



**AIR POLLUTION
CONTROL DISTRICT**
COUNTY OF SAN LUIS OBISPO

October 5, 2011

Daniel G. Foster
Senior Environmental Planner
CALFIRE
P.O. Box 944246
Sacramento, CA 94244-2460

SUBJECT: APCD Comments Regarding the Bridge Street Fuel Break Project Referral (SCH# 2011081093) - Initial Study & Draft Mitigated Negative Declaration

Dear Mr. Foster,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed Bridge Street Fuel Break Project. This forestry fuel reduction project will create a fuel break by reducing understory fuels through mechanical shredding and hand crew work on approximately 50 acres of land in the Cambria area. *The following are APCD comments that are pertinent to this project.*

GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each. **Please address the action items contained in this letter that are highlighted by bold and underlined text.**

Page 30 of the Initial Study (IS)/Mitigated Negative Declaration (MND) indicates that there will be vehicular emissions, diesel particulate emissions and emissions from mastication equipment; however, there is no quantification of these emissions other than stating that the emissions will occur over a 20 to 100 day period. **Please quantify these emissions and compare the estimated emissions with thresholds listed in Table 1 on page 30. If the daily or quarterly emissions exceed the APCD significance thresholds, mitigation measures will be necessary to bring the air quality impacts below APCD thresholds.**

APCD
#1

The IS/MND does not clearly state whether pile burning will be part of this project, or the extent of the emissions if pile burning does occur. Page 31 of the IS/MND indicates that pile burning will have the potential to impact air quality standards. Therefore, if pile burning is part of this project, it is extremely important that CALFIRE work with the APCD to select burn conditions that will minimize impacts to local air quality. **The CALFIRE burn boss should be in frequent contact with APCD staff prior to the burn to select a burn window that meets burn prescription and has meteorological conditions that minimizes smoke impacts to nearby residents (sensitive receptors).**

APCD
#2

Nuisance

The project indicates that the proposed fuel reduction activities will include mechanically shredding or masticating trees and brush, which will result in particulate emissions. As defined in APCD's Rule 402, a person shall not discharge, from any source whatsoever, such quantities of air contaminant or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or public, or which cause or have a natural tendency to cause, injury or damage to business or property. **The project must comply with APCD's Rule 402.**

APCD
#3

Thank you for the opportunity to comment on this project. If you have any questions or comments, feel free to contact me at 781-5912.

Sincerely,



Gary Arcemont
Air Quality Specialist

GJA/arr

cc: Mark Elliot, Enforcement Division, APCD

From: Valerie Bentz [mailto:vbentz@fielding.edu]
Sent: Thursday, September 29, 2011 11:39 PM
To: Sacramento Public Comment
Subject: Objections to use of masticator on Cambria forest preserve

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

Dear Mr. Foster:

Cambria's Monterey pine forest is one of three remaining in the United States, one of five in the world. You and other Californians paid 4.5 million to protect it as part of an easement preserve. The forest is not only a hallmark of Cambria but plays a vital role in keeping our surroundings beautiful, our air fresh, and our community a tourist attraction.

The current plan calls for use of a Giant Masticator machine to cut a swath 100 ft wide covering over 50 acres of our forest. Everything but the top of the largest trees would be shredded. This includes animals who may not be able to run away from it in time, such as newborn fawns, baby owls, and thousands of other creatures who help sustain our lovely forest environment!

All of the material is pulverized, which given our normal winds, would wind up in our lungs, including molds, pollens, dust and ground up animal matter.

The argument that this is needed to stop a possible forest fire from spreading is spurious. Such masticator-made breaks at Yellowstone Park did not impede the progress of their gigantic fires. In fact, due to the rapid growth of grasses and other invasive species in the newly cleared land, the fires spread more rapidly.

Fire Science Research found that mastication, or mechanical thinning increased fire mortality. Even more so, they found that "live, dense green shrubs resisted fire significantly better than areas that had been mechanically masticated. . . in a number of cases, the persistence of dry surface fuels in the masticated units appears to have abetted rather than resisted fire. Such surface fuels can persist in the Sierra Nevada's dry forests for decades." http://www.sierraforestlegacy.org/FC_FireForestEcology/FFE_FireScience.php The same could happen in Cambria.

A project in Santa Barbara County replaced masticators with hand cutting, <http://lpfw.org/news/0611figmntn.htm>, after objections from Los Padres ForestWatch.

Our community could provide a fire barrier using less violent and indiscriminately destructive means.

A crew of workers would not only employ people (who hopefully would be locals) but would allow for preservation of some of the important forest floor and habitat. Sure it would cost more. But maybe we could not do so much at one time and spread out the cost.

VB #11

VB #12

A one hundred foot wide fire break is wider than needed and would allow, if not encourage, the building of roads and more forest destruction in the future.

VB #13

What we do need is implementation of the Forest Management Plan with a professional arborist working with Cambria citizens and the fire department to manage and maintain our rare and lovely forest.

VB #14

Sincerely,
Valerie Bentz,
1855 Cardiff Dr.,
Cambria, CA., 93428

Valerie Malhotra Bentz, Ph.D., C.C.S.
Professor, School of Human and Organization Development
Fielding Graduate University

From: Jeannine [mailto:blueheronca@gmail.com]
Sent: Tuesday, September 27, 2011 11:02 PM
To: Sacramento Public Comment
Subject: Giant Masticator for clearing 50 acres of Cambria's valuable and rare Monterey Pine Forest.

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

Hello Mr. Foster and CALFIRE officers,

I would like to think that a machine could make a great fire break for our town and forrest; but, after interviews with people who have deeply researched this matter, I am objecting to this means of "fire protection".

] JJ #15

First, I'd rather spend Stimulus Money on human labor, than a machine. I would not like that corps of workers to do a prevention burn, or clearing with fire, though—as they are typically not well trained and our forest is endangered.

