



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

*Promoting the wise use of land  
Helping build great communities*

**Tentative Notice of Action**

MEETING DATE <b>December 16, 2011</b> LOCAL EFFECTIVE DATE <b>December 16, 2011</b> APPROX FINAL EFFECTIVE DATE <b>January 6, 2011</b>	CONTACT/PHONE <b>Ryan Hostetter, Coastal Planner (805) 788-2351</b>	APPLICANT <b>Cal Fire</b>	FILE NO. <b>DRC2011-00035</b>
SUBJECT Hearing to consider a request by Cal Fire for a Minor Use Permit/Coastal Development Permit to create a shaded fuel break along the southern, western, and portions of the eastern edges of the CT Ranch property (along the urban reserve lines). This project covers approximately 50 acres which includes a 100 foot wide buffer area where "ladder fuel" will be removed along the edge of the property. This "ladder fuel" includes down, dead and diseased trees as well as shrubs and some small trees, however large trees and the forest canopy will not be removed. Removal will occur through a combination of hand crews and mechanical equipment. The proposed project is within the Rural Lands land use category and is located at 5694 Bridge Street in the community of Cambria. The site is in the North Coast Rural Coastal planning area.			
RECOMMENDED ACTION Approve Minor Use Permit DRC2011-00035 based on the findings listed in Exhibit A and the conditions listed in Exhibit B.			
ENVIRONMENTAL DETERMINATION Consider and rely upon the adopted Mitigated Negative Declaration prepared by Cal Fire.			
LAND USE CATEGORY <b>Rural Lands</b>	COMBINING DESIGNATION <b>Terrestrial Habitat, Sensitive Resource Area, Geologic Study Area, &amp; Local Coastal Plan</b>	ASSESSOR PARCEL NUMBER <b>013-111-005</b>	SUPERVISOR DISTRICT(S) <b>2</b>
PLANNING AREA STANDARDS: <b>Monterey Pine Forest Sensitive Resource Area</b> <i>Does the project meet applicable Planning Area Standards: Yes – see discussion</i>			
LAND USE ORDINANCE STANDARDS: <b>Appeals to the Coastal Commission (Coastal Appealable Zone), Local Coastal Program, Sensitive Resource Area, Environmentally Sensitive Habitats, Terrestrial Habitat, and Geologic Study Area</b> <i>Does the project conform to the Land Use Ordinance Standards: Yes – see discussion</i>			
FINAL ACTION This tentative decision will become the final action on the project, unless the tentative decision is changed as a result of information obtained at the administrative hearing or is appealed to the County Board of Supervisors pursuant Section 23.01.042 of the Coastal Zone Land Use Ordinance; effective on the 10 <sup>th</sup> working day after the receipt of the final action by the California Coastal Commission. The tentative decision will be transferred to the Coastal Commission following the required 14-calendar day local appeal period after the administrative hearing. The applicant is encouraged to call the Central Coast District Office of the Coastal Commission in Santa Cruz at (831) 427-4863 to verify the date of final action. The County will not issue any construction permits prior to the end of the Coastal Commission process.			
ADDITIONAL INFORMATION MAY BE OBTAINED BY CONTACTING THE DEPARTMENT OF PLANNING & BUILDING AT: COUNTY GOVERNMENT CENTER γ SAN LUIS OBISPO γ CALIFORNIA 93408 γ (805) 781-5600 γ FAX: (805) 781-1242			

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

**DISCUSSION**

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

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

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

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

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

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

LAND USE ORDINANCE STANDARDS:

***Section 23.05.060-064 Tree Removal Standards***

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

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

***Section 23.01.043c.(3)(i): Appeals to the Coastal Commission (Coastal Appealable Zone)***

The project is appealable to the Coastal Commission because the subject parcel is located in an Environmentally Sensitive Habitat Area, according to official County maps.

***Section 23.07.120: Local Coastal Program***

The project site is located within the California Coastal Zone as established by the California Coastal Act of 1976, and is subject to the provisions of the Local Coastal Program.

