

## California Department of Transportation

OFFICE OF THE DISTRICT 10 PLANNING  
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Clark Sintek  
Planner 2  
Tuolumne Community  
Development Department  
2 S. Green Street  
Sonora, CA 95370



### TUO-120- Countywide Pine Mountain Lake Fuel Reduction Project Initial Study (IS)

Dear Mr. Sintek,

California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Tuolumne Countywide Pine Mountain Lake Fuel Reduction California Environmental Quality Act (CEQA) Initial Study (IS). The proposed project will use various methods to reduce fuel loading and remove ladder fuels on a highly dense, approximately 640-acre Wildland Urban Interface (WUI) east of Pine Mountain Lake.

The primary method of fuel reduction will be mastication, with a secondary form of herbivory.

The project objectives are:

- Build a sustainable, defensible fuel break
- Dramatically reduce the potential of the release of high levels of CO<sub>2</sub> from wildfire to establish a fire-resilient and healthy forest.

The project is located on State Route (SR) 120 east of Groveland, CA, and adjacent to the community of Pine Mountain Lake.

### Caltrans has the following comments:

#### Environmental

If any construction-related activities are related to the project, the proponent must apply for an Encroachment Permit to the Caltrans District 10 Encroachment Permit Office. All CEQA documentation, with supporting technical studies, must be submitted with the Encroachment Permit Application. These studies will analyze potential impacts to any cultural sites, historic properties, biological resources, hazardous waste

locations, scenic highways, and/or other environmental resources within Caltrans right of way (ROW) at the project site(s).

Evidence of consultation with local Native American tribes and interested parties will need to be presented within the technical documents to approve encroachment in the Caltrans ROW. The Initial Study (IS) indicates no permits are required due to avoidance measures. However, there are impacts to protected water resources within Caltrans ROW. In that case, Caltrans will need to see the correspondence with the permitting authorities, California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) and be provided copies of the required permits before the start of construction in Caltrans ROW.

There are mature trees within and/or near Caltrans ROW that could provide a suitable nesting habitat. Suppose work occurs between February 1 and September 30 of any year. In that case, a pre-construction bird survey must be conducted by a qualified biologist before any construction-related activities in Caltrans ROW. A protective buffer must be established around the nest per CDFW guidelines if an active nest is observed. Work is allowed within the protective buffer limits once the young have fledged and when authorized by the Caltrans District 10 Environmental Office. Results of the pre-construction bird survey(s) must be provided to the Caltrans District 10 Environmental Office before the start of construction.

### **Hydrology**

This project is in a rural area with no existing stormwater systems, which would be affected. Caltrans would not allow additional runoff draining into the Caltrans ROW nor significantly impact the current drainage patterns along SR 120. Since there is no change in hydrology or less than significant impact in rural areas, we at this time have no comment.

Additional review will be required if the Initial Study Plan presented is modified or altered to change the hydrology and flow pattern within SR 120 ROW or along the project limits. If historical undeveloped topography shows drainage from this site flowed into the Caltrans ROW, it may continue to do so with the conditions that peak flows may not be increased from the pre-construction quantity. Any increase in runoff generated by the proposed development should be stored/mitigated onsite and needs approval, subject to review of the new plan.

Caltrans suggest Tuolumne County continue to coordinate and consult with Caltrans to identify and address potential cumulative transportation impacts that may occur from this project and other developments near this location. This will assist Caltrans in

ensuring that traffic safety and quality standards are maintained for the traveling public on existing and future state transportation facilities.

If any future project activities encroach into Caltrans ROW, the project proponent must submit an application for an Encroachment Permit to the Caltrans District 10 Encroachment Permit Office. Appropriate environmental studies must be submitted with this application. These studies will analyze potential impacts to any cultural sites, biological resources, hazardous waste locations, and/or other resources within Caltrans ROW at the project site(s). For more information, please visit the Caltrans Website at: <https://dot.ca.gov/programs/traffic-operations/ep/applications>

Please contact David Karnes at (209) 986-9830 ([david.karnes@dot.ca.gov](mailto:david.karnes@dot.ca.gov)), or me at (209) 483-7234 ([Gregoria.Ponce@dot.ca.gov](mailto:Gregoria.Ponce@dot.ca.gov)) if you have any questions or concerns.

Sincerely,

*Paul Bauldry*

For  
Gregoria Ponce'  
Chief, Office of Rural Planning

C: David Ruby, Planning Manager