Also, I think that 100 feet in width is awfully wide, for this purpose, but I'm no expert on fire.

] JJ #16

Second, the chips will encourage fire spreading, as has been experience (even from one cigarette). The chipping will also spread a fungus or seeds from invasive plants.

] JJ #17
] JJ #18

Third, the weight of the machine will trample the soil, destroying the porosity of layers of loam, sand, and dirt that aereate the topsoil.

] JJ #19

Fourth, the trees could be felled, and the owner could sell them for timber or for firewood. This would be substantial and sustainable (as in a use of resources). Why doesn't the Forest Service provide such a service, and gain back through the sale of the wood.

] JJ #20

Management is all about Sustainability and "do no harm".

] JJ #21

Jeannine Jacobs
Earth Awake

October 7, 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
sacramentopubliccomment2@fire.ca.gov

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.

We spent the day quietly exploring narrow, sun dappled pathways underneath the canopy of beautiful and stately Monterey Pines and California Coast Live Oaks. We inhaled the warm, sweet scent of Candycap mushrooms poking up thru the pine needles, and were utterly delighted when discovering an entire raised area contained one especially giant yellow Amanita underneath. Bird enthusiasts called out "Quail, Stellar Jay, Nuthatch, Grosbeak, Wren, Woodpecker, and Oriole", amid the shrieks of diving Red Tail and Coopers Hawks shooting thru the mid canopy. Others proudly pronounced the common and Latin names of all the wildflowers and bushes, and we would sometimes be able to return the favor by spotting and pointing out a deer, a fox, a sleeping owl or squirrel up high in a Pine tree. I didn't know there were so many different kinds of grasses and sedges and until I learned that "Sedges have edges; rushes are round; grasses are hollow right up from the ground".

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.

JMW
#22

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.

JMW
#23

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)."

JMW
#24

JMW #25

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.

JMW #26

JMW #27

JMW #28



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.

JMW #29

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.

JMW #30

JMW #31

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.

JMW #32

JMW #33

JMW #34

Fire Risk?

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

JMW #35

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.

JMW
#35

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."

JMW
#36

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.

JMW
#37

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

JMW
#38

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.

JMW #38

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.

JMW #39

JMW #40

JMW #41

JMW #42

JMW #43

JMW #44

JMW #45

JMW #46

JMW #47

JMW #48

JMW #49

JMW #50

JMW #51

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.] JMW#52
2. Detailed Archeological Investigation should be performed if mastication is used.] JMW#53
3. Complete on the ground surveys to identify wildlife and sensitive species before mastication is used.] JMW#54
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.] JMW #55
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.] JMW#56
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!] JMW #57

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.] JMW #58
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:

JMW
#59

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

JMW
#60

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 Property. 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 *et 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)(1) 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").

JMW
#60

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 *et 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 easement in, on, over, and across the Property (the "Easement"), granting to 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 1 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 a 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 1(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-1, 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 Property labeled on the Map as "Range Area", and includes (i) areas labeled on the Map as parcels C-1, C-2 and C-3 (excluding however, the 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 time required by Grantee to carry out 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 Property 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

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

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 Property 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, are 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.

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(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 to obtain a 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 Property 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 property (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 et 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 times 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.

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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-1 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 withheld, and any fence built with such approval shall meet the following criteria (in addition to any others set by Grantee in its approval): (1) the fence shall be built solely within two (2) feet 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.

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12. Commercial Uses. There shall be no commercial or industrial use of the Property, 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 Property. 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 Property 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(c) 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

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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

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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

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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?

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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.

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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.

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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.

EB
#66

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 mahalal@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.

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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

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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.

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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?

MB #70

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.

MB #71

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-1 which is attached to this Deed shall be planted anywhere at the Property.

MB #72

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.

MB #73

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 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 re-vegetated after harvest.*

French broom foliage and seeds are toxic, containing a variety of quinolizidine 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.

MB
#73

MB
#74

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-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,

Nichole Burton

MB #74

MB #75

MB #76

MB #77

MB #78

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>

Cal-IPC > Invasive Plants > Invasive Plant Management > Invasive Plants of California's Wildlands > pages > Invasive Plants of California's Wildland

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:

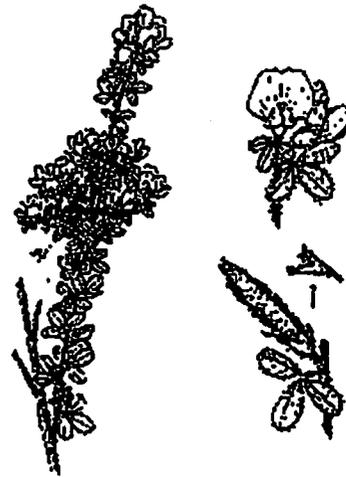
French broom (*Genista monspessulana*) is an upright, evergreen shrub, commonly to ten feet tall. The round stems are covered with silvery, silky hair, and the small leaves are usually arranged in groups of three. About eighty-five percent of the photosynthetic tissue of French broom is in leaf tissue. 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 Rejmánek 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 eliasome (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.

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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?

