

# California Native Plant Society

Monterey Bay Chapter, P.O. Box 221303, Carmel, CA 93922

November 5, 2018

Monterey County Board of Supervisors  
168 West Alisal Street  
Salinas CA 93901

Subject: Resolution 18-153, CalFire Grant

Dear Supervisors:

While the Monterey Bay Chapter of the California Native Plant Society supports fuel reduction to reduce the threat of catastrophic wildfire, we feel the CalFire grant proposal should be subject to CEQA environmental review. We don't agree that the proposed work is exempt from CEQA. A significant 171 acres within established natural preserves, containing environmentally sensitive Maritime Chaparral and Monterey Pine forest and including special status plant species, will be impacted. We object to establishing a precedent of CEQA exemption for a project of this scale. The grant clearance width is overly aggressive compared to those suggested for fire protection space (usually 50 to 100 feet), and alternatives with lesser extent that would provide adequate fire risk reduction with less impact on the forest were not considered.

With the lack of a CEQA review process, there is an urgent need for public review and input into the proposed plan, especially regarding how the Heavy, Moderate, and Light actions are implemented in both the Monterey Pine forest and the Maritime Chaparral areas. We support the removal of dead and dying trees and downed vegetation in a more limited zone around infrastructure, but we are concerned about how ladder fuels will be handled. The grant does not define what will be considered ladder fuels, so the extent of modification and impact on the forest and chaparral cannot be known. In many areas there is a frequent dense mix of small Coast Live Oaks, spindly Monterey Pines, and areas of Poison Oak thickets around more mature Monterey Pines that may have low hanging branches. Will removal of ladder fuels be limited to clearance of lower limbs on trees or be extensive to mean thinning out of young oaks and pines and other shrubs around

mature trees as in the case of CalFire fuel management zones? The grant requires the treated areas to have a lowered fire flame index, but nothing is presented to indicate what amount of vegetation needs to be removed to achieve success. If the ladder fuel removal is to be extensive, then it should be limited to a heavy zone of more limited extent. If a CEQA process had been utilized, we would know the projected outcomes for varying intensities of fuel reduction.

We request the county to have a qualified botanist survey all treatment areas in advance of vegetation removal, particularly in the Maritime Chaparral along the access road where the uncommon and species of concern *Ceanothus rigidus* and the federally endangered Yaden's *Piperia* could occur and where the imperiled Hooker's Manzanita is known to occur. The Central Maritime Chaparral is considered sensitive habitat by CA Fish and Wildlife and supports Shaggy-Bark Manzanita, as well as Bishop Pine. A thorough survey for CNPS-listed plants is needed to maximize protection when the forest plan is prepared.

We are also concerned that the disturbance required to remove downed vegetation and dead and dying trees may encourage the spread of invasive plants that would require follow-up management, but none is proposed. Invasive Broom already occurs in the targeted area.

In summary, we would request that the grant approval be delayed to allow for an analysis of alternative degrees of clearing (both intensity and spatial extent) to select the least impactful plan that would accomplish the goal of reduced fire risk. If not, then Monterey County staff must work with CalFire and the Monterey Peninsula Regional Park District to survey for special status species before vegetation clearance, to protect sensitive plant communities during clearing, and to periodically inspect the zone of disturbance for any invasive species that may become established.

Thank you for your consideration.

Donna Burych  
Conservation Chair, Monterey Bay CNPS

Note: these comments reflect the opinion of MBCNPS and are distinct from personal comments that I emailed last week.



*Dedicated to the preservation of California native flora*

