equipment are working on the project.

3) Because population will not increase as a result of this project, it is not applicable to include land use and transportation control measures from the CAP.

b) Will the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact: According to the San Luis Obispo County Air Pollution Control District (APCD) CEQA Air Quality Handbook, construction emissions must be calculated for all development projects likely to exceed the construction emissions threshold. The proposed project is a forest management project and is only considered "development" as defined by the by the Coastal Commission. No construction or demolition of structures or paved areas will occur; no landscaping, clearing or conversion of any forested areas will take place, nor will any population use be tied to the project. This project is not anticipated to

exceed the APCD's construction emissions threshold. San Luis Obispo County APCD daily construction emissions thresholds of significance are presented in the table below.

TABLE 1 - Thresholds of Significance for Construction Operations

Pollutant	Threshold[1]		
	Daily	Quarterly Tier 1	Quarterly Tier 2
ROG + NOx (combined)	137 lbs	2.5 tons	6.3 tons
Diesel Particulate Matter (DPM)	7 lbs	0.13 tons	0.32 tons
Fugitive Particulate Matter (PM_{10}),		2.5 tons	
Greenhouse Gases (CO_2, CH_4)	*Not Yet Established*		

1. Daily and quarterly emission thresholds are based on the California Health & Safety Code and the CARB Carl Moyer Guidelines.

Vehicular Emissions

San Luis Obispo County APCD CEQA Air Quality Handbook sites examples of large scale projects that would exceed ozone precursor (ROG + NOx) emissions standards. Such projects have population uses tied to them where people would travel in vehicles to and from the projects, creating emissions. The proposed project, as stated above, will not increase population nor would it create an entity that people would use. The proposed project is located on private property and the amount of people using or visiting the area would not increase. The only increase in vehicular emissions would be insignificant and temporary, occurring once to establish the fuel break, and possibly reoccurring every several years to maintain the fuel break.

As an example of vehicular emissions, hand crew work will require one or two crew carrying vehicles, while mastication work will consist of the machinery itself and one or two vehicles for equipment operators and a one time drop-off and pick-up of equipment. Emissions of Diesel Particulate Matter (DPM) will be insignificant, consisting of the crew carrying vehicles, the transport for the masticator and the mastication equipment itself, anticipated to be a rubber track loader with a mulching head (size comparable to a Bobcat).

Durations of these emissions would vary based on activity, with estimates ranging from as little as 20 working days with a single masticator to as many as 100 working days or more for a hand crew (if hand crews alone established the initial fuel break). Due to the relatively short duration of these activities, the slight increase in vehicular emissions, including DPM will not significantly impact air quality.

Fugitive Particulate Matter (dust)

As indicated in the table above, daily thresholds have not been established for fugitive particulate matter (PM_{10}). Dust generated from project activities, whether daily or for the total project duration, will be minimized due to the minor amount of soil disturbance and exposed soil anticipated during and following project activities. Through project design and/or treatment type, each of the possible fuel treatment methods (mastication and/or hand crew - chip, lop and scatter, and pile and burn) have a low potential for significant soil disturbance, and hence the creation of significant dust.

Mastication activities have the potential to generate dust. To limit this potential, project design has incorporated techniques to minimize soil disturbance that include: the use of low ground pressure rubber tracked equipment and instructing equipment operators to: keep the shredding head of mastication equipment at or above the duff layer, minimize sharp turns, and operate up and down slopes rather than on contour. Furthermore, this equipment advances on a path of mulched material, minimizing the amount of direct soil contact and disturbance. Where small areas of soil disturbances occur, a fairly uniform layer of this mulched material covers the ground following treatment, making the likelihood of exposed soil capable of generating dust low. Refer to Section VI (b) of this document for a more complete discussion on the use of mastication equipment as it pertains to soil disturbance. No significant soil disturbance is anticipated with

the use of mastication equipment on this project for the reasons discussed above, and as a result, the generation of significant dust is not likely.

Hand crew work has low potential to generate dust. Small areas of disturbed soil may result from crews dragging cut material to a chipper, or where piles were burned. Such areas are not sufficient in size to act as a source of significant dust generation.

During prevailing winds under normal weather conditions, the project area is located downwind of most of the populated areas of Cambria and the minor amounts of dust that may be generated will normally be carried away from residential areas. The coastal climate, particularly in summer when relative humidities are typically high, reduces the amount of airborne dust. The project area is densely forested which significantly reduces the local winds and reduces the amount of dust in the air compared to open areas along the coastal plain. For these reasons, in addition to the minimal soil disturbance expected and the short duration of mastication activities, it is anticipated the generation of fugitive particulate matter with the proposed project will not be enough to significantly impact air quality.

Burning Emissions
Pile burning will have the potential to impact air quality standards. Impacts from this activity would be addressed prior to burning through the development of Smoke Management Plan(s) approved by the San Luis Obispo County Air Pollution Control District. Smoke Management Plans are developed for burn projects to reduce smoke impacts on air quality and sensitive receptors to a level that is less than significant.

c) Will the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact: As of September 2010, SLO County is classified by CARB as nonattainment for two of the ten criteria pollutants, ozone (O_2) and suspended particulate matter (PM_{10}). As stated above, activities associated with the project will generate short-term emissions of burning vegetation, fugitive dust and mobile source emissions associated with the on-site equipment operation and off-site material and employee transport. This will only occur during relatively short periods when fuel reduction activities and equipment are in use. It is anticipated burning will occur 1 or 2 days every several years, and will adhere to a SLO County APCD Smoke Management Plan. The types of equipment used and duration of their use during the other activities would vary; mastication equipment will likely be used for most of the initial establishment of the fuel break with a duration of 20 or more working days, while hand crews will likely be used every several years for most of the subsequent maintenance work with a duration of 50 or more crew days (100 or more days if crews alone established the initial fuel break). As a result of these relatively short term emissions, it is anticipated the proposed project will have a less than significant cumulative net increase of any criteria pollutant.

d) Will the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact: The prevailing northwest winds during normal summer and fall weather will carry dust and exhaust fumes away from most populated areas. A temporary increase in pollutants would occur as a result of the proposed project (refer to discussion in III.(b)and (c). Smoke has the potential to affect sensitive receptors for possibly one or two days every several years and as previously discussed, impacts would be addressed through an APCD approved Smoke Management Plan. A small amount of emissions from mastication equipment (diesel and dust) as well as exhaust from chainsaws and or chippers could reach sensitive receptors, since residences are adjacent to approximately half of the proposed project.

Such emissions are anticipated to be minor and would be short lived as the project progressed and equipment or crews moved from treated to untreated areas; typically production rates would be ½ - 3 acres per day, depending on fuel levels and activity method, making air pollution concentrations in any one area temporary. This combined with fairly persistent coastal breezes which will provide good dispersion, will make significant impacts from air pollution concentrations on sensitive receptors unlikely.

e) Will the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact: Temporary low concentrations of objectionable odors could be noticeable to any down wind residences that border the project area. It is anticipated the impact will be less than significant for the reasons stated in III.(d) above, regarding exposure of sensitive receptors to pollution.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. Biological Resources. Will the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Information about Biological Resources

Discussion

The intent of the proposed project is to reduce the risk of a catastrophic high intensity wildfire in the Cambria area. Such an event could have significant negative impacts to watersheds, wildlife, air quality, etc. Sensitive species and/or their habitats found in vicinity of the project area are discussed below, including the Monterey pine forest. Fuel loading in and around the proposed project area is high, creating conditions that put such species and/or their habitat at risk. Fuel reduction projects like this decrease the likelihood that wildfires may become catastrophic, which could potentially result in significant habitat degradation for these species.

In general, the size, location, timing and methods used will minimize the potential for significant adverse impacts to biological resources. The size of the proposed treatment area is the smallest that will yield an effective fuel break for needed fire defense. The location is adjacent to a community on mostly level topography. The project will be conducted ~~during summer or fall after~~ outside of the spring nesting/blooming season for the majority of species ~~when soils are dry~~ and when most trees and plants are ~~entering dormancy~~ dormant. Equipment operations will not occur on saturated soils. The methods proposed for the establishment of the fuel break, mainly mechanical mastication, accomplish the work in the shortest time possible with the least amount of overall site disturbance.

It is anticipated the proposed project will not eliminate the available habitat for any wildlife species. Unlike other development projects which in many cases convert natural areas to structures, paved areas and/or unnatural landscaping, the proposed project will keep the Monterey pine and coast live oak habitat in place. Alterations to the understory will occur by removing many of the shrubs, small trees and downed wood, but a certain amount of these understory components will remain. Such attributes are important for wildlife species and can provide for needs such as forage and cover. It is also not unreasonable to expect an increase in the quality of browse following project activities. Understory flora could become more diverse as disturbance dependant plants currently not common could increase in number. After being cut, understory shrub species with sprouting capability will likely produce tender, young growth often more palatable for browsing species. An overall increase in biodiversity is expected within treated areas as a result of disturbance.

As explained previously, the present condition of the undeveloped portion of the Cambria Monterey pine forest is densely overstocked, with extensive ~~disease~~ pathogens and insect problems. The main reason for this unnatural condition is the disruption of the natural fire regime and /or the absence of active forest management through techniques such as thinning and broadcast burning. Most forest types, including Monterey pines, are considered healthy if net wood growth is positive and if pest and pathogen levels are at or near endemic levels. These forests often become unhealthy when tree densities exceed the carrying capacity of the site and net wood growth is negative and they become vulnerable to significant increases in insect attacks, disease infections, and wildfire danger. This project proposes to thin the forest to improve forest health by removing excess small diameter trees and brush and focusing the carrying capacity of the site on a more natural number of trees. Thinning will be accomplished according to the guiding forestry principle of keeping the "best" trees, meaning the healthiest, largest, best formed trees that appear to be vigorous and have full crowns. In this case, thinning will accomplish both a reduction in the overall fire hazard and an improvement within the treated area of forest health and vigor.

However, the two limiting factors that may somewhat diminish the positive effects of this project upon the pine forest are (1) no trees 10" DBH and over will be removed; and (2) only approximately 50 acres (~~.02%~~2%) will be treated of the approximately 2,300 acres of undeveloped pine forest in the Cambria area. Ideally, future conditions will allow for the feasible removal of certain overstory trees and for the thinning of much large portions of the pine forest. Due to the small number of acres proposed for treatment, the overall effect of forest health of the entire Cambria pine forest is expected to be minimal. The most important benefit of this relatively small, strategically placed project is the overall reduction of the risk of catastrophic fire for the entire Cambria pine forest and the community of Cambria as well.