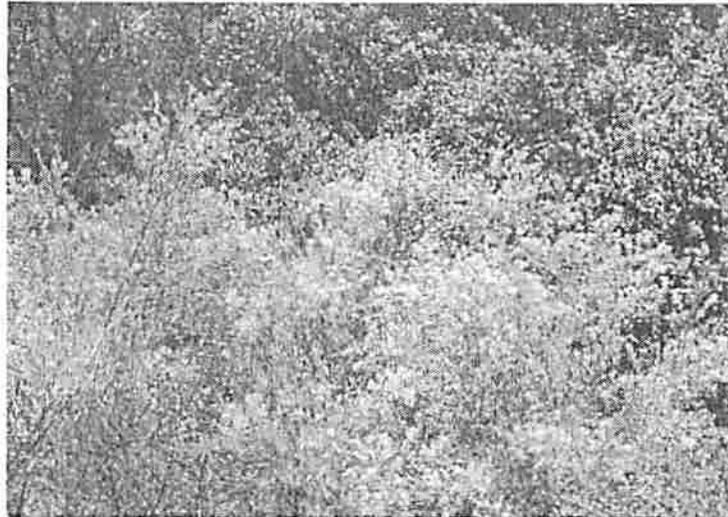
French broom currently occupies approximately 100,000 acres in California (D. Barbe, pers. comm.). It displaces native plant and forage species, and makes reforestation difficult. It is a strong competitor and can dominate a plant community, forming dense monospecific stands. In an experiment in New 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 (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 roadsides obstructs views, requiring expensive ongoing road maintenance. This species establishes a dense, long-lived seedbank, making it difficult to eradicate.

Â

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.

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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 Hasten® or Penevator® 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 dehiscence.

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 Garlon®) (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 Roundup®, 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.



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 nearly 10 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.

GS
#79

With that said, I offer the below comments:

- 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

GS
#80

RICHARD HAWLEY
EXECUTIVE DIRECTOR



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- (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 property is required but under decent 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.

GS
#80

GS
#81

GS
#82

- 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.

GS
#83

GS
#84

- 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 MND and adequate mitigation developed.

GS
#85

- 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

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#86

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#89

are more important than 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.

GS
#89

- 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.

GS
#90

- 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.

GS
#91

- 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.

GS
#92

- 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.

GS
#93

- 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.

GS
#94

- 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?

GS
#95

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.

GS
#96

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 document.

GS
#97

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



DAN FOSTER, SR. ENVIR. PLANNER
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Dan Foster, Senior Environmental Planner
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Program – Environmental Protection
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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.

CFC
#98

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.

CFC
#99

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.

CFC
#100

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

CFC
#101

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.

CFC
#101

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.

CFC
#102

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.

CFC
#103

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.

CFC
#104

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.

CFC
#105

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 probability of public access and the potential for starting a fire.

CFC
#106

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

CFC
#107

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

CFC
#107

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.

CFC
#108

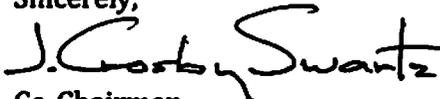
The CFC is aware of three fuel breaks in the Cambria pine forest. The one at the Top of the World was implemented in 1996 by CalFire. Based on discussions with residents adjacent to the fuel break, it was poorly executed and never included any monitoring or maintenance. It has and continues to contain 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.

CFC
#109

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.

CFC
#110

Sincerely,



Co-Chairman
The Cambria Forest Committee



Secretary
The Cambria Forest Committee

From: Kim Miller [mailto:panoramakimberly@gmail.com]
Sent: Sunday, October 09, 2011 4:04 PM
To: Sacramento Public Comment
Subject: My concerns regarding the vegetative removal in Cambria

Hi Dan,

I hope I am not too late to express my concerns regarding the upcoming plans of the California Department of Forestry and Fire Protection to use a masticator machine to clear the 50 acres surrounding Cambria.

While I recognize the importance of a fire break for the WUI around my town and realize that the use of this machine may be more economical, I feel that other options to clear the area need to be looked into because of the damage these type of machines do to the ecosystem and the possible health hazards they

KM
#111

One of the reasons I purchased a house in Cambria is because of the exquisite forest and uniqueness of the landscape. I am also aware that one of the important ways to keep it healthy is to maintain

I have read a few accounts of masticating equipment being used and the following problems associated with that type of vegetative removal. Therefore I ask that other options be considered to not totally rely on using this, in my eyes, destructive method.

1) In the oak woodlands in San Luis Obispo County near Diablo Canyon, the use of the masticator reduced the woodlands to clear land and many invasive plants now have colonized the once intact habitat.

KM
#112

2) It breaks the material into fine particles that are then dispersed in the air. For someone - me! - who has a severe reaction to poison oak and a husband who is sensitive to pollen, this seemed unnecessarily dangerous to have in the air where I live.

KM
#113

I had a friend who was sent to the emergency room due to inhaling poison oak while burning it. I have heard that you need a follow truck to put out the fires the masticating equipment might cause which just seems silly...we don't want fires, right?

KM
#114

3) The other concern for me is the wildlife. If through the course of removal, no thought is given to what is chewed up, many nesting young birds and other small wildlife who make their home in the masticator's path will be killed unnecessarily. Since this habitat does have some animals, like the burrowing owl, whose population is declining in California, I would like my tax dollars to be spent clearing the area WITHOUT further distressing the local fauna.

KM
#115

3) With the economy the way it is, hiring more people to clear the area, would be a good thing to consider even though it seems more costly. In the long run, with maintaining a healthier ecosystem and tourist-friendly forest, the costs may be less and the profits more if you use manpower. You also wouldn't have the problem of fire since you have to use a masticator when the conditions are dry.

KM
#116

My biggest concern is that you are using a short-term, cheaper solution that has shown to cause longer-lasting, permanent damage that will most likely cost more in the long run.

KM
#117

Thank you for considering my concerns.

Kim Miller
Cambria, California

From: Wayne Gracey [mailto:wgsurf@charter.net]
Sent: Monday, October 10, 2011 7:51 AM
To: Sacramento Public Comment
Subject: Cambria Firebreak

Dear Mr. Foster,

We are long time Cambria residents and have lived in our home which backs up the the (now) Covell Ranch for 30 years.

Although we are not opposed to the proposed "Firebreak", and understand the purpose and benefits of such, we are concerned about the methods of mass clearing by use of the "masticator" as described in the CEQA documents.

