October 1, 2018

plan.general@parks.ca.gov (subject line: CASP GP/DEIR Comments)

California State Parks
Strategic Planning and Recreation Services Division
Recreation Planning
P.O. Box 942896
Sacramento, CA 94296
ATTN: Ellie Wagner

SUBJECT: Draft EIR for Carmel Area State Parks (CASP) Preliminary General Plan

Dear Ms. Wagner:

The Monterey Bay Chapter of the California Native Plant Society (MBCNPS) has a long-standing interest in the management of the CASP units. The Monterey Bay Chapter has been active for nearly 50 years and during that time we have hosted numerous wildflower walks in the Gowen Cypress Grove, along San Jose Creek and in Maritime Chaparral habitat on Lobos Ridge. In addition, since 2000, members of our Chapter have conducted monthly stewardship activities in the New State Park Inland Area to control invasive non-native plants, most notably genista and Cape ivy. Our work has focused on controlling weed populations near the Gowen Cypress Grove.

We are pleased that the Carmel River Lagoon and Wetland will be managed as a Natural Preserve in the Coastal Area and strongly support the proposal to designate both the San Jose Creek corridor and Point Lobos Ridge as Natural Preserves in the Inland Area of the CASP. We encourage management efforts in the new Natural Preserves to mirror the high level of attention to habitat integrity maintained at Point Lobos State Reserve.

We have the following comments on the Preliminary General Plan and Draft EIR:

1) Sensitive Plants. The Chapter commends your consideration of all uncommon and special status plants noted on the CNPS List. Based upon local knowledge developed by members during field trips, we would like to point out additional sensitive plant occurrences that should be incorporated into the Draft EIR/General Plan. These include:

- Clarkia lewisi - Widespread, KNOWN populations of the CNPS Rank 4.3 plant occur in the San Jose Creek watershed and likely in the Gibson Creek watershed of the New State Park Inland Area.

- Perideridia gairdneri ssp. gairdneri - A small population of the CNPS Rank 4.2 plant occurs near
Hidden Beach in Point Lobos State Reserve. It occurred more abundantly on the coastal terrace at Weston Beach, though not in recent years. It appears that non-native grasses have crowded out this plant.

- *Astragalus nuttallii var. nuttallii* - It is likely there are occurrences of this CNPS Rank 4.2 plant on coastal bluffs in Point Lobos State Reserve, however this species can intergrade with non-listed *A. n. var. virgatus*. The endemic CNPS Rank 4.2 species must show 22 to 38 ovules (seeds) and have some degree of upper leaf hairiness to suggest var. *nuttallii*. Further work is needed to resolve the presence of this species within State Park holdings.

- *Corethrogynie leucophylla* - This CNPS Rank 3.2 species is likely to occur in Point Lobos State Reserve on coastal bluffs as it is reported from nearby Carmel River State Beach and Soberanes Point at Garrapata State Park. Recent taxonomic treatment currently only recognizes *C. filaginifolia*, with variations that need further study.

The following should **not be listed** as a KNOWN Sensitive Plant in the Study Area:

- *Clarkia jolonensis* - The record in the CNDBD for Point Lobos State Reserve is very likely to be **erroneous**, instead being *Clarkia lewisi*. Early records of *Clarkia lewisi* were initially identified as *Clarkia bottae*, which were then confused with *Clarkia jolonensis*. A chapter member, Brian LeNeve, has considerable expertise with this genus and reports that the *Clarkia* records are being revised, with true *Clarkia jolonensis* limited to only 5 locations well inland.

2) **Upper Hatton Canyon Zone - Goals and Management.** Several sensitive habitats (wetland, riparian, Monterey Pine Forest, etc.) and sensitive plants (including CNPS 1.B2 *Allium hickmanii*) are known to occur in upper Hatton Canyon. However, the management plan and goals for this Unit do not include any mention of habitat protection, enhancement, monitoring or restoration. As a State Park Unit, habitat protection, enhancement and restoration should be included as management goals. Invasive plants are also a significant problem in Hatton Canyon that degrade sensitive habitats and threaten sensitive plant species and communities. We suggest any management plan prepared under the new CASP General Plan include natural habitat management and uncommon plants and communities in the Hatton Canyon unit.

