

**DEPARTMENT OF TRANSPORTATION**

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Governor's Office of Planning & Research

**APR 22 2020**

**STATE CLEARINGHOUSE**

April 22, 2020

Patrick Talbott  
California Department of Housing  
and Community Development  
2020 West El Camino Ave. Suite 200  
Sacramento, CA 95826

**TUO-120-PM 15.327**  
**NDRC Fuel Breaks Project**  
**SCH 2020049021**  
**Notice of Intent (NOI)**  
**Environmental Assessment (EA)**

Dear Mr. Talbott,

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the NDRC Fuel Breaks Project: Notice of Intent (NOI), and Environmental Assessment (EA) to allow for the expansion of shaded fuel breaks in Tuolumne County federal lands. The project is a collaborative effort under the oversight of the State of California Department of Housing and Community Development (HCD) and Sierra Nevada Conservancy (SNC). The USFS Stanislaus National Forest (STF) would be implementing the fuel break activity and California Department of Forestry and Fire Protection (CAL FIRE) staff would be providing support and facilitating STF implementation activities.

The proposed project is part of the Community Watershed Resilience Program (CWRP), which consists of three interconnected sets of activities in Tuolumne County for resilient recovery from the 2013 Rim Fire. The CWRP is funded by the U.S. Department of Housing and Urban Development, and its activities will assist in community recovery efforts and enhancing resiliency. The three sets of activities comprised by the CWRP are: (1) Forest and Watershed Health Projects, including a system of strategic fuel breaks to protect communities from future wildfire; (2) Community Resilience Centers that provide shelter and necessary services in the event of a disaster; and (3) Biomass Utilization Facility Projects that utilize forest byproducts. The proposed project is a Forest and Watershed Health Project activity under the CWRP, which is a collaborative effort to restore and protect the Tuolumne River watershed.

The project location area consists of eight distinct fuel breaks located between Wagner Ridge in the south near State Route (SR) 120, SR 49, and SR 108 in the

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north. The locations are near Twain Harte, Tuolumne, Tuolumne/Groveland/Jawbone Ridge, Moccasin, and Groveland in Tuolumne County totaling approximately 1,808 acres of fuel break clearances.

Caltrans Inter-Governmental Review encompasses the work in Tuolumne County from wildfire and to minimize the spread of fires originating in developed areas while supporting fire resilient landscapes. The shaded fuel breaks project proposes to:

- 1) Reduce the threat of large, high severity wildfires to communities. These strategically placed fuel breaks would interrupt potential fire spread into the Wildland Urban Interface (WUI);
- 2) Provide treated areas with low fuel for fire crews to work from and more quickly stop fire spread;
- 3) Provide safer ingress and egress routes for the public and firefighters during a fire;
- 4) Protect critical wildfire habitat and forests from wildfires.

The project will reduce ladder fuels and establish eight 300-foot-wide shaded fuel breaks totaling 22 linear miles. Most of the areas proposed treatment would expand existing fuel breaks.

**Caltrans comments:**

- 1) How will this project handle temporary traffic that will be utilized for the transport of tree cuttings?
- 2) What kind of trucks will be used for this operation?
- 3) Where will the trucks be accessing SR 49, SR 108, and SR 120 in Tuolumne County? Will these access points have enough sight distance when entering Caltrans state routes?
- 4) Does the Department of Housing and Community Development plan on having a traffic management plan to deal with the traffic during this time? If so, please submit a copy to Caltrans for Traffic Management to review.

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The following are biological resources likely to be found within Caltrans Right of Way (ROW) near the proposed project sites:

- 1) According to the species lists on the Biological Technical Report, there will be some impacts to protected species (Foothill yellow-legged frog and Western pond turtle). Impacts to these species may need correspondence with California Department of Fish and Wildlife (CDFW). There are environmental commitments, including surveys, that are proposed for this project and we request to see the associated documents of those actions. If there will be "Take" of a State listed species, we will need to see the Incidental Take Permit issued by CDFW.
- 2) Lastly, there appear to be large mature trees in the area that will most likely need to be removed due to the project. These trees may provide habitat for nesting birds. If construction will occur during migratory bird season (February 15 – September 1), a pre-construction bird survey will be required. If an active bird nest is observed, a protective buffer will be established to protect the nest until the young have fledged. The size of protective buffers will be determined in coordination with CDFW or using applicable species-specific survey and monitoring protocol guidelines.

Due to the broad area where the work is being proposed, any staging, storage, or other activities in Caltrans ROW will require an Encroachment Permit. If any project construction activities encroach into Caltrans ROW, the project proponent must submit an application for an Encroachment Permit to the Caltrans Permit Office. Appropriate approved environmental studies must be submitted with this application. These studies will include an analysis of potential impacts to any cultural sites, biological resources, hazardous waste locations, and/or other resources within Caltrans ROW at the project site(s). California Environmental Quality Act (CEQA) documentation with supporting technical studies are required when submitting the Encroachment Permit. For more information please visit the Caltrans Website.

<https://dot.ca.gov/programs/traffic-operations/ep/applications>

If you have any questions or would like to discuss these comments, please contact Michael Casas at (209) 948-7475 (Email: [michael.casas@dot.ca.gov](mailto:michael.casas@dot.ca.gov)) or me at (209) 948-7325 (Email: [gregoria.ponce@dot.ca.gov](mailto:gregoria.ponce@dot.ca.gov)).

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Sincerely,

*Gregoria Ponce'*

Gregoria Ponce, Chief  
Office of Rural Planning

c: Quincy Yaley, Director, Tuolumne County Community Resources Agency  
State Clearinghouse