We are concerned about destroying existing native plants and shrubs such as the Coffeeberry, Toyon, and rare Madrone growing near our property. These are often multi-trunked and are far less than the 10" diameter being slated for destruction. We are also concerned about the existing young, healthy Monterey Pines and Coastal Oaks which will be mowed down according to the criteria of anything under 10" in diameter. These are the specimens which should be preserved and allowed to grow to maturity to replace the old ,diseased, and dying trees.

We are also concerned about disturbing the natural habitat of various wildlife such as the quail which nest in the forrest understory.

We would like to encourage more use of the hand crews to clear the brush and understory around the healthy young trees and native trees and shrubs instead of the clear cutting effects of the proposed masticator.

Thank you for your consideration of our concerns.

Sincerely,

Wayne and Madie Gracey
984 Manor Way
Cambria, CA 93428
(805) 927-8382

WMG
#118

WMG
#119

WMG
#120

From: Brent Berry [mailto:brentarc@charter.net]
Sent: Monday, October 10, 2011 11:00 AM
To: Sacramento Public Comment
Subject: Covell Ranch/Bridge Street Fuel Break

Dan Foster
Senior Environmental Planner
Cal Fire

Dear Dan,

I am a resident of Cambria. I have resided at 656 Weymouth Street for approximately 35 years. We are about 300 feet from the WUI that you are considering for a fuel reduction program and I am very familiar with the forest that borders our neighborhood.

I am not opposed to the fuel reduction idea....the removal or thinning of the understory.... however I am concerned with the proposal to use heavy equipment (masticator) to do the removal.

In my experience of walking the forest trails for 35 years, I have noticed that ALL the areas in which the forest floor was disturbed by heavy equipment.... the invasive plants have taken over....specifically scotch broom. A good example can be seen in the forest area bordering the eastern Leimert Estates and Camp Yeager ...Buckley Road and Cambria Pines Drive. When that area was developed 20-25 years ago, they were required to clear a 100 ft. break along the forest border. Within a few years, the scotch broom took over....and is now very apparent in those areas.

I think a good example of a successful fuel reduction program can be seen on the WUI areas of the Fiscalini Ranch. To my knowledge, that was all done by hand crews without disturbing the forest floor.

I appreciate the work you are doing to protect our neighborhoods from devastating wild fires....my hope is that you can find a balance between preserving the delicate nature of the forest and protecting our neighborhoods.

Thank you for the opportunity to comment...

Brent Berry

BB
#121

From: Richard Shepard [mailto:shepardconsulting@verizon.net]
Sent: Monday, October 10, 2011 2:47 PM
To: Sacramento Public Comment
Subject: Comments on IS/Draft MND: Proposed Bridge Street Fuel Break Project, Cambria, CA

October 10, 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

RE: Comments on IS/Draft MND: Proposed Bridge Street Fuel Break Project, Cambria, CA

Dear Mr. Foster:

I wish to comment on the Initial Study (IS) and Draft Mitigated Negative Declaration (MND) for the proposed Bridge Street Fuel Break Project located in Cambria, northern San Luis Obispo County, California.

I am a Cambria homeowner whose property is directly adjacent to a portion of the project area that will occur on Covell Ranch. Before I present my comments, I would like to state that I welcome the fuel break effort because even though it will alter the present scenic value of the forested area behind my home, it promises to significantly reduce the threat of wildfire damage to my property and that of my neighbors. With that, I will sleep more easily.

My comments on the IS/MND arise from two separate areas of concern: 1) my concern as a homeowner about increased runoff to my property as a result of vegetation removal, and 2) my concern as a professional archaeologist about the adequacy of the cultural resources assessment for the project.

1. Concern about increased runoff

My property abuts Covell Ranch and is situated downslope. Even with existing vegetation on the ranch behind my back fence, rain runoff flows into my property, at times aggressively. I have installed several French-type tubular drains to alleviate this, but they are usually overwhelmed in a heavy downpour.

I am concerned that vegetation removal resulting from the project, which I understand will occur 50 feet or less from my property, will cause faster and more aggressive runoff and exacerbate the situation. I regard this as a secondary but direct impact of my property by the project. When I verbally presented this concern at a public meeting about the project earlier this year, CAL FIRE personnel indicated that they would work with me on this issue, perhaps by adding minor trenching or berm features to redirect rainwater toward a natural drainage next to my property. I would like to request, therefore, that CAL FIRE assist me in this matter during or soon after the fuel break work takes place, particularly if the rainy season is imminent, to help prevent undue damage to my property.

2. Concern about archaeological assessment

In addition to being a homeowner affected by the project, I am also a Registered Professional Archaeologist (RPA, #12069) with 17 years of experience in California CRM (Cultural Resource Management), and I am familiar with the CEQA process as it relates to cultural resources. I also realize that, because the Archaeological Survey Report is not circulated with other documents for

RS1
#122

RS1
#123

public review, I am not able to read about the methodology and supporting documentation in more detail at this time.

First, I am concerned that CAL FIRE's assigning of the archaeological assessment to its own staff (p. 42 of the IS/MND) represents a conflict of interest. Too often, an internal approach of this nature creates a way to provide the project proponent (in this case, the lead agency) with an outcome it desires (i.e., the least costly). Thus, it reduces objectivity and puts actual or potential resources at risk. In the interest of best serving actual or potential resources, therefore, I request that the Phase I archaeological study be redone by a qualified, contracted consultant not associated with CAL FIRE to produce more objective results and more appropriate recommendations about mitigation (see below). I remove myself from this process.

