



CALIFORNIA  
NATIVE PLANT SOCIETY

Hon. Mike Broadhurst, President  
Upper Salinas-Las Tablas Resource Conservation District  
9481 El Camino Real  
Atascadero, CA. 93422

September 10, 2021

RE: PWP for the Cambria Monterey Pine Forest

Dear Mr. Broadhurst:

The San Luis Obispo Chapter of the California Native Plant Society (CNPS-SLO) has followed the development of the fuel management plan for the Monterey pine forest on the Covell Ranch near Cambria, CA., with great interest. We have been in dialogue with the sponsors of that project, and although we have not changed each others' minds about aspects of the project, we have reached agreement in principle regarding "testing" of the clearing methodology for the project.

Since the USLTRCD is to be a party to the implementation of the project, we are writing to ask your support for this agreement in principle, and your further support in carrying the agreement forward into a detailed implementation program.

The agreement in principle is essentially that the parties agree to undertake a test or tests of the clearing methodology in stepwise fashion. However, we have not agreed on the details of the testing, including the scale and nature of it. Our main reason for wanting such testing is that we are unhappy with the conditions found in the current fuelbreak areas already constructed within the forest, and are opposed to having those same standards applied to the forest as a whole. We believe that treatments in the fuelbreak areas have significantly reduced habitat values of those areas, and we do not wish to see this repeated.

Our goal in this matter is as follows: the testing would begin by selecting one or more meaningful areas for testing, perhaps of one acre and replicated at least once. Monterey pines only below a certain diameter class (3-4 inches trunk diameter at breast height, dbh), would be cut and removed, and then determining whether further thinning of pines is warranted. If so, the process would be repeated until an agreed upon dbh limit for removal was reached. Once that was done, a new "round" of thinning of understory vegetation, which consists mostly of coast live oaks, toyons, and coffeeberries, would be undertaken, with a goal of agreement on the scale and nature of such thinning to balance the needs of fuel management and wildlife habitat values.

The Fire Safe Council representatives (including USLTRCD representative Mr. Johnson) agreed to such testing in the field meeting on the Covell Ranch in July 2021, but we still need to agree upon specific parameters of the testing, including the size of the test area or areas, and the nature and extent of the treatment of the pines and of the understory vegetation.

Many RCDs throughout California are becoming involved in this type of resource management activity, especially in seeking to balance the sometime conflicting needs of fire hazard abatement and wildlife habitat values. It is for this reason that we ask for your support of the testing program outlined above as this project moves forward. Thank you.

Neil Havlik  
San Luis Obispo Chapter, California Native Plant Society

*Protecting California's native flora since 1965*



PWP USLT RCD <pwp.usltrcd@gmail.com>

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## CNPS-SLO Comments on Cambria Monterey Pine Forest PWP

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PWP USLT RCD <pwp.usltrcd@gmail.com>

Tue, Sep 14, 2021 at 8:49 AM

[Redacted content]

Thank you Mr. Havlik and CNPS-SLO members,

We have received your letter and will take it under consideration. Please note, the current Board Chairperson of the US-LTRCD is Susan Cochrane, Mike Broadhurst is serving as the Vice Chairperson. Thank you for your continued interest in the Covell Ranch Project.

Sincerely,

Upper Salinas-Las Tablas Staff

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# CAMBRIA FOREST COMMITTEE

TO CONSERVE AND MANAGE THE NATIVE FOREST OF CAMBRIA



Devon Best (via email)  
US-LT Resource Conservation District  
9481 El Camino Real  
Atascadero, CA 93422

September 15, 2021

Dear Mr. Best

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, the Coastal Vegetation Treatment Standards in Exhibit A and the Public Works Plan. We support the project goals of improving the health of the Monterey Pine and Coast Live Oak 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 Coast Live Oaks less than 8 inches DBH is excessive. Monterey Pines that have grown to 8 inches DBH have demonstrated that they have the vigor, disease resistance and growing conditions needed to survive to become the large trees of the future. A smaller DBH should be used, depending on spacing to nearby trees. Removal of trees to make room for regeneration of new trees seems counter-productive.