Pitch Canker

The proposed project is within the designated Pitch Canker Zone of Infestation established by the Board of Forestry. Guidelines that have been developed to control the spread of pitch canker have been incorporated into the project. Sanitation of host plant debris will occur to personnel and equipment prior to project commencement and upon leaving the project site. All green pine material will be left on site and treated in a

way that discourages colonization of bark beetles. The pruning of green limbs is not anticipated on pines, but sanitation of saws will occur if pruning is deemed necessary.

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service?

Less than Significant with Mitigation:

Special Status Plants: Survey Results

Pre-project consultation occurred with Brandon Sanderson, Environmental Scientist with the California Department of Fish & Game (DFG), requesting information on potential impacts or ways to avoid impacts to sensitive species. Mr. Sanderson suggested surveying for species (refer to correspondence in Appendix B). Additional pre-project biological consultation occurred with Bob Motroni, Senior Wildlife Biologist with CAL FIRE, and Michael Walgren, Environmental Scientist, California State Parks (CSP).

On 3/5/2011 and 6/3/2011, Mr. Walgren assisted CAL FIRE resource management staff with an informal botanical survey of the project area. To date, two special status plant species are known to occur within the project area: Cambria morning-glory (*Calystegia subacaulis ssp. episcopalis*) (Figure 12) and Monterey pine (*Pinus radiata*).

- Occurrences of Cambria morning–glory were observed in several locations in north and east portions of the project area. This plant is typically described as occurring in grasslands and open scrub or woodlands; however observations of the plant in the project area were in areas ranging from partly to mostly shaded conditions. Despite its Rare Plant Rank (RPR) status of 1B.2, botanical experts typically agree that the plant is not very rare in the area and is currently under review by CNPS for potential down-listing (Walgren, personal communication). Mr. Walgren indicated no significant adverse impacts to this species are anticipated as a result of the project; project activities will occur during the plant's dormant period and after it has set seed. Additionally, the more open understory conditions following the project are expected to create more favorable conditions for this plant.

- Monterey pine (RPR 1B.1) occurs in great abundance throughout the proposed project area. Due to the overstocked nature in much of the assessed area's understory, small diameter Monterey pine would be one of the target species for reduction under the proposed project. The overstocked understory has created competition resulting in a generally poor condition for much of the pine regeneration. In many areas this has or will lead to trees with poor form (unable to remain upright), increased susceptibility to insect and disease attacks and/or mortality. These conditions have been documented and are described in the Forest Management Plan for Covell Ranch (Staub 2011).

  Forests in this condition are particularly vulnerable to stand replacing wildfire. It is anticipated a reduction of small diameter Monterey pine in overstocked areas, as proposed with this project, will lead to improved tree vigor and forest health, and provide a better opportunity for fire officials to protect the Monterey pine habitat from catastrophic wildfire. Thinning small diameter pine in dense understory areas and removing small pines that act as ladder fuel are also described in Staub's plan. Furthermore, the increased sunlight reaching the forest floor and the minor soil disturbance that could result from the reduction in understory fuels and vegetation would improve germination rates for many species, including pine; therefore no significant adverse effect to Monterey pine will occur as a result of this project and no protection measures are proposed for this species.

Special Status Plants: CNDDB Results

Results from a five mile radius query of the California Natural Diversity Database (CNDDB) on 12/17/10 are presented in Appendix C. Also included in the appendix is a table summarizing the results, listing the general habitat requirements of the sensitive-status species from the query and whether habitat may be present within the project area for those species.

Based on the above mentioned CNDDB results and a subsequent habitat assessment, the following special status plants may have habitat requirements similar to those found in the proposed project area:

Table 2. Special status plants that may have habitat in the project area, but not located during surveys.

Common Name	Scientific Name	Status (RPR=Rare Plant Rank) (FE=Federally Endangered) (SE=State Endangered)
Arroyo de la Cruz manzanita	*Arctostaphylos cruzensis*	RPR 1B.2
Carmel Valley bush-mallow	*Malacothamnus palmeri var. involucratus*	RPR 1B.2
Chorro Creek bog thistle	*Cirsium fontinale var. obispoense*	FE SE RPR 1B.2
Cone Peak bedstraw	*Galium californicum ssp. luciense*	RPR 1B.3
Hardham's bedstraw	*Galium hardhamiae*	RPR 1B.3
Hoover's button-celery	*Eryngium aristulatum var. hooveri*	RPR 1B.1
Kellogg's horkelia	*Horkelia cuneata ssp. sericea*	RPR 1B.1
La Panza mariposa-lily	*Calochortus obispoensis*	RPR 1B.2
most beautiful jewel-flower	*Streptanthus albidus ssp. peramoenus*	RPR 1B.2
San Luis Obispo sedge	*Carex obispoensis*	RPR 1B.2
San Simeon baccharis	*Baccharis plummerae ssp. glabrata*	RPR 1B.2
Santa Lucia bush-mallow	*Malacothamnus palmeri var. palmeri*	RPR 1B.2

The State and Federally Endangered Chorro Creek bog thistle and the RPR 1B.1 Hoover's button-celery occur in wet areas. Several seasonal wet areas and/or ephemeral streams have been located in the project area, but more intensive surveys conducted in these areas indicate these plants do not occur in the project area, and therefore no impacts are anticipated to these species.

Although not observed during surveys or project planning activities, the remaining special status plants listed in Table 2 could occur in the project area based on their habitat requirements. With assistance from Michael Walgren, Environmental Scientist (CSP), an analysis of potential significant negative impacts to these species as a result of project activities was conducted. It is anticipated the proposed project will not decrease the habitat availability or significantly decrease the population of any rare plant species. Individual rare plant specimens could be impacted by being cut crushed or in some areas, burned during project activities; however overall populations of such plants are not expected to be significantly impacted. Despite a more open understory following project activities, the amount of available forested habitat will not change. Populations of special status plant species will still have the same opportunity for site occupancy after the treatment(s) occur. CAL FIRE is not aware of any evidence that disturbances created as a result of this project would pose a significant negative impact to any of these species.

Special Status Wildlife Species

Based on the above mentioned CNDDB results, the following special status wildlife species may utilize habitat similar to those found in the proposed project area. A table in Appendix C (*General Habitat Requirements - Bridge Street CNDDB Query*) lists the general habitat requirements of the sensitive-status

species from the query and whether habitat may be present within the project area for those species. Less than significant adverse effects are anticipated for these species as a result of this project:

- The Coast Range newt (*Taricha torosa torosa*) is a California Special Concern species. Terrestrial habitat during the non-breeding season (breeding season follows fall rains in aquatic habitat) includes upland areas of grass, shrub and forested vegetation types with newts taking cover beneath surface objects or underground (DFG California Wildlife Habitat Relationships System). The proposed project will likely occur during the summer or early fall months when adult newts are aestivating in subterranean refuges (DFG California Wildlife Habitat Relationships System). Any projects activities conducted outside this period will warrant consultation with a biologist or wildlife professional to determine an appropriate course of action. The project area following the proposed activities will still be forested, but with reduced live understory vegetation and large down woody debris. Scattered woody debris would remain for cover following project activities, especially pieces too large for equipment and hand crews to process. It is anticipated subterranean aestivation, in addition to the residual tree and woody debris cover following project activities, will result in a less than significant impact to the Coast Range newt.

- The fringed myotis (*Myotis thysanodes*) is a California Special Concern species. This bat is found in a wide range of habitats (but typically in woodlands) where it forages for food in open areas, early successional stage areas and over bodies of water. Roosting areas include caves, mines, buildings, and crevices (DFG California Wildlife Habitat Relationships System). The proposed project will not degrade any foraging areas that may be used by this species since vegetation, at least in the understory, would be more open and possibly more suited for foraging following project activities. Approximately ~~.02%~~2% of the overall undeveloped Cambria pine forest is proposed for treatment. All overstory trees and snags, many of which contain cavities, will be retained. There are no known caves, mines, buildings, or rock crevices within the proposed project area. No significant adverse impacts are expected as a result of project implementation.

- The monarch butterfly (*Danaus plexippus*) is designated as a NatureServe Conservation Status Subnational Rank 3, or vulnerable. This species is migratory and the western US population overwinters in clusters in trees along some portions of coastal central and southern California (http://www.fs.fed.us/monarchbutterfly/index.shtml). Proposed project activities will likely not take place during the winter period when monarchs may be present. Any projects activities conducted during this period will warrant consultation with a biologist or wildlife professional to determine an appropriate course of action. ~~and the~~ The larger trees more suited for monarch congregation will not be removed. Also, removing dense understory vegetation and fuels will increase the amount of sunlight reaching the forest floor. This will likely result in a greater diversity of understory plant species, such as those that tend to be less tolerant of fully shaded conditions, including ones monarchs may use as a winter nectar source. Approximately ~~.02%~~2% of the overall undeveloped Cambria pine forest is proposed for treatment. For these reasons, no significant adverse impacts are anticipated to monarch butterflies as a result of this project.

Monterey dusky-footed woodrat

As a result of pre-project consultation, DFG recommended addressing impacts to the Monterey dusky-footed woodrat (*Neotoma fuscipes luciana*), a California Special Concern species. Though this species is not included as an occurrence on the CNDDB query for the project, several woodrat houses were observed during project planning activities. The proposed project will reduce fuel loading; including sticks which woodrats may utilize for housing material, and shrubs potentially used for food, cover and nesting material.

Understory vegetative cover will be reduced, but not eliminated; and the availability of sticks for housing material will remain in the form of remnant branches and partially shredded woody material. Approximately ~~.02%~~2% of the overall undeveloped Cambria pine forest is proposed for treatment. Because complete removal of housing materials would not occur over most of the proposed project, these actions are not anticipated to adversely impact the species. To help avoid a potentially more significant impact to the species with regard to the destruction of housing, existing woodrat houses will be retained in the project area.

Measure #1: Measures to Protect the Monterey dusky-footed woodrat Houses.
Prior to fuel reduction activities woodrat houses, including the feature(s) the house is constructed around (shrub, tree, stump, log, etc), within the project area will be located and flagged for avoidance prior to project activities.