Second, I am concerned that CAL FIRE has dismissed any possibility that archaeological materials might be present in the project area (p. 43 of the IS/MND). Even though the records search by the Central Coastal Information Center at UC Santa Barbara did not indicate any previously recorded archaeological evidence in the vicinity, it is clear that the project occurs largely within the heavily forested Covell Ranch, and that substantial buildup of forest debris (decaying wood and so on) is the very reason for needing the project. Adequate visibility of the ground is key to archaeological survey, and it is readily apparent that visibility of the project surface – at least directly behind my property – is highly constrained by fallen trees and limbs, leaves, pine needles, and other forest debris. As an archaeologist, I would rate ground visibility here as no more than 25% and characterize it as "poor." That said, poor ground visibility is often the case during archaeological survey, but the appropriate response in this case is hardly a negative assumption. Rather, a proactive approach to natural and relatively undisturbed areas such as this is to recommend some level of archaeological monitoring of ground-moving activities so that topsoils can adequately be examined as they are exposed, especially in proximity to natural drainages. I request, therefore, that archaeological monitoring of ground-disturbing activities (grubbing, grading, etc.) in natural areas with poor ground visibility be required as a mitigation measure for the project.

Third, I am concerned that CAL FIRE has dismissed any possibility that paleontological resources might be present in the project area (p. 43 of the IS/MND). I agree that the nature of the project, which is assumed to cause only shallow ground disturbances, likely precludes any impacts to fossil deposits, which typically occur at greater depths. However, the IS again appears to offer only a negative assumption, and this assumption should not be made without supporting documentation (i.e., a records search by a qualified paleontologist at an appropriate repository). I do not see a citation of this type and therefore request evidence of the documentation, or at least the rationale used to come to this conclusion.

I do not make these comments simply to criticize CAL FIRE, whom we all depend on to safeguard our homes from the devastation of wildfires. I have the deepest respect for all firefighting agencies and the critical work their personnel perform, and I welcome the proposed fuel break.

As a professional archaeologist, I have an ethical obligation to protect cultural resources, even when this is essentially a matter of logic and methodology, and I submit my comments entirely from the perspective of doing the job right.

Sincerely,

Richard Shepard, RPA

Richard Shepard Archaeological Services
9280 Santa Fe Springs Road
Santa Fe Springs, CA 90670
Tel: (909) 815-5078
Fax: (909) 801-2622

RS1
#123

From: roger craig [rcoverturf2000@yahoo.com]
Sent: Thursday, September 22, 2011 11:11 AM
To: Foster, Dan
Subject: Cambria fire-break

Dear Mr. Foster,

Many thanks for sending my wife (Rosalie) the materials regarding the planned clearance project—somebody has obviously been doing their homework! Very impressive planning.

RCO
#128

I have a couple of questions:

1) Does this work require prior approval from the Calif. Coastal Commission? (It seems just about everything else in Cambria does!) If so, what is the schedule for that?

2) Several of us in the Leimert area (on Cambria Pines Drive and Buckley Drive) have already cleared brush, etc. 100 ft. or more around our homes. Adding another 100 ft. of depth behind these houses would appear redundant; is there any possibility of recognizing this and cancelling the planned clearance adjacent to our homes? It would certainly enhance the rear forest views, which was one of the reasons most of us built here, and our own clearances should provide the same fire-break protection.

RCO
#129

Many thanks for taking the time to communicate with us.

With best regards,

R.C. Overturf

From: roger craig [rcoverturf2000@yahoo.com]
Sent: Thursday, September 22, 2011 11:11 AM
To: Foster, Dan
Subject: Cambria fire-break

From: Catherine Ryan Hyde [mailto:ryanhyde@cryanhyde.com]
Sent: Sunday, October 09, 2011 8:53 PM
To: Sacramento Public Comment
Subject: Masticator in Cambria

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

Dear Dan Foster,

Cambria residents are becoming understandably (in my opinion) weary of the negative declaration. It no longer comforts us when local government says, "This will have no effect on the environment." Because there are rarely any studies to back it up. They say it won't hurt because they say it won't hurt.

CRH
#130

It seems to me that an environmental impact report is the tool for learning whether something will hurt the environment or not. The neg dec seems to be the tool for those who don't care to know.

As to this giant masticator that will grind a 100-foot wide swath through our rare pine forest and chew up 50 acres of it: I'm all for stopping fires. But where I come from, when you take live, growing wood, cut it dead, chip it into small pieces and leave it in the sun to dry, that's not called a fire break. That's called kindling.

CRH #131

CRH
#132

I've tried to read up on the issue, and it seems that hand cutting is far preferred, and that it is indeed true that masticator-cut forest can often accelerate a fire instead of retarding it. I know hand-cutting is more expensive, but I hope money doesn't matter more than Cambria homes, and Cambria ecology.

CRH
#133

Please, this issue needs more study. By the time we chew up 50 acres of dry tinder, it will be too late to learn more.

CRH
#134

Thank you,
Catherine Ryan Hyde

From: nancy anderson [mailto:anderso2@ucla.edu]
Sent: Monday, October 10, 2011 11:45 AM
To: Sacramento Public Comment
Subject: Covell Ranch/Bridge Street Fuel Break

Dan Foster
Senior Environmental Planner
California Department of Forestry and Fire Protection (CAL.FIRE)
Resource Management Program-Environmental Protection

Dear Mr. Foster:

You have undoubtedly received other letters of concern regarding the proposed fuel break planned for the Covell Ranch. At the risk of overloading your desk with another letter, I feel compelled to add my concerned voice to the others you have heard.

NA
#135

As a home owner and full time resident in Cambria, I appreciate that CAL.FIRE wishes to protect Cambrians from a devastating fire. My concern regards the manner in which the plan is evolving.

The plan to expand the urban wildlife interface well into the forest by using a masticator that destroys everything in its path is frightening. Such a plan endangers wildlife habitats and leaves a swath of land open to invasive growth that may lead to more damaging fires than a more careful and ecologically balanced plan.

NA
#136

Please consider the ecological implications of the current plan and encourage a modified plan that removes dangerous growth but preserves important protective understory growth and avoids the damage that will be done with a masticator.