Coast Live Oaks are able to withstand dryer and windier conditions, and they will remain an essential component of local forests in the future. Oaks should not be removed to achieve an arbitrary ratio of oaks to pines, and pruning or limbing up of oaks should be limited to small, secondary branches not major stems.

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.

The proposed use of mechanized mastication on an estimated 634 acres of Monterey Pine and Coast Live Oak 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.

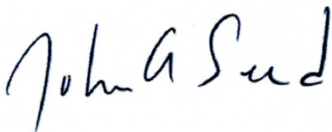
We support conducting at least two test plots of one acre each prior to beginning full project operations. These test plots will be used demonstrate the different outcomes of larger versus smaller diameter tree removal criteria, larger versus smaller numbers of retained trees per acre, and the different results of mechanical mastication versus hand crew cutting of understory vegetation. Test plots have been discussed during the project review process, but they have not been documented in the PSA.

We request that the draft PSA and Attachment F Coastal Vegetation Treatment Standards be modified as necessary to better achieve the project's long term forest health and fire safety goals, while minimizing unnecessary short and long term disturbances in this sensitive habitat area.

Yours truly,



Crosby Swartz, President  
Cambria Forest Committee  
[forest@cambriaforestcommittee.org](mailto:forest@cambriaforestcommittee.org)



John Seed, President  
Greenspace, The Cambria Land Trust  
[johnseed@gmail.com](mailto:johnseed@gmail.com)



PWP USLT RCD <pwp.usltrcd@gmail.com>

## Forest Committee & Greenspace Comments on Covell Ranch PWP/PSA

2 messages

[Redacted]

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

The Cambria Forest Committee and Greenspace-The Cambria Land Trust have combined their comments in the attached letter.

Please contact us if you require additional information or clarification about any of the comments or recommendations in the letter.

Thank you,  
Crosby Swartz, President  
Cambria Forest Committee

John Seed, President  
Greenspace - The Cambria Land Trust

 **Covell Ranch PWP-PSA Comment Letter 9-15-21.pdf**  
1612K

**PWP USLT RCD** <pwp.usltrcd@gmail.com>

Thu, Sep 16, 2021 at 1:24 PM

To: [Redacted]

Mr. Swatz and Mr. Seed,

Thank you for your careful consideration of the proposed Public Works Plan. The comments you have provided are being discussed and evaluated.  
Thank you for your interest and input on this matter.

- RCD Staff  
[Quoted text hidden]



PWP USLT RCD &lt;pwp.usltrcd@gmail.com&gt;

## Notice of Draft Forest Health and Fire Resilience Public Works Plan for Review and Public Hearing

4 messages

Hayley Barnes &lt;hayleybarnes.usltrcd@gmail.com&gt;

Tue, Aug 10, 2021 at 10:11 AM

To the California Native Plant-San Luis Obispo Chapter,

The Upper Salinas-Las Tablas Resource Conservation District (USLTRCD) has released a Draft Upper Salinas-Las Tablas Resource Conservation District Forest Health and Fire Resilience Public Works Plan (PWP) for public review and comment, available on the USLTRCD website [here](#) and attached to this email.

The goal of the USLTRCD PWP is to meet the need for programmatic permitting for high-priority forest health and fuels management projects to reduce the threat of catastrophic wildfire and improve ecological conditions for forests, woodlands, and grasslands within the coastal zone. The PWP provides a planning framework to efficiently review and authorize vegetation management projects within the Program Area over the next ten years using principles, strategies, and best management practices that align fire prevention planning with the protection of coastal resources. This draft PWP is the result of a coordinated planning process of the USLTRCD in collaboration with staff from the California Coastal Commission, San Luis Obispo County Planning and Building Department, California Department of Forestry and Fire Protection (CAL FIRE) and the San Luis Obispo County Fire Safe Council.

