



Hayley Barnes <hayleybarnes.usltrcd@gmail.com>

RE: Covell Ranch VTP Discussion with USFWS

3 messages

Sanderson, Brandon@CALFIRE <brandon.sanderson@fire.ca.gov> Tue, Sep 28, 2021 at 3:02 PM
To: "Takano, Leilani" <leilani_takano@fws.gov>, "Kirkland, Debora L" <debora_kirkland@fws.gov>, "Mitcham, Chad J" <chad_mitcham@fws.gov>
Cc: "Henry, Steve" <steve_henry@fws.gov>, "kevincooper@resoluteassoc.com" <kevincooper@resoluteassoc.com>, "Nielson, Len@CALFIRE" <Len.Nielson@fire.ca.gov>, "Carr, Rick@CALFIRE" <Rick.Carr@fire.ca.gov>, "Engel, Jonna@Coastal" <Jonna.Engel@coastal.ca.gov>, "Matella, Mary@Coastal" <Mary.Matella@coastal.ca.gov>, "Cavalieri, Madeline@Coastal" <Madeline.Cavalieri@coastal.ca.gov>, "steve.auten.arc@gmail.com" <steve.auten.arc@gmail.com>, "Gee, Jonathan@CALFIRE" <Jonathan.gee@fire.ca.gov>, "andy.usltrcd@gmail.com" <andy.usltrcd@gmail.com>, "devin.usltrcd@gmail.com" <devin.usltrcd@gmail.com>, "riley.mcfarland.arc@gmail.com" <riley.mcfarland.arc@gmail.com>, "hayleybarnes.usltrcd@gmail.com" <hayleybarnes.usltrcd@gmail.com>, "firesafeslo@gmail.com" <firesafeslo@gmail.com>, "Johnson, Shannon@CALFIRE" <Shannon.Johnson@fire.ca.gov>, "O'Neil, Dennis@CALFIRE" <Dennis.ONeil@fire.ca.gov>, "legorova, Liza@CALFIRE" <Liza.legorova@fire.ca.gov>

Dear Leilani,

Thank you for your attention and review of the Project Specific Analysis (PSA) for the Covell Ranch Forest Health Fuels Reduction Project (project). CAL FIRE is in receipt of your comment letter dated September 2, 2021 (letter) and email dated September 16, 2021. We have participated in two virtual conference calls on September 16 and September 23, 2021, where we further discussed the project treatment and protections measures as they relate to California red-legged frog (CRLF) habitat and attended a site visit with U.S. Fish and Wildlife Service (USFWS) biologists Deborah Kirkland and Chad Mitcham on September 27, 2021. We value your comments and collaboration regarding the project goals and wildlife protections measures identified in the PSA. We feel the project can move forward with the current mitigations and protection measures detailed in the PSA.

CAL FIRE would like to thank Ms. Kirkland and Mr. Mitcham for attending the Covell Ranch VTP project site visit this past Monday the 27th. We believe it was a very constructive meeting with discussion and visualization of the site specific project goals and objectives, including vegetation treatment prescriptions and appropriate wildlife protection measures proposed for the project. In addition to attendance by USFWS and CAL FIRE, members of the California Coastal Commission (Jonna Engel), Upper Salinas-Las Tablas Resources Conservation District (Andrew Johnson & Haley Barnes), Auten Resources Consulting (Riley McFarland & Steve Auten), San Luis Obispo County Fire Safe Council (Dan Turner) and Resolute Associates (Kevin Cooper, contract biologist) attended the site visit. We looked at mechanical vegetative fuel treatment applications within the existing shaded fuel break in Treatment Area 1 (along Bridge Street and the Wildland Urban Interface (WUI)) and Treatment Area 3 (south of the historic mill site access road). We also looked at two sample flagged vegetation treatment prescription blocks (as detailed in the PSA), with variable vegetative structure, within and adjacent to a Class III (Treatment Area 1) and Class II watercourse (Leffingwell Creek within Treatment Area 2). We observed various understory and overstory retention prescriptions including woodrat vegetative buffer patches, toyon and oak microhabitats, downed dead and standing dead woody material, Class II work exclusion zones and Class III equipment exclusion zones, and live healthy Monterey pine tree stand preservation.

This project focuses on restoring one of five naturally occurring Monterey pine stands in the world to native ecological conditions for long-term forest health, wildlife abundance, carbon sequestration, and resilience of rare botanical alliances. The Monterey pine forest on Covell Ranch has been identified as a rare, important forestland in need of restorative management focused on forest health and fire prevention. The goal for the project is to increase the health and vigor of the Monterey pine forest and associated habitat by conducting ecologically restorative forest health treatments that increase climate resiliency and biological diversity and reduce the severity of wildfire near the

community of Cambria. As observed during the site visit, the Covell Ranch Monterey pine stand is in an unhealthy state that is susceptible to a high intensity stand replacing fire that would likely denude the overstory and associated understory habitat that wildlife species (e.g., CRLF) depend on. Monterey pine forests are fire dependent communities relying on periodic fire or forest management activities to maintain the ecological function of the forest habitat, including the occurrence of many species within that habitat. To mimic natural low to moderate intensity ground fire, mechanical treatments are used to restore the Monterey pine forest habitat and alleviate fire risk to the local community of Cambria as outlined in the PSA. The removal of understory vegetation would mimic a natural disturbance that encourages forest succession to occur resulting in greater biological diversity and habitat resilience. We believe that this type of forest health and fuel reduction project can benefit CRLF and the Monterey pine forest while still protecting the public safety of Cambria.

Approximately 320 hours of field verification, layout, and reconnaissance level surveys have occurred to date on the 665-acre project area by CAL FIRE, registered professional foresters, assistant foresters, and a qualified biologist. The PSA identifies that potentially suitable aquatic and upland habitat for CRLF occurs and assumes presence of CRLF on site. CRLF has not been observed within the project by the qualified professionals that have been conducting the project layout and environmental compliance review. If CRLF is observed on the project site, the notification process will include the USFWS per the PSA SPR BIO-2.

Your letter states, "that the project is likely to result in significant habitat modification or degradation that will result in death or injury to CRLF by significantly impairing essential behavioral patterns, including breeding, feeding, and sheltering." During conference calls and as outlined in your letter and September 21 email, USFWS expressed concern with the nature of understory vegetation treatment proposed. You suggest, "modifying treatment applications for the purpose of allowing the persistence of areas of suitable refugia for the species within the project area" including, "complete avoidance of all aquatic and wetland habitats defined by the presence of hydrophytic vegetation on site with increased no-work avoidance buffers." Complete avoidance with increased no-work buffers of all aquatic and wetland habitats within the treatment area would not meet the fire protection objectives of the project for the community of Cambria. The PSA proposes a multitude of avoidance and minimization measures to avoid adverse effects to CRLF and its habitat and is consistent with the Specific Project Requirements (SPRs) and Mitigation Measures (MMs) outlined in the California Vegetation Treatment Program (CalVTP) Programmatic Environmental Impact Report (PEIR), and with recovery goals and actions outlined in the USFWS 2002 Recovery Plan for the California Red-legged Frog (Recovery Plan). For example:

1. *Biological resources training will occur for workers prior to operations.*
2. *The exclusion of mechanical and hand work treatments in Class II Watercourse and Lake Protection Zones (WLPZs) along Leffingwell Creek and tributary to **San Simeon Creek (50-foot buffer; 100-foot wide corridor total)**. The exclusion of mechanical and hand work treatments within 300-foot buffer during wet season when water is present (**600-foot total**).*
3. *The exclusion of mechanical treatments in Class III Equipment Exclusion Zones (EEZs) (**30-foot buffer; 60-foot wide corridor total**).*
4. *Suspension of mechanical and herbicide treatments if the National Weather Service forecast is a "chance" (30 percent or more) of rain within the next 24 hours. Operations may not resume while soils remain saturated.*
5. *Control of invasive species such as French broom and cape ivy.*
6. *Down dead trees >12 inches diameter to remain in place where feasible unless they create a significant fire hazard.*
7. *Understory vegetation, brush, and shrubs under the drip lines of trees shall be cut and masticated leaving root systems intact for resprouting except:*
 - a. **The contractor shall not masticate, or remove through handwork, hydrophytic riparian species such as Bracken fern, carex spp., rushes, and blue elderberry.**

b. Where significant stands of toyon occur under the drip line of trees, Contractor shall maintain a component of these shrubs at a spacing between 75 – 100 feet for each species occurrence, whose shrub crown is approximately 15-25 feet wide.

8. Outside of the drip line of retained trees, brush and shrubs shall be cut and masticated leaving root systems intact for resprouting to achieve a horizontal crown separation of approximately 50-75 feet. Spacing may be closer to 50 feet on flatter ground and 75 feet on steeper ground or completely removed to provide defensible space when in proximity to infrastructure or near homes within treatment areas. Remaining clumps of brush and shrubs should not exceed approximately 15-25 feet in diameter and will consist of healthy appearing specimens where feasible.

a. Consideration shall be given to maintaining a diversity of understory vegetation, brush, and shrub species in these areas.

As provided above and observed during the site visit, a mosaic of understory vegetation and contiguous habitat will remain untreated for the aquatic and upland dispersal of CRLF across the project site. Additionally, treated understory will quickly regenerate providing a more diverse healthier habitat for CRLF to persist. As part of our conference calls and site visit discussions, per the PSA MM BIO-2a (PSA pg. 97), multiple demonstration treatment plots within various vegetated habitat structure may be reviewed by USFWS prior to full project treatment operations. If USFWS determines that habitat function for CRLF is not being maintained, CAL FIRE will coordinate with USFWS, through an adaptive management process, to determine the appropriate level of habitat function for CRLF on the project site that still meets the fire protection objectives of the project. In addition, CAL FIRE invites USFWS to observe the vegetation treatments for each Treatment Area post operation to become more familiar with prescriptions implemented on the ground.

Thank you for your time and consideration regarding the Covell Ranch Forest Health Fuels Reduction Project. We look forward to working with USFWS during the project term. I have included a reference document directing you to protection measures detailed in the PSA in response to comments provided in your September 16th email. Please feel free to contact me if you have any further questions or comments concerning this project.

Thank you,

-Brandon

Brandon Sanderson

Environmental Scientist

CAL FIRE / SLU

Resource Management

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2 attachments**PSA References to Email_USFWS_9.16.2021_Covell Ranch VTP response.docx**

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**USFWS Email 9.16.2021_Covell Ranch VTP Discussion.msg**

117K

Takano, Leilani <leilani_takano@fws.gov>

Thu, Sep 30, 2021 at 3:19 PM

To: "Sanderson, Brandon@CALFIRE" <brandon.sanderson@fire.ca.gov>, "Kirkland, Debora L"

<debora_kirkland@fws.gov>, "Mitcham, Chad J" <chad_mitcham@fws.gov>

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Dear Brandon,

Thank you for your below email, following the previous day's site visit. Attending the site visit with your team was valuable for us to clearly understand the work being proposed. Chad Mitcham and Debora Kirkland of my staff appreciated the time your team spent in presenting two pre-flagged treatment areas in order to provide an on-the-ground review on how the proposed forest health and fuels reduction treatments would be applied. Within the upland and Class III watercourse example sites, you demonstrated that an adequate amount of understory and downed material would remain in place following treatment, which would provide structure for California red-legged frogs to use for shelter and feeding. At the Class II watercourse site, you demonstrated the seasonal no-work buffers, which are intended to avoid potential breeding habitat that may be present. You defined these seasonal buffers in the Project Specific Analysis (PSA) Impact BIO-2 that references the 2008 U.S. Fish and Wildlife Service Information Needs and Guidelines for Timber Harvest Plans for U.S. Fish and Wildlife Service Technical Assistance Analysis California Red-legged Frogs (hereafter, referred to as USFWS THP guidance). You provided details of the seasonal buffers in the attachment to your September 28, 2021, email. Your team assured my staff that the example (pre-flagged) treatment areas were representative of the treatments to be applied in Treatment Unit 1, as well as Treatment Unit 2, if and when funding for that work is secured.

The USFWS THP guidance is referenced in the Project Specific Analysis for the Covell Ranch Forest Health Fuels Reduction Project (project) to define suitable habitat for the California red-legged frog. As discussed, when defining suitable habitat for the California red-legged frog, we refer to the definitions provided in the 2005 Revised Guidance on Site Assessments and Field Surveys for the California red-legged Frog provided to you via email on July 8, 2021, and in our September 2, 2021, letter for aquatic breeding and non-breeding habitat, upland habitat, and dispersal habitat. To define the aquatic habitat avoidance measures for projects, utilizing the definitions 2005 revised guidance and provided in the September 2, 2021, letter to define suitable aquatic breeding and non-breeding habitat is appropriate.

Thank you for providing references for the California red-legged frog protection measures as an attachment to your September 28, 2021, email. You provided locations and text in the project documents that addressed our recommended avoidance measures. You explained that it was not feasible for a qualified biologist to inspect burn piles for California red-legged frogs prior to ignition for the 665-acre project site. However, we learned during the site visit that pile burning is

anticipated to predominantly be for French broom, will be located at least 300 feet from Class II watercourses, and due to the proximity to the Cambria community, will occur during the wet season aided by accelerant as a highly managed discreet activity. We believe that it is possible that California red-legged frogs could utilize piles for shelter as they disperse after breeding, even if the piles are located outside the riparian exclusion zones. Therefore, we ask that you implement MM BIO-2 and SPR BIO-10 because it is prudent to require that burn piles be inspected by environmentally-trained staff familiar with the California red-legged frog to ensure frogs are not present prior to ignition (measure 1). Environmentally-trained staff includes a qualified RPF or qualified biologist or a supervised trained designee.

We referred to the project documents for the definition of the wet season when considering avoidance measures for the California red-legged frog. In the PSA SPR GEO-4, CAL FIRE defines the wet season for the project area as occurring between mid-October through April, and from the USFWS THP guidance, wet season starts with the first frontal rain system depositing a minimum of 0.25 inch of rain after October 15 and ends on April 15. In order to further minimize the likelihood of take for the California red-legged frog, mechanized work should be avoided 24 hours after a rain event defined as any precipitation resulting in 0.2 inch or greater throughout the year, to avoid dispersing California red-legged frogs (measure 2).