NA
#137

Respectfully,

Nancy Anderson
P.O. Box 1417
Cambria, CA 93428

From: John Jamrog [mailto:jjunk7734@sbcglobal.net]
Sent: Saturday, October 08, 2011 9:24 AM
Subject: Dan Foster.....Cambria Fire Break

Hi Dan,

I read about the proposed fire break for Cambria in our local newspaper. I think this is a great idea. Cambria is a fire disaster just waiting to happen. Years and years of downed trees and pine needles have made this area a prime target for a major fire.

I have contracted with Cal Fire since 1975. We have worked over 130 fires in the State of California. I would like to donate my dozer to work with Cal Fires dozers in creating this fire break. I also can come up with several local Cambria contractors who would love to get involved with this project. This would be our way to give something back to the community.

Please keep me in mind, we would love to do this project.

Thanks

John Jamrog
Bow Valley Agri-Land Services
Atascadero , CA
Cell 805-391-0103

JJ2
#138

From: Connie Edwards [mailto:cedwards56@sbcglobal.net]
Sent: Saturday, October 08, 2011 1:09 PM
To: Sacramento Public Comment
Subject: Stop The Masticator

Mr. Dan Foster

Senior Environmental Planner
CALFIRE
Resource Management Program-Environmental Protection
916-653-0839

Dear Sir:

This letter is to ask you to stop the use of the Masticator to clear a firebreak around my hometown of Cambria. I am highly opposed to this type of massive disruption of our special forest environment. It is highly destructive of the native shrubs, grasses, and animals who rely on this place for existence.

CE
#139

Please approve the use of manual hand cutting which was used in Santa Barbara County. Also, a much less wide (100 ft. is overkill) of 50 feet wide is more realistically achievable by manual removal of selected plant material that is more apt to burn out of control.

CE #140

CE
#141

This would insure that we get the protection we need but without the massive disruption of the ecology in the break area.

Please work with us, Cambria citizens, our Fire Department, and a professional arborist to implement the Cambria Forest Management Plan to manage and protect our rare forest.

CE
#142

Sincerely yours,

Constance Edwards
1957 Sherwood Dr.
Cambria, CA 93428

From: Connie Edwards [mailto:cedwards56@sbcglobal.net]
Sent: Saturday, October 08, 2011 1:09 PM
To: Sacramento Public Comment
Subject: Stop The Masticator

From: Christine Heinrichs [mailto:christine.heinrichs@gmail.com]
Sent: Thursday, September 29, 2011 7:03 PM
To: Sacramento Public Comment
Subject: Cambria Masticator

To: Dan Foster, Senior Environmental Planner, California Department of Forestry and Fire Protection

Regarding the proposed use of a masticator to clear firebreaks in the Monterey Pine forest in Cambria: This is an inappropriate technology for a project that is too large for the forest. Using this noisy, destructive machinery to cut 100-foot firebreaks applies too much technology to a natural area that was purchased by the community to protect it.

CH
#143

CH
#144

As a Cambria resident, I appreciate the need to protect against fire. This recommendation from the knowledgeable fire professionals is valuable. Now we need an evaluation from a forest professional who understands trees and forest ecology before we send in these destructive machines to cut huge swathes through the forest. Residents live in our community because we love the forest. It's not credible to me that the only way we can be safe from fire is to create a dead zone around the forest.

CH
#145

CH
#146

Hand cutting to thin underbrush is one possible alternative. Let's find a better way.

CH
#147

--
Christine Heinrichs
1800 Downing Ave.
Cambria, CA 93428

From: arlastevens@att.net [mailto:arlastevens@att.net]
Sent: Friday, October 07, 2011 3:59 PM
To: Sacramento Public Comment
Subject: possible use of masticator in Cambria

Dear Mr. Foster,

Please avoid using this method of fire control in Cambria. The forest has many valuable functions that would be needlessly destroyed if this method were used.

] AS
#148

Arla Stevens

Cambria CA

From: Helen Pitton [mailto:helenpitton@gmail.com]
Sent: Friday, September 30, 2011 1:50 PM
To: Sacramento Public Comment
Subject: NO Masticator in Cambria, Please!

As long-time homeowners in Cambria, CA, we have just learned of the plan to clear a "swath" of our beautiful Monterey Pines by a Masticator Machine.

PLEASE do not do this. It would be much more appropriate to keep our forest and community safe from fire by working as a community to maintain our trees.

NO Masticator!!

Thank you for your consideration.

Helen and Jim Pitton

HJP
#149

From: Rick Smith [mailto:panoramarick@charter.net]
Sent: Sunday, October 09, 2011 8:16 PM
To: Sacramento Public Comment
Subject: No Masticator in Cambria

I would like to go on record as saying that the use of the masticator as proposed in Cambria is a bad idea.

Such destructive technology is unnecessary and environmentally insensitive. I am opposed to it and suggest you look into less extreme measures to reduce the fire danger in this town.

Rick Smith
A Cambria Resident and Home Owner
805-927-0199

RSL
#150

From: Carole & Phil Adams [mailto:pcadams71@sbcglobal.net]
Sent: Monday, October 10, 2011 2:22 PM
To: Sacramento Public Comment
Subject: Cambria shaded fuel break

For Dan Foster,
I want to comment on the proposed shaded fuel break for Cambria.

I am against using the masticator for creating this fire break it will not be possible to
leave a natural environment using this machine. If the construction of this fuel break
goes through I believe it should be done in a more human labor style that will be more
sensitive to the environment.

PA #151

PA #152

I am also very concerned about the size of the trees that will be allowed to remain as
shade. As the years go by and the culling of the smaller trees continues eventually the
old large trees will die and there will be no replacements.

PA
#153

Thanks for reading my email,

Phil Adams
Cambria

From: Lynne Harkins [<mailto:l.harkins@charter.net>]
Sent: Monday, October 10, 2011 5:08 PM
To: scott_butterfield@tnc.org
Cc: Sacramento Public Comment; mmiller@cambriacsd.org; Hubbs, Andrew
Subject: Cambria Forest-No to the masticator plan!

