

Jessie Waldman - CDFW comments on CDP_2020-0022 (Irwin)

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To: Jessie Waldman <waldmanj@mendocinocounty.org>
Date: 2/9/2022 1:41 PM
Subject: CDFW comments on CDP_2020-0022 (Irwin)

Hi Jessie,

Thank you for the referral and the opportunity for the California Department of Fish and Wildlife (CDFW) to comment on CDP_2020-0022 (Irwin) on APN 116-110-12. CDFW offers the following informal comments and recommendations on this Project in our role as a Trustee and Responsible Agency under the California Environmental Quality Act (CEQA; California Public Resource Code section 21000 et seq.). These comments are intended to help the Lead Agency in making informed decisions in the review process.

CDFW has the following comments and recommendations regarding the project.

1. Veg community impact. 1.5-acre of Bishop pine forest Impacted by the project on parcel.
 - a. Bishop pine forest is an environmentally sensitive habitat, and this parcel contains a relatively large stand that is contiguous with the surrounding forest which is consistently used by Northern Spotted Owls. The remaining forest on this parcel should be protected to prevent further reduction through development.
 - b. The current plan suggests a remediation effort in which a 1:1 replanting ratio would occur to mitigate for the loss of the Bishop Pines. With an 80% success rate of planted saplings, a higher ratio is generally desired. However, CDFW acknowledge that the tree density and parcel size may limit the number of saplings which will be successful after replanting. As such, CDFW recommends that the county make the five-year monitoring plan proposed in the ISMND a condition of approval.
 - c. CDFW recommends that the loss of this habitat should be accompanied with habitat enhancement, such as invasive species removal (e.g. Scotch broom (*Cytisus scoparius*) and Pampas Grass (*Cortaderia jubata*)) and removal of any legacy debris/trash that may occur on the parcel.
2. Development footprint. The biological report does not include a map that explicitly outline the final footprint of the development. This raises concerns that the least impactful building site was selected and that the CalFire defensible fire safe boundaries are not also being accounted for, which could result in additional reduction of Bishop Pine Forest on the parcel.
 - a. Please clarify development plan with map which addresses fire safety buffer if applicable.
3. Mitigation and avoidance measures. CDFW agrees with the remaining mitigation avoidance measures and conditions in the ISMND.
 - a. CDFW recommends the Coastal Commission require these proposed measures.

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