We appreciate CAL FIRE's invitation to revisit the project area after you create two 1-acre demonstration plots this year. The purpose of the demonstration plots are to assist contractors to prepare their bids, and for the California Native Plant Society, as well as the USFWS, to observe results of the treatments. We appreciate your invitation to see the demonstration plots when they are complete and look forward to the continued coordination with CAL FIRE through an adaptive management process, as outlined in your email, and the opportunity to provide recommendations to further minimize the likelihood of take of California red-legged frog, if necessary.

Additionally, you described the reporting requirements under the California Vegetation Treatment Program that requires USFWS notification if federally listed species are observed during and after the project phases. We request that you provide courtesy copies of any and all follow-up reporting on the results of the proposed Treatment Unit 1 work, and notification when future work within the Covell Ranch is proposed, during the 10-year project term. Throughout the 10-year project term, we remain available to provide technical assistance and request that you contact us as early as possible, if needed.

In summary, based on our assessment of the pre-flagged treatment areas and additional information you provided during our site visit; the measures outlined in the attachment to your September 28, email; the implementation of the two measures (identified as measures 1 and 2) detailed above; and the opportunity for the Service to revisit the project area after demonstration plots are completed, we conclude that project activities are likely to avoid take of California red-legged frogs. Additionally, we believe that following application of treatments, adequate cover, in the form of downed woody material and herbaceous vegetation, would remain on-site and would be adequate to avoid take of the species, in terms of harm through the proposed habitat modification.

We appreciate CAL FIRE's commitment to conserve the California red-legged frog and the implementation of the protective measures for the species. We look forward to collaborating with CAL FIRE as the project moves forward, and as additional future fuels reduction projects are proposed within our jurisdiction.

Thank you,

Leilani

Leilani Takano

Assistant Field Supervisor
U.S. Fish and Wildlife Service
Ventura Fish and Wildlife Office
[2493 Portola Road, Suite B](#)
Ventura, CA 93003

From: Sanderson, Brandon@CALFIRE <brandon.sanderson@fire.ca.gov>
Sent: Tuesday, September 28, 2021 3:02 PM
To: Takano, Leilani <leilani_takano@fws.gov>; Kirkland, Debora L <debora_kirkland@fws.gov>; Mitcham, Chad J <chad_mitcham@fws.gov>
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Subject: [EXTERNAL] RE: Covell Ranch VTP Discussion with USFWS

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To: Hayley Barnes <hayleybarnes.usltrcd@gmail.com>

Thu, Oct 7, 2021 at 2:36 PM



Andrew Johnson
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2 attachments

 **PSA References to Email_USFWS_9.16.2021_Covell Ranch VTP response.docx**
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 **USFWS Email 9.16.2021_Covell Ranch VTP Discussion.msg**
117K



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

Ecological Services
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
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IN REPLY REFER TO:
08EVEN00-2021-CPA-0088

September 2, 2021

Brandon Sanderson
CAL FIRE / SLU Unit
635 North Santa Rosa Street
San Luis Obispo, California 93405

Subject: Comments on the Covell Ranch Vegetation Treatment Program, Cambria, San Luis Obispo County, California

Dear Brandon Sanderson:

We received your April 16, 2021, letter, requesting comments on the California Department of Forestry and Fire Protection's (CAL FIRE) California Vegetation Treatment Program (CalVTP) on the Covell Ranch property near Cambria in San Luis Obispo County, California. Specifically, you are requesting comments on proposed avoidance and minimization measures that would be implemented to avoid take of the federally threatened California red-legged frog (*Rana draytonii*), and reduce impacts to other sensitive resources. Proposed avoidance and minimization measures are described in the 2008 Information Needs and Guidelines for Timber Harvest Plans for U.S. Fish and Wildlife Service Technical Assistance Analysis California Red-legged Frogs (Service 2008), received by us on July 28, 2021. We received the final draft CAL FIRE CalVTP Project Specific Analysis for Covell Ranch (PSA) (Auten Resource Consulting 2021) on July 8, 2021.

The mission of the U.S. Fish and Wildlife Service (Service) is working with others to conserve, protect, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people. The Service's responsibilities also include administering the Endangered Species of 1973, as amended (Act). The Act prohibits the unpermitted "take" of listed species [16 U.S.C. 1538(a)(1)(B)]. Take is defined as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Harm is further defined by the Service to include significant habitat modification or degradation that results in death or injury to wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Such taking may be authorized by the Service in two ways: through interagency consultation for projects with Federal involvement pursuant to section 7, or through the issuance of an incidental take permit under section 10(a)(1)(B) of the Act.

The CalVTP is a State-wide program to reduce the chance of large, damaging wildfires by reducing fire hazards on wildland in California. The purpose of the Covell Ranch Forest Health Fuels Reduction Project VTP (project) is to improve Monterey pine (*Pinus radiata*) forest health

and reduce the threat and intensity of wildfire by removing dense understory, ladder fuels, dead or dying trees, and vegetation on 665 acres. The project is described as an Ecological Restoration Treatment Type intended to restore ecosystem processes, native stand conditions, and forestland resiliency by removing vegetation and trees through mechanical and manual vegetation removal, pile burning, and herbicide applications.

The project would occur in stages, and the Covell Ranch was divided into five treatment areas for this purpose. The PSA describes the biological resources of the entire 665-acre project area, but the Biological Assessment in the PSA focused on Treatment Areas 1 and 2, as they are proposed to be treated first, and describes those areas as densely vegetated forest uplands with a dense understory bisected with Class II and Class III riparian areas. The PSA states that Leffingwell Creek in Treatment Area 2, is known to have an active channel with standing water. During a reconnaissance survey, the standing water was described as less than 8 inches deep, and the report concluded that it was too shallow for California red-legged frog breeding at the time of the survey. The PSA also describes a tributary to San Simeon Creek, on the northern edge of the project area in Treatment Area 5 that has greater seasonal water flow and likely has better aquatic breeding potential for the California red-legged frog. The PSA then determined that the uplands were unsuitable for California red-legged frogs, and concluded that there are no special status wildlife species occurring in the uplands in Treatment Areas 1 and 2. However, your letter indicates that you are assuming presence of the California red-legged frog in the Class II and III drainages in the project area. The PSA determined that with adequate riparian area mechanized equipment setbacks in place, and by conducting pre-activity surveys to detect sensitive resources, adverse impacts to California red-legged frogs or their aquatic habitat would be avoided.

Critical habitat was designated for the California red-legged frog in 2010, and the Covell Ranch is within unit SLO-2 (Service 2010). Designated critical habitats are areas of habitat that are believed to be essential to the conservation of the species. When designating critical habitat for a species, we consider whether an area contains the Primary Constituent Elements (PCEs). The PCEs for the California red-legged frog are aquatic breeding habitat, non-breeding aquatic and riparian habitat, upland habitat, and dispersal habitat. The PCEs are based on our current knowledge of the life-history, biology, and ecology of the California red-legged frog. The California red-legged frog's PCEs are described in the 2010 Critical Habitat Designation as:

- (1) Aquatic Breeding Habitat. Standing bodies of fresh water (with salinities less than 4.5 parts per thousand), including natural and manmade (e.g., stock) ponds, slow-moving streams or pools within streams, and other ephemeral or permanent water bodies that typically become inundated during winter rains and hold water for a minimum of 20 weeks in all but the driest of years.
- (2) Aquatic Non-Breeding Habitat. Freshwater pond and stream habitats, as described above, that may not hold water long enough for the species to complete its aquatic life cycle but which provide for shelter, foraging, predator avoidance, and aquatic dispersal of juvenile and adult California red-legged frogs. Other wetland habitats considered to meet these criteria include, but are not limited to: plunge pools within intermittent creeks, seeps, quiet water refugia within streams during high water flows, and springs of sufficient flow to withstand short-term dry periods.

- (3) Upland Habitat. Upland areas adjacent to or surrounding breeding and non-breeding aquatic and riparian habitat up to a distance of 1 mile in most cases (i.e., depending on surrounding landscape and dispersal barriers) including various vegetation types such as grassland, woodland, forest, wetland, or riparian areas that provide shelter, forage, and predator avoidance for the California red-legged frog. Upland features are also essential in that they are needed to maintain the hydrologic, geographic, topographic, ecological, and edaphic features that support and surround the aquatic, wetland, or riparian habitat. These upland features contribute to: (a) Filling of aquatic, wetland, or riparian habitats; (b) maintaining suitable periods of pool inundation for larval frogs and their food sources; and (c) providing nonbreeding, feeding, and sheltering habitat for juvenile and adult frogs (e.g., shelter, shade, moisture, cooler temperatures, a prey base, foraging opportunities, and areas for predator avoidance). Upland habitat should include structural features such as boulders, rocks and organic debris (e.g., downed trees, logs), small mammal burrows, or moist leaf litter.
- (4) Dispersal Habitat. Accessible upland or riparian habitat within and between occupied or previously occupied sites that are located within 1 mile of each other, and that support movement between such sites. Dispersal habitat includes various natural habitats, and altered habitats such as agricultural fields that do not contain barriers to dispersal (e.g., heavily traveled roads without bridges or culverts). Dispersal habitat does not include moderate- to high-density urban or industrial developments with large expanses of asphalt or concrete, nor does it include large lakes or reservoirs over 50 ac (20 ha) in size, or other areas that do not contain those features identified in PCE 1, 2, or 3 as essential to the conservation of the species.

The PSA states that upland habitat within the project area primarily consists of forested areas with dense understory, which also happens to characterize ideal upland and dispersal habitat for California red-legged frogs. The description of Leffingwell Creek and the tributary to San Simeon Creek, as provided in the PSA, indicates that these are California red-legged frog non-breeding aquatic habitats at the very least, and potentially suitable breeding habitats. In cases such as these, we assume that that these creeks provide suitable breeding habitat, unless proven otherwise by protocol level surveys. Class III drainages in the project area provide suitable non-breeding aquatic habitat as well, likely improving in quality during normal rainfall years. All forested upland and dispersal habitat in the project area is well within the dispersal range of suitable breeding habitats both within the project site and at nearby, offsite locations, and also is well within dispersal distance of four known California red-legged frog occurrences located less than 2 miles to the northwest, 1 mile to the west, 1 mile to the east, and 0.25 mile to the south of the project (CNDDDB 2021). Based on this information, it is our opinion that the upland and dispersal habitat in the project area are likely utilized by California red-legged frogs, and provide the habitat needed for the survival and recovery of the species.

The avoidance and minimization measures proposed are referenced from “Information Needs and Guidelines for Timber Harvesting Plans for US Fish and Wildlife Service Technical Assistance Analysis California Red-legged Frogs (USFWS, March 2008)”, a document that describes aquatic California red-legged frog habitat and the setbacks needed to protect suitable habitat. The 2008 document only discusses aquatic habitat and not dispersal or upland habitat. Additionally, vegetation removal activities proposed on the Covell Ranch differ from the select tree thinning activities described in the 2008 document. The 2008 document does not describe

measures to avoid impacts to California red-legged frogs from clearing of understory in upland or dispersal habitat. Therefore, we believe that the measures described in the 2008 document are not adequate to avoid take of California red-legged frogs during the proposed activities.

Excluding use of mechanized equipment in riparian areas may reduce the likelihood of adverse impacts to breeding and non-breeding aquatic habitats, but does little to offset the magnitude of vegetation removal in upland and dispersal habitat that would result in take of California red-legged frogs. Pre-activity surveys in the dense upland forest understory are not adequate to avoid adverse impacts to California red-legged frogs that would result from the degradation of 665 acres of dispersal and upland habitat. California red-legged frogs can be difficult to detect in uplands like those described in the project area, and it is likely that individuals could be overlooked during pre-activity surveys and killed during vegetation clearing and pile burning activities. Further, the removal of dense understory in forested habitat in the project area would significantly reduce the value of this upland and dispersal habitat utilized by California red-legged frogs. Ultimately, we believe that the project is likely to result in significant habitat modification or degradation that will result in death or injury to California red-legged frogs by significantly impairing essential behavioral patterns, including breeding, feeding, and sheltering.

Other sensitive resources within the project area are listed plants and serpentine soils. The PSA described meeting on site with a botanist representing the California Native Plant Society on March 24, to establish a schedule for special status plant surveys appropriate given the limited rainfall during the 2020-2021 wet season. As a result, special status plant surveys were conducted on April 6, April 13, and May 6, 2021. Special status plants were flagged to identify exclusion zones to avoid during vegetation clearing. During a phone conversation with Debora Kirkland of my staff, Brandon Sanderson confirmed there were no serpentine soils in the project area (B. Sanderson, CAL FIRE, pers. comm. 2021). We agree that the measures proposed to avoid impacts to these special status plant species and sensitive soil resources are adequate.

We agree that fire safety for the community of Cambria and the health of the Monterey pine forest are high priorities. However, we believe that the avoidance measures for the proposed activities are not adequate to avoid take of California red-legged frogs. Because impacts to California red-legged frogs and their habitat would result from the proposed activities, we request to work with you to design a project that can meet the objectives of reducing fire risk and improve forest health at the Covell Ranch, while avoiding the large-scale degradation of habitat utilized by the California red-legged frog. If the project cannot be modified to avoid take of California red-legged frogs and the loss of their habitat, we recommend that CAL FIRE obtain an incidental take permit under section 10(a)(1)(B) of the Act prior to conducting the proposed activities.

If you have any questions, please contact Debora Kirkland of my staff by electronic mail at debora_kirkland@fws.gov.

Sincerely,

Leilani Takano
Assistant Field Supervisor

cc: Madeline Cavalieri, California Coastal Commission
Schani Siong, County of San Luis Obispo
Kerry Brown, County of San Luis Obispo
Jonathan Gee, CAL FIRE San Luis Obispo Unit
Mitchell Riley McFarland, Auten Resource Consulting
Steve Auten, Auten Resource Consulting
Dan Turner, San Luis Obispo County Community Fire Safe Council
Andrew Johnson, Upper Salinas-Las Tablas Resource Conservation District

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In litteris

- Sanderson, Brandon. 2021. CAL FIRE, San Luis Obispo County Fire Unit. Phone call with Debora Kirkland, U.S. Fish and Wildlife Service, Ventura Fish and Wildlife Office, Ventura, California. June 8, 2021.