To All Whom it May Concern:

I am sending these comments by the Webbs to express my total agreement with the points they make in their thorough analysis.

LH
#154

In summary, the masticator is literally and figuratively overkill and will ultimately be counter-productive as it creates space for invasive, highly flammable grasses. Do not desecrate the Cambria Pine Forest by implementing this plan!

LH
#155

Thank you for your attention.

Lynne Harkins
Cambria

We want to echo the thoughts in this letter and ask that something less drastic be implemented.

WMB
#156

Sincerely,

Wayne & Marguerite Broome
Wayne and Marguerite Broome

2515 Burton Dr.
Cambria, Ca. 93428

(805) 927-2811

use of a giant masticator machine to cut a swath 100 feet wide covering over 50 acres of our forest.

Everything but the top of the largest trees would be shredded. This includes animals that may not be able to run away from it in time, such as newborn fawns, baby owls and thousands of other creatures who help sustain our lovely forest environment.

All of the material is pulverized, which, given our normal winds, would wind up in our lungs, including molds, pollens, dust and ground-up animal matter.

The argument that this is needed to stop a possible forest fire from spreading is spurious. Such masticator-made breaks at Yellowstone National Park did not impede the progress of their gigantic fires. In fact, due to the rapid growth of grasses and other invasive species in the newly cleared land, the fires spread more rapidly.

Fire Science Research found that mastication or mechanical thinning increased fire mortality. Even more so, they found that live, dense green shrubs resisted fire significantly better than areas that had been mechanically masticated ... in a number of cases, the persistence of dry surface fuels in the masticated units appears to have abetted rather than resisted

fire. Such surface fuels can persist in the Sierra Nevada's dry forests for decades" (<http://www.sierraforest>

[legacy.org/FC_Elec_ForestEcology/FIRE_FireScience.php](http://www.sierraforestlegacy.org/FC_Elec_ForestEcology/FIRE_FireScience.php)). The same could happen in Cambria.

A project in Santa Barbara County replaced masticators with hand cutting (<http://lpfw.org/news/0611/fgintn.htm>), after objections from Los Padres ForestWatch.

Our community could provide a fire barrier using less violent and indiscriminately destructive means. A crew of workers would not only employ people (who hopefully would be locals) but would allow for preservation of some of the important forest floor and habitat. Sure it would cost more. But maybe we could not do so much at one time and spread out the cost.

A 100-foot wide fire break is wider than needed and would allow, if not encourage, the building of roads and more forest destruction in the future.

What we do need is implementation of the Cambria Forest Management Plan with a professional arborist working with Cambria citizens and the fire department to manage and maintain our rare and lovely forest.

Please send comments by Oct. 10 to:

Stop the masticator

Stop the giant masticator! Cambria's Monterey pine forest is one of three remaining in the United States, one of five in the world. You and other Californians paid \$4.5 million to protect it as part of an easement preserve. The forest is not only a hallmark of Cambria but plays a vital role in keeping our surroundings beautiful, our air fresh and our community a tourist attraction.

The current plan calls for

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

Phone: 916-653-0839

Email: sacramento@pubcomment2@fire.ca.gov

Valerie Bentz
Cambria

From: Sondra Brown [mailto:sbtravels@charter.net]
Sent: Tuesday, September 27, 2011 1:56 PM
To: Sacramento Public Comment
Subject: Parks' Commission on Masticator

September 27, 2011

Dear Dan Foster:

Please Stop the Giant Masticator Plan that is being considered for Cambria, California

Cambria's Monterey pine forest is one of three remaining in the United States, one of five in the world. You and other Californians paid 4.5 million to protect it as part of an easement preserve. The forest is not only a hallmark of Cambria but plays a vital role in keeping our surroundings beautiful, our air fresh, and our community a tourist attraction.

The current plan calls for use of a Giant Masticator machine to cut a swath 100 ft wide covering over 50 acres of our forest. Everything but the top of the largest trees would be shredded. This includes animals who may not be able to run away from it in time, such as newborn fawns, baby owls, and thousands of other creatures who help sustain our lovely forest environment!

All of the material is pulverized, which given our normal winds, would wind up in our lungs, including molds, pollens, dust and ground up animal matter.

The argument that this is needed to stop a possible forest fire from spreading is spurious. Such masticator-made breaks at Yellowstone Park did not impede the progress of their gigantic fires. In fact, due to the rapid growth of grasses and other invasive species in the newly cleared land, the fires spread more rapidly.

Fire Science Research found that mastication, or mechanical thinning increased fire mortality. Even more so, they found that "live, dense green shrubs resisted fire significantly better than areas that had been mechanically masticated. . . in a number of cases, the persistence of dry surface fuels in the masticated units appears to have abetted rather than resisted fire. Such surface fuels can persist in the Sierra Nevada's dry forests for decades." http://www.sierraforestlegacy.org/FC_FireForestEcology/FFE_FireScience.php
p The same could happen in Cambria.

A project in Santa Barbara County replaced masticators with hand cutting, <http://lpfw.org/news/0611figmntn.htm>, after objections from Los Padres ForestWatch.

Our community could provide a fire barrier using less violent and indiscriminately destructive means. A crew of workers would not only employ people (who hopefully would be locals) but would allow for preservation of some of the important forest floor

SB
#57

and habitat. Sure it would cost more. But maybe we could not do so much at one time and spread out the cost.

A one hundred foot wide fire break is wider than needed and would allow, if not encourage, the building of roads and more forest destruction in the future.

What we do need is implementation of the Forest Management Plan with a professional arborist working with Cambria citizens and the fire department to manage and maintain our rare and lovely forest.

Using your influence, I again ask that you reconsider this plan by looking into alternatives, checking into the web sites above and giving careful attention to who and what possible special interests are involved in promoting this plan.