The USLTRCD will be hosting a local public hearing on the draft PWP at the USLTRCD Board of Directors Meeting on **September 16th, 2021**, at 4:00 PM  
Location: TBD. Will be posted on the [RCD website](#) by August 30th, 2021.

The meeting agenda will be posted at least 10 days prior to the hearing, and can be found on the [USLTRCD's website](#).

Questions and comments regarding the Draft Upper Salinas-Las Tablas Forest Health and Fire Resilience Public Works Plan can be directed to the USLTRCD at [pwp.usltrcd@gmail.com](mailto:pwp.usltrcd@gmail.com) or 805-460-7272 ext. 1. Comments are due by 5pm on September 15th, 2021. (If you would like to submit a comment by responding to this email please reply all)

### About the Upper Salinas-Las Tablas Resource Conservation District (USLTRCD):

The USLTRCD is a public, non-regulatory special district that helps people protect, conserve, and restore natural resources through information, education, and technical assistance. Serving as a local hub for conservation efforts, the USLTRCD works with a wide variety of partners, including farming and ranching operations, landowners and managers, and federal, state and local government agencies. For more information visit: [www.us-ltrcd.org](http://www.us-ltrcd.org)

### About Public Works Plans (PWP):

A PWP is a land use planning document that plans for and sets a framework for implementing a specific public works project or array of public works-related activities. A PWP provides a land use planning alternative to Local Coastal Programs (LCPs) for obtaining approval of large or phased public works projects, as well as any development proposed by a special district, and remains under the authority of the Coastal Commission irrespective of coastal permit jurisdictional boundaries. A PWP is an alternative to project-by-project review for public works, which would otherwise require multiple coastal development permits for different components of the public works project. For more information contact the Coastal Commission at [statewideplanning@coastal.ca.gov](mailto:statewideplanning@coastal.ca.gov).

Thank you,

**Hayley Barnes***Conservation Technician*

Upper Salinas – Las Tablas Resource Conservation District

9481 El Camino Real, Atascadero, CA 93422

65 S. Main St. Ste. 107, Templeton, CA 93465

Office: (805) 460-7272 ext. 102

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[hayley@us-ltrcd.org](mailto:hayley@us-ltrcd.org)

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**2 attachments****DRAFT-PWP USLTRCD.docx**  
2929K**DRAFT-PWP USLTRCD.pdf**  
3685K

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[REDACTED]

Cc: Andrew Johnson <[andy.usltrcd@gmail.com](mailto:andy.usltrcd@gmail.com)>, "pwp.usltrcd@gmail.com" <[pwp.usltrcd@gmail.com](mailto:pwp.usltrcd@gmail.com)>

Thank you Hayley:

CNPS will be taking a careful look at this. CNPS has been looking at the VTP statewide, and we have some issues with how the PEIR is going to be administered in terms of evaluating site-specific resources. We will also be looking at the intent to fast track projects under VTP against ESHA requirements, which I think is a core piece of your rather unwieldy document, so we will look at that with care. We are not quite sure about why we need this document, given the limited forest areas likely to be subjected to VTP within your jurisdiction.

David Chipping

Conservation Chair, CNPS SLO Chapter

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**From:** Hayley Barnes <[hayleybarnes.usltrcd@gmail.com](mailto:hayleybarnes.usltrcd@gmail.com)>**Sent:** Tuesday, August 10, 2021 10:11 AM**To:** [REDACTED]**Cc:** Andrew Johnson <[andy.usltrcd@gmail.com](mailto:andy.usltrcd@gmail.com)>; [pwp.usltrcd@gmail.com](mailto:pwp.usltrcd@gmail.com) <[pwp.usltrcd@gmail.com](mailto:pwp.usltrcd@gmail.com)>**Subject:** Notice of Draft Forest Health and Fire Resilience Public Works Plan for Review and Public Hearing

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**PWP USLT RCD** <[pwp.usltrcd@gmail.com](mailto:pwp.usltrcd@gmail.com)>