Western pond turtle
No aquatic habitat (perennial water) exists in the project area, but based on DFG pre-project consultation with Mr. Sanderson on 1/31/2011, recommendations were made to address potential project impacts to the western pond turtle (*Actinemys marmorata*), a California Special Concern species. Because the nearest aquatic habitat is more than 600' from the closest point of the project and these species are associated with permanent or nearly permanent water, it is anticipated the turtle would only utilize the project area during what is described as occasional long distance movements (DFG California Wildlife Habitat Relationships System).

If the proposed project is utilized by the western pond turtle for these short periods, it will retain suitable habitat characteristics following project activities such as overstory trees and scattered understory vegetation as well as large woody debris. The proposed project will not present a barrier to the movement of turtles; and furthermore, most activities (except possibly pile burning) would likely be conducted during the summer and fall, prior to seasonal rains while conditions are dry and the upland areas less likely to be hospitable for the turtle. Any projects activities conducted outside this period will warrant consultation with a biologist or wildlife professional to determine an appropriate course of action. Approximately ~~.02%~~2% of the overall undeveloped Cambria pine forest is proposed for treatment. Because of these reasons, no significant adverse impacts are anticipated to the Western pond turtle as a result of the proposed project.

California red-legged frog (CRLF)
The federally threatened California red-legged frog (*Rana draytonii*) is found in riparian areas of Santa Rosa and Leffingwell Creeks, to the south and north of the proposed project area respectively; and DFG recommended addressing impacts to this species during pre-project consultation. The US Fish and Wildlife Service (USFWS) has designated certain areas of the state as critical habitat for the CRLF, which includes the proposed project area. If a species is listed or critical habitat is designated, Section 7(a)(2) of the Endangered Species Act requires Federal agencies to ensure that activities they authorize, fund, or carry out are not likely to jeopardize the continued existence of the species or to destroy or adversely modify its critical habitat. If a Federal action may affect a listed species or its critical habitat, the responsible Federal agency (action agency) must enter into consultation with USFWS. The proposed project is a State project funded primarily through a US Forest Service grant to reduce hazardous fuels and as a result, CAL FIRE requested to initiate consultation with USFWS (refer to correspondence in Appendix B). However to date, no reply has been received from the USFWS regarding consultation or technical assistance for this project.

This project is not being conducted under a Timber Harvest Plan (THP), however its design is consistent with the *California Red-legged Frog Take Avoidance Scenarios (March 25, 2008)* developed by USFWS for

use in THPs. Specifically, Take Avoidance Scenario II of this document would be applicable to the project area:

II. Scenario II: Suitable habitat within 2 miles of harvest units or in units, but no harvest activities within 300 feet of suitable habitat

Suitable habitat in this context is defined as:

C. Suitable California Red-legged Frog (CRF) Habitat:

1) Permanent water (Class I or II watercourses or ponds/wetlands) that is more than 12 inches deep;
OR
2) Permanent water (Class I or II watercourses or ponds/wetlands) that is less than 12 inches deep if suitable shelter/cover habitat is available, e.g. over-hanging vegetation, emergent vegetation, over-hung banks, root wads, rock piles, log debris, etc.;
OR
3) Permanent wet ground (e.g. seep) with vegetative or other cover.
OR
4) Intermittent water that persists through late July

Scenario II would be applicable to this project if it were conducted under a THP since no suitable habitat is within 300' of the project area. This document references the USFWS developed take avoidance scenarios in absence of USFWS consultation. It is reasoned that no take of this species will occur as a result of this project. The take avoidance scenario developed by the USFWS for timber harvest activities supports this line reasoning.

Ephemeral streams and areas with seasonally wet soils exist in the project area. One such stream, for its small size, has a considerable pool located downstream of a headcut (Figure 10 and 11). It is reasoned that these features, including the sizable pool, are not suitable habitat for breeding due to the short duration that water is present. The persistence of water in this pool and each of the streams in the project area is dependent on seasonal precipitation and does not significantly extend beyond the rainy season. No evidence of adult or juvenile frogs was observed during any of the site visits to the pool or any other portion of the project area. Suitable breeding habitat must have water that persists through July (see critical habitat reference below and avoidance take scenario definition above). As a result, breeding habitat is not likely to occur within the project area; however based on USFWS criteria used to determine critical habitat, the project area would be considered terrestrial upland and/or dispersal habitat for the species. According to habitat descriptions in USFWS's *Endangered and Threatened Wildlife and Plants; Revised Designation of Critical Habitat for the California Red-Legged Frog* (available at: http://www.gpo.gov/fdsys/pkg/FR-2010-03-17/pdf/2010-4656.pdf#page=1), the species is known to inhabit upland areas for 50 days at a distance of 302 ft from aquatic habitat. If the species does utilize the proposed project area as upland terrestrial habitat, it seems reasonable to assume it would be infrequent and for short durations during moist conditions primarily because of the distance to the nearest permanent water (more than 600 ft) and its separation from it by the historic downtown area of Cambria. It would seem more likely the proposed project would be utilized for short durations when the species is dispersing, during which time they are known to travel 2 miles or more from aquatic habitat in search of other suitable habitats (referenced from the above mentioned USFWS document).

The proposed project will retain suitable habitat characteristics following project activities such as overstory trees and scattered understory vegetation as well as large woody debris. The proposed project will not present a barrier to dispersing frogs; and furthermore, most activities (except possibly pile burning) will likely be conducted during the summer and fall, prior to seasonal rains while conditions are dry and the upland areas less likely to be hospitable for the frog. Any projects activities conducted outside this period will warrant consultation with a biologist or wildlife professional to determine an appropriate course of action. Because of these reasons, no significant adverse impacts are anticipated to the CRLF or its designated critical habitat as a result of the proposed project.

Note: Prior to any future maintenance activities (beyond the initial establishment of the fuel break), a CNDDB query and DFG consultation will reoccur to address potential changes to any sensitive species occurrence and status. Furthermore additional CEQA documentation will occur for any maintenance activity conducted beyond a five year period from the filing date of the ~~NOI~~ NOD associated with this document.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service?

Less Than Significant with Mitigation: The proposed project would not adversely affect any riparian habitat. Typical riparian habitat does not occur within the project area, but several ephemeral streams and/or areas with seasonally wet soil do occur. These mesic areas, moister than surrounding sites, have a mix of riparian type plant species such as sedges growing alongside upland plant species. The wettest of these areas near the ballfield on the KEEP parcel could be considered riparian-like or possibly a seasonal wet meadow. To avoid potentially impacting this area and two other areas with ephemeral streams/seasonal wet areas the following mitigations have been developed.

Mitigation Measure #2: Watercourse Protection Zone near the Cemetery Area
No equipment use will be allowed within 50 feet of the ephemeral stream and associated seasonal wet area near the cemetery, except to facilitate crossing in a designated area when conditions are dry (See Figure 1b).

Mitigation Measure #3: Watercourse Protection Zones near Ballfield Area
No equipment use will be allowed within 50 feet of the ephemeral stream and associated seasonal wet area near the ballfield, except to facilitate crossing in a designated area when conditions are dry (See Figure 1b).

Mitigation Measure #4: Watercourse Protection Zones near the Headcut Area
No equipment use will be allowed within 50 feet of the ephemeral stream near the headcut delineated by blue flagging and no vegetation removal will be allowed within 25 feet of the banks above this stream (See Figure 1b).

The proposed project is within the Coastal Zone and is a part of the San Luis Obispo County Combing Designation Sensitive Resource Area – Terrestrial Habitat (SRA - TH), specifically the Monterey Pine Forest Environmentally Sensitive Habitat Area (ESHA) of the North Coast Planning Area. The County defines ESHA as areas where plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could easily be disturbed or degraded by human activities and development. They include wetlands, coastal streams and riparian vegetation, terrestrial and marine habitats and are mapped as Land Use Element combining designations.

The proposed project is also within an area the Department of Fish and Game identifies as the Monterey Pine Forest Special Status Natural Community, Rank G1 and S1 (Critically Imperiled Global and Subnational Conservation Status Ranks). The table below defines the Conservation Status Ranks:

G1	**Critically Imperiled**—At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors.
N1 **S1**	**Critically Imperiled**—Critically imperiled in the jurisdiction because of extreme rarity or because of some factor(s) such as very steep declines making it especially vulnerable to extirpation from the jurisdiction.

The proposed project will have a less than significant adverse effect on the sensitive habitat and natural community identified by the County Combing Designations and State Special Status Natural Community designation for the following reasons:

- The amount of land occupied by Monterey pine and associated species will not decrease as a result of this project. No areas would be converted to a non-forest state nor will any loss of pine habitat occur, as overstory trees (greater than 10" dbh) will not be removed and understory trees (less than 10" dbh) and shrubs will be retained in areas lacking overstory trees.
- The proposed project will not degrade the productivity of the land or prohibit the ability of Monterey pine and associated species to regenerate. Increased sunlight reaching the forest floor and the minor soil disturbance that could result from the reduction in understory fuels and vegetation could improve germination rates for many species, including pine.
- The reduction in understory vegetation will create conditions resulting in less competition among residual vegetation for improved health and vigor. Overall forest health in the treated areas is expected to improve as a result of this project.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less Than Significant with Mitigation: U.S. Army Corps of Engineers (Corps) and the U.S. Environmental Protection Agency (EPA) define wetlands as areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

Ephemeral streams and/or areas with seasonally wet soils do occur within the project area. These areas would be better defined as having mesic habitat, rather than riparian or wetlands as defined by Section 404 of the Clean Water Act, since saturated soil conditions occur for only a period of time following significant precipitation during the wetter months. However, two such ephemeral streams have associated areas that could be described as a seasonal wet area and/or a seasonal wet meadow; one near the cemetery and another near the ballfield on the KEEP parcel. No hydrological interruption or filling of these areas will occur. The following mitigations have been developed to prevent potential impacts from equipment:

Mitigation Measure #2: Watercourse Protection Zone near the Cemetery Area
No equipment use will be allowed within 50 feet of the ephemeral stream and associated seasonal wet area near the cemetery, except to facilitate crossing in a designated area when conditions are dry (See Figure 1b).

Mitigation Measure #3: Watercourse Protection Zones near Ballfield Area
No equipment use will be allowed within 50 feet of the ephemeral stream and associated seasonal wet area near the ballfield, except to facilitate crossing in a designated area when conditions are dry (See Figure 1b).