Thank you very much.

Sondra Brown
685 Evelyn Court, Cambria Ca 93428

sbtravels@charter.net

↑
SB
#157

] SB
#158

From: Alan Francisco [mailto:alanfrancisco@hotmail.com@change.org] **On Behalf Of** Alan Francisco
Sent: Sunday, October 09, 2011 6:54 PM
To: Sacramento Public Comment
Subject: Protect Cambria's Forest from the Giant Masticator

Greetings,

I just signed the following petition addressed to: California Department of Forestry and Fire Protection. ----- Not use a mechanical Masticator to clear a Fire Path Because everything but the top largest trees are saved. All the small animals - fawns, owls, and other wildlife my not be able to flee fast enough and destroys the forest floor. It also does not actually prevent fires as shown in other areas where it has been used. (Sierra Nevada, Santa Barbara and Yosemite) ----- Sincerely,

AF and
178 petitioners
#159
#160
#161

Unnecessary wildlife razing isn't good management.

AF
#162

San Diego, California

Note: this email was sent as part of a petition started on Change.org, viewable at www.change.org/petitions/protect-cambrias-monterey-pine-forest. To respond, email responses@change.org and include a link to this petition.

19 September 2011

Mr. Andrew Hubbs, Forester I

Andrew.hubbs@fire.ca.gov

RE: Proposed Fuel Reduction Treatment on Covell Ranch // 975 Northampton Street

Dear Mr. Hubbs,

Thank you for your letter of 7 September. We appreciate your work to make this project go smoothly.

Regarding the property line of our lot at 975 Northampton Street, Cambria:

The northeast corner of the property is marked by a 6-foot tall 4-inch diameter wooden post that was put in some years ago by a former owner of the adjacent property. It is our understanding that it properly marks that corner of our lot. From there the property line extends diagonally in a southwest direction to rather close to the end of the fence between our lot and our neighbors at 957 Northampton.

Please let me know if I can help in any other way; and please thank all concerned for their efforts to make our properties safer from fire.

Sincerely,

Holly Hoffer

(805) 927-8543

(Daughter of Rex Fairless, owner)

eandhhoffer@aol.com

HH
#163

Hubbs, Andrew

From: Gene Wagner [surfing2@charter.net]
Sent: Saturday, September 17, 2011 12:15 PM
To: Hubbs, Andrew
Subject: Your 9/7/11 Letter

Mr. Hubbs,

I am the owner of the residence at 6435 Cambria Pines Road here in Cambria. Using a metal detector, I have located the survey monument at the North-East corner of my property. I have marked it with a 3 foot green stake to which I have attached a yellow ribbon with the word "Corner" on each end of the ribbon.

GW
#164

I hope this will be of assistance in your worthwhile project. If you need any further information or assistance please feel free to contact me at this email address.

Gene Wagner

Hubbs, Andrew

From: marshall hamilton [marshallha@att.net]
Sent: Friday, September 16, 2011 7:42 PM
To: Hubbs, Andrew
Subject: Fuelbreak

September 16, 2011

Andrew Hubbs, Forester 1
Cal Fire San Luis Obispo

Dear Mr. Hubbs:

We support and appreciate the plan to develop a fuelbreak in the Cambria area between the forested and populated areas.

We learned the importance of being proactive rather than reactive in the 90's when a large fire approached where we lived then in the Santa Rosa Mountains of Riverside County. We had cleared material to develop a defensible area around our property and when we were told to evacuate, our reward for being prepared came when the fireman said "I think we can save your house". Others were not so prepared and were not so lucky.

MH
#165

Sincerely,

Marshall L Hamilton, Ph.D.
Ilme A. Hamilton
6475 Cambria Pines Rd.
Cambria, CA 93428

Hubbs, Andrew

From: Bob Mitton [rimitton@att.net]
Sent: Thursday, September 15, 2011 9:16 AM
To: Hubbs, Andrew
Subject: Covell Ranch fuel treatment

Hello Andrew,

I apologize for the delay in picking up your letter and responding. I have been out of the country for three months. I live at 6465 Cambria Pines Rd in Cambria and have a boundary with the area you that you will be treating. The boundary is clearly marked with a deer fence and you are authorized to clear fuel right to the fence. I have lived here for ten years and have occasionally done a bit of clean up, with Mr. Covell's consent, but I have not been equipped to do much more than move the problem further from the property line. I am a retired forester (educated and practiced in Canada) and I have been advocating fuel management with my neighbours and friends since I moved here so I am a strong supporter of the project you are about to undertake. Please drop by when you in the neighbourhood for coffee and a chat.
Bob Mitton

BM
#166

CAL FIRE
San Luis Obispo Co. Fire Dept
635 N. Santa Rosa
San Luis Obispo, CA 93405
Attn: Andrew Hubbs
September 9, 2011-09-09
Re: Fuel Reduction - Covell Ranch

Dear Forester Hubbs:

My property at 6406 Buckley Drive is the last parcel to adjoin the Covell Ranch on the west, and intersects with the Yeager Youth Camp. There is a permanent marker at the southeast corner of my property by the fence which will allow you to do whatever close up work is available to me. I am pleased to know that this fuel reduction project will be taking place.

I am, however, equally concerned about the amount of fuel buildup on the Yeager Camp property adjacent to the Covell Ranch. There is an abundance of Scotch Broom growing and lots of down wood, including one whole tree, against my property line fence. A number of other homes along the division of the Camp and residences have the same problem along their fence lines. At one time the camp manager cut the brush annually but finances curtailed that program. I hope some plan can be devised to provide more security to homes along that area and I am appealing to you to intercede. If this is not your role, I would greatly appreciate your forwarding my concerns to the proper person or agency.

Please contact me if you need further information or if I can be of any help.



Barbara Jewett
6406 Buckley Drive
Cambria, CA 93428
805 927-8819

BJ
#167