CAMBRIA FOREST COMMITTEE

TO CONSERVE AND MANAGE THE NATIVE FOREST OF CAMBRIA



Auten Resource Consulting
116 Martinelli Street, Suite #8
Watsonville, CA 95076

June 29, 2021

Dear Mr. Auten

Thank you for the opportunity to review and comment on the proposed Covell Ranch Forest Health Fuels Reduction Project in Cambria, CA.

We have reviewed the draft CalVTP Project Specific Analysis and the Coastal Vegetation Treatment Standards in Attachment F. We support the project goals of improving the health of the Monterey Pine forest on the Covell Ranch, and we have the following suggestions to improve the long-term results of the project.

The proposed removal of 70 to 80 percent of Monterey Pines and Live Oaks less than 8 inches DBH is excessive. Smaller, younger trees are the most resilient to changeable climatic and soil moisture conditions, and they are the large trees of the future. Healthy oaks should not be removed to achieve any arbitrary ratio of oaks to pines and the removal criteria for all tree types should be adjusted to retain the maximum number of live trees.

Standing dead trees or snags are an essential habitat for numerous bird and related wildlife species. Except for hazardous trees next to roads, the maximum number of snags should be left in place.

There is a statement in Attachment F. that the removal of trees and understory vegetation will allow more sunlight to penetrate the forest floor. Unfortunately, this will result in the proliferation of invasive non-native vegetation including French Broom and annual grasses which are more flammable than the existing native vegetation.

The proposed use of mechanized mastication on an estimated 634 acres of Monterey Pine

forest is troubling. The resulting extensive disturbance of existing native vegetation and animal habitat is not justified by any forest health or fire safety rationale. Selective use of hand crews can achieve project goals very effectively with less collateral damage.

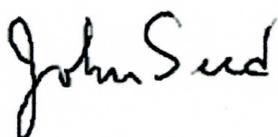
A related issue is that extensive mastication of understory vegetation in combination with pruning or limbing up of a majority of trees can increase the speed and intensity of fire by allowing the wind and embers to blow freely under the forest canopy.

We request that the draft PSA and Attachment F. be modified as necessary to best achieve the project's long term forest health and fire safety goals.

Yours truly,



Crosby Swartz, President
Cambria Forest Committee
forest@cambriaforestcommittee.org



John Seed, President
Greenspace, The Cambria Land Trust
johnseed@gmail.com

cc: Riley McFarland via email



July 20, 2021

Cambria Forest Committee
P.O. Box 23
Cambria, CA 93428

Greenspace, The Cambria Land Trust
P.O. Box 1505
Cambria, CA 93428

Mr. Crosby Swartz, Mr. John Seed, and colleagues

Thank you for taking the time to review the Project Specific Analysis (PSA) for the proposed Covell Ranch Forest Health Fuels Reduction Project in Cambria, California. This PSA was developed as a permitting addendum to the CEQA-compliant California Vegetation Treatment Program (CalVTP) Programmatic Environmental Impact Report¹. The proposed Treatment Types for this project (Ecological Restoration and Wildland-Urban Interface Fuel Reduction) were selected in accordance with the treatment guidelines, descriptions, and impact analyses described in detail in the PEIR.

Formulated upon careful evaluation of your recommendations, we hope the following responses adequately address your comments and concerns in sequence with how they were received:

1. *"The proposed removal of 70 to 80 percent of Monterey Pines and Live Oaks less than 8 inches DBH is excessive. Smaller, younger trees are the most resilient to changeable climatic and soil moisture conditions, and they are the large trees of the future. Healthy oaks should not be removed to achieve any arbitrary ratio of oaks to pines and the removal criteria for all tree types should be adjusted to retain the maximum number of live trees."*

The determination of tree diameters expected for removal within the Monterey pine forest at Covell Ranch is predominantly based on research and monitoring conducted previously at similar stands in Monterey and North Santa Cruz Counties, as well as professional forester observations described in the 2011 Forest Management Plan (FMP) for Covell Ranch, developed by Staub Forestry and Environmental Consulting².

Sampling efforts conducted for the 2011 FMP for Covell Ranch estimated an average of 569 trees per acre (TPA) on the property (over 75% of which were trees measured at less than 6 inches in diameter) in conjunction with "increasingly hazardous quantities and structures of live and dead fuels in this valuable forest that abuts the community of Cambria on two sides" (Staub FMP, page 8). Our own reconnaissance of the ranch in 2020 and 2021 corroborates the conditions observed in 2011 and suggests substantial fuel loading has continued to occur over the intervening 10 years.

By contrast, existing data collected by Cal Poly during monitoring and continuous surveying of 1/5th-acre Monterey pine sample plots in the Scotts Creek Watershed near Año Nuevo State Park determined tree density levels within the healthiest stands averaged approximately 200-250 TPA. Prior to the August 2020 CZU Complex Fire, these were considered vigorous Monterey pine stands that maintained periodic

¹ <https://bof.fire.ca.gov/projects-and-programs/calvtp/calvtp-program-eir/>

² <http://cambriaforestcommittee.org/wp-content/uploads/2011/05/Covell-Ranch-FMP-for-TNC-2.11.pdf>



occurrences of pitch canker infestation and promoted a diverse vegetative understory with very low rates of vertical and horizontal dead fuel loading.

Healthy Monterey pine stands managed within the Del Monte Forest in Monterey, California have been maintained at 170 TPA or 16-foot tree spacing in some areas and 300 TPA or 12-foot spacing in other areas to achieve similar fire and stand resiliency goals across the native forest. Following the 1987 Pebble Beach Fire in this forest, post-fire regeneration of Monterey pine reached densities as high as 2,000 TPA. The fire consumed nearly 100-acres of pine forest and destroyed 31 homes in the community³.

A review of the Cambria Forest Management Plan developed in 2002 by the Cambria Forest Committee⁴ recommends a residual TPA of at least sixteen 20-inch diameter trees or eight 24-inch diameter trees following understory treatments that simulate medium-scale ecological processes (Treatments 3 and 4). More intensive treatments described in the plan (Treatments 6 and 7) suggest a residual TPA of eight 20-inch diameter trees and recommend the maximum spacing between retained mature trees should not exceed the vertical canopy height when simulating large-scale, "catastrophic" ecological processes. While residual spacing under these recommendations may easily exceed 100 feet in some portions of the forest and could result in as few as 3 trees per acre, 15-20 foot spacing is more suitable for our objectives on Covell Ranch. To attain these goals, reduction in the overall density of smaller diameter trees [≤ 8 " diameter at breast height (DBH)] will allow for the retention of mature Monterey pine trees, reduce the spread and continuity of forest pathogens, and promote a balanced ratio of oaks to pines in the understory per the recommendations outlined in the Cambria FMP (Jones & Stokes):

"Care should be taken to ensure that the existing ratio of Monterey pines to native oaks is preserved. Thus, oak trees should be included in this prescription to the extent that they occur naturally in the management unit. The Forest Manager should document the occurrence and status of oak trees within the unit before planning this treatment. The inclusion of oak trees will ensure that, as in a natural event, the whole of the forest overstory and not just the Monterey pines will be affected". (Page 4-7).

By considering the discretion of previous management plans and resource professionals, acknowledging the high mortality rate of smaller diameter trees following moderate to high severity fire, and considering which diameter classes are overstocked, the phased removal of trees ≤ 8 inches DBH is expected to meet healthy density, spacing, and fire hazard standards. 15-foot spacing between retained mature trees (225 square feet per tree) extrapolates to approximately 200 TPA which restores ample growing space and favorable conditions for natural pine regeneration. Our target post-treatment value of 200-250 TPA appears to exemplify healthy Monterey pine stand conditions.

It should be kept in mind that the 8-inch DBH removal threshold and 200 TPA standards are overarching goals. The size of removed trees will vary between sites due to site-specific conditions, including existing tree sizes and levels of disease and mortality. Prior to beginning full operations, we plan to conduct test plot treatments with variable removal schema to evaluate and demonstrate the treatment plan.

³ <https://www.usfa.fema.gov/downloads/pdf/publications/tr-007.pdf>

⁴ http://cambriaforestcommittee.org/wp-content/uploads/2011/04/Cambria_Forest_Management_Plan_4_02.pdf



2. *"Standing dead trees or snags are an essential habitat for numerous bird and related wildlife species. Except for hazardous trees next to roads, the maximum number of snags should be left in place."*

In reference to the Coastal Vegetation Treatment Standards (Coastal VTS) in **Attachment F** on page 168 of the PSA, treatment operators are to retain 1 to 2 snags per acre across all treatment units. Given the cost and safety risk associated with their removal, it is realistic to assume the actual amount of retained snags throughout the treatment area will exceed those standards. Special consideration will be given to snags with exceptional denning or nesting habitat or those with observable signs of faunal inhabitation. Due to the sizeable component of standing mortality in the forest at Covell Ranch, it is not feasible to retain all snags given how frequently these individuals fall or experience top break from wind events, inevitably increasing the amount of downed, flammable vegetation and damage to understory pine, oak, and other species regeneration. Careful and prudent determinations by resource professionals regarding the amount and quality of retained snags will be exercised given our shared appreciation of their ecological significance in the structure, habitat suitability, and nourishment of the forest.

3. *"There is a statement in Attachment F. that the removal of trees and understory vegetation will allow more sunlight to penetrate the forest floor. Unfortunately, this will result in the proliferation of invasive non-native vegetation including French Broom and annual grasses which are more flammable than the existing native vegetation."*

Treatments are predominantly focused on the reduction of understory and ladder fuels while maintaining mature, dominant Monterey pine and oak trees. No treatments are proposed that will substantially manipulate the existing overstory canopy within the treatment units. The light gaps that are expected to result from the proposed treatments are intended to facilitate the regeneration of pines (which favor sunlight, not shade) and associated native flora.

Respective to variable treatment scenarios, the Cambria Forest Committee 2002 Cambria Forest Management Plan discusses the benefits of canopy openings related to the regeneration of Monterey pine as well as the ecological consequences of closed, diseased canopies within Treatments 2, 4, and 5 on pages 4-5 through 4-10.

Undoubtedly, some level of non-native or invasive plant recruitment is expected to occur and will be managed during maintenance that follows initial treatment, which may include hand removal and pile burning or post-emergent herbicide application. The San Luis Obispo County Community Fire Safe Council, in collaboration with the Cambria Community Services District, has undergone substantial efforts to suppress French broom in previously treated areas and continues to successfully monitor and maintain the locations where those efforts have been focused. Background research, existing forest data, and field verification confirm that existing stand density levels and current fuel loading rates in the forest at Covell Ranch poses a significantly greater fire hazard than the expected conditions and outcomes following treatment in these areas.

4. *"The proposed use of mechanized mastication on an estimated 634 acres of Monterey Pine forest is troubling. The resulting extensive disturbance of existing native vegetation and animal habitat is not justified by any forest health or fire safety rationale. Selective use of hand crews can achieve project goals very effectively with less collateral damage."*

Our objectives to treat the proposed acreage are most efficiently and effectively attained by implementing mechanized treatments where that is the most feasible treatment method. Vast majority of the terrain at



Covell Ranch does not exceed 20% slope. Given these circumstances, mechanized equipment is readily able to safely access most of the project area without manipulation or construction of new roads or crossings and can cover more ground per day than a hand crew. The use of mechanized equipment is also greatly more cost effective in treating these areas than manual treatments, as handwork can range up to 6 times the cost of mechanization. This maximizes the value of public funds and minimizes the timeframe in which they are used. Handwork will most certainly be utilized in special treatment areas near Class II and Class III streams, exceptionally sensitive vegetation communities, cultural and biological resource protection zones, and where mechanized entry is not feasible or appropriate.

5. *"A related issue is that extensive mastication of understory vegetation in combination with pruning or limbing up of a majority of trees can increase the speed and intensity of fire by allowing the wind and embers to blow freely under the forest canopy."*

We are unaware of information that supports an increase in speed and intensity of fire, its spread, or ember mobility following the reduction of ground and ladder fuels. Fire behavior calculations using scientific fire behavior modeling shows the current fire danger and spread conditions to be far worse than the projected post-treatment conditions.

Thank you for your careful consideration of the Covell Ranch Forest Health Fuels Reduction Project and offering your valuable insight to the development process as we pursue alignment with the values and objectives held by your representatives and the community they serve. Comprehensive in-field biological surveying, open communication with state and federal resource agencies, partnership consultation within a team who possess decades of Monterey pine management experience, and extensive CEQA analysis has been conducted to ensure proper treatments and best management practices will be implemented across the project area to maintain species health and vigor, biodiversity, fire resiliency, wildlife habitat, community awareness, and ecological conservation values.

Sincerely,

A handwritten signature in cursive script that reads "Steve R. Auten".

Steve R. Auten - RPF #2734

A handwritten signature in cursive script that reads "Riley McFarland".

Riley McFarland – Assistant Forester I

Comments on Covell Ranch PSA

8.12.21

- **TNC Easement:** Are there any conservation easement (CE) conditions to review?
 - Does the CE with TNC have any provisions/restrictions pertinent to the PSA? E.g. - no herbicide use, etc.?
 - Do you expect a comment letter coming from TNC?
- **ESHA statement:** Pg 44/218 (also 49/218, 175/218) – There is a statement that occurs 3 times that says “The entirety of the Coastal Zone has been identified as ESHA in SLO County by the CCC.” The entire CZ area is not ESHA, but maybe you mean the sensitive resource areas in SLO (like the terrestrial habitat – Monterey Pine forest areas) are considered ESHA by CCC? Please clarify.
- **Chaparral:** Pg. 48/218- Can you map the chaparral? Please explain more prominently that it is not in treatment areas.
- **Test Plots:** Somewhere in PSA (Maybe in Attachment F Pg. 179/218) - Can you clarify circumstances related to using test plots in the PSA for tree treatments? Density goals are general. Comment letter reply from Steve Auten says tests will be done related to hierarchy in response to Greenspace comment letter-- See quote below:

It should be kept in mind that the 8-inch DBH removal threshold and 200 TPA standards are overarching goals. The size of removed trees will vary between sites due to site-specific conditions, including existing tree sizes and levels of disease and mortality. Prior to beginning full operations, we plan to conduct test plot treatments with variable removal schema to evaluate and demonstrate the treatment plan.