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact: Fish habitat does not exist within the project area. The nearest fish habitat is south of Main Street in Santa Rosa Creek; more than 600 feet from the closest point of the proposed project area. No impacts would occur as a result of this project to the movement of native resident or migratory fish.

CNDDB query results indicate occurrences of monarch butterflies (*Danaus plexippus*) within the vicinity of the project area. Monarchs are migratory, and western US populations are known to overwinter in trees in certain areas of coastal central and southern California. During cooler periods they typically congregate in tree canopies, and during warmer periods may forage for nectar (http://www.fs.fed.us/monarchbutterfly/index.shtml). The proposed project will likely not take place during the winter period when monarchs may be present. Any projects activities conducted during this period will warrant consultation with a biologist or wildlife professional to determine an appropriate course of action. The ~~and the~~ larger trees more suited for monarch use will not be removed. Also, removal of dense understory vegetation and fuels could increase understory plant diversity in the treated areas. Typically, an increase in sunlight reaching the forest floor will create conditions more suitable for the recruitment of understory plant species that are not tolerant of fully shaded conditions, which may include some that monarchs could use as an overwinter nectar source. For these reasons, no significant adverse impacts are anticipated for monarch butterflies as a result of this project.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact: A local vegetation/tree preservation policy would apply to the proposed project by means of an approved Development Plan from San Luis Obispo County. A Development Plan in the Monterey Pine Forest SRA of the North Coast Planning Area of the Coastal Zone in San Luis Obispo County (of which this project is a part of) requires native vegetation to be retained as much as possible. Furthermore, it requires the replanting of native stock when Monterey pines, and in some areas oaks, larger than 6 inches dbh are removed. This project will be carried out in accordance with a coastal development permit or minor use permit issued by the SLO County Coastal Planning office.

This project was designed to remove the least amount of vegetation feasible to accomplish the objectives of fuel reduction. Pines 10 inches dbh and greater will not be removed, unless posing a safety hazard. Only understory material less than 10 inches dbh will be treated, with small trees and shrubs retained to achieve spacing that is not conducive to the spread of high intensity fire and spacing that improves forest health and vigor.

As stated above, the replacement of trees larger than 6 inches dbh is required for development projects in this planning area of the Coastal Zone. Projects that remove major vegetation, such as this, are defined as "development" by the County's Coastal Land Use Ordinance. This project is also considered a forest management project intended to reduce fire hazard. The removal and planting of trees is often necessary with forest management activities. In this case the need for small diameter tree removal has been clearly identified by Registered Professional Foresters (RPFs), including Steven Staub and RPFs from CAL FIRE,

while the need to plant more trees has not. Pockets of overstory pine mortality have occurred in portions of the project; such areas are naturally regenerating, and neither these areas nor any other locations have been identified as areas in need of planting. The Forest Management Plan for Covell Ranch indicates both coast live oak and Monterey pine natural regeneration is active and maintaining forest cover (Staub 2011).

Most portions of the undeveloped Cambria pine forest are significantly overstocked with excess trees of at least several hundred to, in some cases, one thousand or more trees per acre. The intent of the proposed project is to lessen the amount of fuel, including trees in the overstocked stand. Overstocked stands are more easily stressed as trees and other vegetation species compete for limited resources such as soil nutrients, light and water. The stressed conditions cause the vegetation to be more susceptible to insect and disease outbreaks and the buildup of fuel increase vulnerability to wildfire. Replacing trees is contrary to the project's intent because it would add to the fuel loading and increase competition among residual vegetation, thereby causing a decrease in forest health and an increase in fire hazard. Because of these reasons, a less than significant impact would occur as it relates to a conflict with the County Planning requirements of vegetation retention and tree preservation.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact: The proposed project is not known to be within or near the boundaries of a Habitat Conservation Plan, Natural Community Conservation Plan, or other habitat conservation plan. The Covell Ranch is under a conservation easement held by TNC that excludes development. The proposed project is consistent with the management policies outlined in the conservation easement. Therefore, it is anticipated the project would not conflict with implementation of this or any such plan.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. Cultural Resources. Will the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Information about Cultural Resources

Discussion

An archaeological survey of the project area was conducted by CAL FIRE Associate State Archaeologist Stephanie Velasquez with assistance from Forester Andrew Hubbs. No sites were found during the survey. A pre-survey records search conducted by the Central Coast Information Center indicated the presence of two historical sites adjacent to the project area. Per CAL FIRE's Archaeological Program policy, Native American contact was made notifying cultural groups of the project and requesting information about known sites. Survey results, records search results, Native American contact results and any needed protection measures are discussed apart from this document, in a confidential archaeological survey report.

Note: The records search conducted for this project is valid for a period of five years. Any future project maintenance activities after five years will require another records search. Native American contact would likely be made at that time as well.

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

No Impact: ***The known historical sites are outside of the project area and will not be impacted by project activities.b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?***

No Impact: No other archaeological resources are known to be within the project area and as a result no changes are anticipated in the significance of any such resources.

c) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact: There are neither known unique paleontological resources nor geologic features within or adjacent to the assessment area and as a result, no impacts are anticipated to occur to such resources as a result of project activities.

d) Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant with Mitigation: Human remains are not known to be within the proposed project area. The project boundary runs adjacent to the Cambria Cemetery. No disturbance to any known human remains will occur as a result of the proposed project and the minimal depth of soil disturbance anticipated with the project will make disturbance of unknown human remains unlikely. No human remains or associated grave goods were encountered during the archaeological surveys completed during this Initial Study and none are expected to be encountered during project activities. Nonetheless, because of the project's location near a year-round stream, the possibility exists for human remains to occur within the project area. If human remains were unearthed and not protected in accordance with procedures in State Law (see below), this could be a potentially significant impact. To prevent this impact, the following mitigation measure shall be implemented.

Mitigation Measure #5: Procedures for Inadvertent Discovery of Human Remains
In accordance with the California Health and Safety Code, if human remains are discovered during ground-disturbing activities, CAL FIRE and/or the project contractor(s) shall immediately halt potentially damaging activities in the area of the burial and notify the SLO County Coroner and a qualified professional archaeologist to determine the nature and significance of the remains. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050[c]). Following the coroner's findings, the archaeologist and the Most Likely Descendent (designated by the Native American Heritage Commission) shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities of SLO County and CAL FIRE to act upon notification of a discovery of Native American human remains are identified in PRC § 5097.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact

				Incorporated
VI. Geology and Soils. Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that will become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

Discussion

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)

No Impact: The proposed project will not increase the risk to people or structures as a result of a fault rupture. Human use will not increase and no structures will be constructed within the assessment area as a result of this project.

ii) Strong seismic ground shaking?

No Impact: The proposed project will not increase the risk to people or structures as a result of strong seismic ground shaking. Human use will not increase and no structures will be constructed within the assessment area as a result of this project.

iii) Seismic-related ground failure, including liquefaction?

No Impact: The proposed project will not increase the risk to people or structures as a result of seismic-related ground failures. Human use will not increase and no structures will be constructed within the assessment area as a result of this project.

iv) Landslides?

No Impact: No evidence of unstable areas, including previous slope failures, has been observed in the project area. Much of the project area has gentle slopes and it is anticipated the retention of overstory trees, shredded (masticated) material and residual understory vegetation would maintain soil and slope stability.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant with Mitigation:
A soils report for the proposed project was generated and is included in Appendix E (*Custom Soil Resource Report for San Luis Obispo County, California, Coastal Part, Bridge Street Fuel Break*). The report describes soil types and properties; and analyzes erosion potential based on factor K ratings (indicates the susceptibility of a soil to sheet and rill erosion by water), slope and surface soil exposure. More than 98% of the project area is classified in the 200, 201 and 202 series known as San Simeon sandy loam. The anticipated effects of project activities on this soil type are discussed below.

Reduced Surface Cover
The sandy loam soils present throughout most of the project area are considered to be moderately well drained and have a low to moderate erosion potential, based on factor K ratings (pg 24 of Appendix E). However, this erosion potential is largely influenced by surface soil cover and slope. The attached soils report also displays the erosion hazard (pg. 18 of Appendix E) assuming a soil surface exposure of 50-75% (fixed amount, can not be adjusted in the report). It is anticipated surface soil exposure over most of the area following project activities would be far less than 50-75%, so even though the erosion hazard analysis is not representative of post project conditions, it exemplifies the effect of reduced soil surface cover. The areas with the highest hazard ratings coincide with the steepest slopes.

Most of the fuel reduction activities associated with the proposed project such as shredding (mastication), chipping or the lopping and scattering of treated material, would reduce vegetative cover, but leave a substantial layer of mulch material on or near the soil surface. This material would act as both as an energy dissipater to limit soil detachment from rain drop impact and limit sheet erosion. Erosion potential is further reduced by residual vegetation providing additional surface cover following project activities in the form of overstory trees, scattered shrubs and small trees, and herbaceous vegetation. Despite some areas with steep pitches, it is not likely significant surface soil erosion would occur as a result of project activities, based on factor K ratings and anticipated post project surface soil cover.

Heavy Equipment Use
Soil disturbance, including soil compaction can increase erosion potential and a minor amount of disturbance will occur as a result of heavy equipment use. The level of disturbance is largely dependant on the type of equipment used, where it is used and how moist the soil is. Unlike rubber tired equipment, tracked equipment is generally considered to exert relatively light ground pressures, leading to minimal soil compaction and rutting when conditions are dry. PSI for tracked equipment varies, but a common range for mastication equipment is 2-10 psi (Vitorelo et al. 2009). More so than compaction, mastication equipment has the potential to cause soil disturbances from actions that include the shredding action of the masticating head making contact with the ground, tracked equipment making sharp turns or equipment operating along the contour of steep slopes. Project design incorporates methods intended to reduce the potential of soil erosion caused by mastication equipment, including:

- Heavy equipment will be rubber or steel tracked.
- Heavy equipment use will not occur on ~~wet~~ saturated soils.
- Heavy equipment use will not occur on slopes exceeding 50%.*
- Heavy equipment will operate perpendicular to (up and down) the slope where feasible.

- Heavy equipment operators would be instructed to keep the cutting and mulching head above the mineral soil layer.

*Figure 1b displays several equipment limitation zones (ELZs). The ELZ indicated in the southwest portion of the project area has slopes that exceed 50% in some areas and as a result no heavy equipment use will occur in this area.

