

# CAMBRIA FOREST COMMITTEE

TO CONSERVE AND MANAGE THE NATIVE FOREST OF CAMBRIA



Mary Matella, PhD (via email)  
Statewide Planning Unit, California Coastal Commission  
455 Market Street, Suite 300  
San Francisco, California 94105

May 30, 2023

**Subject: Cambria Reserves and Hearst Ranch Forest Projects  
SLT-NOID-0002-23 and SLT-NOID-0003-23**

Dear Dr. Matella

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 suggestions to improve the long-term results of the project.

The proposed removal of large numbers of Monterey Pines and Coast Live Oaks will create adverse impacts which require mitigation measures. To estimate the number of trees that will be removed, assume a current tree density of 400 trees per acre reduced to 200 trees per acre post-treatment. Multiply that per-acre reduction by the number of acres in each project to get a sense of the magnitude of tree removal.

The large reduction of the number of trees per acre as proposed by the current PWP/PSA will reduce the ability of the forest to absorb excess carbon dioxide from the atmosphere and will reduce the capacity of the forest to sequester carbon in the wood of the trees. This adverse impact is particularly relevant today, as the warming climate caused by increased levels of CO<sub>2</sub> in the atmosphere results in more frequent hot, dry, windy weather and more frequent dangerous and destructive wildfires.

A longer-term adverse impact of the proposed removal of large numbers of healthy trees,

especially smaller, younger trees, is that the ability of the forest to adapt to changing climate conditions and tree diseases is reduced. Each new tree seedling contains genetic variations necessary for stronger, healthier, more disease-resistant trees to evolve in the future. When trees are cut down, the evolutionary improvement process is interrupted. Please remember that today's small trees are the large trees of the future.

A related issue is that extensive removal of understory vegetation in combination with removal or limbing up of large numbers of trees will reduce the windbreak effect of a dense forest. This will increase the speed and intensity of future windblown fires by allowing the wind and burning embers to blow freely under the forest canopy, creating spot fires far ahead of the main fire areas.

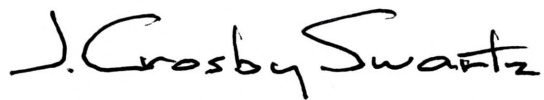
Extensive removal of trees and understory vegetation will allow more sunlight to reach the forest floor, as stated in the Coastal Vegetation Treat Standards Appendix. Unfortunately, this disturbance will result in the proliferation of invasive non-native vegetation including French Broom, Pampas Grass, and dry annual grass varieties which are more flammable than the existing pre-treatment native vegetation.

These adverse impacts can be mitigated by eliminating arbitrary goals such as the maximum number of trees per acre or thinning to obtain a set minimum spacing between trees. Only dead, dying or diseased trees should be removed. Live, healthy trees of all sizes and the associated habitats are important for the health of the forest and the environment. The goal of these projects should not be to create a visually pleasing park-like setting, but should be to retain a mosaic of undisturbed young and old growth with a diverse habitat structure to maintain wildlife cover and forage, and prevent soil erosion. The maximum number of trees should be retained.

We recommend that the reporting requirements of Standard Project Requirement AD-7 and Special Condition 3.2 Monitoring Report be revised to require reporting the number and type of trees removed. This information is needed for post-treatment evaluation for adaptive management purposes.

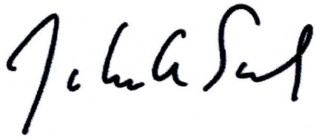
We recommend conditioning your approval of the Cambria Reserves and Hearst Ranch Projects to best achieve the project's long term forest health and fire safety goals, while mitigating unnecessary short and long term adverse impacts to these sensitive habitat areas as outlined above. The Current and future projects that permanently reduce the overall number of trees in our forests are not compatible with the goal of protecting sensitive coastal resources.

Yours truly,



Crosby Swartz, President  
Cambria Forest Committee

[forest@cambriaforestcommittee.org](mailto:forest@cambriaforestcommittee.org)



John Seed, President  
Greenspace, The Cambria Land Trust

[johnseed@gmail.com](mailto:johnseed@gmail.com)



Karin Argano, Executive Director  
Greenspace, The Cambria Land Trust

[director@greenspacecambria.org](mailto:director@greenspacecambria.org)

References: See Attached



# CAMBRIA FOREST COMMITTEE

TO CONSERVE AND MANAGE THE NATIVE FOREST OF CAMBRIA



References:

May 30, 2023

Bradley, C.M., C.T. Hanson, and D.A. DellaSala (2016) Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States? *Ecosphere*, 7(10): e01492.

Brennan, T.J. and J.E. Keeley (2015) Effect of mastication and other mechanical treatments on fuel structure in chaparral. *International Journal of Wildland Fire*, 24(7): 949-963.

Campbell, J.L., M.E. Harmon, and S.R. Mitchell (2012) Can fuel-reduction treatments really increase forest carbon storage in the western US by reducing future emissions? *Frontiers in Ecology and the Environment*, 10(2): 83-90.

Miguel G. Cruz, Martin E. Alexander, and Jelmer E. Dam (2014) Using Modeled Surface and Crown Fire Behavior Characteristics to Evaluate Fuel Treatment Effectiveness: A Caution. *Forest Science* 60: 1000-1004.

Miguel G. Cruz, Martin E. Alexander, and Paulo A.M. Fernandez (2008) Development of a Model System to Predict Wildfire Behavior in Pine Plantations. *Australian Forestry* 71: 113-21.

Zald, H.S.J. and C.J. Dunn (2018) Severe fire weather and intensive forest management increase fire severity in a multi-ownership landscape (2018) *Ecological Applications* 28(4): 1068-1080.