

CAMBRIA FOREST COMMITTEE

TO CONSERVE AND MANAGE THE NATIVE FOREST OF CAMBRIA



Spencer Gordon, Project Manager (via email)
US-LT Resource Conservation District
9481 El Camino Real
Atascadero, CA 93422

March 20, 2023

Subject: Cambria Reserves and Hearst Ranch Draft CalVTP PSA

Dear Mr. Gordon

Thank you for the opportunity to review and comment on the proposed Cambria Reserves and Hearst Ranch Forest Health Fuels Reduction Projects in Cambria, CA.

We have reviewed the draft CalVTP Project Specific Analysis, and the attached Coastal Vegetation Treatment Standards. We support the project goals of improving the health of the Monterey Pine and Coast Live Oak forest in the project areas, and we have the following recommendations to improve the long-term results of the project.

The proposed removal of large numbers of healthy Monterey Pines and Coast Live Oaks less than 8 inch diameter does not improve the health of the forest or reduce fire hazard. Competition among small trees is necessary for forests to evolve and adapt to changing climate conditions. Healthy Monterey Pines of all sizes have demonstrated that they have the vigor, disease resistance and growing conditions needed to survive and become the large trees of the future.

Retaining healthy trees of all sizes is necessary to maximize absorption of CO₂ and sequestration of carbon to control climate warming and the increased fire danger associated with hot, dry, windy weather. Extensive removal of trees and other vegetation can increase the rate of fire movement by reducing the windbreak effect of a dense forest, allowing flames and embers to blow faster and further through the forest. Arbitrary goals of trees per acre, minimum trunk diameters, and ratios of oaks to pines do not account for local growing conditions and do not advance the goal of a healthy and safe forest. Only dead, dying or diseased trees should be removed. We recommend that the PSA's be

revised to ensure that the maximum number of healthy trees are retained.

As stated in the Coastal Vegetation Treatment Standards, removal of trees and understory vegetation will allow more sunlight to reach the forest floor. Unfortunately, this will result in the proliferation of invasive non-native vegetation including French Broom and annual grasses which are more flammable than the existing native vegetation. Past French Broom burn piles in the Cambria area have often been located dangerously close to existing trees and other vegetation. Use of portable curtain burners could be a cleaner and safer way to dispose of French Broom slash. Efforts to cut or pull French Broom must be completed before seeds form on the plants each year. After seeds form, any handling of the plants will result in more seeds added to the "seed bank" in the soil.

The fire prevention goals of this project can be accomplished by the proposed shaded fuel break and defensible space zones specified in the PSA's. While we support the proposed treatments in specified defensible space zones, we oppose expansion of defensible space treatments to the remaining areas of the forest. The goal of this project should not be to create a visually pleasing "park-like" setting, but should be to retain a mosaic of old and young growth with diverse habitat structure to maintain wildlife cover and forage, and prevent soil erosion.

The proposed use of mechanical treatments and mastication on the Monterey Pine and Coast Live Oak forest understory is not compatible with the requirement to protect coastal resources and habitat values in this ESHA area. The resulting extensive disturbance of existing native vegetation and animal habitat will create hotter and dryer conditions in the understory by reducing shaded areas, and will stimulate growth of flammable invasive vegetation such as French Broom, Pampas Grass and dry annual grass varieties as noted above. We recommend that the PSA specify the use of hand crews to lop and scatter dead branches to minimize the collateral damage caused by mechanical mastication. Use of hand crews to lop and scatter dead branches can be cost-effective if they do not attempt to duplicate mechanical mastication by cutting down all understory vegetation. Proposed broadcast and pile burning should not be used on these project areas to avoid the obvious air quality, public health impacts and danger of fire escape.

We recommend adding a requirement to create at least two test plots of one acre each prior to beginning full project operations. These test plots will be used demonstrate the different outcomes of larger versus smaller diameter tree removal criteria, larger versus smaller numbers of retained trees per acre, and the different results of mechanical mastication versus hand crew cutting and scattering dead branches. Representatives of interested agencies and local organizations should be offered field tours of the test plots, and their observations and recommendations should be used as input to adaptive management of the project operations.

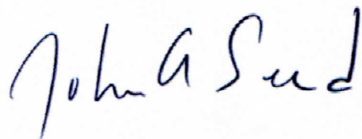
After full project operations are underway, representatives of interested agencies and organizations should be offered field tours of each completed area. We suggest that interested organizations such as The California Native Plant Society, the Cambria Forest Committee and Greenspace the Cambria Land Trust be included on the field tours.

We recommend that the draft PSA's and attached Coastal Vegetation Treatment Standards be modified as outlined above to better achieve the project's long term forest health and fire safety goals, while minimizing unnecessary short and long term adverse impacts to the coastal resources and habitat values of this important ESHA area.

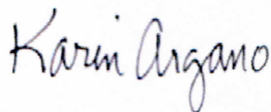
Yours truly,



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