The erosion potential from mastication activities will further be minimized with the proposed project for the following reasons:

- Mastication equipment generally operates over a mat of treated material. Shredded material is deposited ahead of the advancing equipment which helps to limit soil disturbance and compaction.
- Slopes in the project area are gentle (less than 30% in most areas). Water velocity of overland flow in areas of disturbed soils is slowed on gentle slopes, resulting in less rill and gully formation. Also, gentle slopes increase time for greater water infiltration to occur, resulting in less run off and erosion potential.
- Soils in the project area are classified in the low to moderate range (factor K) for erosion potential.
- The complete removal of surface cover would not occur with the proposed project (refer to surface cover discussion above).
- The root system of treated material will remain intact, aiding in soil stability.

The following links are examples of articles that discuss erosion potential and soil compaction related to mastication equipment:
http://www.forestry.vt.edu/cofe/documents/COFE_2009_Vitorelo_et_al.pdf
http://ucce.ucdavis.edu/files/repositoryfiles/ca6002p77-69243.pdf
http://nature.berkeley.edu/stephens-lab/Publications/Moghaddas%20Stephens%20Soil%20Mech%20FFS%20FEM%204-08.pdf

Anticipated soil erosion potential from project activities will be low for the above stated reasons including: soil properties, residual materials covering the soil surface, residual vegetation, intact root systems of treated material, limited soil disturbance, minimal soil compaction, heavy equipment restrictions, and fairly gentle slopes over most of the project area. To prevent potential impacts from soil movement, the following mitigation measures shall be implemented.

Mitigation Measure #2: Watercourse Protection Zone near the Cemetery Area
No equipment use will be allowed within 50 feet of the ephemeral stream and associated seasonal wet area near the cemetery, except to facilitate crossing in a designated area when conditions are dry (See Figure 1b).

Mitigation Measure #3: Watercourse Protection Zones near the Ballfield Area
No equipment use will be allowed within 50 feet of the ephemeral stream and associated seasonal wet area near the ballfield, except to facilitate crossing in a designated area when conditions are dry (See Figure 1b).

Mitigation Measure #4: Watercourse Protection Zones near the Headcut Area
No equipment use will be allowed within 50 feet of the ephemeral stream near the headcut area delineated by blue flagging and no vegetation removal will be allowed within 25 feet of the banks above this stream. (See Figure 1b)

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

No Impact: No evidence of unstable areas, including previous slope failures, has been observed in the project area. Much of the project area has gentle slopes and it is anticipated the retention of overstory trees, residual understory vegetation and intact root systems of treated material will maintain soil and slope stability. This project is designed to reduce the risk of catastrophic wildfire which often results in slope failures, mass wasting and other significant geological impacts.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial risks to life or property?

No Impact: No building construction or other activities will occur as a result of this project that would be affected by expansive soil.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact: No septic tanks or alternative waste water disposal systems would be used as a result of this project.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. Greenhouse Gas Emissions. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Information about Greenhouse Gas Emissions (GHG)

Greenhouse gases defined by State law include: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and three groups of synthetic, fluorinated gases including hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexaflouride (SF_6). The US EPA also recognizes these same six GHGs that were also the subject of the Kyoto Protocol. Additional GHGs recognized scientifically are water vapor (H_2O) and ozone (O_3). GHGs in order of abundance are water vapor, carbon dioxide, methane, and ozone. Water vapor (H_2O) is the dominant GHG comprising approximately 95% of the earth's atmosphere and two-thirds of the "greenhouse effect". H_2O, CO_2, CH_4, and O_3 occur both from natural and manmade sources, whereas the fluorinated gases are primarily produced by industrial processes.

The "greenhouse effect" refers to the atmospheric process by which heat radiated from the earth is absorbed by GHG and trapped or re-radiated in all directions. The atmosphere (including the greenhouse effect) moderates and protects the earth by warming and cooling the surface to create survivable conditions. "Global warming" is a recent phenomenon where some evidence indicates that the earth's average temperature is increasing at a rapid rate since the industrial revolution due to anthropogenic GHG emissions. There is considerable study and debate around the world to determine how human activities are influencing climate change and how to address the issue.

Many governmental bodies around the world, including California and the US EPA, have adopted polices that are intended to reduce human-caused GHG emissions. Current policy in California (AB32) is focused

on reducing man-made GHGs, primarily CO_2. The SLO County APCD has not yet established significance thresholds for GHG emissions from project operations. Nonetheless, GHGs (CO_2 and CH_4) from all projects subject to CEQA must still be quantified and mitigated to the extent feasible. The California Office of Planning and Research (OPR) has provided the following direction for the assessment and mitigation of GHG emissions:

- Lead agencies should make a good-faith effort (see Tables 3, 4 & Appendix D), based on available information, to calculate, model, or estimate the amount of CO_2 and other GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities;

- The potential effects of a project may be individually limited but cumulatively considerable. Lead agencies should not dismiss a proposed project's direct and/or indirect climate change impacts without careful evaluation. All available information and analysis should be provided for any project that may significantly contribute new GHG emissions, either individually or cumulatively, directly or indirectly (e.g., transportation impacts); and,
- The lead agency must impose all mitigation measures that are necessary to reduce GHG emissions to a less than significant level. CEQA does not require mitigation measures that are infeasible for specific legal, economic, technological or other reasons. A lead agency is not responsible for wholly eliminating all GHG emissions from a project; the CEQA standard is to mitigate to a level that is "less than significant."

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact: Through project design, GHG emissions have been minimized by treating the smallest area feasible, while still accomplishing the objectives of the fuel break. However, GHG emissions can not be eliminated from the proposed project. Emissions would result from mechanized equipment, pile burning and the decomposition of treated (shredded, chipped or cut) vegetative material. Because the decomposition of treated material would occur over a number of years, the release of GHG emissions would be metered. Such a low-level long-term release of emissions is anticipated to be insignificant and no further analysis was conducted.

Because the treatment method and amount of material to treat would likely vary between the establishment and future maintenance of the fuel break, the estimation of GHG emissions from each of these phases has been conducted separately. The variables that contributed to the separation of these phases are the amount and type of equipment and primarily, the level of burning activity in each phase. A relatively small amount of pile burning may occur during the establishment phase, but more wide spread pile burning could occur every several years during the maintenance phase. Described below are the anticipated activities that would generate GHG emissions from each of the phases. Scenarios were developed to portray the anticipated sources of GHG emissions, though minor variability of these sources could occur (for example, if a higher percentage of the establishment phase was completed with hand crews rather than mastication or vice versa).

Fuel Break Establishment:
It is anticipated the fuel break establishment would require use of a masticator and a handcrew, each for approximately 30 working days. GHG emissions would occur as a result of equipment operation and through pile burning. Table 3 illustrates the estimated CO2 emissions from the equipment associated with conducting these activities.

Table 3. Estimated CO2 Emission from Equipment Associated with Fuel Break Establishment

Equipment type	Equipment amount	Gasoline consumption (gal/day)	Diesel consumption (gal/day)	Number of days	Total gallons	Metric tons of CO2e*
masticator	1	n/a	40	30	1200	12.18
transport	1	n/a	10	2	20	0.20
CCV (crew bus)	1	n/a	6	30	180	1.83
chipper	1	n/a	10	15	150	1.52
utility truck	1	3	n/a	15	45	0.40
passenger vehicle	2	3	n/a	30	180	1.59
chainsaw	4	0.5	n/a	30	60	0.53
					total	**18.25**

**The conversion factor of gallons to metric tons of CO2e was obtained from the California Climate Action Registry (CCAR) General Reporting Protocol (CCAR 2009).*

Fuel usage estimated for masticator and chainsaws; assumed 6 mpg for transport, 10 mpg for CCV, and 20 mpg for utility and passenger vehicles (60 miles round-trip).

In addition to the 18 metric tons of carbon dioxide generated from equipment emissions, pile burning will add an additional 10 metric tons of GHG emissions for a total of **28 metric tons** during the fuel break establishment phase (pile burning assumes 50 piles at 3'high x6' wide, using the Fire and Environmental Research Applications (FERA) model developed by Pacific Wildland Fire Sciences Laboratory, USDA Forest Service Pacific Northwest Research Station). Appendix D displays the results of the FERA run.

Fuel Break Maintenance

It is anticipated the fuel break could be maintained every several years (perhaps 5-10 years); and such activity would likely involve the use of hand crews over most of the project area. Chippers would be used in accessible areas, while piling and burning or looping and scattering of material would be conducted in the remaining areas. Table 4 illustrates the estimated CO2 emissions from the equipment associated with conducting these activities.

Table 4. Estimated CO2 Emission from Equipment Associated with Fuel Break Maintenance

Equipment type	Equipment amount	Gasoline consumption (gal/day)	Diesel consumption (gal/day)	Number of days	Total gallons	Metric tons of CO2e*
CCV (crew bus)	1	n/a	6	70	420	4.26
chipper	1	n/a	10	35	350	3.55
utility truck	1	3	n/a	35	105	0.93
chainsaw	4	0.5	n/a	70	140	1.23
					total	**9.91**

**The conversion factor of gallons to metric tons of CO2e was obtained from the California Climate Action Registry (CCAR) General Reporting Protocol (CCAR 2009).*

Fuel usage estimated for chipper and chainsaws; assumed 10 mpg for CCV, and 20 mpg for passenger vehicles (60 miles round-trip).

GHG emissions from pile burning were calculated using FERA (referenced above). Pile burning (assuming 100, 3'high x6'wide piles) would generate an estimated 20 metric tons of GHG emissions. Appendix D displays the results of pile burning GHG emissions calculations. Total GHG emission during the maintenance periods is estimated at **30 metric tons**.

Summary

It is reasonable to assume that short term equipment use at this project will not produce a net increase in emissions due to the fact that such equipment would likely be in operation elsewhere during this same period if this project was not proposed. It is common for contractors who perform mastication work to fully utilize their equipment and move from job to job to maintain full capacity utilization. It is also common for CAL FIRE hand crews to work "sponsor" projects each day. If a crew was not used for this project, it is assumed they would be assigned somewhere else since the demand for crews far exceeds their availability. A net increase in vehicular emissions is only possible if equipment used for this project would otherwise not be in use which is considered not likely. It is not likely that this equipment will be brand new and placed into service only for this project.