Other issues

- Pg 9/218 Could include a footnote defining the MCV2 membership rule for Monterey Pine forest.
- Pg 10/218 – The PSA states “[t]he results of a densely overstocked stand are impaired forest conditions that require ecologically restorative treatments to reduce competition among trees by predominantly removing trees ≤ 8 ” in diameter to increase healthy growth of larger trees and allow sunlight to reach the forest floor to increase plant diversity, while also reducing ladder fuels and the associated fire hazard.”

We recommend discussing how Monterey Pine forests easily survive moderate fires but a dense forest that allows the canopy to ignite often results in the death of the healthy mature trees - that laddering and thinning/clearing understory helps to prevent canopy fire

- Be explicit on pg 10/218 that the “respective vegetative alliance” has at least 25% cover of Monterey Pines and associated native species such as coast live oak, manzanita, huckleberry, and poison oak.
- Pg 10/218 – The PSA states: “Per the 2nd Manual of California Vegetation (Sawyer et al., 2009), the project area on Covell Ranch predominantly consists of Monterey pine forest, or the Pinus muricata – Pinus radiata Forest & Woodland Alliance, which possesses a rarity rank of S3.2. This alliance designation requires Monterey pine to encompass more than 25% cover in the tree layer.”

Is the Covell Ranch dominated by Bishop pine or Monterey pine? We didn't think the Covell Ranch was defined as a Bishop Pine-Monterey Pine Community. Please make sure to use the correct habitat description. The rarity ranking of Monterey Pine forest is G1 S1.2 – very, very rare. Instead of noting the designation “requires” Monterey pine to encompass more than 25% cover in the tree layer, we suggest it “describes Monterey Pines trees with more than 25% cover in the tree layer.”

- Pg 12/218 – We suggest including a description of “health impairments” in the justification, e.g., was evaluated and was determined to be overgrown with a significant excess of dead, dying and diseased trees, to be invaded by the highly invasive French Broom, to have an excess of sapling and young trees less than 8" dbh, and to have an overgrown understory...
- Pg 13/218. It would be nice to know the proposed timing order of the treatment units - if you know it - say Treatment Unit 1 first to promote protection of the town of Cambria the first year...Treatment Units 2 and 3 the following year...and so on.
- Pg 20/218

10. Treatment activities shows herbicide application on 665 acres. Is this an estimate or is herbicide actually planned to be used on all 665 acres? More detail on the proposed use and type of herbicide would be helpful. For instance is it only proposed to eradicate French Broom or is it proposed for use in sensitive areas like riparian habitat for cape ivy? If so, how will it be used.
- Pg 174/218 Coastal VTS – PSA Attachment F

4. The PSA write-up describes that the southern portion of Covell Ranch predominantly made up of Monterey pine forest falls under a California Vegetation Treatment Program (CalVTP) Project Specific Analysis (PSA) project to conduct ecological restoration and wildland-urban interface fuel reduction treatments. The main PSA summary explains the Covell project as ecological restoration or forest health and does not describe it as fuel reduction treatments. Was there discussion and distinction of fuel reduction components laid out in the PSA or maps? Is there proposed shaded fuel break work for the future?

- Pg 176/218 - 6. Can the modeling from the Forest Vegetation Simulator be discussed or interpreted for the main PSA text? This is helpful information to explain the plan for the understory thinning.
- Pg 177/218 - The nesting and bat roost buffer zones of 50-100 feet are well below the CDFW guidelines for nesting songbirds (300') and raptors (500'). Please explain the need for the reduced buffer.
- Pg 178/218 - Please describe the benefits of the woodrat test buffer and why 5-10 feet is protective.
- Pg 179/218 - Priority 1 is removing trees infected with dwarf mistletoe, western gall rust, and/or pitch canker. What about dead, dying, or diseased mature trees?
- Pg 180/218 Tree Pruning Treatments – 1. can you specify the hardwood species?
- Pp 181/218 – Understory Vegetation, Brush, and Shrub Treatments - The rules for thinning/clearing the understory seem unclear.
 - “2. Outside of the drip line of retained trees, brush and shrubs shall be cut and masticated leaving root systems intact for resprouting to achieve a horizontal crown separation of approximately 50-75 feet. Spacing may be closer to 50 feet on flatter ground and 75 feet on steeper ground or completely removed to provide defensible space when in proximity to infrastructure or near homes within treatment areas. Remaining clumps of brush and shrubs should not exceed approximately 15-25 feet in diameter and will consist of healthy appearing specimens where feasible.”

The description sounds like everything is masticated except then discussion of crown separation is inserted. This could be written more clearly - Sounds like clumps of healthy shrubs approx 15-25' in diameter will be preserved and spaced apart certain distances depending on the slope....



September 14, 2021

California Coastal Commission – Central Coast District
725 Front Street #300
Santa Cruz, CA

California Coastal Commission representatives,

Thank you for taking the time to review the Project Specific Analysis for the proposed Covell Ranch Forest Health Fuels Reduction Project in Cambria, California. This PSA was developed as a permitting addendum to the CEQA-compliant California Vegetation Treatment Program (CalVTP) Programmatic Environmental Impact Report¹. The proposed Treatment Types for this project (Ecological Restoration and Wildland-Urban Interface Fuel Reduction) were selected in accordance with the treatment guidelines, descriptions, and impact analyses described in detail in the PEIR.

Formulated upon careful evaluation of your recommendations, we hope the following responses adequately address your comments and concerns in sequence with how they were received:

1. *TNC Easement: Are there any conservation easement (CE) conditions to review?*
 - *Does the CE with TNC have any provisions/restrictions pertinent to the PSA? E.g. - no herbicide use, etc.?*
 - *Do you expect a comment letter coming from TNC?*

The Nature Conservancy conducted an in-depth review of the PSA in August 2021 under the guidance of Cassady Bill Vaughan (RPF #2685) of Vaughan Forestry, who assisted in the development of the 2011 Forest Management Plan for Covell Ranch. TNC determined that the objectives, proposed treatments, and “activities proposed in the PSA are consistent with our [Conservation Easement] and [Forest Management Plan]”. A letter of concurrence from TNC and associated memo from Vaughan Forestry have been appended to the PSA as *Attachment M*. Additionally, information regarding TNC’s review has also been included in *Item #14* of the PSA on Page 17:

“The Nature Conservancy and associated Registered Professional Forester Bill Vaughan conducted a detailed review of the Covell Ranch Forest Health Fuels Reduction Project CalVTP Project Specific Analysis in August 2021 that determined ‘the activities proposed in the PSA are consistent with our [Conservation Easement] and [Forest Management Plan]’. See Attachment M for a letter of approval from TNC and Forester Bill Vaughan.”

2. *ESHA statement: Pg 44/218 (also 49/218, 175/218) – There is a statement that occurs 3 times that says “The entirety of the Coastal Zone has been identified as ESHA in SLO County by the CCC.” The entire CZ area is not ESHA, but maybe you mean the sensitive resource areas in SLO (like the terrestrial habitat – Monterey Pine forest areas) are considered ESHA by CCC? Please clarify.*

¹ <https://bof.fire.ca.gov/projects-and-programs/calvtp/calvtp-program-eir/>



The statement ~~"The entirety of the Coastal Zone has been identified as ESHA in SLO County by the CCC"~~ has been redacted from the PSA and replaced with **"The entirety of the Monterey pine forest at Covell Ranch is considered ESHA, as defined by the CCC"** in the following sections:

Impact BIO-3 (Page 41)

SPR BIO-8 (Page 46)

Attachment F – CVTS (Page 173)

3. *Chaparral: Pg. 48/218- Can you map the chaparral? Please explain more prominently that it is not in treatment areas.*

Chaparral within the project boundary is mapped on Map 4 – Covell Ranch Project Area Vegetation Types in Attachment B of the PSA. Language regarding the absence of treatments within chaparral and coastal scrub communities has been bolstered in the "Vegetation" description under Item #13 (Page 16) and in the SPR BIO-5 discussion (Page 43) of the PSA:

"Some areas within the project boundary contain portions of chaparral/coastal scrub communities, predominantly in the north and northeast portions of the project area; however, the proposed treatment units do not include any chaparral or coastal scrub vegetation types as identified by CAL FIRE's Fire and Resource Assessment Program (FRAP) data. Single specimens of manzanita have been observed in Unit 3B and may be incidentally trimmed as part of operations. It can be expected that these species will vigorously resprout."

Additionally, Item #11 (Page 15) indicates treatments will only occur in the Tree Fuel Type and not in the Shrub Fuel Type which would include chaparral and scrub.

4. *Test Plots: Somewhere in PSA (Maybe in Attachment F Pg. 179/218) - Can you clarify circumstances related to using test plots in the PSA for tree treatments? Density goals are general. Comment letter reply from Steve Auten says tests will be done related to hierarchy in response to Greenspace comment letter-- See quote below:*

"It should be kept in mind that the 8-inch DBH removal threshold and 200 TPA standards are overarching goals. The size of removed trees will vary between sites due to site-specific conditions, including existing tree sizes and levels of disease and mortality. Prior to beginning full operations, we plan to conduct test plot treatments with variable removal schema to evaluate and demonstrate the treatment plan."

"Test plots" were initially suggested as a direct response to CNPS to alleviate concerns regarding the extent of treatments being proposed. They are now being referred to as "demonstration plots"; however, these are not required as part of this CalVTP PSA and would only be conducted if time and equipment availability permit their implementation.

The CVTS and project specifications outline the extent of treatments proposed for implementation, but do not necessarily act as a blanket prescription across the entire project area. Subjectivity will be used on a stand-level basis to ensure proper site-specific treatments are implemented across each unit at the discretion of the RPF, CAL FIRE, or qualified designee. Demonstration plots will be considered to provide local NGOs with an on-the-ground insight on the proposed project.



5. Pg 9/218 Could include a footnote defining the MCV2 membership rule for Monterey pine forest.

A footnote has been added on Page 4 of the PSA to reference the *Pinus radiata* Forest Alliance in the Manual of California Vegetation, 2nd Edition. Information regarding the alliance and its membership rules is not available through the CNPS Online Database, therefore a printed version of MCV has been referenced.

6. Pg 10/218 – The PSA states “[t]he results of a densely overstocked stand are impaired forest conditions that require ecologically restorative treatments to reduce competition among trees by predominantly removing trees ≤ 8 ” in diameter to increase healthy growth of larger trees and allow sunlight to reach the forest floor to increase plant diversity, while also reducing ladder fuels and the associated fire hazard.”

We recommend discussing how Monterey Pine forests easily survive moderate fires but a dense forest that allows the canopy to ignite often results in the death of the healthy mature trees - that laddering and thinning/clearing understory helps to prevent canopy fire.

Language has been added to Page 5 of the PSA within the paragraph referenced above to further describe potential fire conditions and treatment objectives:

“While Monterey pine forests may survive low- to moderate-intensity surface fires in a well-spaced, healthy stand, the conditions present at Covell Ranch have the potential to exacerbate fire severity by allowing fire to mobilize into the forest canopy by way of excess continuities of vertical and horizontal dead and dry fuels throughout the property. Crown fires in Monterey pine forests typically kill mature pine trees and spread rapidly at high intensities. The proposed removal of excess understory fuels and small diameter trees is expected to help prevent large-scale, stand replacement canopy fires in the Monterey pine forest at Covell Ranch.”

7. Be explicit on pg 10/218 that the “respective vegetative alliance” has at least 25% cover of Monterey Pines and associated native species such as coast live oak, manzanita, huckleberry, and poison oak.

Language has been added to Page 5-6 of the PSA within the paragraph referenced above to further describe the *Pinus radiata* Forest Alliance:

“Per the Manual of California Vegetation, 2nd Edition (Sawyer et al., 2009), the project area on Covell Ranch predominantly consists of Monterey pine forest, or the *Pinus radiata* Forest Alliance, which possesses a rarity rank of S1.2. This alliance’s membership rules require Monterey pine to encompass greater than 25% cover in the tree layer while maintaining a composition of associated native species such as coast live oak, manzanita, huckleberry, and poison oak.”

8. Pg 10/218 – The PSA states: “Per the 2nd Manual of California Vegetation (Sawyer et al., 2009), the project area on Covell Ranch predominantly consists of Monterey pine forest, or the *Pinus muricata* – *Pinus radiata* Forest & Woodland Alliance, which possesses a rarity rank of S3.2. This alliance designation requires Monterey pine to encompass more than 25% cover in the tree layer.”

Is the Covell Ranch dominated by Bishop pine or Monterey pine? We didn't think the Covell Ranch was defined as a Bishop Pine-Monterey Pine Community. Please make sure to use the correct habitat description. The rarity ranking of Monterey Pine forest is G1 S1.2 – very, very rare. Instead of noting the designation “requires” Monterey pine to encompass more than 25% cover in the tree layer, we suggest it “describes Monterey Pines trees with more than 25% cover in the tree layer.”



The alliance designation was modified to describe the *Pinus radiata* Forest Alliance which more accurately defines the vegetative composition of the project area. Bishop pine (*P. muricata*) does not occur within the forest at Covell Ranch. The "*Monterey Pine Forest Alliance*" is not represented on the MCV Online Database, therefore the "*Bishop pine - Monterey Pine Forest & Woodland Alliance*" was initially used as the closest available description of forest conditions on the ranch. This is now revised and references the MCV, 2nd Edition in textbook form where the correct designation can be found.

9. Pg 12/218 – We suggest including a description of "health impairments" in the justification, e.g., was evaluated and was determined to be overgrown with a significant excess of dead, dying and diseased trees, to be invaded by the highly invasive French Broom, to have an excess of sapling and young trees less than 8" dbh, and to have an overgrown understory...