Thu, Aug 12, 2021 at 3:35 PM

To: Riley McFarland <[riley.mcfarland.arc@gmail.com](mailto:riley.mcfarland.arc@gmail.com)>, "Gee, Jonathan@CALFIRE" <[jonathan.gee@fire.ca.gov](mailto:jonathan.gee@fire.ca.gov)>, "Sanderson, Brandon@CALFIRE" <[brandon.sanderson@fire.ca.gov](mailto:brandon.sanderson@fire.ca.gov)>, Hayley Barnes <[hayleybarnes.usltrcd@gmail.com](mailto:hayleybarnes.usltrcd@gmail.com)>, Devin Best <[devin.usltrcd@gmail.com](mailto:devin.usltrcd@gmail.com)>, Steve Auten <[steve.auten.arc@gmail.com](mailto:steve.auten.arc@gmail.com)>

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**PWP USLT RCD** <pwp.usltrcd@gmail.com>

Fri, Sep 10, 2021 at 4:02 PM

To: [Redacted]

Hello Mr. Chipping,

Thank you for your email and interest in the PWP. We appreciate your interest and review of the PWP. Please note that all written comments are due September 15 at 5pm.

Thank you,

Hayley Barnes

[Quoted text hidden]





PWP USLT RCD &lt;pwp.usltrcd@gmail.com&gt;

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**draft USLTRCD PWP**

2 messages

**Kitty Connolly** [REDACTED]

Tue, Sep 14, 2021 at 1:37 PM

To: "PWP.usltrcd@gmail.com" &lt;PWP.usltrcd@gmail.com&gt;

Devin Best, Executive Director

Andrew Johnson, Program Manager

Upper Salinas-Las Tablas Resource Conservation District

September 14, 2021

Dear Mr. Best and Mr. Johnson:

As holders of a conservation easement over approximately 130 acres of Monterey pine owned by Cambria Community Services District (CCSD), Friends of the Fiscalini Ranch Preserve (FFRP) appreciates the opportunity to comment on the draft Upper Salinas-Las Tablas Resource Conservation District (USLTRCD) Forest Health and Fire Resilience Public Works Plan (PWP).

CCSD is a frequent collaborator with the San Luis Obispo County Fire Safe Council on the Fiscalini Ranch Preserve. Reviewing these projects is an obligation under FFRP's conservation easement. FFRP is very appreciative of the expertise and grants provided by the Fire Safe Council as we balance fire safety with forest health.

Thank you for taking the initiative to propose a PWP for much needed ecosystem health and fire safety projects. While many areas of our county have had too frequent fires, others have had too few for ecosystem health. USLTRCD's comprehensive and clearly articulated approach is a much-needed move toward regional forest and vegetation management.

The overall emphasis in the PWP on ecosystem health is most welcome. For example, the Coastal Vegetation Treatment Standards ensure that projects more than 100 (and up to 300) feet from structures will prioritize ecosystem health. Further, the goal of restoring pre-European settlement conditions, as far as feasible considering a changing climate, provides a common objective to guide these projects. While wildfire threat is an issue no one can ignore or underplay, the PWP's emphasis on habitat resilience distinguishes it from other efforts and significantly moves efforts in the right direction for both fire safety and forest resilience.

FFRP enthusiastically supports approval of the PWP and thanks USLTRCD for the considerable effort put into drafting the agreement and into public education about its contents and intent.

Sincerely,

Kitty Connolly

Executive Director

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**PWP USLT RCD** <pwp.usltrcd@gmail.com>

Tue, Sep 14, 2021 at 3:30 PM

To: [REDACTED]

Ms. Connolly,

Thank you very much for your support of the Public Works Plan. The USLTRCD is excited for the opportunity to facilitate forest health and fire resilience projects within our district. Collaboration with professional partner organizations and community groups is a core tenant of the RCD Mission. We look forward to continuing to broaden this outreach and offering our assistance to improve community safety and ecological health.

Sincerely,

Andrew Johnson  
Program Manager  
Upper Salinas-Las Tablas Resource Conservation District

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