It is also reasonable to assume that a certain amount of greenhouse gasses emitted as a result of burning activities would be sequestered by the increased growth rate of residual vegetation. The treatment is anticipated to improve the health and vigor of residual vegetation. An individual tree or shrub with less competition from surrounding vegetation has the capability to grow faster and larger than those competing for limited resources. A portion of the emissions created from burning activities can be sequestered by the capture and storage of carbon from the increased growth of residual vegetation.

Ultimately, regardless of project implementation, the vegetation in this area will burn and greenhouse gasses will be released. Through fuel reduction designed to minimize the chance of large wildland fires, land managers can have a say in the timing and quantity of some of those releases. The primary intent of this project is to reduce the threat of a large, catastrophic wildfire. If a wildfire does happen to enter an area that was treated, the wildfire may be contained sooner with reduced area burned and consequently reduced carbon emissions. For these reasons a less than significant impact on the environment is anticipated as a result of the GHG emissions generated from the proposed project.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact. SLO County APCD has not presently established a significance threshold limit for GHG emissions. The Legislature passed and the Governor signed AB32, The Global Warming Solutions Act of 2006. This law requires the Air Resources Board (ARB) to adopt strategies to reduce GHG emissions to baseline 1990 levels by 2020, and by 2050 to reduce emissions to 80% of 1990 levels. In December 2007, the Board approved the 2020 emission limit of 427 million metric tons of carbon dioxide equivalent (MMTCO2E) of greenhouse gases.

This proposed project is not considered likely to conflict with AB32 and the goals stated above due to the following reasons:

- Short term equipment emissions as discussed above are not likely to cause a net increase in GHG emissions. These emissions (see Tables 3 and 4) are expected to last approximately 1 to 3 months (depending on type of activity) every several years and the proposed project is relatively small (+/- 50 acres) that will not require a large workforce with numerous vehicles.
- Short term emissions associated with pile burning are not likely to cause a significant net increase in GHG emissions, as discussed above. Again these emissions will occur from a limited number of piles and be short term, expected to last one or two days every several years.

- The fuel break will be established prior to the 2020 deadline and it is reasonable to assume that this relatively small project will not be "cumulatively considerable" by ARB at that time. Future maintenance activities could be reexamined to evaluate any actions that are contrary to reaching the 2020 levels.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. Hazards and Hazardous Materials. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, will it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, Would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, Would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

Discussion

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant Impact: No hazardous materials will be transported, used, or disposed of as a result of this project, with the exception of substances used to maintain and operate equipment (such as fuel and lubricants). Accidental spills of these substances will be cleaned up immediately and will not be in quantities large enough to pose a significant hazard to the public or environment, with the possible exception of accidental discharge into watercourses; however the small seasonal watercourses that are present would not be areas where equipment or fueling would occur. Such activities occur where service vehicles can access equipment, such as close proximities to roadways; therefore any small quantity of spillage during these activities will pose a less than significant impact to the environment.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact: Refer to VIII. (a).

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact: Cambria Elementary School is within ¼ mile of the proposed project area, however refer to VIII. (a) for a discussion on hazardous materials and substances and III. (d) for a discussion on hazardous emissions near sensitive receptors.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact: The proposed project site is not included on any list of hazardous materials sites.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact: The proposed project is not located within an airport use plan nor is it within two miles of a public airport.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Less than Significant Impact: The proposed project is within the vicinity of three private airports or airstrips: Hearst Airport, Rancho San Simeon, and Poteete Airstrip. Burning activities associated with the proposed project would be performed in accordance with County APCD regulations, including the issuance of a Smoke Management Plan, and as a result smoke would present a less than significant risk to airports and airstrips. No other aspect of the proposed project, with respect to airstrip vicinity, would result in a safety hazard for people residing or working in or near the project area.

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No impact: The Cambria Area Pre-Attack Plan and Cambria Evacuation Plan are within the vicinity of the proposed project area. Both plans are available for viewing at the following website:

http://www.calfireslo.org/PreAttack.html#Evacuation_Planning

Portions of the proposed project are identified as a "proposed fuel break" in the Cambria Area Pre-Attack Plan and will add to the effectiveness of emergency response during a wildland fire. The proposed project is not part of the Cambria Evacuation Plan and will not interfere with any evacuations. Portions of the proposed project along Bridge Street, following project implementation, will allow for safer egress and ingress for residents and emergency responders during wildfires through a decrease in fire intensity in this area.

h) Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less than Significant Impact: The intent of the proposed project is to reduce exposure of people and structures to a significant risk of loss, injury and death involving wildland fires. Residences are adjacent to the wildland within the proposed project area. Project operations will not occur during times of elevated fire danger including red-flag warnings as determined by the ECC. Mastication operations will only occur

during Level I conditions defined by the Industrial Fire Precaution Level system (IFPL). The proposed project will reduce fuel loads in these areas to provide a better opportunity for fire officials to suppress wildland fire and provide safer egress and ingress for residents and emergency responders during wildfires by decreasing fire intensity along Bridge Street.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. Hydrology and Water Quality. Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there will be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells will drop to a level that will not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which will result in substantial on- or off-site erosion or siltation?	☐	☐	☐	☒
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in on- or off-site flooding?	☐	☐	☐	☒
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☒	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Result in inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

Discussion

a) Would the project violate any water quality standards or waste discharge requirements?

Less than Significant with Mitigation: Fuel reduction activities associated with the proposed project such as shredding (mastication), chipping or lopping treated material, will leave a substantial layer of mulch material on or near the soil surface following such activities, and thereby limit the potential for significant erosion or sediment delivery. The gentle slopes over most of the project area will further reduce this potential.

Soil compaction can increase erosion potential. Reduced infiltration rates can increase surface runoff and erosion. Heavy equipment (masticators) used in the project area will have little impact on soil compaction. Mastication equipment is generally considered to exert relatively light ground pressures leading to minimal soil compaction when conditions are dry. PSI for tracked equipment varies, but a common range for

mastication equipment is 2-10 psi (Vitorelo et al. 2009). Ground pressure ratings for most mastication equipment are often less than that of an average human.

The following links are examples of articles that discuss erosion potential and soil compaction related to the use of mastication equipment:
http://www.forestry.vt.edu/cofe/documents/COFE_2009_Vitorelo_et_al.pdf
http://ucce.ucdavis.edu/files/repositoryfiles/ca6002p77-69243.pdf
http://nature.berkeley.edu/stephens-lab/Publications/Moghaddas%20Stephens%20Soil%20Mech%20FFS%20FEM%204-08.pdf

Reducing understory vegetation could slightly increase surface runoff, but not to the point of significant sediment delivery or increased turbidity to watercourses. As stated above, erosion potential from project activities will be low due to residual materials providing soil coverage and minimal soils compaction. Furthermore, slopes are gentle throughout the project area, rarely exceeding 30%. Ground based equipment (masticators) will not be operated during wet soil conditions or on slopes that exceed 50%. Refer to VI. (b) for addition discussion regarding soil erosion potential.

The headwaters of a few small seasonal watercourses are located within the proposed project; each of them appears to only flow water during the wettest months and following significant precipitation events. Evidence of these watercourses is difficult to detect in most cases due to the shallow, barely definable channels and herbaceous vegetation covering them. Figures 6 and 7 are photos depicting the typical small watercourses in the project area. Again in these areas, residual vegetation and mulch material would limit the potential for significant erosion and sediment delivery. To further limit erosion potential near these watercourses, soil disturbance will be minimized by limiting or restricting equipment use through the establishment of equipment limitation zones (ELZs).

The 25' ELZ as depicted in Figure 1b is intended to limit equipment use during wet conditions near a small watercourse. Water collects on a road/trail just upstream of the small watercourse, and to prevent impacts to water quality, no equipment use will occur in this area when the soil is wet.

ELZs within 50 feet of watercourses as depicted in Figure 1b, have been established to limit equipment use. In these areas, equipment use is only allowed for the purposes of crossing the watercourse during dry conditions in a designated area where no disturbance to channels and banks can occur. If necessary, although not anticipated, devices or methods to limit disturbance would be utilized, such as crossing over materials or objects that would protect banks and channels, and then removing them once the crossing was made. Vegetation removal in the 50 foot ELZs will be limited to hand crew work (refer to Mitigations 2-4). For these reasons it is anticipated, erosion as a result of surface runoff, and any other activity associated with the proposed project, will not have a significant adverse effect on water quality or significantly increase turbidity in any watercourse.

One of the ephemeral streams, though not visibly moving a significantly larger amount of water than the others, is incised and actively headcutting (Figures 8 and 9). The banks along the incised area downstream of the headcut appear to be stabile, with evidence of established vegetation apparent. A 50 foot ELZ has been established in this area, and within 25' of the stream, no equipment use or vegetation removal shall occur. Mitigation #2, #3 and #4, discussed below discusses protection measures in this and other stream areas.

To prevent potential impacts to ephemeral watercourses and wet areas, the following mitigation measures shall be implemented.

Mitigation Measure #2: Watercourse Protection Zone near the Cemetery Area
No equipment use will be allowed within 50 feet of the ephemeral stream and associated seasonal wet area near the cemetery, except to facilitate crossing in a designated area when conditions are dry (See Figure 1b).

Mitigation Measure #3: Watercourse Protection Zones near the Ballfield Area
No equipment use will be allowed within 50 feet of the ephemeral stream and associated seasonal wet area near the ballfield, except to facilitate crossing in a designated area when conditions are dry (See Figure 1b).

Mitigation Measure #4: Watercourse Protection Zones near the Headcut Area
No equipment use will be allowed within 50 feet of the ephemeral stream near the headcut area delineated by blue flagging and no vegetation removal will be allowed within 25 feet of the banks above this stream (See Figure 1b).

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?

No Impact: The proposed project will not use or deplete groundwater supplies nor interfere with ground water recharge. Substantial vegetation removal over large areas can lead to an increase in groundwater recharge by decreasing transpiration amounts. Because overstory trees will be retained, combined with the relatively small area involved with the proposed project, no impact to groundwater recharge is expected following project activities.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial on- or off-site erosion or siltation?

No Impact: As stated in IX. (a), erosion and surface runoff is not expected to significantly increase as a result of the proposed project. No alterations to drainage patterns will occur within the project area, including those of any watercourse.

d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in on- or off-site flooding?