Language has been added to Page 7 of the PSA within the paragraph referenced above to further describe the observed conditions of the forest at Covell Ranch:

"These impairments occur throughout the forested lands and are in close proximity to the community of Cambria. Existing management plans (Jones & Stokes 2002, Staub Forestry 2011), biological evaluations (Cooper, Attachment E), professional forester observations, the San Luis Obispo County Community Fire Safe Council, and CAL FIRE have all determined the forested conditions at Covell Ranch to be overstocked with an excess of dead or dying understory vegetation and in extremely poor health due to prolonged drought, historic land uses, and extensive disease and pathogen transmission in conjunction with decades of fire suppression. These conditions have resulted in disproportionate amounts of understory vegetation, diseased trees, and trees less than 8 inches in diameter. The ecologically restorative treatments proposed in this project are expected to mitigate these impairments and forest health issues while also supporting efforts to reduce the risk of wildfire next to the community of Cambria."

10. Pg 13/218. It would be nice to know the proposed timing order of the treatment units - if you know it - say Treatment Unit 1 first to promote protection of the town of Cambria the first year...Treatment Units 2 and 3 the following year...and so on.

While the exact timing order of treatments is unknown at this time, language was added to Page 7 of the PSA within the paragraph referenced above to describe in more detail the priority treatment areas relative to their proximity to the town of Cambria:

"The proposed project is intended to occur in priority phases in sequence with the respective treatment unit numbers. Treatment Units 1 and 2 are of high priority for treatment given their proximity to residential areas in the town of Cambria. Initial implementation of ecologically restorative treatments in these portions of the property will also maximize the efficacy of the existing shaded fuel break along Bridge Street and the western perimeter of the Covell Ranch forest. Treatments will occur in Units 3, 4, and 5 in subsequent phases to achieve similar goals of impaired forest health treatments and understory fuels reduction."

11. Pg 20/218.

[10] Treatment activities shows herbicide application on 665 acres. Is this an estimate or is herbicide actually planned to be used on all 665 acres? More detail on the proposed use and type of herbicide would be helpful. For instance is it only proposed to eradicate French Broom or is it proposed for use in sensitive areas like riparian habitat for cape ivy? If so, how will it be used.

Herbicide application is proposed *within* the 665-acre treatment area, but not planned or expected to occur over the entirety of the 665 acres. Please refer to the existing discussions on Herbicide Treatments



(Page 12) within the Treatment Activities section of the PSA as well as the Invasive Species section (Page 15) for specifics on herbicide use and type as it relates to invasive species control.

Herbicide application will be predominantly implemented in areas where invasive species are likely or expected to occur such as sunlight openings, along roads and trails, and where existing populations of French broom exist which will “significantly reduce the actual acreage to which herbicide is applied” (Page 12). No herbicide treatments will occur in Watercourse and Lake Protection Zones or Class III Equipment Exclusion Zones, within 50 feet of CESA or ESA listed plant species, or during periods of significant rainfall per SPR HYD-5 of the CalVTP PEIR.

12. Pg 174/218 Coastal VTS – PSA Attachment F

[4] The PSA write-up describes that the southern portion of Covell Ranch predominantly made up of Monterey pine forest falls under a California Vegetation Treatment Program (CalVTP) Project Specific Analysis (PSA) project to conduct ecological restoration and wildland-urban interface fuel reduction treatments. The main PSA summary explains the Covell project as ecological restoration or forest health and does not describe it as fuel reduction treatments. Was there discussion and distinction of fuel reduction components laid out in the PSA or maps? Is there proposed shaded fuel break work for the future?

Wildland-Urban Interface Fuel Reduction was chosen as a Treatment Type for this project exclusively for maintenance work that will be conducted as part of this CalVTP PSA in the *existing* shaded fuel break along Bridge Street and the western perimeter of Covell Ranch. No new construction of shaded or non-shaded fuel breaks is for this project. Please refer to Maps 1-3 in Attachment B for location and acreage of the existing shaded fuel break within the project area.

Discussion on the maintenance treatments proposed for the existing fuel break can be found in the Treatment Activities section of the PSA under “Mechanical Treatments” (Page 11). New language was added to the Project Goals description on Page 10 that reads:

“Building on existing shaded fuel break treatments implemented predominantly along the perimeter of the southwestern portions of the property that form the WUI, this project proposes to increase the health and vigor of the Monterey pine forest by conducting ecologically restorative forest health treatments that increase climate resiliency and biological diversity and reduce the severity of wildfire near the community of Cambria. No new construction of shaded or non-shaded fuel breaks is proposed as part of this CalVTP PSA.”

13. Pg 176/218

[6] Can the modeling from the Forest Vegetation Simulator be discussed or interpreted for the main PSA text? This is helpful information to explain the plan for the understory thinning.

Interpretations gathered from Forest Vegetation Simulator modeling were offered in response to comments from CNPS regarding the validity and comparison analysis of long-term net carbon benefits related to the proposed treatments at Covell Ranch. The comments made were a product of the CalVTP PEIR analysis of carbon outputs produced from a ‘theoretical’ wildfire versus the carbon outputs produced from treatment implementation.

The interpretations made from FVS modeling with regard to net carbon benefit were based on projects and grant writing efforts with similar objectives and treatment specifications to the proposed project at Covell Ranch and not developed as a product of actual modeling of the forest conditions at Covell Ranch.



14. Pg 177/218 - The nesting and bat roost buffer zones of 50-100 feet are well below the CDFW guidelines for nesting songbirds (300') and raptors (500'). Please explain the need for the reduced buffer.

Per SPR BIO-12, treatment activities will be scheduled to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. The nesting season or peak nesting season of birds not otherwise treated as special status species will be determined by a qualified RPF or biologist.

If a special status bird or raptor species is identified in the field during operations, or an active nest is observed, operations will cease within a species-appropriate buffer, at a minimum of 100 feet or as determined by a qualified RPF or biologist, and CDFW will be contacted. Treatments will be modified accordingly per the recommendations of CDFW, and buffer sizes are expected to increase in the event a special status bird or raptor species is identified in the field or should operations agitate or otherwise disturb the individual(s).

Mitigation Measure BIO-2b outlines necessary actions that shall be taken to avoid mortality, injury, or disturbance of special status wildlife (CalVTP Final PEIR, Volume II, Section 3.6.3, 148-149).

15. Pg 178/218 - Please describe the benefits of the woodrat nest buffer and why 5-10 feet is protective.

Per the MM BIO-2b in the CalVTP PEIR (Page 98 of the PSA), CAL FIRE is required to "Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species" by establishing, "a no-disturbance buffer around occupied sites (e.g., nests, middens, etc.). Buffer size will be determined by a qualified RPF, or biologist using the most current, commonly accepted science and will consider published agency guidance".

The woodrat nest buffer provides additional protection to avoid impacts to woodrats by retaining constructed nests and adjacent understory habitat per PSA MM BIO-2b. The 5-10 foot no-disturbance buffer around woodrat nests is typical of vegetation treatment projects where additional treatment buffer restrictions are implemented. As part of the Coastal Vegetation Treatment Standards (CVTS), significant stands of toyon will be maintained leaving additional understory dispersal habitat for woodrats (Page 171). No mechanical treatments shall occur within 50 feet of watercourses and vegetation treatment activities shall be conducted during daylight hours when woodrats are least active, therefore further reducing potential impacts.

CDFW was contacted regarding woodrat nest buffer measures per California Coastal Commission's request. Please see the attached response that provides concurrence with proposed measures in Attachment G of the PSA. The following language has been added to the CVTS (Page 176) to clarify implementation measures if woodrat nest must be removed:

"Woodrat nests would only be removed if necessary to access a portion of a treatment area otherwise inaccessible, or to reasonably pass from one treatment polygon to another. Nest removal shall be avoided during the breeding season if feasible (January 1st - September 30th). If woodrat nests must be removed during the breeding season, they will be slowly removed by hand to determine if young are present. If young are present the nest material shall be replaced, and the nest left alone for 2-3 weeks at which time the nest can be rechecked to verify that young are capable of independent survival before proceeding with nest dismantling."



16. Pg 179/218 - Priority 1 is removing trees infected with dwarf mistletoe, western gall rust, and/or pitch canker. What about dead, dying, or diseased mature trees?

Discretion will be used when encountering standing dead, dying, or diseased mature trees. While consideration of these individuals is a priority, the cost and safety associated with their removal warrants a careful examination of their condition and removal will be determined on a per-individual basis. Hazard trees within proximity to structures or publicly accessible road systems or trails will be given preference per the standards outlined in the project specifications which reads:

"A tree of any size considered a hazard and direct threat to personal safety or infrastructure may be removed."

17. Pg 180/218 Tree Pruning Treatments – 1. can you specify the hardwood species?

Coast live oak is the primary hardwood species on Covell Ranch and language in the CVTS (Page 178) has been revised to reflect that.

18. Pp 181/218 – Understory Vegetation, Brush, and Shrub Treatments - The rules for thinning/clearing the understory seem unclear.

[2] Outside of the drip line of retained trees, brush and shrubs shall be cut and masticated leaving root systems intact for resprouting to achieve a horizontal crown separation of approximately 50-75 feet. Spacing may be closer to 50 feet on flatter ground and 75 feet on steeper ground or completely removed to provide defensible space when in proximity to infrastructure or near homes within treatment areas. Remaining clumps of brush and shrubs should not exceed approximately 15-25 feet in diameter and will consist of healthy appearing specimens where feasible.

The description sounds like everything is masticated except then discussion of crown separation is inserted. This could be written more clearly - Sounds like clumps of healthy shrubs approx 15-25' in diameter will be preserved and spaced apart certain distances depending on the slope....

The specification indicates that clusters of understory shrubs (approximately 15-25 feet in diameter) occurring outside of the dripline of residual trees will be retained at a spacing of 50-75 feet apart edge-to-edge. Healthy specimens/clusters will be given preference for retention. Where shrubs or clusters of understory vegetation exist around infrastructure or homes, complete removal will be considered to establish defensible space. These spacing standards are expected to maintain the vegetative composition and proper species proportions within the *Pinus radiata* Forest Alliance. Discretion will be used on a site- or stand-specific basis to achieve these objectives.



Thank you for your careful consideration of the Covell Ranch Forest Health Fuels Reduction Project and offering your valuable insight to the development process. Auten Resource consulting is happy connect further to discuss any additional items of concern or to clarify the adjustments and revisions made. Please note that page numbers on previous versions the PSA may have changed, but we hope they are adequately referenced here to the most current draft.

Sincerely,

A handwritten signature in cursive script that reads "Steve R. Auten".

Steve R. Auten - RPF #2734

A handwritten signature in cursive script that reads "Riley McFarland".

Riley McFarland - Assistant Forester I



CALIFORNIA
NATIVE PLANT SOCIETY

June 29, 2021

Mr. Steve Auten
Auten Resource Consulting
116 Martinelli Street, Suite B
Watsonville, CA 95076

RE: Covell Ranch Forest Health Fuels Reduction Project

Dear Mr. Auten:

The California Native Plant Society, San Luis Obispo County chapter (CNPS-SLO) is a local chapter of a Statewide not-for-profit corporation established for the purpose of preserving the natural flora of the State of California, and educating the public about the importance of such preservation. We are writing in response to the recently circulated “Covell Ranch Forest Health Fuels Reduction Project”, regarding a proposed fuel reduction and vegetation management project in the native Monterey pine forest at the Covell Ranch near Cambria, California. We have reviewed the document and have certain observations, concerns and recommendations regarding the proposed project. These include the following:

1. Nowhere in the report is there a justification of the choice of the 8 inch diameter as the cutoff for removals. Why not select 4 inches, or 6 inches, or even 10 inches instead? What is the basis for the selection of this size? We believe that this diameter is too large; a reconnaissance in the northern portion of the Cambria Community Cemetery—an area that might itself be reasonably considered to be a fuelbreak—found that 50% of the pine trees were below 8 inches in diameter and thus could be considered prospects for removal. We appreciate your offer to have CNPS participate in a test thinning effort, but would like such an effort to be formal, structured and replicated; see our recommendations below.
2. Discussion in the report focused almost exclusively on Monterey pines. There is very little mention of the other species, which are an important component of the Cambria pine forest habitat. These include coast live oak, toyon, coffeeberry, elderberry, poison oak, blackberry, and other less common species, some of which are at or near their southern limit of distribution in the Cambria area. This oversight extends to the importance of physiognomy; that is, the actual structure of the forest habitat. The pines range from quite small to very tall; the oaks, toyons, coffeeberries, and other species create a variety of heights and densities that are desirable for habitat diversity and use by wildlife. The fuelbreak areas that have been created appear very sterile and unattractive as habitat, with remaining pines and oaks limbed up to a height of 8 to 10 or 12 feet, few remaining shrubs or small trees, and a ground cover of primarily non-native annual grasses. While this may be necessary or acceptable in the fuelbreak areas, it is not so in the forest itself.
3. It appears that what is being proposed is to extend the fuelbreak standards to the entire forest. We believe this is wrong and do not support it. We further note that this concern is not new: a letter dated November 14, 2011 from the California Coastal

Protecting California's native flora since 1965

Commission sites the concern for “balancing” of fuel reduction needs with proper conservation of habitat values, regarding the initiation of fuelbreak construction on the Covell Ranch back in 2011.

4. The project as proposed includes maintenance work on the existing fuelbreak areas, of which presumably none are more than ten years old, and most less. Shouldn't the landowner have responsibility for such maintenance? Why should the public pay for such upkeep? Why is maintenance even necessary in such a short timespan? We note some fallen trees in the fuelbreak area along Bridge Street; are these fallen trees a result of the thinning?
5. This project constitutes a significant gift of public funds to a private landowner. We question whether this is the best use of these funds. Much of the Covell Ranch is remote from the community, and as private property is inaccessible to the public. Should not the project concentrate on areas closer to the urban lands where such expenditures can be more reasonably justified? Sites which have similar risk and lie within the community (see below) might be more deserving of consideration. Furthermore, we question whether the apparent ratio of mechanical work to hand work (95:5) is truly reasonable; we believe that a smaller, more targeted effort with more hand work and less mechanical work might accomplish as much and have more immediate results beneficial to the community. We also believe that a more detailed measure of relative costs is justified given the significant difference between the quoted costs of hand work and mechanical work (and their internal range of 100%).
6. As stated in the report, this situation is the result of many factors, operating over a long period of time—over 100 years. It cannot and will not be restored to the conditions of 100 years ago in one fell swoop. We cannot really be sure that such a restoration is even possible. The local occurrence of pernicious weedy species such as French broom—which is here to stay—render such ideas difficult at best. Therefore it is incumbent upon us to think more carefully and conservatively when it comes to projects of this nature.

