

Appendix B: Agency Correspondence

DFG Correspondence :

Brandon,

Thank you for your response. I'll start by saying that we've been mindful to try to avoid or minimize wildlife impacts the best we could through project design. We are treating as small an area as we can to accomplish the objective of minimizing a catastrophic wildfire in the Cambria area. As examples of other projects that would have accomplished that objective, one alternative would have been a prescribed burn of a few hundred acres (more acres impacted and likely high pine mortality), while another was a fuel break three times as wide (again more acres impacted). It's our intent that by treating a relatively small yet strategic area, retaining the larger trees, snags and large woody debris, and timing project implementation for summer and fall, we are already avoiding most wildlife impacts. I'm hoping that by working with you any impacts that may remain can be identified and worked through.

Getting to your response, I agree that a survey would provide a reasonable determination of what species are present, but at this point I'm not sure it's feasible to do as much surveying as we ideally might like to do. My thinking with sending you the table was that a predictive list that was deemed to be accurate by a knowledgeable professional such as yourself, could provide an equally reliable or even better portrayal of sensitive species that may be present. If for example, if a botanical survey was conducted that missed a small rare plant population a predictive list would include it based on known rare plants in the area that have habitat requirements similar to those of the project area.

The table I sent to you listed CNDDDB occurrences within 5 miles of the project and based on my research, indicated whether habitat was present for them in the project area. As you pointed out several other plant and animal species should have been included that also may utilize that habitat. I would like to continue to work together to refine this species list to one that would be deemed accurate (one that would encompass all sensitive species known to utilize Monterey pine forest habitat in the Cambria area). Based on that list a determination could then be made if the project is likely to cause impacts to a given species.

If it can reasonably be determined the project wouldn't impact any sensitive species it doesn't particularly matter if those species are present. On the other hand if it does appear impacts could occur, we may need to survey for a given species (to avoid a plant that can not tolerate disturbance, for example). Let me know whether this seems like a reasonable approach.

Thanks again,

Andy Hubbs
Forester I

CAL FIRE SLU

-----Original Message-----

From: Brandon Sanderson [<mailto:BSANDERSON@dfg.ca.gov>]
Sent: Monday, January 31, 2011 3:16 PM
To: Hubbs, Andrew
Subject: Re: Sensitive Species - Bridge Street Fuel Break

Andy,

First of all, the Department does not recognize predictive work, such as is presented in the attached Table, to substitute for actual on-the-ground surveys. We recommend that surveys be conducted during the time when sensitive resources could be detected; predictive analyses cannot reliably demonstrate the "absence" of a species on the Project site. For example, the Table suggests that there are no grasslands present to accommodate certain plant species within the Project area. However, a quick look at aerial photos shows that there are multiple openings in the forest canopy that contain grasslands. The Table also states that the project is not near water and therefore determined that California red-legged frog (CRLF) and western pond turtle(WPT) (among other species) would not be present. CRLF and WPT are both known to use uplands greater than a mile from a water source. The Project area is less than a mile from both Santa Rosa Creek and Leffingwell Creek. The Department recommends that CalFire conduct surveys, at the appropriate time of year by knowledgeable personnel (botanist and wildlife biologist), to determine whether sensitive species may be present. Monterey dusky-footed woodrat along with multiple bat species should be considered in surveys. Based on survey results, measures which would avoid or lessen impacts, to particular species which may be affected, can be developed.

Secondly, there is concern with the spread of pitch canker and sudden oak death in such forests, and so I ask what measures CalFire plans to put in place to prevent the spread of such diseases.

Brandon

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Pursuant to the Governor's Executive Order S-12-10, DFG offices will be closed most Fridays. Visit <http://gov.ca.gov/press-release/15691/> for more information.

>>> "Hubbs, Andrew" <Andrew.Hubbs@fire.ca.gov> 1/28/2011 4:15 PM >>>

Brandon,

Could you please review the attached habitat assessment table for sensitive species (based on a five mile radius CNDDDB query) of the Bridge Street Fuel Break. This project is located in Cambria in a mixed

Monterey pine-coast live oak forest. I sent a map and brief description

of this project to you earlier, but to recap, we would "remove" most of the understory trees, shrubs, and smaller diameter downed woody debris within the fuel break. This would be accomplished primarily through mastication (mechanical shredding), but also hand crew work (chainsaws) and possibly prescribed burning or pile burning. These activities would

take place on or after July 1st and before fall rain, except any burning

which might take place (likely in the fall). Fuel break maintenance may

occur every several years, likely using hand crews.

With regard to the attached table, could you provide your expertise on the following?:

* Does the "presence" or "absence" of habitat for each of the species within the project area seem reasonable and accurate?

* Would the proposed project, as describe, likely cause any significant negative impact to species that have habitat present?

* Conversely, would any of these species benefit from project activities (i.e. disturbance dependent plants)?

* If you advise significant impacts may occur, can you provide suggestions to avoid or lessen them (work a different time of year, survey and avoid, etc)

A preliminary look seems like most species would not be significantly impacted. I can't find information regarding the "preferred" disturbance regimes of several of the plants though. Any feedback you can provide to us is appreciated. I'd also be happy to show you around the project area, or just meet with you, if you like. Thank you for your time.

Andy Hubbs, Forester I
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From: Hubbs, Andrew
Sent: Thursday, December 16, 2010 10:04 AM
To: 'Brandon Sanderson'
Cc: Peters, Alan
Subject: Bridge Street Shaded Fuel Break

Attachments: BridgeStFuelBreak_24kTopo_20101210.pdf



BridgeStFuelBreak_
24kTopo_2010...