3) **New State Park Inland Area - Management Intent.** The Monterey Bay Chapter strongly supports the designation of the San Jose Creek area and Point Lobos Ridge as Natural Preserves. We would like to see the following added:

    a) **Point Lobos Ridge Natural Preserve Zone Management Intent 4.4.3** – should also list Ecological Restoration and Invasive Plant Control as new uses and management intents. Three important areas that are being, or have been degraded by invasive plants include the Coastal Scrub and wildflower area fronting the south border and hillside above the San Jose Creek access road, the Monterey Pine Forest adjacent to the old homestead site near the Gowen Cypress Grove, and the summit area of Huckleberry Hill, which is severely degraded by invasive genista. Our chapter has contributed much effort to restore the Homestead site.
b) Preserve Management Plans - The Coastal Scrub/wildflower habitat in the San Jose Creek watershed occurs in both the San Jose Creek and Point Lobos Ridge Natural Preserves and thus requires a unified plan to control the rampant invasive plants, such as Cape ivy, Italian thistle, fox glove, poison hemlock and bur chervil (*Anthriscus caucalis*). Significant habitat for the sensitive plant species *Clarkia lewisi* and *Delphinium hutchinsoniae* occurs in the Coastal Scrub areas of San Jose Creek and Point Lobos Ridge and the State Park General Plan should recognize the diverse and extremely high-quality scrub/annual wildflower slopes as valued habitat.

c) A.M. Allen Ranch - North Zone Management Plan and Intent – specifically the **San Jose Creek Canyon Road** eastward of the employee housing. Our chapter has serious concerns regarding management of the San Jose Creek Road and the 20-foot corridors on each side that are excluded from the adjoining Natural Preserves. This unpaved roadway and access corridor passes through rich wildflower habitat that spans both the San Jose Creek Natural Preserve Zone and the Point Lobos Ridge Natural Preserve Zone. The roadway corridor has substantial special status plant habitat and occurrences of *Delphinium hutchinsoniae* and *Clarkia lewisi*. In addition, the spring area that ponds into the road-bed supports wetland indicator plants and has been known to harbor the federally threatened California Red-legged Frog. Any improvements to this road or maintenance of the roadside corridor must be consistent with protecting and enhancing this uniquely diverse habitat. Since disturbance is likely to occur near the road, control of invasive plants is vital. We feel that the new General Plan should mandate that the road be managed as a trail and not be developed for routine vehicular access.

d) Please elaborate on what active forest management strategies will be allowed by the plan for the Point Lobos Ridge Natural Preserve. What is meant by “active forest management” when the area is set aside as Natural Preserve? The goal of a natural preserve is to limit disturbance so natural processes occur, which seems to be at odds with the proposal for active forest management. This would also relate to the Fire Management plans that will be developed. What portions of the Monterey Pine Forest, Gowen Cypress Forest and Maritime Chaparral are proposed for fire management activities that involve thinning? Will thinning include understory plants, many of which are special status species? In addition, how will invasive weeds in the disturbed areas be controlled. The General Plan should describe what actions and methods will be included in active forest management and what the environmental impacts would be.

4) **Management Guidelines.**

   a) Guideline 1.3 for Point Lobos Ridge Natural Preserve Zone and Point Lobos Natural Reserve should include monitoring for *Phytophthora* infections and other pathogens that may impact Monterey pines, Gowen cypress and Monterey cypress.

   b) For Point Lobos Ridge Natural Reserve ADD - MANAGEMENT GUIDELINE 1.5 – To conduct annual weed surveys to prioritize the prompt control of new invasive plants and the spread from existing invasive plant populations.

5) **Will there be opportunity for public review of the management plans for the Preserves and State Parks?**
6) **Access to Gowen Cypress Forest.** Our chapter has hosted numerous field trips over the years to examine the Gowen Cypress Forest and adjoining unique Maritime Chaparral. We would be disappointed if access is eliminated to this botanically rich area and hope that the Chapter could maintain occasional visitation, with permission, to continue organized field trips.

Guideline 2.5 needs to ensure that reasonable access to special habitats continues.

7) **Trail Maintenance in State Park Units.** Goals for trail maintenance must include the control of invasive plants and occasional trimming/brushing to enhance native plants. It is sad to see trail corridors converted to invasive weed corridors and native plants often cut way back at the wrong time of year before they can produce seed or produce growth that can compete with non-natives.

8) **Fire Management Plan.** Our chapter supports the use of prescribed fire in natural communities, such as Monterey Pine Forest and Maritime Chaparral, that have evolved with occasional fire disturbance. The new General Plan should detail what methods will be implemented for fire management and what the potential impacts could be. Construction of fire breaks by mechanical means may impact special status species and will create significant potential for spread of invasive plants, which could be extremely difficult to mitigate. Widespread thinning and active forest management could also increase risk for introduction of invasive plants and degradation of habitat in the Natural Preserves. Prescribed burning under favorable conditions can also increase the risk of invasive weeds post-fire.

Thank you for your consideration and the opportunity to provide comments on the DEIR and General Plan.

Sincerely,

Donna Buzych

(Nikki Nedeff)

Donna Buzych
Conservation Chair

cc: Board of Directors, Monterey Bay Chapter, CNPS