Although minor in comparison to the above, we have some additional concerns about the language of the report, and examples cited within it. These include:

1. Terms such as “rampant”, “desperately”, and “more easily” are vague and subjective and in our view are inappropriate in a technical report such as this.
2. Figures 8 and 9 are distant or aerial views of a portion of the forest just north of the community of Cambria, reportedly taken in 2015. These photos show numerous dead trees. However, more recent views of this area show that significant clearing of dead trees has occurred in the intervening years, greatly reducing the fire danger in what is now indicated as a “fuelbreak” on the southern boundary of the Covell Ranch adjacent to the community. We therefore consider these photographs to be somewhat misleading.
3. The text states that the “proposed treatments focus predominantly on mechanized mastication of dead, dying, and diseased trees with some handwork in sensitive areas to remove approximately 70-80% of trees less than 8 inches in diameter” (presumably at breast height, DBH). We assume that the majority of trees meeting this description (i.e., under 8 inches diameter) are neither dead, dying nor diseased. Please provide documentation of this condition within the forest.

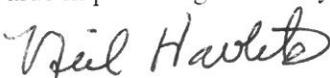
4. The report describes the proposed project as an “ecological restoration”, with many benefits both to the forest itself and to the Cambria community. Among these claims is the statement that “reduction in vegetation competition in the understory would increase the growth and carbon storage capacity of the residual stand”. This seems to imply that the project will improve carbon sequestration. We question this because the report compares the greenhouse gas production of the project against a theoretical wildfire, rather than against the amount of carbon sequestration that would presumably occur because of the success of the project in reducing or eliminating a wildfire in that portion of the Cambria Monterey pine forest and presumed increase in growth rates of the remaining vegetation.

Our recommendations

We recommend that, prior to any significant operations of this proposed project, that one or more test plots of one acre or so be established and a variety of hand worked thinning activities be undertaken and evaluated. (This seems to have been agreed to in principle, in the email from Dan Turner to Neil Havlik dated June 4, 2021; however, we would like to have more detail as to the exact nature of such testing, as recommended below.) As we have stated, we do not agree that the 8 inch diameter is the appropriate size for a “cutoff” of thinning operations outside of the fuelbreak areas. We recommend that a smaller size, say 3 or 4 inches in diameter, be cut and removed and the resultant condition evaluated before any more work is done. Then, if it is determined that more thinning to a larger diameter is needed, that can be done and evaluated. When consideration of pine thinning at the diameter ultimately determined to be appropriate is completed, then consideration of thinning of live oaks, toyons, and the other understory shrubs can be undertaken and evaluated in the same manner, being cognizant of the need for suitable physiognomy of the forest. Remember, we are talking not about the fuelbreak but the entire forest, and the standards which have been applied to the fuelbreak should not apply.

We also recommend that consideration of alternative sites for thinning and restoration work be done. The Covell Ranch project proposes to extend over ten years. We do not believe that the Covell Ranch should have exclusive access to these funds for that timeframe. Several areas, among them Fern Canyon, Strawberry Canyon, the Burton Drive arroyo, Camp Ocean Pines, and the Fiscalini Ranch, are appropriate sites for consideration of this program. They are smaller, closer in to, or actually within, the community, and contain species (such as sword fern, huckleberry, osoberry, cow parsnip, and currant), which will require special treatment and care.

Thank you for the opportunity to review and respond to this proposal. We support the concept of ecologically restorative actions; however, this term is subject to wide interpretation. We are concerned about what we consider to be excessive reliance upon mechanized equipment for over 95% of the treatment proposed, what appears to be a fixation on the 8 inch diameter “cutoff”, and the preferential treatment being given to a single property owner in an area, at least part of which is remote from the community and of reduced value in providing fire safety.

Sincerely, 

Neil Havlik, Member, Conservation Committee

California Native Plant Society, San Luis Obispo Chapter



July 13, 2021

California Native Plant Society, San Luis Obispo Chapter
P.O. Box 784
San Luis Obispo, CA 93406

Dr. Neil Havlik and colleagues,

Thank you for taking the time to review the Project Specific Analysis for the proposed Covell Ranch Forest Health Fuels Reduction Project in Cambria, California. This PSA was developed as a permitting addendum to the CEQA-compliant California Vegetation Treatment Program (CalVTP) Programmatic Environmental Impact Report¹. The proposed Treatment Types for this project (Ecological Restoration and Wildland-Urban Interface Fuel Reduction) were selected in accordance with the treatment guidelines, descriptions, and impact analyses described in detail in the PEIR.

Formulated upon careful evaluation of your recommendations, we hope the following responses adequately address your comments and concerns in sequence with how they were received:

1. *"Nowhere in the report is there a justification of the choice of the 8-inch diameter as the cutoff for removals. Why not select 4 inches, or 6 inches, or even 10 inches instead? What is the basis for the selection of this size? We believe that this diameter is too large; a reconnaissance in the northern portion of the Cambria Community Cemetery - an area that might itself be reasonably considered to be a fuel break-found that 50% of the pine trees were below 8 inches in diameter and thus could be considered prospects for removal. We appreciate your offer to have CNPS participate in a test thinning effort, but would like such an effort to be formal, structured and replicated; see our recommendations below."*

The determination of tree diameters expected for removal within the Monterey pine forest at Covell Ranch is predominantly based on research and monitoring conducted previously at similar stands in Monterey and North Santa Cruz Counties, as well as professional forester observations described in the 2011 Forest Management Plan (FMP) for Covell Ranch, developed by Staub Forestry and Environmental Consulting².

Sampling efforts conducted for the 2011 FMP for Covell Ranch estimated an average of 569 trees per acre (TPA) on the property (over 75% of which were trees measured at less than 6 inches in diameter) in conjunction with "increasingly hazardous quantities and structures of live and dead fuels in this valuable forest that abuts the community of Cambria on two sides" (Staub FMP, page 8). Our own reconnaissance of the ranch in 2020 and 2021 corroborates the conditions observed in 2011 and suggests substantial fuel loading has continued to occur over the intervening 10 years.

By contrast, existing data collected by Cal Poly during monitoring and continuous surveying of 1/5th-acre Monterey pine sample plots in the Scotts Creek Watershed near Año Nuevo State Park determined tree density levels within the healthiest stands averaged approximately 200-250 TPA. Prior to the August 2020 CZU Complex Fire, these were considered vigorous Monterey pine stands that maintained periodic occurrences of pitch canker infestation, some western gall rust, and promoted a diverse vegetative understory with low rates of vertical and horizontal dead fuel loading.

¹ <https://bof.fire.ca.gov/projects-and-programs/calvtp/calvtp-program-eir/>

² <http://cambriaforestcommittee.org/wp-content/uploads/2011/05/Covell-Ranch-FMP-for-TNC-2.11.pdf>



Healthy Monterey pine stands managed within the Del Monte Forest in Monterey, California have been maintained at 170 TPA or 16-foot tree spacing in some areas and 300 TPA or 12-foot spacing in other areas to achieve similar fire and stand resiliency goals across the native forest. Following the Pebble Beach Fire of 1987 in this forest, post-fire regeneration of Monterey pine reached densities as high as 2,000 TPA. The fire consumed nearly 100-acres of pine forest and destroyed 31 homes in the community³.

A review of the Cambria Forest Management Plan developed in 2002 by the Cambria Forest Committee⁴ recommends a residual TPA of at least sixteen 20-inch diameter trees or eight 24-inch diameter trees following understory treatments that simulate medium-scale ecological processes (Treatments 3 and 4). More intensive treatments described in the plan (Treatments 6 and 7) suggest a residual TPA of eight 20-inch diameter trees and recommend the maximum spacing between retained mature trees should not exceed the vertical canopy height when simulating large-scale, "catastrophic" ecological processes. While residual spacing under these recommendations may easily exceed 100 feet in some portions of the forest and could result in as few as 3 trees per acre, 15-20 foot spacing is more suitable for our objectives on Covell Ranch. To attain these goals, reduction in the overall density of smaller diameter trees [≤ 8 " diameter at breast height (DBH)] will allow for the retention of mature Monterey pine trees, reduce the spread and continuity of forest pathogens, and promote a balanced ratio of oaks to pines in the understory per the recommendations outlined in the Cambria FMP (Jones & Stokes, Page 4-9).

By considering the discretion of previous management plans and resource professionals, acknowledging the high mortality rate of smaller diameter trees following moderate to high severity fire, and considering which diameter classes are overstocked, the phased removal of trees ≤ 8 inches DBH is expected to meet healthy density, spacing, and fire hazard standards. 15-foot spacing between retained mature trees (225 square feet per tree) extrapolates to approximately 200 TPA which restores ample growing space and favorable conditions for natural pine regeneration. Our target post-treatment value of 200-250 TPA appears to exemplify healthy Monterey pine stand conditions.

2. *"Discussion in the report focused almost exclusively on Monterey pines. There is very little mention of the other species, which are an important component of the Cambria pine forest habitat. These include coast live oak, toyon, coffeeberry, elderberry, poison oak, blackberry, and other less common species, some of which are at or near their southern limit of distribution in the Cambria area. This oversight extends to the importance of physiognomy; that is, the actual structure of the forest habitat. The pines range from quite small to very tall; the oaks, toyons, coffeeberries, and other species create a variety of heights and densities that are desirable for habitat diversity and use by wildlife. The fuel break areas that have been created appear very sterile and unattractive as habitat; with remaining pines and oaks limbed up to a height of 8 to 10 or 12 feet, few remaining shrubs or small trees, and a ground cover of primarily non-native annual grasses. While this may be necessary or acceptable in the fuelbreak areas, it is not so in the forest itself."*

Please refer to the Coastal Vegetation Treatment Standards (Coastal VTS) in **Attachment F** (Page 149) of the PSA to review our proposed treatment guidelines and retention standards regarding understory shrubs, brush, and hydrophytic vegetation. Treatments are focused on Monterey pines as they are the primary and dominant species throughout the forest. Treatments of additional species, outlined in the Coastal VTS, are designed to promote and restore vigor to Monterey pines, reduce competition in the residual stand, and mitigate forest type conversion in some areas of the ranch.

³ <https://www.usfa.fema.gov/downloads/pdf/publications/tr-007.pdf>

⁴ http://cambriaforestcommittee.org/wp-content/uploads/2011/04/Cambria_Forest_Management_Plan_4_02.pdf



3. *"It appears that what is being proposed is to extend the fuelbreak standards to the entire forest. We believe this is wrong and do not support it. We further note that this concern is not new: a letter dated November 14, 2011 from the California Coastal Commission sites the concern for "balancing" of fuel reduction needs with proper conservation of habitat values, regarding the initiation of fuel break construction on the Covell Ranch back in 2011."*

Treatments proposed for this project do not include the implementation of any shaded fuel breaks such as those along Bridge Street. The treatment standards that were considered during construction of the existing fuelbreaks in 2011 do not extend to the interior forest from the mapped fuelbreak areas and should not be regarded in such manner. Only maintenance will occur in the existing shaded fuel break areas as part of this CalVTP PSA. The objectives for the newly proposed treatment areas, while they include similar aspects of community wildfire protection and safe access for fire suppression, are predominantly based around forest health and ecological restoration.

Comprehensive in-field biological surveying, open communication with state and federal resource agencies (including but not limited to the California Coastal Commission), partnership consultation within a team who possess decades of Monterey pine management experience, and extensive CEQA analysis has been conducted to ensure proper treatments and best management practices will be implemented across the project area to maintain species health and vigor, biodiversity, fire resiliency, wildlife habitat, community awareness, and ecological conservation values.

4. *"The project as proposed includes maintenance work on the existing fuelbreak areas, of which presumably none are more than ten years old, and most less. Shouldn't the landowner have responsibility for such maintenance? Why should the public pay for such upkeep? Why is maintenance even necessary in such a short timespan? We note some fallen trees in the fuel break area along Bridge Street; are these fallen trees a result of the thinning?"*

As described above, the existing fuel break along Bridge Street was constructed almost exclusively to help slow or prevent the spread of wildfire to the adjacent community while also allowing potentially safe access points for emergency responders to contain a fire, should one occur. In order to maintain the effectiveness of the existing fuel break, periodic maintenance treatments are needed to clear horizontal and vertical accumulations of live and dead fuels, control invasive species, and assess hazard trees within proximity to areas frequented by the public.

As the landowner, Mr. Covell has no legal obligation to maintain or treat vegetation on his property unless it is to create or maintain defensible space around structures or remove trees that pose a hazard or safety risk to the public. Given that the proposed maintenance treatments are both costly and centered around community protection, the use of grant funding and state resources are warranted to ensure those treatments are conducted altogether.

Familiarity related to trees actively falling within the existing fuel break is not something our firm maintains at this time. Widespread falling of trees and limbs is apparent throughout the forest at Covell Ranch due to many considerations related to the decline in stand vigor. Our new collaborative effort in support of the proposed treatments will strive to address these factors.



5. *"This project constitutes a significant gift of public funds to a private landowner. We question whether this is the best use of these funds. Much of the Covell Ranch is remote from the community, and as private property is inaccessible to the public. Should not the project concentrate on areas closer to the urban lands where such expenditures can be more reasonably justified? Sites which have similar risk and lie within the community (see below) might be more deserving of consideration furthermore, we question whether the apparent ratio of mechanical work to hand work (95:5) is truly reasonable; we believe that a smaller, more targeted effort with more hand work and less mechanical work might accomplish as much and have more immediate results beneficial to the community. We also believe that a more detailed measure of relative costs is justified given the significant difference between the quoted costs of hand work and mechanical work (and their internal range of 100%)."*

Funding for this project was secured by the San Luis Obispo Community FireSafe Council through a competitive application process for the purpose of implementing vegetation treatment projects in high priority areas around the town of Cambria and San Luis Obispo County. The available funds are not exclusive to Covell Ranch and portions of this grant have been channeled to other Monterey pine projects throughout the community⁵. Despite the ownership status of the property, SLO FireSafe Council determined the forest at Covell Ranch to be of high priority for treatment due to its declining health and proximity to the 4,500 structures that make up the community of Cambria; definable as the Wildland-Urban Interface. Aerial photos provided on page 2 of the PSA display the significant level of development that has occurred adjacent to the forest between 1937 and 2021.