Brandon,

Another fuel break we are proposing is in Cambria (see attached map). This project involves using: 1) hand crews with chain saws and possibly chippers and/or 2) heavy equipment to shred or masticate vegetation in the understory (generally brush, small diameter trees ≤ 10 " diameter and small diameter dead and downed material). In areas without an overstory, brush or trees ≤ 10 " diameter would be retained to achieve a spacing of approximately 10-15 feet between crowns. Along the length of the fuel break the width would range between 100-150'. It is anticipated this project would be conducted during the summer or fall months. To maintain the functionality of the fuel break, future periodic maintenance may be proposed, likely involving hand crews to remove re-growth of vegetation. A neg dec is being prepared for this project and a coastal development permit is required. Please let me know if more information is needed for any recommendations you may have.

Thank you,

Andy Hubbs, Forester I
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USFWS Correspondence:

From: Peters, Alan
Sent: Tuesday, February 15, 2011 7:32 PM
To: Della_Snyder-Velto@fws.gov
Cc: Hubbs, Andrew
Subject: CLRF - Proposed Fuel Treatment Projects

Attachments: CRLF Protection - Attachment C.pdf;
BridgeStFuelBreak_24kTopo_20110114.pdf;
W.Atascadero.FuelBreak_8.5x11Topo_2011.01.28.pdf;
W.AtascaderoFuelBreak_NDDB_20110215.pdf; SLO-2-3-
4_2010_CRLF_fCH.pdf; BridgeStFuelBreak_NDDB_20110215.pdf

Della,

You and Julie have been a big help in keeping our Los Osos project moving along and we appreciate that.

This message is to ask for your assistance with two additional projects for which we are proposing mechanical treatment of vegetation within red-legged frog critical habitat. Project topo maps and maps showing the current NDDB layer are attached and a brief project description of each is below. Thus far we are working with Brandon Sanderson from DFG and CAL FIRE biologist Bob Motroni to address the other non-federally listed plant/animal issues.

Bridge Street Fuel Break - Approximately 50 acres in an unsurveyed area of the County bordering the eastern edge of the town of Cambria within the Coastal Zone. Mechanical mastication (shredding) is proposed to create a shaded fuel break. Project area has been reduced to approximately 100' wide in order to minimize disturbance. According to the current CNDDDB layer, Santa Rosa Creek provides red-legged frog habitat approximately 450 feet from the southern end of the project area on the opposite (south) side of town. Project area is upland habitat consisting entirely of Monterey pine forest. There are some small ephemeral streams within the project area. According to the attached critical habitat map, this area is within critical habitat unit SLO-2.

West Atascadero Fuel Break - Approximately 60 acres in an unsurveyed area of the County just north of Highway 41 near Devil's Gap. Mechanical mastication (shredding) is proposed to create a shaded fuel break. Project area is approximately 150' wide. According to the current CNDDDB layer, a red-legged frog location exists near Devil's Gap in Morro Creek approximately 1/4 mile south of the south end of the project area. Toro Creek lies a few hundred feet north of the north end of the project area. Project area is steep upland habitat consisting entirely of chamise chaparral. According to the attached critical habitat map, this area is within critical habitat unit SLO-3.

Our standard mitigations for these projects include applicable provisions of the attached protection guidelines which were developed for timber harvesting. Project timing for both projects is planned to occur between July 1 - October 31, 2011. Due to timing and the absence of aquatic habitat within both project areas, we think potential adverse impacts to CLRF and this critical habitat are not likely. However, we anticipate that we will need to provide additional information to substantiate this opinion. The objective of this project is to reduce the important risk of fire present in this area which will in turn

provide significant habitat protection.

Please let me know what additional information you need and advise us how to proceed with this CRLF issue. Thanks for your help.

Alan Peters, Unit Forester
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CRLF Protection - BridgeStFuelBreak_ W.Atascadero.Fuel W.AtascaderoFuelB SLO-2-3-4_2010_C BridgeStFuelBreak_ Attachment C... 24kTopo_2011... Break_8.5x11T... reak_NDDB_201... RLF_fCH.pdf (5... NDDB_2011021...

Central Coast RWQCB Correspondence:

From: Hubbs, Andrew
Sent: Thursday, December 16, 2010 1:44 PM
To: 'mhiggins@waterboards.ca.gov'
Cc: Peters, Alan
Subject: Review of the Bridge Street Shaded Fuel Break

Attachments: BridgeStFuelBreak_24kTopo_20101210.pdf



BridgeStFuelBreak_24kTopo_2010...

Mike,

The above referenced fuel break is located in Cambria (map attached). This project involves mastication and/or hand crew work (chainsaws/chippers or burn piles) and is similar to the West Atascadero project I sent you, . The main difference is we are following property lines and roads rather than just ridgelines. Another difference is the Atascadero project has little in the way of trees; here we are leaving most trees over 10" in diameter and removing most trees smaller than that and most of the brush. The end result will be an overstory of pine and oak (trees greater than 10" diameter), with a few scattered small trees and shrubs in the understory. Again, the masticated or chipped material remains on site, no equipment/soil disturbance/vegetation disturbance near watercourses, no equipment on saturated soils.

Future maintenance, if any, of the fuel break would involve hand crew work.

I'll be happy to discuss in more detail if you feel the project may impact water resources. Thank you for your time and help.

Andy Hubbs, Forester I
Hazardous Fuel Treatment Program

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