

CALIFORNIA COASTAL COMMISSION

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W17a

ADDENDUM

June 6, 2023

To: Commissioners and Interested Persons

From: Dan Carl, Deputy Director, Central Coast District
Shana Gray, Deputy Director, Statewide Planning
Erin Praher, Coastal Program Manager, Statewide Planning
Mary Matella, Environmental Scientist, Statewide Planning

Subject: Addendum to **Item W17a**, Coastal Commission NOID Application SLT-NOID-0002-23 (CAMBRIA PINES AND RANCHO MARINO RESERVES FOREST HEALTH AND VEGETATION TREATMENT PROJECTS), for the Commission Meeting of June 7, 2023

The purpose of this addendum is to respond to comments received in the time since the staff report for the above-referenced proposed NOID was distributed (on May 19, 2023). A number of comments regarding the NOID do not address the proposed project's consistency with the PWP, which is the standard of review, but rather raise issues with the goals and methods of forest health and fire resilience projects in general. Some commenters also requested additional reporting of project outcomes and recommended pre-thinning surveys and retention tagging.

One commenter raised concerns about the sufficiency of project monitoring for a prior project carried out pursuant to the PWP and asserts that no public reporting of that monitoring has been provided. This comment does not directly relate to this proposed project's consistency with the PWP. However, it is worth noting that Special Condition 2 of the NOID requires a monitoring report after completed phases of treatment. This condition is consistent with SPR AD-7, which requires project proponents to provide information on proposed, approved, and completed treatment projects to the Board of Forestry or CAL FIRE. Currently, no Upper Salinas-Las Tablas RCD project has been completed, so monitoring reports have not been submitted to the CalVTP database, but monthly local meetings offer status reports on the previously approved treatment at Covell Ranch authorized with certification of the PWP. The RCD will continue to offer public briefings on the status of its forest health projects. When a project's initial phase

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and subsequent maintenance phases are completed, formal reporting will occur. This requirement is intended to allow project implementation transparency and efficiency. The PWP requirement (PWP Project Standard 4) for programmatic reporting at 5 and 10 years will also allow broader assessment of lessons learned throughout the PWP treatment area.

Reporting on the number and type of trees removed in the project treatments, as requested by another commenter, is not necessary or practical given the amount of understory that will be cleared. The scale of the treatments and impracticability of identifying and tracking every sapling removed from the understory would not promote the goal of increasing the pace and scale of critical project implementation to improve both ecological conditions and the resilience to future climate change-induced wildfire. Nor is this type of extremely detailed reporting necessary in order to carry out the PWP's requirements for monitoring and adaptive management (e.g., SPR AD-7) or to assess achievement of the NOID's goals.

Comments were also submitted regarding the science behind forest health treatment prescriptions in general. As stated in the PWP, which is the standard of review for this NOID, these projects encourage the long-term storage of carbon in trees and soils through the reduction of dead, diseased, and dying trees, invasive species, as well as dense understory, thus promoting larger, healthier stands of mature trees. The review of the literature supporting the PWP found that the reduction of vegetative competition in the understory would increase the growth and carbon storage capacity in the residual stand. Minimizing the loss of forest carbon from large, intense wildfires through reducing ladder fuels and shrubs resulting from years of fire suppression is a key goal of the projects.

Other comments assert that, for a variety of ecological reasons, the project should not remove too much understory vegetation. However, the PWP found that reducing ladder fuels and shrubs, or understory, can not only provide fire safety benefits but can also be compatible with maintaining environmentally sensitive habitat areas. In fact, by mimicking the pattern fire would have historically created on the landscape using vegetation treatments, the project aims to enhance the diversity of a Monterey pine forest mosaic. In addition, the project is not designed to remove all understory vegetation. Rather, Coastal VTS Standard 6, which states: "provide for a mosaic of appropriate native plants by age, size, and class that support the overall habitat," requires retention of some understory vegetation, as designed by persons knowledgeable in plant ecology and wildlife habitat, such as the required biological monitors and registered professional foresters. SPR BIO-4 also requires that at least 75 percent of the overstory and 50 percent of the understory canopy of native riparian vegetation within riparian corridors be maintained. Within other habitat in the treatment areas, existing native herbaceous vegetation will be retained in a mosaic pattern per Mitigation Measure BIO-2a; and a mosaic of native shrubs at a spacing of 75–100 feet between crowns, where the combined crown for each clump is approximately 15–25 feet wide, would be retained. Thus, the project is consistent with PWP requirements and standards regarding protection of habitat and retention of understory vegetation.

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Another commenter requested that the Commission require pre-project thinning surveys and identification of shrubs for retention. The provisions described above ensure that appropriate experts identify shrubs and trees for retention, and design of treatments occurs in concert with site surveys (for example, SPRs BIO-1, BIO-3, BIO-7, and BIO-10).

In summary, staff has reviewed the comments received, has provided the above responses to them, and does not recommend requiring additional conditions to address the comments.