***Section 23.07.170.e(1-5) Environmentally Sensitive Habitat (ESH) Development Standards***

- (1) New development within or adjacent to the habitat shall not significantly disrupt the resource.*
- (2) New development within the habitat shall be limited to those uses that are dependent upon the resource.*
- (3) Where feasible, damaged habitats shall be restored as a condition of development approval.*
- (4) Development shall be consistent with the biological continuance of the habitat.*
- (5) Grading adjacent to Environmentally Sensitive Habitats shall conform to the provisions of Section 23.05.034.c (Grading Standards.)*

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

***Section 23.07.174 Streams and Riparian Vegetation***

*Coastal streams and adjacent riparian areas are environmentally sensitive habitats. The provisions of this section are intended to preserve and protect the natural hydrological system and ecological functions of coastal streams. Development adjacent to a coastal stream shall be sited and designed to protect the habitat and shall be compatible with the continuance of such habitat.*

This proposed project includes conditions of approval which state that all project activities remain outside riparian (or wetland) setback areas which complies with the requirements of this section. Required setbacks are 100 feet from the upland extent of the stream or wetland area.

***Section 23.07.164-166 Sensitive Resource Area***

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

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

(3) Any proposed clearing of topsoil, trees, or other features is the minimum necessary to achieve safe and convenient access and siting of proposed structures, and will not create significant adverse effects on the identified sensitive resource.

(4) The soil and subsoil conditions are suitable for any proposed excavation; site preparation and drainage improvements have been designed to prevent soil erosion, and sedimentation of streams through undue surface runoff.

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

#### ***Section 23.07.176 Terrestrial Habitat Protection***

The subject parcel supports a mapped Terrestrial Habitat (TH) combining designation, and is subject to *Section 23.07.176 Terrestrial Habitat Protection*. This section implements development standards for protection of Terrestrial Habitat. Specifically, that revegetation with native plants occurs where vegetation is removed, and that “readily-identifiable barriers that will protect the surrounding native habitat areas” be used to ensure protection during grading and construction. However, this specific project does not involve the construction of structures, and the purpose of the project is to protect the health and safety of the community of Cambria while enhancing the forest health within the project zone. It is anticipated that tree replacement will occur naturally within this shaded fuel break area. Small and large healthy plants/trees are required to remain with this proposed project. The County will require a monitor on site during project activities to ensure that healthy trees remain to the maximum amount feasible and that new seeds are scattered as recommended in the Cambria Forest Management Plan.

#### ***Geologic Study Area 23.07.080***

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

#### **COASTAL PLAN POLICIES:**

Following is a brief list of the Coastal Plan Policies (discussion of specific applicable policies following):

Shoreline Access: N/A

Recreation and Visitor Serving: N/A

Energy and Industrial Development: N/A

Commercial Fishing, Recreational Boating and Port Facilities: N/A

Environmentally Sensitive Habitats:  Policy No(s): 1, 2, 3, 27, 28, 33

Agriculture: N/A  
Public Works: N/A  
Coastal Watersheds:  Policy No(s): 7, 8, and 10  
Visual and Scenic Resources:  Policy No(s): 1 and 7  
Hazards:  Policy No(s): 1  
Archeology: N/A  
Air Quality: N/A

**Coastal Watersheds:**

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

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

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

**Hazards:**

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

**Environmentally Sensitive Habitats:**

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

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

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

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

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

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

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

***Visual and Scenic Resources:***

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

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

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

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

**AGENCY REVIEW:**

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

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

*Staff Response (in the order listed above):*

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

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

**LEGAL LOT STATUS:**

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

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

## EXHIBIT A - FINDINGS

### *CEQA*

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

### *Minor Use Permit*

- B. The proposed project is consistent with the San Luis Obispo County General Plan because the shaded fuel break project as conditioned is consistent with all applicable General Plan policies, including policies for Environmentally Sensitive Habitats, Coastal Watersheds, Hazards, and Visual and Scenic Resources.
- C. As conditioned, the proposed project or use satisfies all applicable provisions of Title 23 of the County Code.
- D. The establishment and subsequent operation or conduct of the use will not, because of the circumstances and conditions applied in the particular case, be detrimental to the health, safety or welfare of the general public or persons residing or working in the neighborhood of the use, or be detrimental or injurious to property or improvements in the vicinity of the use because the proposed shaded fuel break project will not generate activity that presents a potential threat to the surrounding property and buildings. This project is subject to Ordinance and Building Code requirements designed to address health, safety and welfare concerns.
- E. As stated in Coastal Plan Policies above, and incorporated herein by reference, the proposed project or use will not be inconsistent with the character of the immediate neighborhood or contrary to its orderly development because the project does not include any new structures or uses within this area, and will only include the 100 foot shaded fuel break as proposed in the attached maps and project description.
- F. The proposed project or use will not generate a volume of traffic beyond the safe capacity of all roads providing access to the project, either existing or to be improved with the project because the project is located on Bridge St., a local road constructed to a level able to handle any additional traffic associated with the project.

