



DEPARTMENT OF PLANNING AND BUILDING

Environmental and Resource Management Division

April 12, 2012

Subject: Review of the Biological Report for the Cantinas Camp (DRC2011-00037), Lake Nacimiento, San Luis Obispo County, CA by Althouse and Meade, Inc.

I have reviewed the document referenced above and have the following comments. Overall, the document is well written and appropriately documents the timing and types of focused biological surveys that were conducted on the property on behalf of the applicant. However, I am requesting the following supplemental information:

1. The information provided does not follow the required format. Please review the County's guidelines and resubmit the report. Specific items to include are as follows:
 - a. Cover Page. Please update to include the standard acknowledgement paragraph and signature line.
 - b. Although a comprehensive search of the California Natural Diversity Database (CNDDDB) on-line inventory was conducted for all 7.5 minute quadrangles within 5 miles of the property (including 4 quadrangles), the County guidelines require a minimum 9 quadrangle search (i.e., project site quadrangle and eight surrounding quadrangles). As such, please either include a review of the additional quadrangles to be consistent with County guidelines or provide information on why a 9 quadrangle search is not necessary for this project.
 - c. Please update the project site maps (Sheets 1 and 2) to include all stock pond feature(s) identified and surveyed within the project limits.
2. Please update the report to include the current status of *Navarretia jaredii* (Paso Robles naverretia) as a synonym of *N. mitracarpa*, a common species per updated in The Jepson Manual, Vascular Plant of California, Second Edition (2012). Previously on List 4.3 on California Native Plant Society (CNPS) website but now considered a non-listed taxon. As such, no mitigation would be necessary for this species.
3. The report notes suitable habitat for western spadefoot toad within the manmade stock ponds on-site. Although the ponds were surveyed for amphibian larvae in May-June 2006, no focused surveys were conducted to determine presence/absence of this California Species of Special Concern. Please conduct a focused spadefoot toad survey and, if detected on-site, include further analysis of potential impacts and any proposed mitigation measures for this species. Further, please include an impact discussion and mitigation measures for the southwestern pond turtles identified on-site and known to occur within Lake Nacimiento. This should include any suggested avoidance and minimization mitigation measures for these sensitive species, such as preconstruction surveys to confirm presence or absence and potential for impacts and suggested mitigation for nesting habitat.

4. The report notes suitable roosting habitat for pallid bat within the oak trees and rock crevices on-site. Please include further analysis of potential impacts to this species and any proposed mitigation measures including avoidance and minimization mitigation measures.
5. Please acquire appropriate grading plans, bridge construction plans, drainage plans, and wastewater plans for the project and conduct the following studies:
 - a. Needlegrass Grassland Survey. A comprehensive needlegrass grassland survey and impact assessment should be completed using the grading and construction plans for the project. Due to the lack of a County-defined significance threshold for needlegrass grassland it is recommended that >10 percent cover of *Stipa* spp. as described in the Manual of California Vegetation be utilized as the survey guideline (D. Hilyard, pers. comm., Feb. 29, 2012). Further, it is recommended that the Santa Barbara County threshold for native needlegrass grasslands be utilized as a guideline to determine significant patch sizes (> 0.25 acre). As such, the survey should include an assessment of the small to medium-sized perennial grassland areas documented as less than <1 acre within the project site to determine if they meet the minimum density and patch size requirement. Lastly, the assessment should provide appropriate avoidance and minimization measures to ensure long-term preservation of the needlegrass grasslands on-site. Minimizing impacts to needlegrass grassland, where they occur, is encouraged as part of the overall project. This should include a discussion of any alternate development sites which may avoid needlegrass grassland impacts, if available. All needlegrass grasslands shall be shown as sensitive resource areas on final project plans. The mitigation ratio for replacement of needlegrass grassland should be commensurate with the level of impact to the overall population present within the project site (i.e., > 50 percent impact to overall population should have a 2:1 replacement ratio). Deb Hilyard of the California Department of Fish and Game should be consulted to determine the final mitigation replacement ratios for the project.
 - b. Oak and Pine Tree Survey. A comprehensive oak and pine tree impact survey should be completed using the grading and construction plans for the project to quantify all project related native tree impacts. All native trees to be removed and impacted due to project implementation shall be shown on final project plans. Please also provide further analysis of potential tree impacts and any proposed mitigation measures including avoidance and minimization measures to protect native trees during and after construction. All native tree avoidance and minimization measures shall also be shown on final project plans.
 - c. Wetland Delineation. A formal wetland delineation per U.S. Army Corps of Engineers guidelines should be completed using the grading and construction plans for the project (i.e., culverts and bridge installation sites). All delineated wetlands and/or jurisdictional waters shall be shown as sensitive resource areas on final project plans. Further, all avoidance and minimization measures to protect wetlands and jurisdictional waters shall also be shown on final project plans.
6. The report does not currently provide any dry season work restrictions in order to avoid and/or minimize potential erosion and sedimentation impacts to the sensitive aquatic resources of Lake Nacimiento and associated tributaries (i.e., Cantinas Creek). As such, please include a discussion of the measures that will be taken to ensure both short- and long-term runoff from the property will not affect Cantinas Creek and/or Lake Nacimiento. Mitigation should include development of an erosion and sedimentation control plan for the Project Site. Final erosion and sedimentation control measures shall be shown on final project plans.
7. Include a discussion of the necessary Cal Fire requirements for road improvements and defensible space. This should include a Cal Fire recommendation for fuel modification (i.e., 100 feet from

proposed structures and 10 feet from existing/proposed roadways) and how this may affect the foothill woodland, chaparral and scrub habitat areas, sensitive plants communities and/or rare plant populations identified within the Project Site.

In conclusion, I recommend the document be revised to include the additional information described above. If you have questions about these comments, please feel free to contact me at (805) 781-1431 or e-mail at tkeith@co.slo.ca.us.

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