It is important to note that Mr. Covell does not receive any financial benefit, grant funds, or any form of revenue from this project. No commercialization of trees is proposed or authorized under the CalVTP. Treatment needs on Covell Ranch were determined wholly by potential fire mobility in proximity to the Wildland-Urban Interface, the decades-long expansion and increasing density of vegetation, and extremely high rates of mortality and disease across the forest.

Our objectives to treat the proposed acreage are most efficiently and effectively attained by implementing mechanized treatments where feasible. Vast majority of the terrain at Covell Ranch does not exceed 20% slope. Given these circumstances, mechanized equipment is readily able to access most of the project area without manipulation or construction of new roads or crossings and can cover more ground per day than a hand crew. The use of mechanized equipment is also greatly more cost effective in treating these areas than manual treatments, as handwork can range up to six times the cost of mechanization. This maximizes the value of public funds and minimizes the timeframe in which they are used.

6. *"As stated in the report, this situation is the result of many factors, operating over a long period of time- over 100 years. It cannot and will not be restored to the conditions of 100 years ago in one fell swoop. We cannot really be sure that such a restoration is even possible. The local occurrence of pernicious weedy species such as French broom-which is here to stay- render such ideas difficult at best. Therefore it is incumbent upon us to think more carefully and conservatively when it comes to projects of this nature."*

While the proposed project would be bound by a 10-year permit from the time of approval, it is likely permits will be renewed and new agreements will be pursued with the landowner to achieve long-term forest health. We do not expect the forest to be restored in one set of treatments and recognize that our

⁵ <https://fscslo.org/>



objectives rely on a decades-long commitment to the Monterey pine forest and community of Cambria. In addition to continuing the extensive, long-term efforts by FireSafe SLO to control French broom and other invasives throughout the community, there is potential in the future for prescribed burning to be implemented following treatments at Covell Ranch to reintroduce low-intensity fire onto the landscape.

In response to your additional concerns;

1. *"Terms such as "rampant", "desperately", and "more easily" are vague and subjective and in our view and inappropriate in a technical report such as this."*

We are happy to revise the document to not include these terms and appreciate your attention to detail.

2. *"Figures 8 and 9 are distant or aerial views of a portion of the forest just north of the community of Cambria, reportedly taken in 2015. These photos show numerous dead trees. However, more recent views of this area show that significant clearing of dead trees has occurred in the intervening years, greatly reducing the fire danger in what is now indicated as a "fuelbreak" on the southern boundary of the Covell Ranch adjacent to the community. We therefore consider these photographs to be somewhat misleading."*

The aerial photographs (Figures 9 and 10) included in the project summary of the PSA are intended to show the level of mortality and disease across the entire forest and are not intended to misrepresent current conditions, although Figures 7, 8, and 9 are images captured outside of the viewshed of the existing shaded fuel break and adequately depict areas where no treatments have occurred. A similar description for these images is included in the body of the project summary on pages 3 and 4. Discussion of the existing shaded fuel break and proposed maintenance treatments are available in the Project Description of the PSA on pages 8-15.

3. *"The text states that the "proposed treatments focus predominantly on mechanized mastication of dead, dying, and diseased trees with some handwork in sensitive areas to remove approximately 70-80% of trees less than 8 inches in diameter "(presumably at breast height, DBH). We assume that the majority of trees meeting this description (i.e., under 8 inches diameter) are neither dead, dying nor diseased. Please provide documentation of this condition within the forest."*

There is substantial documentation of the level of mortality, disease, and forest decline across all diameter classes available in both the 2011 Covell Ranch Forest Management Plan and the 2002 Cambria Forest Management Plan as well as detailed, site-specific treatment recommendations. In addition, the PSA provides detail on the existing forest health conditions on Covell Ranch on pages 11 and 12. The overabundance of smaller diameter trees within the forest is presumably due in large part to decades of fire suppression around the adjacent community, shifting climates, and a long history of moderately intensive grazing on the property. In addition to this size class being susceptible to disease and mortality, the overstocked nature of these smaller trees creates widespread vectors for forest pathogens to travel throughout the stand and infect mature trees. Figures 7 and 8 on page 3 of the PSA are photos taken on Covell Ranch in February of 2021 to serve as a representation of smaller diameter trees infected simultaneously with western dwarf mistletoe and pitch canker.



4. *"The report describes the proposed project as an "ecological restoration", with many benefits both to the forest itself and to the Cambria community. Among these claims is the statement that "reduction in vegetation competition in the understory would increase the growth and carbon storage capacity of the residual stand". This seems to imply that the project will improve carbon sequestration. We question this because the report compares the greenhouse gas production of the project against a theoretical wildfire, rather than against the amount of carbon sequestration that would presumably occur because of the success of the project in reducing or eliminating a wildfire in that portion of the Cambria Monterey pine forest and presumed increase in growth rates or the remaining vegetation."*

We expect net carbon sequestration to occur over the long term as spacing is achieved and residual trees have more room to grow, and thus, develop more volume for carbon storage. The use of a theoretical wildfire to compare the emissions produced by treatment to those produced by fire in a similar forested environment was authored in the PEIR to analyze impacts associated with treatment versus no-treatment scenarios. Recent carbon storage modeling efforts for CAL FIRE Forest Health Grant applications completed by Auten Resource Consulting utilizing the Forest Vegetation Simulator⁶ indicate that understory treatments in similar forested stands show a long-term carbon benefit. Modeling comparisons were completed with representative forest data sets undergoing "no treatment with wildfire" and "treatment with wildfire" scenarios utilizing the California Air Resources Board Quantification Methodology, Forest Restoration and Management, 2020-2021⁷.

Thank you for your careful consideration of the Covell Ranch Forest Health Fuels Reduction Project and offering your valuable insight to the development process. The recommendations you have provided along with your comments are being discussed and evaluated by the project collaboration. We hope representatives from the San Luis Obispo Chapter of the California Native Plant Society will continue to accept our invitations for a site walks to further discuss these proposed treatment activities and pursue alignment with the values and objectives held by your staff and the community they serve.

Sincerely,

A handwritten signature in red ink that reads "Steve R. Auten".

Steve R. Auten – RPF #2734

A handwritten signature in black ink that reads "Riley McFarland".

Riley McFarland – Assistant Forester I

⁶ <https://www.fs.fed.us/fvs/>

⁷ <https://ww2.arb.ca.gov/sites/default/files/classic/cc/capandtrade/auctionproceeds/FRM%20FY20-21%20QM.pdf>



Friends of the Fiscalini Ranch Preserve

June 29, 2021

Dear Mr. Auten and Mr. McFarland:

Thank you for the opportunity to review the draft Project Specific Analysis of the Covell Ranch Forest Health Fuels Reduction Project under CalVTP. This impressive document is evidence of the significant planning effort that has gone into this project.

I have two comments:

Where possible and safe to do so, consider maximizing the number of retained snags. There are ample dead trees in the project area that contribute significantly to habitat function.

I was encouraged to see the emphasis on structural mosaics in the project. Taking this approach further by removing large areas of small or diseased trees to create larger canopy openings would encourage understory recovery in habitat-rich ecotones. These openings would serve as sites for natural Monterey pine regeneration, as well. Uneven aged patches of pines could reduce the spread of fire through uniform stands and create a more organic age structure in the forest.

Again, thank you for the opportunity to comment.

Sincerely,

Kitty Connolly
Executive Director



July 20, 2021

Friends of the Fiscalini Ranch Preserve
604 Main Street - P.O. Box 1664
Cambria, CA 93428

Ms. Kitty Connolly and colleagues,

Thank you for taking the time to review the Project Specific Analysis (PSA) for the proposed Covell Ranch Forest Health Fuels Reduction Project in Cambria, California. This PSA was developed as a permitting addendum to the CEQA-compliant California Vegetation Treatment Program (CalVTP) Programmatic Environmental Impact Report¹. The proposed Treatment Types for this project (Ecological Restoration and Wildland-Urban Interface Fuel Reduction) were selected in accordance with the treatment guidelines, descriptions, and impact analyses described in full detail in the PEIR.

Formulated upon careful evaluation of your recommendations, we hope the following responses adequately address your comments and concerns in sequence with how they were received:

In reference to the Coastal Vegetation Treatment Standards (CVTS) in **Attachment F** on page 168 of the PSA, treatment operators are to retain 1 to 2 snags per acre across all treatment units. Given the cost and safety risk associated with their removal, it is realistic to assume the actual amount of retained snags throughout the treatment area will exceed those standards. Special consideration will be given to snags with exceptional denning or nesting habitat or those with observable signs of faunal inhabitation. Due to the sizeable component of standing mortality in the forest at Covell Ranch, it is not feasible to retain all snags given how frequently these individuals fall or experience top break from wind events, inevitably increasing the amount of downed fuels and damage to understory pine, oak, and other species regeneration. Careful and prudent determinations regarding the amount and quality of retained snags will be exercised given our shared appreciation of their ecological significance in the structure, habitat suitability, and nourishment of the forest.

Our objectives are to ensure proper treatments and best management practices will be implemented across the project area to maintain species health and vigor, biodiversity, fire resiliency, wildlife habitat, community awareness, and ecological conservation values. Maintaining heterogeneity and biodiversity in this forest are key components to achieving our goals. We believe a mosaicked treatment structure will provide this rare and unique forest with a resilient, adaptive future for all of the reasons you mentioned.

Thank you for your careful consideration of the proposed project and offering your valuable insight to the development process as we pursue alignment with the values and objectives held by your organization and the community they serve.

Sincerely,

A handwritten signature in cursive script, appearing to read "Steve R. Auten".

Steve R. Auten – RPF #2734

A handwritten signature in cursive script, appearing to read "Riley McFarland".

Riley McFarland – Assistant Forester I

¹ <https://bof.fire.ca.gov/projects-and-programs/calvtp/calvtp-program-eir/>

To whom it may concern,

As you know, The Nature Conservancy (TNC) has held a conservation easement (CE) over the property known as the Covell Ranch in Cambria since 2000. The primary purpose of the CE is to ensure 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 the Monterey pine forest.

The terms of the CE describe certain permitted and prohibited uses and activities that can occur on the property in order to meet this purpose. The CE limits timber harvest as follows:

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.

Per item iii above, a Forest Management Plan (FMP) was drafted by Staub Forestry and approved by TNC in 2011. Since that time, we have used both the CE and the FMP to determine if proposed timber harvest activities are consistent with the purposes of the CE.

In June 2021, we hired Vaughan Forestry to support our staff review of the proposed Covell Ranch Forest Health Fuels Reduction Project – Project Specific Analysis (PSA). Please reference the attached memo from Vaughan Forestry providing their qualifications and experience working on the Covell Ranch and Monterey pine forests, and their review of the PSA in relation to our CE and FMP.

Upon review by our staff and by Vaughan Forestry staff, we have determined that the activities proposed in the PSA are consistent with our CE and FMP. Please also note in the memo a few specific comments and recommendations by Vaughan Forestry that may further improve the PSA.

Please reach out if we can answer any questions or provide further details regarding our assessment. We look forward to further reviewing of the PSA as it evolves through the various review and approval processes.

Thanks

Ethan Inlander

To: Upper Salinas Tablas RCD
To: SLO Fire Safe Council
To: Ralph Covell
Cc: Auten Forestry
Cc: Vaughan Forestry

VAUGHAN FORESTRY MEMO



To: Ethan Inlander, The Nature Conservancy

Subject: Review of Covell Ranch Forest Health Fuels Reduction Project Specific Analysis (PSA)

Date: August 13, 2021

Background: I worked with the Stephen Staub in 2010-2011 when he prepared the most recent Forest Management Plan (FMP) for the Covell Ranch (hereafter called 2011 FMP). The plan was commissioned by The Nature Conservancy (TNC) with the intent of providing forest management and fuel reduction guidance. Staub's FMP begins with the following: *"This FMP is being prepared to meet the immediate need for current information and recommendations to address fire risk management issues and opportunities in cooperation with local fire agencies. While data collection is sufficient to describe characteristic forest conditions and processes, the primary focus of this plan is our evaluation and recommendations for fuel reduction treatments and fire protection improvements."* I assisted some with the 2011 FMP and also retained Staub's Covell Files, stand data, and reference documents after he passed away in 2012. I carried on Staub's business as Vaughan Forestry. I reread Staub's 2011 FMP and some of the supporting documentation. Staub references half a dozen relevant documents dealing with ecology and management of Monterey pine forests in and around Cambria: "Structure and Function of Monterey Pine Forest at Cambria" (Chorover, J. and J. McBride. 1987), "CT Ranch Forest Management Plan" (Smith, S. and M. DeLasaux. 1990), "Cambria Forest Management Plan" (Jones and Stokes, 2002), "Monterey Pine Forest Shaded Fuel Break Project in Cambria" (Bohlman 2004), and "Potential Wildfire Behavior – Covell Ranch" (Schmidt, 2010). Staub's FMP acknowledges that property characteristics, including recent property history and soil and biological resources, are well described in the CT Ranch Forest Management Plan (Smith & DeLasaux, 1990, referred to as FMP 1990) and the TNC Easement Documentation Report (Langford, 2000).

2021 Covell Ranch PSA: Aside from updating the 2011 FMP to account for fuel reduction projects since, e.g., 2012-2103, I believe the stand conditions observed then and those we see today are likely similar in terms of stand metrics (vegetation types, acreage, trees per acre, tree size classes, overall health, persistent disease, overstory crown death, etc.). The stand has clearly changed in 10 years, but in predictable ways one would expect with continued forest growth in the absence of significant disturbance or fire. I did notice when reviewing PSA Map Figures 4 and 5 that a subdivision popped up west of Unit 2, between 1996 and 2013. It speaks to increasing pressure on forested habitats, and underscores expansion of the wildland-urban interface.