### *Coastal Access*

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

### *Sensitive Resource Area*

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

- J. The proposed clearing of material is the minimum necessary for the proposed project, and will not create significant adverse effects on the identified sensitive resource. There will be no disturbance or removal of top soil with this proposed project.
- K. The soil and subsoil conditions are suitable for the proposed project, and there will be no disturbance or removal of native soils with this proposed project. All vegetation removal will occur above grade.

Environmentally Sensitive Habitat

- L. There will be no significant negative impact on the identified sensitive habitat, and the proposed use will be consistent with the biological continuance of the habitat as the project has been designed to avoid impacts to the maximum extent feasible. To ensure this is the case, a County approved monitor shall be on site during project activities.
- M. The proposed use will not significantly disrupt the habitat, as the project site is located along the edge of the urban developed neighborhood. The purpose of the project is to remove "ladder fuel" material which will include forest thinning; healthy trees and plants will remain.

## EXHIBIT B - CONDITIONS OF APPROVAL

### Authorized Use

1. This approval authorizes a Minor Use Permit/Coastal Development Permit to allow a shaded fuel break along the southern, western, and portions of the eastern edges of the CT Ranch property (along the urban reserve lines). This project covers approximately 50 acres which includes a 100 foot wide buffer area where "ladder fuel" will be removed along the edge of the property (as shown on the attached maps). This "ladder fuel" includes down, dead and diseased trees as well as shrubs and some small trees, however large trees and the forest canopy will not be removed. Removal will occur through a combination of hand crews and mechanical equipment (small bob cat size masticator only). The project shall specifically include the following:
  - a. All trees and snags 10 inches or larger will remain.
  - b. There shall be minimal soil disturbance (less than 3 acres) with this proposed project.
  - c. The fuel break will be a maximum of 100 feet and will be considered "shaded" as the canopy shall remain within this area, the short length parallel to Bridge Street between the southernmost portion of the project along bridge street to the sharp curves in Bridge Street will be 150' (a.k.a. "hog back" area).
  - d. Riparian and/or wetland areas shall be tagged and avoided with a minimum buffer of 100 feet from the upland extent of the riparian or wetland area. The county approved monitor shall inspect tagging and project activities to ensure riparian habitat is not impacted.
2. Prior to commencement of project activities, Cal Fire shall submit a monitoring plan to be reviewed and approved by the County which will demonstrate how the project will comply with the anticipated goals to ensure habitat health as outlined in the Mitigated Negative Declaration prepared by Cal Fire and as outlined in the Cambria Forest Management Plan of April 2002. Monitoring shall occur as outlined in section 6 (page 6-7) in numbers 1-4 of the Cambria Forest Management Plan (attached) and include the "Cambria Forest Site Condition Checklist" which is outlined in Chapter 3 of the Cambria Forest Management Plan. The results of the monitoring data shall be archived and analyzed as required by the Cambria Forest Management Plan (also outlined in section 6 titled "What to do with the Results: Archiving and Analyzing Monitoring Data").
3. Prior to commencement of project activities, the applicant shall submit a mitigation program for review and approval by the County which is consistent with the seed dispersal program outlined within the Cambria Forest Management Plan (attached page 4-26 regarding Scatter Cones and/or seeds). Seeds and/or scatter cones shall be disbursed on a site(s) that will allow for maximum regrowth with regards to site conditions and shall be spread across a minimum of 50 acres. Success of this mitigation shall be included within the monitoring plan results listed in condition of approval no. 2 above.
4. Unanticipated Discovery Plan. Prior to project commencement, the Applicant shall submit to the County an Unanticipated Discovery and Monitoring Plan for review and

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

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

5. A masticator shall not be used within 100 feet of the upland extend of a stream or wetland area. Hand crews can conduct vegetation removal within the 100 foot setback up to 25 feet from the edge of riparian or wetland area.
6. Prior to commencement of project activities, the applicant shall obtain approval from the Air Pollution Control District (APCD) for the project prior to work commencing. Cal Fire shall comply with all APCD requirements for the project.
7. This permit is valid for a period of 24 months from its effective date unless time extensions are granted pursuant to Land Use Ordinance Section 23.02.050.
8. All conditions of this approval shall be strictly adhered to, within the time frames specified, and in an on-going manner for the life of the project. Failure to comply with these conditions of approval may result in an immediate enforcement action by the Department of Planning and Building. If it is determined that violation(s) of these conditions of approval have occurred or are occurring, this approval may be revoked pursuant to Section 23.10.160 of the Coastal Zone Land Use Ordinance.