No Impact: As stated in IX. (a), surface runoff is not expected to significantly increase as a result of the proposed project. No flooding will occur as a result of this project.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less than Significant Impact: As stated in IX. (a), surface runoff is not expected to significantly increase as a result of the proposed project. No impact to stormwater drainage will occur and no substantial additional sources of polluted runoff would occur.

f) Would the project otherwise substantially degrade water quality?

Less than Significant with Mitigation: As stated in IX. (a), erosion as a result of surface runoff, and any other activity associated with the proposed project, will not have a significant adverse effect on water quality or significantly increase turbidity in any watercourse.

To prevent potential impacts to ephemeral watercourses and seasonal wet areas, the following mitigation measure shall be implemented.

Mitigation Measure #2: Watercourse Protection Zone near the Cemetery Area
No equipment use will be allowed within 50 feet of the ephemeral stream and associated seasonal wet area near the cemetery, except to facilitate crossing in a designated area when conditions are dry (See Figure 1b).

Mitigation Measure #3: Watercourse Protection Zones near the Ballfield Area
No equipment use will be allowed within 50 feet of the ephemeral stream and associated seasonal wet area near the ballfield, except to facilitate crossing in a designated area when conditions are dry (See Figure 1b).

Mitigation Measure #4: Watercourse Protection Zones near the Headcut Area
No equipment use will be allowed within 50 feet of the ephemeral stream near the headcut area delineated by blue flagging and no vegetation removal will be allowed within 25 feet of the banks above this stream (See Figure 1b).

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact: No structures or housing will be placed within a 100-year flood hazard area and no such areas will be altered as a result of the proposed project.

h) Would the project place within a 100-year flood hazard area structures that would impede or redirect flood flows?

No Impact: Refer to IX. (g).

i) Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact: No flooding would occur as a result of the proposed project and no levees or dams are within the vicinity of the project.

j) Would the project result in inundation by seiche, tsunami, or mudflow?

No Impact: No inundation by seiche, tsunami, or mudflow would occur as a result of the proposed project.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. Land Use and Planning. Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Discussion

a) Would the project physically divide an established community?

No Impact: No barriers will be constructed and no access or routes will be affected that would physically divide any community.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact: Refer to the discussion on IV. (b). All project activities will be performed in accordance with provisions set forth in a Coastal Development Permit or Minor Use Permit issued by the SLO County Coastal Planning office.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact: Refer to the discussion on IV. (f). All project activities are in accordance with a conservation easement for the Covell ranch held by TNC.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. Mineral Resources. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Discussion

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact: The availability of mineral resources will not be affected by the proposed project.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact: The site is not designated in the general plan as having locally-important mineral resources, nor will the availability of any such resources be affected by the proposed project.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. Noise. Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, will the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, will the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion

a) Would the project create exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?

Less than Significant Impact: Fuel reduction activities, especially mastication equipment, chainsaws and chippers would cause a short-term increase in noise levels. These levels are not expected to be significant because they will be confined to regular weekday business hours (8am – 5pm), and they will only be for short periods that potentially would only reoccur every several years. Duration of the short periods of project noise will vary based on project activity, but typically excessive noise levels may be heard in any one area for at most several days until fuel treatment activities progress and move further away. Work will progress at an average rate of ½-3 acres per day, meaning most residents adjacent to the project area should expect to have activity directly adjacent to their property for less than one day, or up to two days if preparatory hand work is required. All nearby residents will be notified of the project and timing of project operations, such as where people normally sleep during the day, will be adjusted where necessary. This short term project activity noise is expected to be in conformance with the County noise ordinance. Because the noise created during the treatment process is not stationary, and mechanical equipment will only be used during the hours of 8am and 5pm noise impacts are considered less than significant.

b) Would the project create exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

No Impact: Project activities will not involve the use of explosives, pile driving or other intensive techniques that could generate groundborne vibration or noise. All nearby residents will be notified of the project and timing of project operations, such as where people normally sleep during the day, will be adjusted where necessary.

c) Would the project create a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

No Impact: No permanent noise will be created as a result of the proposed project. Project operations are expected to last 1 to 2 months initially and maintenance may occur every several years as necessary. Nearby residents will be informed of the project and timing of operations will be adjusted when necessary.

d) Would the project create a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than Significant Impact: All mechanized activities associated with the project will be limited to daytime hours of operation (8am to 5pm). No work activities will occur at night or on weekends. Fuel reduction activities at the actual project site will temporarily increase noise levels in the area, most noticeably to the residents that border the west side of the project area, but the dampening effect of vegetation between equipment and homes in addition to the normal coastal breezes will minimize these impacts. Noise levels could reach 109 dBA within the project site for short periods with the use of chainsaws and 80-90dba with use of mastication equipment. These noise levels will be lower away from equipment use, as distance and vegetation screening increase. Any substantial noise will be short lived as the project progresses and equipment or crews moved from treated to untreated areas; typically production rates would be ½ - 3 acres per day, depending on fuel levels and activity method. Residents near the project area should expect to have equipment directly adjacent to their property for 1 – 2 days or less every several years, making noise concerns in any one area temporary.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact: The project would not be located within an airport land use plan and is not within two miles of a public airport.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact: The proposed project would not impact noise generated from any private airstrips in the vicinity.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. Population and Housing. Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing homes, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

a) Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact: No new homes or infrastructure would be created as a result of the proposed project.

b) Would the project displace substantial numbers of existing homes, necessitating the construction of replacement housing elsewhere?

No Impact: No displacement of existing homes would occur as a result of the proposed project.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact: No displacement of people would occur as a result of the proposed project.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. Public Services. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

Discussion

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

Fire protection?

No Impact: The proposed project will create more favorable conditions for fire protection and suppression during a wildfire. The proposed project will not necessitate a change in fire protection services or create new fire stations or facilities.

Police protection?

No Impact: The proposed project will have no impact on police protection services nor create a need for additional police facilities.

Schools?

No Impact: The proposed project will have no impact on the number of children attending schools nor create a need for additional school services or facilities.

Parks?

No Impact: Parks or other recreational facilities will not be displaced by the proposed project since the project is located on private property that is not intended for such uses. In addition, the project will not add residences that could result in increase demand for parks or other recreational opportunities.

Other public facilities?

No Impact: The proposed project will have no impact on other public services nor create the need for additional public facilities.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. Recreation. Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion

Approximately 1-2 acres of the project is located on land owned by Coalinga-Huron Recreation & Parks District, with a County Land Use designation as Recreation. The land is leased to Camp KEEP, also known as Camp Yeager, a camp used for educational purposes for children from Kern County. Of the 13 plus acres of this parcel, the project will treat only 1-2 acres of a wooded, undeveloped area surrounding the ballfield in the southeast portion of the property. No impacts to the recreational aspect of the camp will occur as a result of this project.

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact: The proposed project will not alter or prohibit recreational opportunities such that additional use would occur to neighborhood and regional parks or recreational facilities. The proposed project will not result in an increase in population or visitors who use neighborhood and regional parks or recreational facilities.

b) Would the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

No Impact: No recreational facilities will be included and no construction or expansion of such facilities will be required as a result of the proposed project for the reasons described in XV. (a).

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. Transportation/Traffic. Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

Discussion

a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less than Significant Impact: The proposed project will not cause an increase in bicycle or pedestrian traffic or congestion, or an increase in the use or need of mass transit. The proposed project will have no effect on population or number of visitors in the area and following project activities will not alter any transportation or travel routes.

An insignificant short term increase to vehicular traffic in the area can be expected during the establishment of the fuel break, and may reoccur every several years during fuel break maintenance. For example hand crew work will require one or two crew carrying vehicles, and mastication work will require one or two vehicles for equipment operators and a one time drop-off and pick-up of equipment. The slight increase in vehicular traffic from each of these activities will be short lived and should not significantly impact the circulation system in the area.

A portion of the project area is located adjacent to Bridge Street. This is a dead-end street with relatively light traffic, used to access Cambria Cemetery and the Covell Ranch. During project activities activities, portions of Bridge Street may be subject to traffic control or temporary road closures when there is a danger of debris reaching the roadway. Likewise, the same could happen during burning activities due to decreased visibility with smoke and/or to allow operational access for fire suppression personnel. During these occurrences, access to the Cambria Cemetery and the Covell Ranch at the end of Bridge Street, would be impacted. Any traffic control or road closures would be short term and lifted once conditions became safe. Advanced notice of any closures will be given as a requirement in obtaining a permit with San Luis Obispo County Public Works Department.

b) Would the project conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less than Significant Impact: Refer to the discussion in XVI. (a). The project area is located adjacent to Bridge Street, a quiet dead-end street; and not immediately adjacent to any other roadway.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The project will not increase the population in the area, nor will it involve any changes in air traffic operation.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact: No road design would result of the proposed project; however, hazards could exist from mastication and burning. Refer to the discussion in XVI. (a) for a discussion of these potential hazards.

e) Would the project result in inadequate emergency access?

No Impact: Emergency response personnel will have full access to any needed route. Any road closures that do occur will not physically block routes and emergency response personnel will have full access at all times. Project is designed to improve safety and increase the effectiveness of emergency response resources, particularly during wildfire incidents.

f) Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less than Significant Impact. The project will not result in any permanent features that could affect regional transportation and will not result in alteration of any existing facilities nor interfere with construction of any future planning facilities that are intended to serve alternative modes of transportation (i.e., bus turnouts, bicycle lanes, etc.). A temporary decrease in the performance of existing facilities could occur if a road closure were to take place. Such an effect would be temporary; refer to XVI. (a) for the discussion. No conflict with adopted alternative transportation plans for policies will occur as a result of the project.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. Utilities and Service Systems. Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

Discussion

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

No Impact: Wastewater will not be generated and wastewater treatment will not occur as a result of the proposed project.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact: Water facilities and wastewater facilities will not be expanded nor constructed as a result of the proposed project.

c) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact: The construction and expansion of storm water drainage facilities will not occur as a result of the proposed project.

d) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

No Impact: Any water use that will occur (such as water for project personnel) as a result of the project would be an insignificant amount easily served by existing entitlements.

e) Would the project result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?

No Impact: Wastewater will not be generated and wastewater treatment will not occur as a result of the proposed project.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

No Impact: The small amount of trash generated by project personnel while conducting project activities will easily be accommodated by local landfills.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste?

No Impact: The small amount of trash generated by project personnel while conducting project activities will be disposed of in a proper manner.