Staub's 2011 FMP clearly suggested projects similar, if not identical, to those proposed in the PSA. The PSA's goal of reducing fuel loading, creating defensible space, and installing a network firebreaks and fuelbreaks aligns with the 2011 FMP, and my own professional experience. Look no further than native Monterey pine stands at the Año Nuevo which were severely damaged by the 2020 CZU Lighting Complex Fire to see that fire is very present and very difficult to contain. Cambria is absolutely no exception. I do not have any particular concern about the management approach detailed in the PSA so long as it is done thoughtfully and bears in mind similar forest management experiences with native Monterey pine stands at Point Lobos, Monterey, and Año Nuevo. For example, Staub's FMP 2011 suggests that pine regeneration recruitment be done judiciously as it can become overabundant. This likely stems from his experience with prescribed burns at Point Lobos and pine regeneration that followed the 1987 wildfire in Pebble Beach where seedings production often exceeded 3,000 tree per acre in the burn area. Staub opinion wasn't whether management should occur at Covell, but

whether there would ever be sufficient funding. It is encouraging to see the State recognizes the need for proactive forest management and fuel reduction, and has provided a funding mechanism

Staub closes his FMP by stating: “*Although pine regeneration has been documented over the last more than twenty years to be relatively abundant, the need to enhance the health and safety of the native Monterey pine forests of Cambria through active management has been recognized in every study and document reviewed in preparing this plan. The Cambria Forest Management Plan (2002) is explicit that its goals of improving forest health, maintaining biological diversity, reducing hazards to life and property, and maintaining and enhancing the aesthetic values of the forest are interrelated and can best be achieved by sensitive implementation of the variety of management measures listed in the plan.*” Sensible implementation of the practices described in the PSA, when properly supervised and carried out by professional contractors, can help achieve this end.

Comments and Recommendations:

- 1) Installing continuous forest inventory (CFI) plots and photo-documenting conditions at fixed plot locations within both treated and non-treated plots will help inform and adapt future efforts. The PSA includes two sets of before-and-after photos of a site which can be revisited and studied, which will provide input for adaptive management. Permanent CFI plots should be installed with a scientific question or project parameter in mind and located thoughtfully as they require maintenance and should be revisited regularly.
- 2) I would caution against a hard-and-fast minimum cutting limit of 8” dbh, as this may or may not be appropriate in all settings or stand conditions. I suspect this diameter threshold is not a *mandate* of the PSA. I envision the results being more like those featured in the PSA’s before-and-after photos, which includes trees <8” dbh. In my work in the native Monterey Pine stands in Pebble Beach, I often *flag residual trees* (regardless of dbh) in treatment areas to retain the best genetics (disease resistance, form, fecundity, etc.)
- 3) Fuelbreaks often include some residual understory component in clusters or islands. I generally work directly with the equipment operator or crew supervisor for at least a day so that we both agree on what should be retained. This sometimes requires educating the crew on native species, niche habitats, stand structure, etc. but they often appreciate the information and gain some respect for the diversity their work produces. Again, I highly recommend that you retain an RPF or other forest specialist to provide on-site, professional supervision through the project, but most importantly the first several days.
- 4) I suspect the PSA will be a phased approach, working as Staub recommended, from the highest risk areas to the least risky. As I understand it, the PSA is a living 10-year document which presumably has some built-in flexibility. I think it is also a good idea to vary treatment prescriptions, perhaps even settle on several *untreated* control plots/areas where fire risk is lowest.

Thank you for the opportunity to comment. I know this was not a requirement, but I do bring 25+ years of management experience, much of which has been in native Monterey pine forests. I count myself lucky to be a steward of these extremely rare native Monterey pine stands. Please let me know if you have any comments or questions.



Cassidy Bill Vaughan



August 27, 2021

Ethan Inlander
The Nature Conservancy of California
201 Mission Street #4
San Francisco, CA

Mr. Inlander

Thank you for taking the time to review the Project Specific Analysis (PSA) for the proposed Covell Ranch Forest Health Fuels Reduction Project in Cambria, California. This PSA was developed as a permitting addendum to the CEQA-compliant California Vegetation Treatment Program (CalVTP) Programmatic Environmental Impact Report (PEIR)¹. The proposed Treatment Types for this project (Ecological Restoration and Wildland-Urban Interface Fuel Reduction) were selected in accordance with the treatment guidelines, descriptions, and impact analyses described in full detail in the CalVTP PEIR.

Thank you for considering our request on behalf of the landowners and determining that this project is consistent with the Conservation Easement for the Covell Ranch and the 2011 Forest Management Plan prepared by Staub Forestry. The 2011 Forest Management Plan provided a cornerstone of information and guidance for the development of the Covell Ranch Forest Health Fuels Reduction CalVTP and we are very appreciative of the work completed by Staub Forestry.

Formulated upon careful evaluation of Vaughn Forestry recommendations, we hope the following responses adequately address comments in sequence with how they were received:

1. "Installing continuous forest inventory plots (CFI) and photo documenting conditions at fixed plot locations within both treated and non-treated plots will help inform and adapt to future efforts. The PSA includes two sets of before-and-after-photos of a site which can be revisited and studied, which will provide input for adaptive management. Permanent CFI plots should be installed with a scientific question or project parameter in mind and located thoughtfully as they require maintenance and should be visited regularly."

Most foresters agree that installing CFI plots are a positive attribute for any long-term management of a property (including photo points). Often, CFIs can be cost prohibitive, requiring financial support, and sometimes difficult to install with enough frequency to generate reasonable statistical outcomes. It would be feasible to place a grid over the property and randomly select 5 to 10 locations to install CFI plots for trend monitoring purposes. It seems a comparative analysis of Monterey pine health and forest regeneration between treated plots (4-8 total plots) under the CalVTP to untreated plots (1-2 total plots) could add information to the Covell Ranch CalVTP for adaptive management purposes.

Although CFIs are not a requirement for the CalVTP PEIR, it is worth considering their installation. CAL FIRE, FireSafe SLO, and the State of California have contributed significant funds to this project and recognize The Nature Conservancy (TNC) has also contributed significant funds to protect this Monterey pine forest from development by working with the

¹ <https://bof.fire.ca.gov/projects-and-programs/calvtp/calvtp-program-eir/>



Covell family. Would TNC consider providing financial support to the installation and periodic remeasurement (every 5-10 years) of a CFI plot system on the Covell Ranch? If the grid were placed over the Covell Ranch property, it could also be extended to the rest of the Monterey pine forest in Cambria allowing other potential partners to contribute plot information to evaluate stand changes over time. Some initial work on tree measurement was completed by a Cal Poly professor that established monitoring plots across Cambria, and who might consider playing a role in developing a next step to this project (see attached Mortality Map completed in 2016). Drought, Bark beetle, and other mortality factors have played a significant change in the composition. Other partners to consider might be California Department of Parks and Recreation (adjacent property), California Department of Fish and Wildlife (adjacent property), and the Fiscalini Open Space Preserve.

No matter what the outcome of the CFI recommendation, photo monitoring points will be established at a reasonable frequency to record before-and-after results from any unit operated on in the Covell Ranch CalVTP.

2. "I would caution against a hard-and-fast minimum cutting limit of 8" DBH, as this may or may not be appropriate in all settings or stand conditions. I suspect this diameter threshold is not a *mandate* of the PSA. I envision the results being more like those featured in the PSA's before-and-after photos, which includes trees <8" DBH. In my work in the native Monterey pine stands in Pebble Beach, I often *flag residential trees* (regardless of DBH) in treatment areas to retain the best genetics (disease resistance, form, fecundity, etc.)"

The 8-inch diameter at breast height (DBH) limit is only to set as a maximum diameter for removal of live and healthy Monterey pine trees as part of this project. The process of marking the Monterey pine stands will be to select single Monterey pine trees for retention ahead of forestry mulching equipment to create spacing between trees that have good phenotypic value that promote the future vigor of the stand. It can be expected that there will be a range of diameters retained under 8 inches DBH throughout the stand where healthy saplings that have little or no overstory, spaced 15-20 feet apart, will be positioned as the next generation of Monterey pine trees on the Covell Ranch. Overall tree per acre treatment prescriptions will target approximately 200 live trees of all diameters per acre.

3. "Fuelbreaks often include some residual understory component in clusters or islands. I generally work directly with the equipment operator or crew supervisor for at least a day so that we both agree on what should be retained. This sometimes requires educating the crew on native species, niche habitats, stand structure, etc. but they often appreciate the information and gain respect for the diversity their work produces. Again, I highly recommend that you retain an RPF or other forest specialist to provide on-site, professional supervision through the project, but most importantly the first several days."

Many areas have specific retention requirements to retain a multitude of hydrophytic species within riparian zones where only handwork is allowed. In addition, general treatments leave pockets of hardwoods, toyon, and other shrub species throughout the treatment areas to create a balance between forest health and fuel reduction. In the same manner as flagging



trees for retention in these areas discussed above, the same practice will be instituted for the protection of select components of understory habitat.

The project will continue to have Registered Professional Forester (RPF) supervision throughout active operations including significant representation in the beginning, periodic on-site visits during project activities, and on-site visits to evaluate close-out of project areas following forestry mulching treatments.

4. "I suspect the PSA will be a phased approach, working as Staub recommended, from the highest risk areas to the least risky. As I understand it, the PSA is a living 10-year document which presumably has some built-in flexibility. I think it is also a good idea to vary treatment prescriptions, perhaps even settle on several untreated control plots/areas where fire risk is slowest."

Forest health fuels reduction treatments will be implemented from the highest risk areas to the least hazardous areas in order of Treatment Unit numbers 1-5 per the CalVTP. In addition, reasonably sized areas of untreated control plots are being considered for Treatment Units 3 and 4 where risk is lower for community spread in the event a wildfire were to occur.

We appreciate your attention detail and support of this important project for the community of Cambria on the Covell Ranch Monterey pine forest. I hope you find the responses to your recommendations reasonable, and we are open to any additional questions that you might have. We are hopeful that you will also consider discussing the support of a small CFI system that could be installed on the Covell Ranch and expanded across the range of Monterey pine in Cambria. Dan Turner with FireSafe SLO has reputable contacts with Cal Poly and other landowners in the area that would facilitate a great baseline for discussion. Lastly, we would be happy to provide a tour of active operations when they get under way if requested by The Nature Conservancy.

Sincerely,

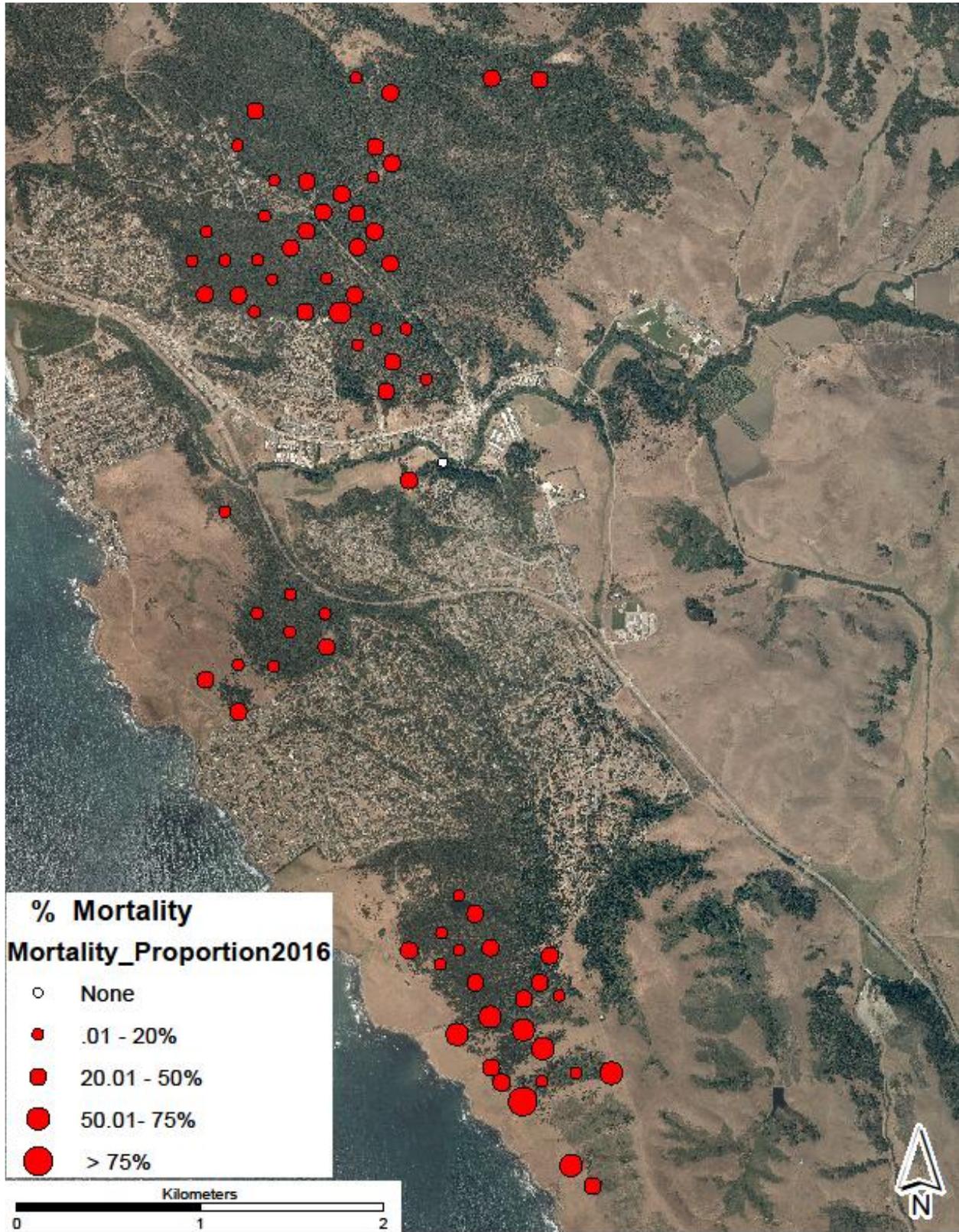
A handwritten signature in cursive script that reads "Steve R. Auten".

Steve R. Auten - RPF #2734

A handwritten signature in cursive script that reads "Riley McFarland".

Riley McFarland - Assistant Forester I

Mortality map created by former Cal Poly Professor, Dr. Sarah Bisbing (Now working at the University of Reno, NV).



(map not to scale)