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. Mandatory Findings of Significance.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c) Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Authority: Public Resources Code Sections 21083 and 21083.05.
Reference: Government Code Section 65088.4, Public Resources Code Sections 21080(c), 21080.1, 21080.3, 21083.05, 21083.3, 21093, 21094, 21095, and 21151; *Sundstrom v. County of Mendocino*, (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors (1990)*, 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San* Francisco (2002) 102 Cal.App.4th 656.

Discussion

a) Would the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact with Mitigation: The intent of the proposed project is to help protect people, property, wildlife habitat and the environment by reducing the threat of a catastrophic wildfire in the Cambria area. The proposed project will not substantially degrade the quality of the environment,

substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community. The project will, however reduce the number of Monterey pines, and potentially several other sensitive RPR species in the project area. Refer to the discussion in IV. (a). No impact will occur to cultural resources related or unrelated to important examples of the major periods of California history or prehistory. Refer to the discussion in V. (a) and (b). Project design, timing, technique and placement are intended to avoid or minimize impacts as much as possible. Mitigations have been incorporated into the project that lessens potential impacts to Biological Resources, Cultural Resources, Geology and Soils, and Hydrology and Water Quality to a level that is less than significant (Mitigation #s 1 - 5).

b) Would the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less than Significant Impact: No significant fuel reduction activities are known to have previously taken place within the proposed project area. Several home owners have thinned vegetation, removed or piled dead trees, or limbed trees within the project area adjacent to their property. The effects of these small projects are mostly consistent with the expected outcome of the proposed project and in these areas less work and in some cases, no additional work would occur. Future activities associated with the maintenance of the proposed fuel break have been addressed in this document and are not anticipated to have impacts that are cumulatively considerable.

Several areas outside the proposed project, but in the Monterey pine forest of the Cambria area have undergone fuel reduction activities that include tree thinning, brush clearing and prescribed burning. San Simeon State Park and the Fiscalini Ranch are two examples of such areas that have conducted some or all of these activities. San Simeon State Park continues fuel reduction work using hand crews. As expected, numerous property owners have also conducted various fuel reduction activities adjacent to their homes to provide defensible space. The projects conducted on lands in the vicinity of the proposed project are considered to be small in scope and magnitude, and minor (if any) in terms of adverse impacts to people, wildlife or the environment. The effects of these projects in conjunction with the proposed project are not anticipated to have any significant adverse impacts.

c) Would the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact: No project-related environmental effects were identified that will cause substantial adverse effects on human beings. As discussed herein, the proposed project has the potential to create impacts related to Biological Resources, Cultural Resources, Geology and Soils, and Hydrology and Water Quality. However, with implementation of the aforementioned mitigation measures, these potential impacts will be reduced to a less than significant level. The project will not have substantial adverse effect on humans. The project will, by contrast, provide better protection to the community and adjacent wildlands by decreasing the threat of catastrophic wildfire.

Appendix A
Mitigation Monitoring and Reporting Plan (MMRP) for the Bridge Street Fuel Break Project Initial Study/Mitigated Negative Declaration San Luis Obispo County, California

In accordance with CEQA Guidelines Section 15074(d), when adopting a mitigated negative declaration, the lead agency will adopt a Mitigation Monitoring and Reporting Plan (MMRP) that ensures compliance with mitigation measures required for project approval. The California Department of Forestry and Fire Protection (CAL FIRE) is the lead agency for the above-listed project and has developed this MMRP as a part of the final Initial Study/Mitigated Negative Declaration (IS/MND) supporting the project. This MMRP lists the mitigation measures developed in the IS/MND which were designed to reduce environmental impacts to a less-than-significant level. This MMRP also identifies the party responsible for implementing the measure, defines when the mitigation measure must be implemented, and which party or public agency is responsible for ensuring compliance with the measure.

Potentially Significant Effects and Mitigation Measures
The following is a list of the resources that will be potentially affected by the project and the mitigation measures made part of the Initial Study/Mitigated Negative Declaration.

Mitigation Measure #1: Measures to Protect the Monterey dusky-footed woodrat Houses.
Prior to fuel reduction activities woodrat houses, including the feature(s) the house is constructed around (shrub, tree, stump, log, etc), within the project area will be located and flagged for avoidance prior to project activities.

Schedule: Houses shall be located and marked with flagging prior to operations and this protection measure shall apply for the duration of the project.
Responsible Party: CAL FIRE shall be responsible for carrying out this mitigation measure.

Verification of Compliance:
Monitoring Party: CAL FIRE
Initials: _____
Date: _____

Mitigation Measure #2: Watercourse Protection Zone near the Cemetery Area
No equipment use will be allowed within 50 feet of the ephemeral stream and associated seasonal wet area near the cemetery, except to facilitate crossing in a designated area when conditions are dry (See Figure 1b).

Schedule: Areas shall be marked with flagging prior to operations and this protection measure shall apply for the duration of the project.
Responsible Party: CAL FIRE shall be responsible for carrying out this mitigation measure.

Verification of Compliance:
Monitoring Party: CAL FIRE
Initials: _____
Date: _____

Mitigation Measure #3: Watercourse Protection Zones near the Ballfield Area
No equipment use will be allowed within 50 feet of the ephemeral stream and associated seasonal wet area near the ballfield, except to facilitate crossing in a designated area when conditions are dry (See Figure 1b).

Schedule: Areas shall be marked with flagging prior to operations and this protection measure shall apply for the duration of the project.
Responsible Party: CAL FIRE shall be responsible for carrying out this mitigation measure.

Verification of Compliance:
Monitoring Party: CAL FIRE
Initials: _____
Date: _____

Mitigation Measure #4: Watercourse Protection Zones near the Headcut Area
No equipment use will be allowed within 50 feet of the ephemeral stream near the headcut area delineated by blue flagging and no vegetation removal will be allowed within 25 feet of the banks above this stream (see Figure 1b).

Schedule: Areas shall be marked with flagging prior to operations and this protection measure shall apply for the duration of the project.
Responsible Party: CAL FIRE shall be responsible for carrying out this mitigation measure.

Verification of Compliance:
Monitoring Party: CAL FIRE
Initials: _____
Date: _____

Mitigation Measure #5: Procedures for Inadvertent Discovery of Human Remains
In accordance with the California Health and Safety Code, if human remains are discovered during ground-disturbing activities, CAL FIRE and/or the project contractor(s) shall immediately halt potentially damaging activities in the area of the burial and notify the SLO County Coroner and a qualified professional archaeologist to determine the nature and significance of the remains. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050[c]). Following the coroner's findings, the archaeologist and the Most Likely Descendent (designated by the Native American Heritage Commission) shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities of SLO County and CAL FIRE to act upon notification of a discovery of Native American human remains are identified in PRC § 5097.

Schedule: Immediately if human remains are discovered.

Responsible Party: CAL FIRE shall be responsible for carrying out this mitigation measure.

Verification of Compliance:
Monitoring Party: CAL FIRE
Initials: _____
Date: _____

LIST AND DEFINITION OF ACRONYMS AND SYMBOLS USED IN THIS DOCUMENT

Acronyms

ARB	Air Resources Board
APCD	Air Pollution Control District
CA	California
CAL FIRE	California Department of Forestry and Fire Protection
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Data Base
CNPS	California Native Plant Society
CO_2	Carbon Dioxide
CSP	California State Parks
CZ	Coastal Zone
CZLUO	Coastal Zone Land Use Ordinance
dBA	decibel
DBH	Diameter at Breast Height
DFG	Department of Fish and Game
ELZ	Equipment Limitation Zone
EPA	Environmental Protection Agency
et al.	*et alii* (Latin) (it means "and others")
FERA	Fire and Environmental Research Applications
GHG	Greenhouse Gas
HWY	Highway
IS	Initial Study
IS/MND	Initial Study/Mitigated Negative Declaration
MDBM	Mount Diablo Base Meridian
MND	Mitigated Negative Declaration
MMRP	Mitigation, Monitoring, and Reporting Plan
N/A	Not Applicable
NDDB	Natural Diversity Data Base
NOI	Notice of Intent (to adopt a negative declaration or mitigated negative declaration)
PRC	Public Resources Code
RPF	Registered Professional Forester
RPR	Rare Plant Rank (used by DFG and CNDDB, formerly referred to as CNPS listed)
RWQCG	Regional Water Quality Control Board
SCH	State Clearinghouse
SLO	San Luis Obispo
THP	Timber Harvest Plan
TNC	The Nature Conservancy
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey

Symbols

§	Section
#	Number
%	Percent

LIST OF PREPARERS OF THIS DOCUMENT

Daniel G. Foster	Senior Environmental Planner CAL FIRE's Sacramento Headquarters, (916) 653-0839
Andrew Hubbs	Forester I, RPF #2897, Unit Environmental Coordinator CAL FIRE's San Luis Obispo Unit, (805) 543-4244
Alan Peters	Forester II, RPF #2633, Unit Environmental Coordinator CAL FIRE's San Luis Obispo Unit, (805) 543-4244

LIST OF EXPERTS CONSULTED

Biological Issues
Brandon Sanderson, Environmental Scientist
Department of Fish & Game
3196 Higuera St., Suite A
San Luis Obispo, CA 93401
805-594-6141

Michael Walgren, Environmental Scientist
California State Parks
San Luis Obispo Coast District
805-776-2387

Bob Motroni, Senior Wildlife Biologist (RA)
Department of Forestry & Fire Protection
1416 9th Street
Sacramento, CA 94244
916-653-9420

Della Synder-Velto
United States Fish and Wildlife Service
Della_Snyder-Velto@fws.gov

Cultural Resource Issues
Stephanie Velasquez, Associate State Archaeologist
Department of Forestry and Fire Protection
2524 Mulberry Street
Riverside, California 92501

Forest Management Issues
Stephen Staub, Registered Professional Forester #1911
Staub Forestry and Environmental Consulting
6010 Highway 9, Suite 6
Felton, CA 95018
831-335-1452

Kim Camilli, Forest Pest Specialist, RPF #2916
Department of Forestry & Fire Protection/Cal Poly
635 N. Santa Rosa Street
San Luis Obispo, CA 93405
805-543-4244

San Luis Obispo County Contact
Ryan Hostetter, Coastal Planning & Permitting
San Luis Obispo County Planning & Building
976 Osos Street, Room 300
San Luis Obispo, CA 93408
(805) 788-2351

Water Quality Issues
Mike Higgins
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401
(805) 542-4649

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